

Consultation on the revision of the guidance for the supply of wild game for human consumption

Summary of stakeholder responses

10th February 2021

Introduction

This consultation was issued on 15th July 2020 and closed on 11th September 2020.

The consultation sought views on a review of the guidance for the supply of wild game for human consumption.

The FSA is grateful to those stakeholders who responded and sets out in the table below responses in order of the group responding.

The key proposals on which the consultation sought views were:

- clarity in relation to EU Regulations for hunter and retail exemptions.
- change in layout of the original guide to improve readability.
- clarity from current EU regulations within areas such as the game larder, transport, traceability, primary producers and hunter/hunting party.
- Intended audience: guide is specifically for the wild game industry (hunters and retailers), not food law enforcement authorities as the previous guide suggests (although it may prove useful when undertaking enforcement checks).
- Terminology: term 'shooter' has been removed. Hunter is a single term that covers both hunting and shooting.

Food Standards Agency's considered responses to stakeholders' comments are given in the last column of the table. A summary of changes to the original proposal resulting from stakeholder comments is set out at the end of the document.

Summary of substantive comments

Respondent	Comment	Response
Natterjack publications	<p>I would like to be able to find a reliable, safe, ethically produced supply of this meat, preferably shot in my locality (i.e. within a radius of no more than 5 miles from where I live). I am concerned for the environment and the fewer food miles the better. I am also concerned for the deer's welfare and would hate to buy anything 'poached' or taken in an illegal or unethical way. I know that local venison is probably as sustainable a food as I can get. I believe that dealers have to be registered with their local authority to be able to sell venison. I would like to be able to interrogate the council's database to find a stalker/dealer near to me. It would be helpful if this database said exactly what the stalker/dealer's training has been and therefore whether I would feel safe buying such meat from him/her. I have friends who have never tried venison before who am sure would do so if they feel equally secure when purchasing such meat.</p>	<p>The FSA cannot assist in helping source this meat as we do not hold a database of deer stalker's/dealers. We suggest you contact your Local Authority for information or contact game training organisations who may have a record of trained venison dealer's</p>
Natterjack publications	<p>Interestingly, I note that you state that your consultation "would be of concern to Wild Game Hunters, Wild Game Organisations, Wild Game Retailers, Wild Game Processors and Enforcement Authorities'. You make no mention of 'consumers'. However surely without the 'consumers' there is no market.</p>	<p>We have not included 'consumers' as the target audience for this guide as the content is only relevant (as it includes detailed legislation) to those supplying wild game and working within the industry. However, the guidance is there with the aim to protect consumers in the food and feed chain and minimise any potential</p>

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		risks to human and animal health and we will ensure that this is reiterated in the guidance.
The British Deer Society	The British Deer Society has previously been one of your primary contacts having a key interest in wild deer and venison handling but unfortunately we appear to have been omitted from your current list as named in your consultation Annex B. We will obviously wish to respond to this consultation with regard to venison. I would be extremely grateful if you might amend this oversight please in your published documentation on the website and for your future records.	Comment noted. We will ensure the contact details for The British Deer Society are added to the final version of the revised guidance.
The British Deer Society	You may also wish to amend your Annex B list which currently names the National Gamekeepers 3 times? and you are also referencing the Deer Initiative as a consultee. This body (DI) was wound up and ceased to exist from March 2020 so the information you are currently showing is a little inaccurate.	Comments noted. We will review Annex B and make the appropriate amendments.
Furness Fish and Game Ltd	We are a licenced game plant and I think this guide explains all requirement clearly, however, there is a little confusion about acceptance of carcasses from untrained hunters.	Comment noted. We will aim to provide further clarity on this within the guidance.
Furness Fish and Game Ltd	Page 8 states " in the case of large wild game, if no trained hunter was available, is accompanied by the head (except for antlers or horns) and all the viscera except	Comment noted. We will aim to provide further clarity on this within the guidance.

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	<p>the stomach and intestines;” meaning that AGHE can accept deer carcasses from untrained hunters but they have to be provided with head and viscera. But furtherly it states “AGHEs can only accept wild game carcasses from trained hunters. You will need to comply with the requirements below to supply.” Meaning the AGHE cannot accept carcasses from untrained hunters.</p>	
<p>Furness Fish and Game Ltd</p>	<p>As far I’m concerned the carcasses from untrained hunters on an occasional basis can be accepted by an AGHE if the head, viscera and relevant documentation is provided.</p>	<p>It is a legal requirement that all the carcasses of wild game destined to an AGHE must be examined by a trained hunter. The same legislation makes provisions for the meat of wild game to be sent to an AGHE without a trained hunters inspection when occasionally, in exceptional circumstances, the trained hunter is not available to perform the inspection. This does not mean that untrained hunters can send the meat of their wild game on regular basis by attaching the offal to the carcase. We will aim to provide further clarity on this within the guidance.</p>
<p>Furness Fish and Game Ltd</p>	<p>Also, I could not find anything about the acceptance of carcasses out of season? Currently, carcasses could be accepted (occasionally) out of a season if the hunter can proof that animals have been causing damage to crops etc. Again, relevant documentation must be provided to verify this (e.g. letter from the farm, a declaration with a clear reason why the animal was shot out of the season). I think it would be beneficial to add this information into the guide.</p>	<p>Comment noted. We will aim to provide further clarity on this within the guidance.</p>

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<p>Furness Fish and Game Ltd</p>	<p>In relation to exemptions explanation, most of them are clear but I'm a bit confused as to whether hunter has to be registered as a food business to supply unlimited qty of in-fur/ in-feather to AGHE? (page 13) "As a hunter, if you are supplying and/or selling wild game outside your immediate household you are a food business, whether for profit or not, and you must register as a food business with your Local Authority. This applies whether you supply directly to local consumers, local retailers (butchers, restaurants, etc) or an AGHE. Registration is free and can be completed online.</p> <p>The hunters supply in-fur in-feather wild game into a food business must be checked by a trained hunter and traceability information must be provided by the hunter. In addition, each person/business must supply information with each batch to the next person/business in the supply chain in compliance with Regulation (EC) 178/2002. The supply of wild game by a hunter can either be:</p> <ul style="list-style-type: none"> • To an AHGE on an unlimited quantity basis;" <p>Currently, the hunter was not required to be registered as a food business to supply to AGHE? When did that changed?</p>	<p>The comments are noted and may be considered for the revised guidance.</p> <p>The requirement for hunters to register has pre-existed in UK and EU law. The hunter has always been required to register as a food business as stated in Regulation 853/2004 for the initial handling of wild game intended for subsequent supply to an AGHE.</p>

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	<p>I will appreciate clarification of mentioned issues as we are preparing for the new season. Also, I hope that my suggestions will help in improving this guide.</p>	
<p>Daventry District Council</p>	<p>I have a few points that I think should be considered, but probably not for the WGG inclusion.</p> <p>I think it needs clarification that the `hunter` can only process his own game. He/they cannot accept game from another hunter, and then process for retail sale. Although they can accept game for transfer to an AGHE (acting as a broker/collector of game: they still need to be registered as a food business).</p>	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>
<p>Daventry District Council</p>	<p>There are sectors of the hunting community who solely shoot woodpigeons/rabbits as pest species, and then sell to AGHE`s. These hunters are required to register as a food business. Hunting organisations (BASC/NGO etc.), must make it clearer to their members that registration is required.</p>	<p>Comment noted. However, under these circumstances, it is the responsibility of the hunter to ensure they register as an FBO.</p>
<p>Daventry District Council</p>	<p>My greatest concern is the `black hole` in enforcement between AGHE/FSA and Local Authorities. There is no engagement or co-operation or understanding by either parties on how or what each other does. We are requiring hunters to register, but the AGHE`s/FSA are not (currently) checking or asking for proof of registration. AGHE/FSA are accepting hunter declarations, but no verification of the accuracy of the information provided is taking place. As a trained hunter myself, I could provide a declaration with false details on location and date of kill,</p>	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

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	<p>and no one is checking it or following it up. This is, or has enabled illegal hunting/poaching of game. My own investigation of poaching/illegal hunting has convinced me that the system is completely broken. No other sector of the UK food system has so much trust endowed on so many people to `do the right thing`, and comply voluntarily without enforcement taking place.</p>	
<p>Daventry District Council</p>	<p>Processing and supply of meat – AGHE</p> <p>Add this bullet point – ‘The hunter must provide verification/proof of registration as a food business. (or words to this effect).’</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
<p>Daventry District Council</p>	<p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <ul style="list-style-type: none"> • Paragraph 2 – add in ‘Article 18’ of (EC) Regulation 178/2002. <p>FSA/Competent Authority to advise enforcement officers to accept that trained hunter certificate achieves this requirement.’</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
<p>Daventry District Council</p>	<p>Processing and sale of game meat by hunters</p> <p>Add in separate bullet point – ‘The hunter having completed training to the satisfaction of the competent authorities in order to be deemed a trained Food Business Operator within the meaning of Regulation (EC) No 852/2004, Chapter 12. 2 (training in the application</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>

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	HACCP principles). N.B. It may be for the for the FSA/Competent Authority to advise enforcement officers to accept that trained hunter certificate achieves this requirement.'	
National Game Dealers Association	The document is easy to follow and clear.	Comment noted.
National Game Dealers Association	Trained hunter declaration should be for each animal, confusing otherwise. (page 9)	Comment noted. However, Regulations allow for the hunters declaration to cover more than one animal Reg 853/2004 Annex III, Section IV, para 4(a). All animal bodies covered by a single declaration may only be sent to a single game-handling establishment. We will aim to provide further clarification on this within the guidance.
National Game Dealers Association	There was a condition that if no trained hunter was available a carcass could be sent to an AGHE, as long as all the red offal, head and feet accompanied the carcass. (page 10)	Comment noted. This still applies and is covered in the guidance under Trained person (Hunter) unexpectedly delayed. However, we will aim to provide further clarity within the guidance.
National Game Dealers Association	Carcass contamination. Non head shots rarely result in body cavity damage, good training and good practice will reduce any contamination. Mandatory rejection could result in carcass washing (page 12) and the possibility of cross contamination.	Comment noted. We will aim to provide further clarity within the guidance.
National Game Dealers Association	(Page 22) Transport has become chilling; all game should be chilled as soon as possible. Using the previous guides, hunters refused to have chillers in place because of the words "where climatic conditions so permit", this	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

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	<p>resulted in chillers not being provided all year round even though only a few days per year could result in “where climatic conditions so permit”. As we know from all discussions any small loophole will be used to avoid compliance at all cost. All game should be chilled, it is a food product not a trophy.</p>	
<p>National Game Dealers Association</p>	<p>(Page 23) Pictures of good and bad examples; the game cart of pheasants is also a bad example. If it rains, which it does a lot in winter, the game will get wet. On occasion I have been to collect game that is sodden, the sides do not allow for adequate airflow and the heat will become trapped causing the birds to waste. There must be better pictures in the NGO archives.</p>	<p>Comment noted. We will aim to provide further clarity of this within the guidance.</p>
<p>National Game Dealers Association</p>	<p>(Page 28) Waste; “excess shot animals” cannot be exempt from ABP waste. This will just create a huge hole for shoots to dispose of carcasses they cannot sell for any reason and call them excess. This needs to be removed or clarified. It could be that, “once shot game has had human intervention, picked up, moved and or inspected it becomes a food product and therefore liable to ABP regulations, any shot game not found by the hunter is exempt”.</p>	<p>Comment noted. We will aim to provide further clarity within the guidance.</p>
<p>National Game Dealers Association</p>	<p>(Page 32) The definition of a primary product is unclear. It is not normal practice to “remove fur and feathers “. Normal hunting practice is to leave all birds whole and</p>	<p>Comment noted. However, the guidance states that primary products in the wild game sector include:</p> <ul style="list-style-type: none"> • ‘In-fur’ large wild game

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	<p>intact, and to remove the red and green offal from furred game, not always common with rabbits and hares.</p>	<ul style="list-style-type: none"> • 'In-fur' small wild game • 'In-feather' wild game birds <p>And that these products may be supplied into the food chain either eviscerated or non-eviscerated.</p> <p>We will aim to provide further clarity within the guidance.</p>
<p>National Game Dealers Association</p>	<p>Along with the need for all game to be placed on the market by trained hunters, the game should also be traceable. To meet this requirement for deer the "hunter declaration" must be tamper proof. There is no stipulation as to a format for a declaration, which is fine as long as all relevant information is included. It needs to be made clear that all declarations should be attached to each carcass in such a way that they cannot be altered and/or removed. At present 50% of the declarations are interchangeable. This should not be possible, all food fraud comes from providing an easy path.</p>	<p>Comment noted.</p>
<p>The British Shooting Sports Council</p>	<p>Introduction</p> <p>Add – 'Individuals (Individual 'Guns' or 'Rifles' [e.g. invited or paying guests on a game shoot or guests on a stalk taken by a guide or ghillie] should not be regarded as food business operators, albeit that their intention is to shoot game that will ultimately enter the food chain.</p>	<p>Comment noted. We will aim to provide further clarity within the guidance.</p>

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	<p>Article 3 of Regulation 178/2002 defines “food business operator” as the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control”. In the case of game shooting [such as pheasant, partridge or grouse shooting] or commercial deer stalking it is not the individual ‘Guns’ or ‘Rifles’ but the shoot manager, organiser or owner who controls the business and who is therefore the food business operator. The word ‘Individuals’ either requires further clarification or deletion.) and food businesses involved in hunting wild game with the intention of placing it on the market are food business operators (FBOs) and the food they produce will need to meet food safety requirements. This will be achieved by ensuring compliance with relevant requirements of the legislation.’</p>	
<p>The British Shooting Sports Council</p>	<p>Contamination on carcasses and belly shots ‘</p> <p>This paragraph tends to discourage anything but head shooting of large game. However, recommended best practice is to chest shoot, and head shooting is widely disapproved of on welfare grounds. The Deer Initiative best practice guidance states: “A shot which destroys vital areas of the brain (head shot) will achieve instantaneous loss of consciousness and death. However, the brain is a very small target and for this reason head shots should be avoided except for humane dispatch” See:</p>	<p>Comment noted. We will review this section of the guidance and where appropriate, amend accordingly.</p>

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	<p>http://www.thedeerinitiative.co.uk/uploads/guides/161.pdf. The risks associated with head shooting are substantially increased where the smaller species of deer are concerned. We recommend deletion of references to head shooting.'</p>	
The British Shooting Sports Council	<p>Processing and sale of game meat by hunters</p> <p>Summary – Bullet point 2 – ‘This requires better clarification. It is not required that the final consumer must be ‘local’ to where the game is hunted, as this does not take account of the fact that consumers travel widely around the country, visiting localities where game is hunted and purchasing local produce when they do so. It should instead be explained that the supply must be made locally to where the game is hunted.’</p>	Comment noted. We will aim to provide further clarity within the guidance.
The British Shooting Sports Council	<p>Examples</p> <p>Bullet point 2 – ‘This is worrying. Many caterers supply to hotels and this is a restraint on their businesses.’</p>	When supplying directly, the hunter can only supply to the first retailer unless the meat has been processed through an AGHE. See Regulation 853/2004.
The British Shooting Sports Council	<p>Examples</p> <p>Bullet point 3 – ‘This is worrying. Many restaurateurs access their supplies from farm shops. This places a</p>	Beef, lamb and pork has gone through an approved FSA slaughterhouse, wild game meat shot by a hunter and supplied directly to a retailer has not. If it has not

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	significant onus upon the farm shop operator who is able to supply lamb, beef, pork etc. to a restaurateur, but not wild game that has been obtained directly from a hunter.'	gone through an AGHE, the hunter can only supply locally to where it was shot. See Regulation 853/2004.
The British Shooting Sports Council	Testing examination – figure 3 Bullet point 3 - 'as soon as possible' is at a variance with 'can be stored...for a few days' as stated in the previous paragraph. This requires explanation or correction.'	Comment noted. We will aim to provide further clarity within the guidance.
The British Shooting Sports Council	Waste Incorrect spelling: should be gralloch	Comment noted. We will correct the spelling in the final version of the guidance.
Private Individual	In relation to the above consultation, could clarity be supplied as to whether a hunter supplying small quantities of processed they have hunted direct to local consumers or retailers requires to be registered as a venison dealer in addition to being registered as a food business with the local authority? There is currently conflicting option on this with the British Deer Society stating that hunters do need to be registered as a venison dealer but other sources stating that a hunter selling venison they have hunted is not a venison dealer. The definition of a dealer being someone who buys and sells goods.	Requirement to be a venison dealer is only a requirement in Scotland and we are not in control of what other organisations communicate on their websites. Please see Deer Act Scotland 1996
Northern Ireland Food Managers Group which include:	Northern Ireland Food Managers Group (NIFMG) welcomes the opportunity to comment on the proposed	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
<p>1. Environmental Health Service of Newry, Mourne and Down District Council,</p> <p>2. Environmental Health Service of Fermanagh and Omagh,</p> <p>3. Environmental Health Department, Dungannon Office</p>	<p>guidance on the Supply of Wild Game for Human Consumption.</p> <p>Question 1 - Does the new guide clarify the hunter and retailer exemptions of Regulation (EC) 853/2004 for supply of wild game and wild game meat?</p> <p>NIFMG is of the opinion that the new guide does provide clarification on the hunter and retailer exemptions of Regulation (EC) 853/2004 but that it does not go far enough in terms of addressing all aspects of supply. For example, the collection and transportation of in-fur/in-feather game is not covered in sufficient detail. NIFMG is also of the opinion that the section on Exemptions is repetitive and that reorganising this section may assist clarification for the intended audience.</p>	
<p>Northern Ireland Food Managers Group</p>	<p>Question 2 - Does the new guide have improved readability?</p> <p>NIFMG agrees that in general, the guide has improved readability. However, this could be improved further by considering the following:</p> <p>Page 2 – Intended Audience - The intended audience which includes enforcement officers appears to conflict with the last paragraph of the introduction on page 5 i.e. “This guide is not intended to provide enforcement advice for local authority enforcement officers though the</p>	<p>Comment noted. We will aim to provide further clarity within the guidance.</p>

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	information provided may prove useful” and could be construed as contradictory to a lay person reading this document.	
Northern Ireland Food Managers Group	Page 4 – Content - The sections on the contents page could be numbered to make it more obvious to the reader when one sections finished and another section starts.	Comment noted and where appropriate will be considered for incorporation onto the revised guidance.
Northern Ireland Food Managers Group	Page 5 – Intended Audience - NIFMG believes that the first sentence should be reworded. For example: “This guidance is intended primarily for industry who hunt and sell wild game for human consumption, and enforcement officers.....”	Comment noted and where appropriate will be considered for incorporation onto the revised guidance.
Northern Ireland Food Managers Group	Page 9 – Trained Hunters Declaration - NIFMG believes that to add clarity for the reader the competent authority should be identified, and contact details provided.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 9 – Trained Hunters Declaration - NIFMG believes that to add clarity for the reader the competent authority should be identified, and contact details provided.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 10 – Acceptance at AGHE - Guidance on what an alternative suitable method to verify that the hunter is trained, would be beneficial in this section.	Comment noted. We will aim to provide further clarity within the guidance.

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Northern Ireland Food Managers Group	Page 11 - Trained person (hunter) unexpectedly delayed. Guidance on what constitutes the term “unexpectedly delayed” would be helpful in this section as this may be misinterpreted and thus enable this rationale to be used without good reason.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 11 – Small Wild Game - For consistency, it would be beneficial to state that it is considered good practice for a trained hunter’s declaration to be provided after inspecting small wild game. Also stating the name and contact details of the competent authority would be helpful for the reader.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 13 – Exemptions NIFMG would suggest the last sentence be reworded. For example: “You cannot sell or supply this game to anyone else as part of a food business operation”.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Northern Ireland Food Managers Group	Page 13 - Primary Production for direct or local sale by a hunter (in-fur/in-feather) NIFMG would suggest that the first sentence should finish after the word “not” and a new sentence should start “Therefore, you must register.....” The first bullet point should read AGHE (not AHGE). It would be helpful for the reader if the second bullet referred to the definition of small quantities on page 33.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Northern Ireland Food Managers Group	Page 14 - Processing and sale of game meat by hunters - In the first paragraph the use of final consumer and local consumers could cause confusion. It is suggested that the term final consumer only is used. The definition	Comment noted. We will aim to provide further clarity within the guidance.

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	of small quantities is on page 33 (not page 32). It is also suggested that the words “commensurate with the work activity” follow the existing text in the 4 th bullet point.	
Northern Ireland Food Managers Group	Page 15 - Under the third bullet, further detail on hunter training is on Page 29 (not page 16).	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 15 – Summary - The first bullet point in relation to the exemption extending to online sales directly to the final consumer is not mentioned anywhere else other than in the summary. It is suggested that the second bullet point is re-worded to improve readability. It is suggested that the summary is moved to the end of this section.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Northern Ireland Food Managers Group	Page 16 – Examples (cont.) - It would be beneficial to include a definition of a caterer in the first bullet point.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 16 – Exemptions Explained - The first sentence after the bullet points is long. It is suggested that it is reworded. For example: “Unless wild game and wild game meat is supplied by an AGHE, a retailer cannot supply wild game meat to another retailer. A retailer can only receive wild game meat from a register hunter and supply to the final consumer.” It appears the word “is” requires to be inserted between document and merely.	Comment noted. We will aim to provide further clarity within the guidance.

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Northern Ireland Food Managers Group	Page 18 - Processing and supply of game meat by retailers - NIFMG considers this section may be confusing to a lay person. Therefore, it is suggested that it is re-worded to improve readability.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 18 - Separate Area for de-feathering or de-skinning - It is suggested that the word “ideally” is removed, and the wording changed to reflect the guidance under the same heading on page 17.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 18 - Food safety management documentation - NIFMG would suggest that this section should reflect that a food safety management system needs to be in place that is commensurate with the work activity rather than giving the impression that records are all that is required.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 19 - Table for the supply of wild game/wild game meat - NIFMG considers that the title does not reflect the purpose of this section. We would welcome the inclusion of a version of the flowchart on page 9 and 10 from the previous guide which helped identify the requirements which applied to a particular situation. In addition, the collection and transportation of wild game meat is not fully addressed in this table or anywhere else in the document. Paragraph 22 on page 14 of the previous guide provided information on this and again, we would welcome the inclusion of this in the new guidance.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

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Northern Ireland Food Managers Group	Page 24 – Traceability - It was noted that: Under the first bullet point, “(EC)” needs to be inserted between “Regulation” and “178/2002”. On the next paragraph, “Regulation (EU)” needs to be inserted in front of 931/2011.	Comment noted. We will review how legislation should now be quoted now that we have exited the EU and aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 25 – Traceability - NIFMG would welcome some clarification on what would be considered good practice in terms of recommended timescales for retaining traceability records.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 26 - Wild boar for personal consumption - It is suggested that the last sentence in this section is reworded to improve readability.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Northern Ireland Food Managers Group	Page 33 - Hunter/ Hunting Party cont'd from page 32 - It is suggested that the second sentence in the second paragraph is reworded to improve readability. In the first sentence there is reference to the “community market”, it may be beneficial to include a definition of this.	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Page 33 – Small Quantities - NIFMG suggest that the first sentence of the second paragraph is reworded. For example: “The supply of small quantities by the producer must also be local to where the hunter is registered with the Local Authority.”	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

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Northern Ireland Food Managers Group	<p>Question 3 - Does this guide fulfil the needs of its intended audience (hunters, processors and retailers of wild game and wild game meat)?</p> <p>NIFMG agrees that it does fulfil the needs of its intended audience so long as the comments above and in the next sentence are taken into consideration.</p> <p>The guide no longer covers the consignment of wild game to other EU member states.</p> <p>As mentioned above, NIFMG considers that the collection and transportation of wild game is not adequately covered in this guide.</p>	Comment noted. We will aim to provide further clarity within the guidance.
Northern Ireland Food Managers Group	Additional Comment: Although it may be beyond the scope of the guidance, NIFMG would welcome some clarification on what obligation hunters, retailers etc have to inform the consumer that wild game may contain shotgun pellets.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Summary (Key words) – ‘Livestock????’</p> <p>Contents – Revise and check page refs</p> <p>Introduction :</p> <p>Paragraph 3 – ‘Then where is this advice and how are FBOs supposed to know what is expected of them???’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

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Forestry Commission	<p>Intended Audience:</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘anyone who hunts and sells...’ ○ Paragraph 1 – ‘Unnecessary, repeats statement above. Delete or use to replace the statement above.’ ○ Subheading – ‘This’ ○ First bullet point – ‘Hunters of wild game and anyone who supplies wild game in-fur/in-feather or as wild game meat for human consumption, and’ ○ Second bullet point – ‘Define in glossary’ <p>‘This includes AGHES and retail establishments such as butchers’ shops, restaurants’</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	<p>Approved Game Handling Establishments (AGHE)</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘Confusing in the context of this guidance as it is patently not the case. Suggest remove this whole para and replace it with the text as in the comment 3 down.’ <p>Paragraph 2 – ‘Remove to below next heading down’.</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>

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Forestry Commission	<p>Processing and Supply of Meat</p> <ul style="list-style-type: none"> ○ 'Move this entire section up to just below the main heading' ○ Paragraph 1 – 'as defined in Annex I of Regulation (EC) No 853/2004' ○ Paragraph 2 - Veterinary inspection as opposed to trained hunter 'An AGHE may sell unprocessed game that has not been subject to official post-mortem inspection but only to another AGHE in the UK or EU.' <p>Paragraph 3 – 'Delete, does not scan with rest of text and is dealt with under the Trained Hunter heading'</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	<p>Trained hunter's examination</p> <ul style="list-style-type: none"> ○ Heading – 'use "inspection" so as not to confuse with the qualification' ○ Paragraph 1 – 'this occurrence and all occurrences below, use "inspection' ○ Paragraph 1 – 'add "The trained hunter does not have to be the individual who killed the game but must have been present as a member of the hunting party involved." 	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
Forestry Commission	<p>Trained hunter's examination</p> <p>Paragraph 2 – 'Just AGHEs or all game supplied by all routes as suggested elsewhere in the doc???'</p>	Comment noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Trained hunter's declaration: large wild game:</p> <ul style="list-style-type: none"> ○ Paragraph 2 – 'Suggest that this should not be permissible for large game. Each animal should carry its own declaration tag. This is usual sector practice anyway.' <p>Paragraph 3 – 'Define exactly who this is and how they might be contacted'</p>	Comments noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Head and viscera:</p> <p>'Explain at what point the body can go to the AGHE (pre or post the ABP head being declared Trichinella free?) and if any certification is required....?'</p>	Comment noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Acceptance at AGHE:</p> <ul style="list-style-type: none"> ○ Paragraph 4 – 'The AGHE' <p>Paragraph 5 – 'Move to AGHE section, not relevant to trained hunters.'</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Trained person (hunter) unexpectedly delayed:</p> <p>'This is confusing and unnecessary. The subject is covered in bullet 2 on page 8.'</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
Forestry Commission	<p>Offal</p> <p>Paragraph 1 and 2 – ‘For large wild game, in most cases the carcass will be presented with a hunters declaration and the offal will not be present. If there is no hunter’s declaration the offal must be presented with the carcass. Neither the carcass nor the offal will be accepted unless clear identification and correlation marks between carcass and offal are present.’</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	<p>Small wild game</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘In general, if small game exhibits abnormal behaviour, they should not be considered to be fit for human consumption a trained hunter’s declaration is not a legal requirement for small wild game, but it is considered best practice. All small game carcasses must be still inspected by a trained hunter. 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 competent authority via a declaration tag. A single declaration may be attached to individual carcasses or a batch in trays or cartons.’ <p>Paragraph 2 – ‘If this is the AGHE (or AGHE vet) then say so.’</p>	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
Forestry Commission	<p>Contamination on carcasses and belly shots</p> <ul style="list-style-type: none"> ○ Title – ‘Retitle: Contamination on Large Game Carcasses’ <p>Paragraph 1 & 2 - Suggest “The inspection of large game by a Meat Hygiene Inspector (MHI) or Official Veterinarian at the AGHE pays particular attention to contamination associated with gut contents around the pelvis sternum and cut flanks. In carcasses that have been poorly gralloched or where a projectile has passed behind the diaphragm, contamination may be extensive and may result in rejection of the whole carcass – pre-inspection checks by the FBO should normally identify such carcasses which should not be presented. Carcasses that are so contaminated that entry in an AGHE would jeopardise operational hygiene or that show evidence of advanced or generalised decomposition will be rejected and disposed of as animal by product (ABP).” NOTE TO FSA: The industry does not want to normalise head shots (on welfare grounds) and a cleanly chest shot animal will have no gut contamination.’</p>	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	Exemptions	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	<p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <p>Paragraph 2 – ‘This is a new and substantial provision backed in general by the industry please confirm that it is so and applies to all supply, not just to AGHEs. Suggest: “The hunter’s supply of in-fur in-feather wild game into any food business must be checked by a trained hunter and traceability information must be provided by the hunter. In addition, each person/business must record and supply information with each batch to the next person/business in the supply chain in compliance with Regulation (EC) 178/2002”.’</p>	
Forestry Commission	<p>Exemptions</p> <p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <p>Paragraph 3 – ‘This is really important to emphasise unless it is the intention to ignore it? See later comments on retailers.’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
Forestry Commission	<p>Exemptions</p> <p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <p>Bullet point 3 – ‘i.e. registration with the local authority as a food business. why not say so?’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>
Forestry Commission	<p>Exemptions</p> <p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <ul style="list-style-type: none"> ○ Bullet point 4 – ‘i.e. a one step forward, one step back supply traceability’ ○ Bullet point 6 – ‘Having adequate structures and operations in place for the processing of wild game carcasses.’ ○ Bullet point 7 – ‘Having adequate facilities in place for the appropriate storage-including the ability to maintain the cold-chain of wild game carcasses.’ ○ Bullet point 8 – ‘Having hygienic and where required, chilled, facilities to transport the wild game or wild game meat to the final consumer or local retailer.’ 	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
Forestry Commission	<p>Processing and sale of wild game meat by hunters</p> <ul style="list-style-type: none"> ○ Bullet point 1 – ‘i.e. registration of a food business, why not say so? Suggest “Registration with the appropriate competent authority, i.e. local authority, of the relevant food business establishment under their control”.’ ○ Bullet point 2 – ‘i.e. a one step forward, one step back supply traceability’. 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Processing and sale of wild game meat by hunters</p> <p>Bullet point 5 – ‘VERY IMPORTANT - Does this include using a third party (not a member of the hunting party) to break down and package game meat supplied by and taken back by the hunter?? Please could we have a judgement on this point.’</p>	Comment noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Processing and sale of wild game meat by hunters</p> <p>Bullet point 7 – ‘Having hygienic and chilled facilities to transport the wild game or wild game meat to the final consumer or local retailer.’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Summary</p> <p>Bullet point 2 - This implies one thing whereas the previous guide said. The terms “small”, “local” and “direct</p>	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
	<p>supply” are interpreted in paragraph 16. However, it is the premises where the hunter prepares game meat that have to be local to the retailers that the hunter plans to supply and not the place(s) where the hunter shoots. So hunters may shoot on other people’s estates and then bring the game back to their own premises or game larder for supply to local retailers.” Suggest “Hunters of wild game can supply small quantities of their wild game carcasses or meat to final consumers locally to where the game is processed”.’</p>	
Forestry Commission	<p>Suggested new sections before ‘Separate area for de-feathering or de-skinning’</p> <p>Suggest new section” Facilities” which then describes, in this order</p> <ul style="list-style-type: none"> ○ Transportation of carcasses from the field. ○ Game larder. ○ Separate de-feather/skin area. ○ Separate meat processing, packing, dispatch area. ○ Transport to retailer/customer.’ 	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
Forestry Commission	Suggested wording for 'Transportation from the field - For bringing carcasses from where they are hunted to a Game larder or direct to an AGHE, the transport provided must allow for adequate carcass separation to allow for cooling and prevent cross contamination.'	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested wording for 'Deer Larder - Define this is the area where hunting processes to produce the primary product (in feather/in skin) carcasses are finalised and where the primary product is stored. The larder area must be completely pest proofed, easy to clean, have hot and cold-water supply to a dedicated wash hand basin, have equipment washing facilities, and a means of disinfecting knives and other cutting equipment used to complete hunter preparation of large wild game primary product.'	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested wording for Separate area for de-feathering or de-skinning - 'The place where feathers or skins are removed should be so arranged as to prevent contamination of either stored primary product or of any meat processing area. Separation can be by solid partition, or a number of other means under advice of the local Authorities. The area must be completely pest proofed, easy to clean, have hot and cold-water supply to a dedicated wash hand basin, have equipment washing facilities, and a means of disinfecting knives and other cutting equipment used to de-feather/gut, or skin.'	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
Forestry Commission	<p>Separate processing area for the game larder</p> <p>Title suggestion: 'Separate processing area for the game larder and de-feathering/de-skinning area'</p> <p>This is the area where empty de-feathered or skinned carcasses are further cut and/or packaged and stored prior to dispatch. The processing area must be completely pest proofed, easy to clean, have hot and cold-water supply to a dedicated wash hand basin, have equipment washing facilities, and a means of disinfecting knives and other cutting equipment used to prepare the wild game meat. Packaging and storage may take place in the same area provided cross contamination is avoided.</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	<p>Temperature control</p> <p>A freshly killed carcass should be brought to this temperature as soon as practicably possible under a regime of continuous cooling.</p>	<p>Comment noted and where appropriate will be considered for incorporation into to the revised guidance.</p>
Forestry Commission	<p>Waste</p> <p>And the Waste Regulations. ABPR does not apply to wild animals. See section 13 page 2 of ABP reg i.e. (13)</p> <p>In addition, in order to prevent risks arising from wild animals, bodies or parts of bodies of such animals suspected of being infected with a transmissible disease should be subject to the rules laid down in this</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	<p>Regulation. This inclusion should not imply an obligation to collect and dispose of bodies of wild animals that have died or that are hunted in their natural habitat. If good hunting practices are observed, intestines and other body parts of wild game may be disposed of safely on site. Such practices for the mitigation of risks are well-established in Member States and are in some cases based on cultural traditions or on national legislation which regulates the activities of hunters. Community legislation, in particular Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin 2) OJ L 139, 30.4.2004, p. 55. (2), lays down rules for handling of meat and animal by-products from wild game. Those rules 2/003L NE Official Journal of the European Union L 300/3 also place the responsibility for the prevention of risks on trained persons such as hunters. In view of the potential risks for the food chain, animal by-products from killed wild game should only be subject to this Regulation in so far as food hygiene legislation applies to the placing on the market of such game and involves operations carried out by game-handling establishments. In addition, animal by-products for the preparation of game trophies should be covered by this Regulation in order to prevent animal health risks arising from such by-products. And page 11 2. This Regulation shall not apply to the following animal by-products: (a) entire bodies or parts of wild animals, other</p>	

Respondent	Comment	Response
	<p>than wild game, which are not suspected of being infected or affected with a disease communicable to humans or animals, except for aquatic animals landed for commercial purposes; (b) entire bodies or parts of wild game which are not collected after killing, in accordance with good hunting practice, without prejudice to Regulation (EC) No 853/2004; (c) animal by-products from wild game and from wild game meat referred to in Article 1(3)(e) of Regulation (EC) No 853/2004;</p> <p>Suggest “Waste generated in the field as part of normal hunting practice can be left in the field following best Practice guidance. Any other waste brought from the field and/or generated during carcass processing must be collected, stored and disposed of according to recognised by-product and waste practice and regulations.</p>	
Forestry Commission	<p>Processing and supply of game meat by retailers</p> <p>Paragraph 1 – ‘Can you confirm that there can be no retail to retail trade of wild game meat supplied by hunters, if so please make this clear?’</p> <p>Paragraph 2 - No, they can supply from AGHEs also. Suggest “Retailers can supply wild game meat purchased from any legitimate source. However, a retailer who receives wild game (in-fur/feather) or wild game meat direct from hunters must only supply that</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	meat to a final consumer, (i.e. walk in customers in restaurants, butchers, hotels, pubs, farm shops), not to another food business. Retailers using this exemption are expected to comply with Regulation EC 852/2004 and Regulation EC 178/2002.”	
Forestry Commission	<p>Temperature Control</p> <ul style="list-style-type: none"> ○ Suggested Title - Temperature Control in Facilities <p>Paragraph 1 - “Wild game meat should be stored below 7°C for large game and not frozen and below 4°C for small game. A freshly killed carcass should be brought to this temperature as soon as practicably possible under a regime of continuous cooling.”</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Waste</p> <p>Paragraph 1 – ‘And waste regs as above’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Labelling</p> <p>Paragraph 1 - ‘This applies equally to direct supply although it is not mentioned in that context’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <p>Column 1 – and not to approved game handling establishments – ‘delete. This part is not relevant if the word “any” replaces “all”.’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
Forestry Commission	<p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <p>Column 2 – ‘No mention of trained person, the NEW provision mentioned in the body text above.???? Or of traceability’</p>	Comment noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Supply of in-fur/in-feather game carcasses to approved game handling establishments</p> <ul style="list-style-type: none"> ○ Title – underline carcasses ○ Column 1 – ‘If you are a hunter, member of a hunting party, estate or a shoot organiser’ ○ Column 1 – ‘any’ instead of all or part 	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Supply of in-fur/in-feather game carcasses to approved game handling establishments</p> <p>Column 2 - No mention of trained person, the NEW provision mentioned in the body text above? Or of traceability?</p>	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
Forestry Commission	<p>Supply of in-fur/in-feather game carcasses to approved game handling establishments</p> <p>Column 2 - Insert "You are responsible for supplying safe food under Regulation (EC) 852/2004 and"</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
Forestry Commission	<p>Supply of in-fur/-in-feather game carcasses to approved game handling establishments</p> <ul style="list-style-type: none"> ○ Column 1 - This implies hunter to hunter supply. Surely this is not allowed??? It appears to derive from point 18 in the old guide? ○ Column 2 – 'What does this mean ? does it refer to the declaration tag (already mentioned) and or to the evidence of trained hunter qualification ? Or does it mean that those should be passed to the OV?' 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
Forestry Commission	<p>Direct supply of wild game meat by the hunter to the final consumer or local retailers</p> <ul style="list-style-type: none"> ○ Title – underline 'meat' ○ Column 1 - "If you hunt then process small quantities of game meat and supply locally direct to the final consumer and/or to local retailers that directly supply game meat to the final consumer, and/or process game meat hunted by you for sale from your own retail outlet. Note: You may not 	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
	<p>supply game meat from another shooter or shooting party under this exemption.”</p> <ul style="list-style-type: none"> ○ Column 2 - “Please note – It may be possible to adapt the requirements where private dwelling houses or temporary/moveable premises are being used. Advice can be sought from your Local Authority during registration.” 	
Forestry Commission	<p>Direct supply of wild game meat by the hunter to the final consumer or local retailers</p> <p>Column 2 - No mention of trained person, the NEW provision mentioned in the body text above? Or of traceability, or of chill and facility requirements.</p>	Comments noted. We will aim to provide further clarification within the guidance.
Forestry Commission	<p>Supply of unlimited quantities of game meat to processors, retailers and wholesalers</p> <ul style="list-style-type: none"> ○ Title – insert ‘carcasses or’ ○ Column 1 – insert ‘receiving one’, ‘carcasses’, ‘them’ 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	<p>Supply of unlimited quantities of game meat to processors, retailers and wholesalers</p> <p>Additional comment</p>	Comments noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
	No mention of collection and transportation to AGHE, this was in the old guide	
Forestry Commission	<p>Transport</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘When transporting wild game from the shoot to a larder or to an AGHE, it is essential to ensure good hygiene. In particular, while cooling during collection and transport, wild game must be stored away from people and animals and to allow good airflow allowed between carcasses.’ ○ Paragraph 2 – insert ‘storage’, ‘but not frozen’ ○ Paragraph 3 – replace ‘carcasses or wild game meat’ with ‘bodies’ ○ Suggested insert bullet point – ‘Wild game meat, already at the required temperature, is being delivered over anything but short distances.’ ○ Suggested insert sentence – ‘The key point is that the carcass should be continuously cooling down from its freshly killed state to its storage temperature with no upward fluctuations during cooling or in storage or subsequent transport.’ 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Good examples of transportation	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	Title – ‘Good examples of transportation from the hunting area.’	
Forestry Commission	<p>Traceability</p> <ul style="list-style-type: none"> ○ Example ‘Traceability is defined in Article 3 (15) of Regulation (EC) 178/2002 as: ‘the ability to trace and follow a food, feed, food-producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution’. ○ If you produce wild game carcasses or game meat for supply to an AGHE or through exempt routes you must maintain full traceability records. In its simplest form this means keeping a “one step back, one step forward” record of what you produce and supply. ○ Information required “one step back” (provided by supplier) ○ Accurate description of the animal (date, time, and location where animal is shot, species, approximate age, sex). ○ Volume/quantity; number of animals with approximate size/weight (large game) or volume/quantity (small game). 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ Name and address of person/food business supplying. ○ Name and address of carrier / transporter / person responsible for moving wild game or game meat. ○ Information required looking forward (supplier record of destination) ○ Name and address of the AGHE/retailer receiving the carcass or retailer receiving game meat. If supplied to a final consumer, the date and description of what was supplied (as below) but not consumer names and addresses. ○ Reference identifying lot, batch or consignment. ○ Date of dispatch ○ The Regulations do not specify an amount of time traceability records should be kept for, other than “until it can be reasonably assumed that the food has been consumed. When requested by the competent authority, the food business operator shall provide the information without undue delay. The appropriate form in which the information must be made available is up to the choice of the supplier of the food, as long as the information requested is clearly and unequivocally available to 	

Respondent	Comment	Response
	<p>and retrievable by the business operator to whom the food is supplied.</p> <ul style="list-style-type: none"> ○ Suggested insertion for bullet point 1 – ‘carcasses and game meat.’ 	
Forestry Commission	<p>Traceability</p> <p>‘An AGHE cannot accept game meat!!’</p>	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
Forestry Commission	<p>Testing/examination</p> <ul style="list-style-type: none"> ○ Title – ‘Wild Boar Testing/ examination’ ○ Subheading – ‘Trichinella’ ○ Paragraph 1 – ‘Please make it clear if testing is compulsory for exempt routes as well as the AGHE route.’ ○ Paragraph 1 – insert ‘by law’, ‘outside of person consumption’. <p>Paragraph 1 - ‘this testing is done at AGHE.’</p>	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
Forestry Commission	<p>Wild boar for personal consumption</p> <ul style="list-style-type: none"> ○ Title - Wild boar for personal consumption and wild boar supplied through exempt (non-AGHE) routes? 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ Paragraph 1 – ‘Please make it clear if testing is compulsory for exempt routes as well as the AGHE route.’ ○ Paragraph 1 – insert ‘of yourself and those you supply through exempt routes.’ 	
Forestry Commission	<p>Waste</p> <p>This section needs some better clarification and research. A simple statement that “while gralloch and waste from “normal hunting practice” can be left in the field at the time of killing, any waste transported or brought into any premises must be dealt with as WASTE under the Waste regs. Or “Waste generated in the field as part of normal hunting practice can be left in the field following Best Practice guidance. Any other waste brought from the field and generated during carcase processing must be collected, stored and disposed of according to recognised by-product/waste practice and Regulations.” Move to the new Waste section inserted higher in the document Page 21.’</p> <p>“Gralloch” What about heads and feet? Surely this only applies to waste produced in the field at the time of shooting, NOT to larder and processing waste? If so say so.’</p>	Comments noted. We will aim to provide further clarification within the guidance.
Forestry Commission	Export of unskinned deer carcasses to Europe (current requirements)	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
	<p>'This is a bit of an orphan section and could be better placed.'</p>	
Forestry Commission	<p>Hunter training</p> <p>Suggest re-write depending on whether all game supplied must go through a trained hunter or just that going to an AGHE. Please make a clear judgement on this point.</p> <p>Example. "Under Regulation (EC) 853/2004 at least one member (the Trained Hunter) of a hunting party planning to supply game into the food chain should have received training in the following areas:</p> <p>(a) the normal anatomy, physiology and behaviour of wild game;</p> <p>(b) abnormal behaviour and pathological changes in wild game due to diseases, environmental contamination or other factors which may affect human health after consumption;</p> <p>(c) the hygiene rules and proper techniques for the handling, transportation, evisceration etc. of wild game animals after killing; and</p>	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
	<p>(d) legislation and administrative provisions on the animal and public health and hygiene conditions governing the placing on the market of wild game.</p> <p>Any person who hunts wild game with a view to supplying into the food chain must be a trained hunter (having sufficient knowledge of the pathology of wild game, and the production and handling of wild game and wild game meat after hunting, to undertake an initial inspection of the game on the spot), unless they are part of a hunting team of which at least one “trained hunter” is a member. The trained person can undertake an initial inspection of all of the carcasses on behalf of the hunting group. For supply to an AGHE, it is the responsibility of the AGHE operator (or FBO) to satisfy themselves that those supplying wild game are suitably trained and the trained hunter must complete a declaration in an approved manner. For large game the compulsory declaration is in the form of a tag attached to each carcass. For small game a declaration is considered best practice only tag can refer to a batch of carcasses. For hunter supply to a retailer of final consumer it is considered best practice for the trained hunter to complete and attach a declaration to large game carcasses. Trained Hunter training is available from the following organisations: Deer Management Qualifications (DMQ) has information on deer and wild boar training. The National Gamekeepers Organisation has information for large and small game. In</p>	

Respondent	Comment	Response
	Northern Ireland, Country Sports Ireland also provide appropriate training for hunters and the handling of large wild game (deer).	
Forestry Commission	Paragraph 1 – ‘Clarity required here. At what stage does the Trained Hunter have to make their inspection? It may be that the first time the trained hunter sees the carcass it has already been gralloched.’	Comment noted. We will aim to provide further clarification within the guidance.
Forestry Commission	Suggested definition title/section – ‘Dressed carcass – ‘Once a carcass has been de-feathered /gutted or skinned/emptied it is no longer a primary product and becomes game meat.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested definition title/section Game meat – ‘Game meat may be a dressed carcass or parts of it.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested definition title/section – AGHE – ‘An Approved Game Handling Establishment (AGHE) can accept only primary game products but can do so in unlimited numbers from any supplier and can supply into a wide food chain ranging from final consumers to wholesalers where there may be multiple selling and re-selling before reaching the consumer. AGHEs must comply with very strict hygiene requirements and Game meat from an AGHE will carry an official stamp applied after an official Meat Hygiene Inspector or Official Veterinarian inspection.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
Forestry Commission	Suggested definition title/section - AGHE and Exempt (non-AGHE) supply - Hunters do not have to supply to AGHEs and can supply to either a final consumer or to a retailer but are only allowed to do this under exemption from the AGHE route. The exemptions limit the source, numbers, range and destination of the wild game carcasses and meat supplied.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested title – ‘Small quantities and local.’ Suggested insertion – ‘The territorial limit does not apply to internet sales’.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested title – ‘(EC) 178/2002 defines a final consumer as.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested insertion to Retailer definition: ‘A Retailer can buy in wild game carcasses or game meat from any legitimate source but must sell them only to a final consumer if they were supplied direct by a hunter.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested definition - ‘Food Business - A food business is any individual or enterprise supplying food into the food chain. Hunters wishing to supply game into the food chain including to an AGHE, Retailer, or final consumer, must register with their Local Authority as a food business.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested insertion – Game Larder definition – ‘A food business will include its Game larder as part of its registration A Game larder normally consists of a room or	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	area within a food business used for the storage of in-fur/in- feather wild game.'	
Forestry Commission	Suggested definition - De-feathering/gutting and Skinning area - This area has similar design standards to the Game larder and is a separate place where the operations can be carried out without risk of contamination of the Game larder carcass storage area or the Game meat Preparation area.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	Suggested definition - Game meat preparation area - This area is separate to the Game larder and de-feather/gut and skinning area. It has very high hygiene standards and may incorporate packaging and storage areas.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Forestry Commission	References England and Wales Deer and Wild Boar best practice guides	Comment noted and will be considered for incorporation into the revised guidance.
Forestry Commission	Annex A - Specimen forms ○ A - 'Suggest a sector led re-design and supply from a single source with single tagging code system and that the physical nature of the tag is	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<p>reviewed to ensure that it stays with the carcass for as long as possible.'</p> <p>C – 'Suggest that this provision is deleted for large game.'</p>	
Forestry Commission	<p>Annex B – Bibliography</p> <ul style="list-style-type: none"> ○ Suggested insertion – 'The British Deer Society.' ○ Suggested insertion – 'The Deer Initiative.' 	Comment noted. We will update the guidance as suggested.
National Gamekeepers Association	<p>Key words section</p> <p>'Not sure how relevant this is?'</p>	Comments noted. However, this is mandatory for all FSA guidance and is used to facilitate the search for any related guidance to the key words listed. We will however review the key words used and where appropriate, update accordingly.
National Gamekeepers Association	<p>Introduction</p> <ul style="list-style-type: none"> ○ Paragraph 2 – food – 'Could this be changed to include "and organisations", it is a broader and more encompassing term.' <p>Paragraph 2 – legislation – 'Is a new sentence required after this one "Anyone selling a single carcasse or part of a carcasse is, in law, a food business operator (FBO).'</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
National Gamekeepers Association	<p>Legal status of guidance</p> <p>Regulation (EC) 2017/625 – Official Controls Regulations – ‘Add new bullets 1. EC reg 931/2011 the requirement to provide traceability of food and feedstuffs 2. EC reg 2015/1375 Trichinella testing of wild boar’.</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Approved game handling establishments (AGHE)</p> <ul style="list-style-type: none"> ○ Paragraph 1 – Game-handling establishment - Should read ‘ An Approved Game Handling Establishment (AGHE)?’ <p>Paragraph 2 – approval – ‘by the Food Standards Agency.’</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Processing and Supply of Meat – AGHE</p> <p>New bullet point suggestion – ‘New bullet with ‘Game meat passing through an AGHE is subject to examination by a qualified veterinary surgeon (VO) or meat hygiene inspector (MHI)’.</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Trained hunters declaration: large wild game</p> <p>Paragraph 2 – body – ‘Which has been killed at the same time and under the same circumstances.’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Trained hunters declaration: large wild game</p> <p>Note section – ‘Not sure about this one. If I suspect a notifiable disease I must inform the competent authority</p>	Comments noted. We will aim to provide further clarity within the guidance

Respondent	Comment	Response
	(APHA) but otherwise I can simply reject it from the food chain. E.g. if I've gut shot it and it is therefore contaminated I simply reject it from the food chain.'	
National Gamekeepers Association	Acceptance at AGHE <ul style="list-style-type: none"> ○ Title – 'Add 'an AGHE.' Paragraph 4 – substitute 'have another' for 'other'	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	Trained person (hunter) unexpectedly delayed Paragraph 1 - After intestines add, "Often referred to as 'the gralloch.'"	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	Offal <ul style="list-style-type: none"> ○ Title - This is a new term & needs a definition, other terms are often used by 'Hunters' including 'The Pluck', possibly with an explanation that of what this is. Or should it be more specific and somewhere list the actual organs. Paragraph 1 - Add 'usually by tagging or labelling to link them to each other'	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	Small wild game <ul style="list-style-type: none"> ○ Paragraph 1 – the carcasses - Change to 'every carcass must..' 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ Paragraph 2 – inform - ‘either reject the carcass from the food chain or if a notifiable disease is suspected inform..’ ○ Paragraph 2 – For the last sentence – ‘Suggest we take this out, it tends to suggest that abnormal, diseased or contaminated carcasses can be sent. Surely safer to reject from the food chain at this stage and NOT send to the AGHE?’ <p>Paragraph 2 – For the last sentence – ‘Yes but add after abnormal behaviour, ‘is found to be contaminated, diseased or showing signs of decomposition.’</p>	
National Gamekeepers Association	<p>Contamination on cases of belly shot</p> <p>Paragraph 1 - Gralloching – ‘New term! Should it read, ‘eviscerating the carcass, often referred to as gralloching’ or define the term used.’</p>	Comments noted. We will aim to provide further clarity within the guidance.
National Gamekeepers Association	<p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <ul style="list-style-type: none"> ○ Title – ‘Add ‘only’ to distinguish from The Hunter Exemption.’ ○ Paragraph 1 – For the last sentence – ‘Take out ‘local’ here, in the regulation I think it is the retailer that is local not the final consumer, and change to ‘final’. 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ Paragraph 1 – For the last sentence - After this should we include a sentence worded something like this ‘ There is a responsibility for every supplier of food, at whatever level, to supply food that is safe’ ○ Paragraph – 2 – First sentence – ‘853 only requires this where the supply is to an AGHE. Do we need to ensure that this is a national, not local, requirement to co-operate with authority then state this and show the source in law?’ <p>Bullet point 2 – ‘Should this read, ‘to the final consumer or local retailers’</p>	
National Gamekeepers Association	<p>Processing and sale of game meat by hunters</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘Should ‘to local consumers’ come out?’ <p>Summary</p> <p>Bullet point 2 – ‘Change this, it is the retailer that must be local not the final consumer. E.g. If I supply to a restaurant the final consumer could be a visitor from New Zealand who eats the meal then the following day could visit me and buy meat to prepare themselves in their holiday cottage</p>	Comments noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
National Gamekeepers Association	<p>Examples</p> <ul style="list-style-type: none"> ○ Bullet points – ‘make it a local caterer, butcher etc.’ ○ Bullet point 4 – ‘I’m not sure about this one!’ 	Comments noted. We will aim to provide further clarity within the guidance.
National Gamekeepers Association	<p>Exemptions explained:</p> <ul style="list-style-type: none"> ○ Bullet point 2 – add ‘local’ before retailer ○ Paragraph 1 – ‘Change this to ‘only supply or sell wild game meat received from a registered hunter to the final consumer’ ○ Paragraph 1 – ‘Change to ‘Where meat has been supplied to a retailer by a Hunter, rather than an AGHE, this meat can only be supplied to the final consumer and not to another retailer.’ <p>Paragraph 2 – ‘Do we need to say this again? It was part of the introduction.’</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Separate area for de-feathering or de-skinning</p> <p>Title – ‘Add before this ‘ Notes on premises used for processing?’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Separate processing area from the game larder</p> <p>Add ‘well lit’ and ‘have suitable drainage facilities’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
National Gamekeepers Association	<p>Temperature Control</p> <p>The maximum temperatures are 7 and 4 so alter say 'at or below'</p>	Comment noted. We will aim to provide further clarity within the guidance.
National Gamekeepers Association	<p>Processing and supply of game meat by retailers</p> <p>Paragraph 2 – 'Suggest it might read, 'retailers receiving game or game meat from local hunters under the hunter exemption can only supply this to the final consumer.'</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
National Gamekeepers Association	<p>Table for the supply of wild game/wild game meat</p> <p>Hunting for private and domestic consumption</p> <ul style="list-style-type: none"> ○ Column 1 – 'This may be interpreted too widely, as written it could include beaters etc. Previously it had been to close family and friends on a non-commercial basis. Many hunting parties have a highly commercial element and many employees, supply to them would surely establish a business element and a responsibility to provide safe food?' <p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <ul style="list-style-type: none"> ○ Column 2 – 'Switch these two paragraphs round to show continuity of style with subsequent paragraphs and start the first with; 'You are a food business operator and are required to.....' 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<p>Supply of in-fur/in-feather game carcasses to approved game handling establishments</p> <ul style="list-style-type: none"> ○ Column 2 – ‘Add, You are a food business operator and....’ <p>Direct supply of wild game meat by the hunter to the final consumer or local retailers</p> <p>Column 2 – ‘Add, ‘You are a food business operator and...’</p>	
National Gamekeepers Association	<p>Traceability</p> <p>Paragraph 1 - At the end of this paragraph add a piece to give an interpretation of ‘food’ -for human consumption and ‘feed or feedstuffs’ – feed for animals or birds which are eventually intended for human consumption. It makes it a requirement to be able to trace feedstuffs fed to birds intended for human consumption as well as a product intended for direct human consumption.</p>	Comment noted. We will aim to provide further clarification within the guidance.
National Gamekeepers Association	<p>Definitions</p> <ul style="list-style-type: none"> ○ Do we need to include a definition of all the terms used in the guide, e.g. Offal, Gralloch, Food Business, Food Business Operator? ○ Wild game - Wild ungulates – ‘Add, “Wild birds includes all wild birds e.g. Pigeons and wildfowl as well as those traditionally thought of as ‘Game’.” 	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<p>(Some believe that the term ‘game’ refers to birds named in the Victorian game laws. This would clear that up.)’</p> <ul style="list-style-type: none"> ○ Hunter/hunting party – offal – ‘change to Gralloch.’ ○ Hunter/hunting party – game manager – ‘Add; or other qualified person.’ <p>Hunter/hunting party – Viscera - The dictionary definition of viscera includes the intestines. What is needed at the AGHE is the carcass with the head on, also the ‘pluck’ (Heart, Lungs, Liver and Spleen) clearly identified to each carcass.</p>	
National Gamekeepers Association	<ul style="list-style-type: none"> ○ Small quantities – Paragraph 2 – ‘This sentence is not clear, I suggest ‘ The term ‘Local’ where a supply is made by a primary producer or hunter to a ‘local’ retailer means in the county where the producer or hunter is registered as a FBO, within an immediately adjoining county or within 30 miles/50Km, whichever is greater;’ ○ Small quantities – Paragraph 2 – ‘Surely ‘Local’ only relates to the supply to retailers, when supplied to final consumers they can come from anywhere, the supplier has no way of controlling where they come from e.g. I can supply to the restaurant down the road but they may have 	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
	<p>customers in from New Zealand who order a meal of game pie and then those same people call on me the following day to buy game to prepare themselves in their holiday cottage.'</p>	
<p>National Gamekeepers Association</p>	<p>Trichinella Testing</p> <p>Whilst researching this subject for The NGO I came across the attached document on the FSA website. I believe it needs revising, EC Reg 854 has been repealed and replaced with new regulations regarding testing including the compulsory testing at AGHEs. I believe that they make testing compulsory, including wild boar sold in the skin under the primary producer exemption or processed and sold as meat under the hunter exemption. Please correct me if I am wrong since this is the advice that The NGO is giving. In addition the email address and contact details for obtaining sampling kits has changed, I believe it is now the lab at Sand Hutton, York.</p>	<p>Comments noted. We recognise that the references are out of date. We will review this section of the guidance and ensure the details for obtaining sampling kits is updated.</p>

Respondent	Comment	Response
Deer Management Qualification	<p>Response:</p> <ol style="list-style-type: none"> 1. Does the new guide clarify the hunter and retailer exemptions of regulation (EC 853/2004 for the supply of wild game meat? <p>Response: <i>Yes subject to suggested clarification and amendment as detailed below.</i></p> <ol style="list-style-type: none"> 2. Does this new guide have improved readability? <p>Response: Yes</p> <ol style="list-style-type: none"> 3. Does the new guide fulfil the needs of its audience? <p>Response: <i>Yes subject to suggested clarification and amendment detailed below</i></p> <p>In regard to Annex B DMQ considers they should be listed as an interested party.</p> <p>Feedback to this consultation is centred upon the hunter exemptions in respect of the supply of small quantities and the requirements of FBO registration together with trained hunter status and verification</p>	Comments noted.
Deer Management Qualification	Page 8 - Final bullet point in respect of the verification of hunter status a trained person:	Comment noted.

Respondent	Comment	Response
	<p>Clarity is sought on what verification is acceptable of proof of any qualification.</p> <p>DMQ are shortly to introduce identity cards which will contain a photograph and registered number in respect of the qualification of trained hunter. DMQ holds a register of all such qualified persons.</p>	
Deer Management Qualification	<p>Page 10 - The wording here appears to require an AGHE to keep a copy of the 'hunter training certificate'.</p> <p>Is this a new requirement and in addition to the signed declaration that is attached to the carcass containing the trained person's details? Clarity is sought here.</p>	Comment noted. It is not a requirement that the AGHE keeps a copy of the hunter training certificate. We will provide further clarity of this within the guidance.
Deer Management Qualification	Page 12 - Contamination of carcass and belly shots. The reference/emphasis on head shots may be seen as an acceptance or encouragement to take such shots which would be contrary to the Best Practice Guidance and bring about welfare concerns.	Comment noted. We will review the wording and make amendments as appropriate.
Deer Management Qualification	<p>Page 14</p> <p>FBO registration requirements.</p> <p>In regard to trained hunters supplying direct to AGHE's; if the supply is direct from the place of culling (field) to the AGHE and in which no processing has taken place i.e. in fur and no premises are used is the requirement within the current guidance indicating the need for FBO registration too onerous and unnecessarily bureaucratic</p>	

Respondent	Comment	Response
	given the existing legal safeguards of responsibility to supply safe food?	
Deer Management Qualification	Page 15 - It should be included that supply under this exemption requires declaration by the trained hunter to be attached to the carcass (as required when supplying to an AGHE).	Comment noted. We will aim to provide further clarification in the guidance.
Deer Management Qualification	Page 30 - DMQ does not directly supply the training although advice is available and can be sought in this respect. DMQ is the awarding body for the Deer Stalking Certificates 1 and 2 including trained hunter qualification and Wild Boar.	Comment noted. We will amend the guidance accordingly.
British Association for Shooting and Conservation (BASC)	Rewording the key words " <i>Meat and livestock</i> " with " <i>Wild Game and Wild Game meat</i> " would make the wording clearer to the intended audience.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	FSA need to ensure all agencies have a full understanding of the requirements of the legislation in respect of this document along with a standard approach by all agencies.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	A clear definition of an AGHE in lay person terms would be useful here, rather than quoting directly from the regulation.	Comment noted. However, AGHE is defined in law.

Respondent	Comment	Response
BASC	The guidance infers the WGMH Guidance is for England, Wales and Northern Ireland. Are FSA Scotland producing their own WGMH Guide? Surely the legislation is applicable across the UK?	Food Standards Scotland have their own guide called The Wild Game Guide
BASC	When referencing a non-AGHE, the terminology “You” should be replaced with “a non AGHE”	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	A clear definition for “Trained Hunter” should be placed at the head of the section entitled Trained Hunter’s Examination. It should be possible in exceptional circumstances to send the carcass with head, feet and viscera to a game dealer if no trained hunter is present. Perhaps the paragraph later in the document should be referred to here for clarity.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	In the section entitled Trained Hunter’s Examination the text “ <i>examination of the body</i> ” should be rewritten as “ <i>carry out ante-mortem and post-mortem examination</i> ”.	Comment noted. However, this relates to the examination of the carcass carried out by the trained hunter after the animal has been killed, prior to onward travel to an AGHE. The animal is already dead, so no ante-mortem is carried out. Post-mortem is carried out by the FSA at the AGHE to verify that the carcass is fit for human consumption.
BASC	The section entitled Trained Hunter’s Declaration should include reference to animals taken back to a larder/collection point and eviscerated. The draft text	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	reads as if you only have to make a declaration if you gralloch in the field.	
BASC	In reference to a Trained Hunter’s declaration, our understanding is that all animal bodies from a single estate covered by a single declaration may only be sent to a single game handling establishment. If this is still a requirement then this text needs adding to this section.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	If the Trained Hunter finds abnormal characteristics during the examination, it is not clear from this text in the guidance who the “ <i>competent authority</i> ” is. Should this be the AGHE in this case? Please provide clarity on this point.	Comment noted. We will aim to provide further clarification in the guidance.
BASC	In the section entitled Head and viscera, the text “species susceptible to trichinosis” should be amended to “species susceptible to trichinosis in the UK”. For the text “APB processing plant” consider a clarification change to taxidermist.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	In the section entitled Acceptance at AHGE, the text “If there is no signed declaration, such carcasses will not be accepted in AGHEs, and are not eligible for human consumption” is confusing because a carcass may still enter the food chain via for example private consumption.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<p>The text “and are not eligible for human consumption” should be removed.</p> <p>If any of the information required to be included in the hunter’s declaration in the sub-topic above is missing, the carcasses will not be accepted in the AGHE and the carcass is not eligible for human consumption unless the missing information is provided by the Food Business Operator (FBO). Consider removing the text “and the carcass is not eligible for human consumption”. Consider replacing with the text “Food Business Operator (FBO)” with “Trained Hunter”.</p> <p>For the text “The FBO of the AGHE should keep a copy of the hunter’s training certificate for verification purposes or other suitable method that can verify that the hunter is trained” consider removing “The FBO of the” as the AGHE will be a FBO.</p>	
BASC	<p>The section entitled Trained person (hunter) unexpectedly delayed needs reviewing as it is confusing. The text begins with the topic of delays then moves onto the topic of offal. The un-expected delay text should come at the end or in the AGHE section. The abnormalities and offal text needs further clarification.</p>	<p>Comment noted. We will aim to provide further clarity in the guidance.</p>

Respondent	Comment	Response
	Consideration should be given to reasons for acceptable delays.	
BASC	In the Offal section, the phrase “Offal” should be replaced with “internal organs” to provide clarity on what is required to accompany the carcass.	Comment noted. We will aim to provide further clarity in the guidance
BASC	In the offal section, it states “Where the carcass has a hunter’s declaration stating that abnormalities were found, then the offal must accompany the carcass and must be correlated to it”. This text needs clarification. For example, if a carcass is presented for declaration and there was an abscess on the fetlock joint then that’s an abnormality. In this example would the trained hunter have to send the offal with the carcass? Abnormalities which require offal to accompany the carcass need defining.	Comment noted. We will aim to provide further clarity in the guidance
BASC	With regards to the example of correlation in the offal section, this text needs revision. Each tie-on label has a unique number. Therefore, the tag attached to the offal would not correlate to the label attached to the carcass	Comment noted. We will aim to provide further clarity in the guidance
BASC	With regards to the section on Small wild game, It is not clear in the text who the competent authority is. Should this be the AGHE?	Comment noted. The competent authority is the agency responsible for enforcement, which in this case would be the FSA. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
BASC	In the section entitled Small wild game, and reference to exhibiting abnormal behaviour, the text is not clear. Either they are or they are not fit for human consumption. Text should define what is acceptable and what is not.	Comment noted. We will aim to provide further clarity in the guidance.
BASC	In relation to the section entitled Contamination on carcasses and belly shots some game dealers do not want rabbits gutted and hares are generally never gutted before the dealer takes them so does this also apply to small game animals? BASC has concerns around the statement, which seems to be encouraging head shots for deer, which has some welfare implications along with encouraging dealers to only accept head shot deer, which again has industry implications. We would rather there no mention of shot placement and that the emphasis is on contamination from whatever source. Shot placement is a major animal welfare issue and the FSA should not be encouraging head shots which goes against our own Code of Practice and Best Practice guides.	Comments noted. We will aim to provide further clarity in the guidance.
	In relation to the section entitled Primary production for direct or local sale by a hunter (in-fur/in feather), Registration/approval, BASC believes this will be over	Comments noted. We will review the legislative requirements and update the guidance accordingly to

Respondent	Comment	Response
	<p>burdensome and bureaucratic for those hunters who onward supply carcasses in the fur and feather. They may not have premises. For example, a stalker that takes the carcass straight from the field to the AGHE/Consumer/Butcher etc. has no premises to be inspected or registered.</p> <p>There may be some that are very occasional suppliers again this may be seen as burdensome and bureaucratic and may drive some sales underground which may increase rather than reduce the potential for issues.</p> <p>BASC feels those selling occasionally, locally small numbers to a retailer supplying the final consumer or direct to a final consumer, if one party of the transaction is a FBO then this would suffice.</p> <p>Traceability would not be compromised and would follow a similar route to selling venison in Scotland. The Deer (Scotland) Act 1996 requires that all those that deal in venison in Scotland must be licensed.</p> <p>It is an offence for any person to sell, offer or expose for sale venison unless they are a licensed venison dealer or selling to or has purchasing from a licensed venison dealer.</p> <p>BASC would welcome further dialogue on FBO registration those hunters who would be required to be</p>	<p>ensure clarity on the details of when registration as a food business operator (FBO) is required'</p>

Respondent	Comment	Response
	registered as an FBO for in fur and feather game onward supply.	
	In relation to the section for primary production for direct or local sale by a hunter, it is not clear what the exemption is. Originally you were exempt from training but were required to have due diligence in place. It now appears that all persons have to be a Trained Hunter.	Comment noted. We will aim to provide further clarity in the guidance.
BASC	In the section Processing and sale of game meat by hunters, the phrase “ <i>Processing</i> ” needs a definition at the start of this section. The statement “ <i>all normally supply an AGHE</i> ” is questionable. For example a member of the GDA estimates only around 20% of deer carcasses go through an AGHE and in the current climate with AGHE’s prices (and in some cases not taking small game), more are looking for other routes for game meat into the food chain.	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	<p>In the section Processing and sale of game meat by hunters, consider bullet points explaining the requirements of the legislation.</p> <p>Article 1</p> <p>This Regulation lays down specific rules on the hygiene of food of animal origin for food business operators. These rules supplement those laid down by Regulation</p>	Comment noted. We will aim to provide further clarity in the guidance.

Respondent	Comment	Response
	<p>(EC) No /2004 *. They shall apply to unprocessed and processed products of animal origin. 2. Unless expressly indicated to the contrary, this Regulation shall not apply to food containing both products of plant origin and processed products of animal origin. However, processed products of animal origin used to prepare such food shall be obtained and handled in accordance with the requirements of this Regulation. 3. This Regulation shall not apply in relation to:</p> <p>3c the direct supply, by the producer, of small quantities of primary products to the final consumer or to local retail establishments directly supplying the final consumer;</p> <p>3e hunters who supply small quantities of wild game or wild game meat directly to the final consumer or to local retail establishments directly supplying the final consumer.</p>	
BASC	In the section Processing and sale of game meat by hunters, consider referring only to the local authority in the text with regards to the appropriate competent authority.	Comment noted. We will aim to clarify this within the guidance.
BASC	In the section Processing and sale of game meat by hunters, define a basic food safety management plan here for clarification rather than referring to a food safety	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	management system based on HACCP (Hazard Analysis and Critical Control Point) Principles.	
BASC	In the final bullet point of the section Processing and sale of game meat by hunters, The text is not clear on who the competent authority is. In this case it may be the FSA who approve Training for Trained Hunter status.	Comment noted. However, the FSA do not approve training for trained hunter status. We will aim to provide further clarity within the guidance.
BASC	In the examples section, If the caterer has cooked and processed the meat then using a caterer is not an appropriate example to use here.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	In bullet point four of the examples section, it would be helpful to also outline who the wholesaler can supply in this example	Comment noted. We will aim to provide further clarity within the guidance.
BASC	In the section entitled Exemptions explained, consider amending “Registered hunter” to “Trained Hunter”. It would helpful to state who holds the register of Trained Hunters within the UK.	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
BASC	In the section entitled Exemptions explained and reference that it is expected that the vast majority of wild game processing will be conducted at approved game handling establishments, BASC questions this	Comment noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
	statement; especially in the current climate with low AGHE payments for game and in some cases AGHEs not taking small game. There are a number of incentives for shoots and stalkers to develop their own supply chains.	
BASC	In relation to the last paragraph of the section entitled Exemptions explained, please outline the relevant approved training that is required.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	In the section Separate processing area from the game larder, amend “hot and cold water supply” to “hot and cold potable water supply”.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	In the section Temperature control, this text is confusing. Is this referring to ‘in fur and feather’ or processed meat products?	Comment noted. This only applies to supply to an AGHE. We will aim to provide further clarity within the guidance.
BASC	In relation to the section on Food safety management documentation, how often does a chiller storing birds in the feather and carcasses in the fur have to be checked?	It is the responsibility of the FBO to determine this in accordance with their HACCP plan.
BASC	In relation to the section on waste under the heading of . processing and sale of game meat by hunters, waste is	Comment noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
	<p>different from ABP. Gralloch etc left on the hill is waste, as are the bits we put in the bin at the larder, which is then subject to Waste Regs and taken away by an Approved Waste Handler.</p> <p>ABP are only relevant once it goes to an AGHE. Reg 1069/2009 states that it is NOT applicable to:</p> <ul style="list-style-type: none"> • entire bodies or parts of wild game which are not collected after killing, in accordance with good hunting practice, without prejudice to Regulation (EC) No 853/2004; • (c) animal by-products from wild game and from wild game meat referred to in Article 1(3)(e) of Regulation (EC) No 853/2004 (which refers to the supply of small quantities by a trained hunter) • if a stalker registers as a food business but only so he can supply as per the “primary producers” paragraph, this is misleading as it suggests he needs to follow ABP regs and not just waste regs. 	
BASC	In the section, Processing and supply of game meat by retailers, should “hunters” be “trained hunters”?	Comment noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
BASC	<p>In the section, Separate area for de-feathering or skinning, consider alternative to “Ideally”. The word “ideally’ infers that you do not need to do this and that raises contamination risks.</p>	<p>Comment noted. We will update the guidance to include this as ‘best practice.’</p>
BASC	<p>In relation to the section on waste under the heading of . processing and sale of game meat by retailers, waste is different from ABP. Gralloch etc left on the hill is waste, as are the bits we put in the bin at the larder, which is then subject to Waste Regs and taken away by an Approved Waste Handler.</p> <p>ABP are only relevant once it goes to an AGHE. Reg 1069/2009 states that it is NOT applicable to:</p> <ul style="list-style-type: none"> • entire bodies or parts of wild game which are not collected after killing, in accordance with good hunting practice, without prejudice to Regulation (EC) No 853/2004; • (c) animal by-products from wild game and from wild game meat referred to in Article 1(3)(e) of Regulation (EC) No 853/2004 (which refers to the supply of small quantities by a trained hunter) • if a stalker registers as a food business but only so he can supply as per the “primary producers” 	<p>Comment noted. We will aim to provide further clarity within the guidance.</p>

Respondent	Comment	Response
	paragraph, this is misleading as it suggests he needs to follow ABP regs and not just waste regs.	
BASC	In relation to the section on labelling, please extract and list the relevant text on correct labelling here.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	In relation to the Table for the supply of wild game/wild game meat; this table is critical to ease of understanding of the guidelines and navigation of the document it should therefore be placed right at the start of the guidelines.	Comment noted and where appropriate, will be considered for incorporation into the guidance.
BASC	In relation to the section on Transport, consider rewording the following text “Game are not transported to an approved game handling establishment as soon as possible after killing and are intended to be stored at the site of primary production or elsewhere for a period of time” to “Game which is not transported to an approved game handling establishment or retailer supplying the final consumer or consumer.”	Comment noted and where appropriate, will be considered for incorporation into the guidance.
BASC	In relation to the Traceability section, please list the requirements. We must not assume people will wade through legislation to see what is required of them, give people an easy to follow list	Comment noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
BASC	In the Traceability section, Please amend “game meat” to “in fur/in feather game” in this text.	Comment noted and where appropriate, will be considered for incorporation into the guidance.
BASC	In relation to the traceability requirements, please give an example of Trained hunter record keeping requirements in this text	Comment noted. We will aim to provide further clarity within the guidance.
BASC	In relation to the information required for traceability purposes, please amend “Date of dispatch” to Date of supply”.	Comment noted. We will aim to provide further clarity within the guidance. However, we must comply with the terminology stated in the traceability legislation.
BASC	Please define the period “kept at least available until it can be reasonably assumed that the food has been consumed”.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	With regards to the traceability information, please add an annex with a list of information required with reference to paragraph 1 of the Traceability section.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	With regards to the section on Trichinella testing of wild boar and Wild boar for personal consumption, consider	Comment noted and where appropriate, will be considered for incorporation into the guidance.

Respondent	Comment	Response
	merging the two paragraphs into one as applicable to both home consumption and onward supply.	
BASC	With regards to Trichinella testing of wild boar, consider advising an approximate size of sample.	Comment noted. We will aim to provide further clarity within the guidance.
BASC	<p>In relation to the section on waste; waste is different from ABP. Gralloch etc left on the hill is waste, as are the bits we put in the bin at the larder, which is then subject to Waste Regs and taken away by an Approved Waste Handler.</p> <p>ABP are only relevant once it goes to an AGHE. Reg 1069/2009 states that it is NOT applicable to:</p> <ul style="list-style-type: none"> • entire bodies or parts of wild game which are not collected after killing, in accordance with good hunting practice, without prejudice to Regulation (EC) No 853/2004; • (c) animal by-products from wild game and from wild game meat referred to in Article 1(3)(e) of Regulation (EC) No 853/2004 (which refers to the supply of small quantities by a trained hunter) • if a stalker registers as a food business but only so he can supply as per the “primary producers” 	Comment noted. We will aim to provide further clarity within the guidance.

Respondent	Comment	Response
	<p>paragraph, this is misleading as it suggests he needs to follow ABP regs and not just waste regs.</p>	
BASC	<p>In the bullet point for Exemptions from the ABP waste rules, amend “Grollach” to “Gralloch”.</p>	<p>Comment noted. We will amend to the correct spelling.</p>
BASC	<p>In the bullet point for Exemptions from the ABP waste rules, the text “excess shot animals” is unclear and needs to be amended - does this refer to badly shot animals?</p>	<p>Comment noted. We will aim to provide further clarity within the guidance.</p>
BASC	<p>In relation to the section on Animal by-products (ABP), Article 16(c) and Article 18(1) of the Regulation allows for derogations for the feeding of category 2 and category 3 materials to various animals: i. Zoo animals ii. Circus animals iii. Reptiles/birds of prey other than zoo or circus animals iv. Fur animals v. Wild animals vi. Dogs from recognised kennels or packs of hounds vii. Dogs and cats in shelters viii. Maggots and worms for fishing bait.</p> <p>Most of these derogations were already available under previous legislation. The UK does not intend to use the derogation for fur animals because fur farming is banned in the UK. The derogation for feeding to wild animals will apply except in the case of feeding wild boar where there is a potential risk to animal health. We intend to make</p>	<p>Comments noted. We will aim to provide further clarity within the guidance.</p>

Respondent	Comment	Response
	<p>provisions for the feeding of dogs and cats in shelters, which was not an available derogation under previous legislation. As with feeding at hunt kennels and recognised packs of hounds, this would require registration.</p>	
BASC	<p>With regards to Hunter training, we believe there should no longer be any exemptions and all who supply large game in any quantity should be 'trained hunters' this should help with the venison supply chain and aid quality assurance through that chain.</p>	<p>Comment noted. Regulations 853/2004 (retained EU legislation) details that persons who hunt wild game with a view to placing it on the market for human consumption must have sufficient knowledge of the pathology of wild game and of the production and handling of wild game and wild game meat after hunting, to undertake an initial examination of wild game on the spot. It is however enough if at least one person of a hunting team has this knowledge and is trained accordingly.</p>
BASC	<p>With regards to the section on Hunter training, DMQ is an awarding body and carries out no training. It has one of the approved qualifications for the route to Trained Hunter (large game only).</p> <p>BASC should be added in here as the Association delivers training for Trained Hunter through DSC 1 and other qualifications.</p>	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	There needs to be an up to date description of how to become approved by the FSA and who will approve training content for delivering training for Trained Hunter as this seems unclear at the moment and is historic.	
BASC	With regards to the section on "Farmed" game, suggest removing this text as the guidance is for wild game.	Comment noted, however, this has been included to differentiate from wild game meat.
BASC	In reference to accredited training in the section entitled Hunter/hunting party, there needs to be an up to date description of how to become accredited by the FSA and who will approve training content for delivering training for Trained Hunter as this seems unclear at the moment and is historic.	Comments noted. We will aim to provide further clarification within the guidance.
BASC	With regards to the section entitled Hunter/hunting party and reference to community market, please define "community market" - is this the EU as a community or a local community supply route?	Comment noted. We will aim to provide further clarification within the guidance.
BASC	With regards to the section on Small quantities, a definition of self-defining needs inserting in the text given that sales are restricted by season and time of year. The text also needs the inclusion of online sales.	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
BASC	With regards to Annexe A: Specimen forms A - Suggested format for large wild game declaration, a trained person qualification should also include a trained hunter number.	Comment noted. We will review the specimen document to include the addition of the trained hunter number for clarity.
BASC	With regards to Annex B – Bibliography, reference should be made here to the British Game Alliance, Code of Shooting Practice and Deer Initiative and SNH deer Best practice guides.	Comment noted. We will review the Annex and make the appropriate amendments.
Defence Deer Management	<p>Observations / Recommendations:</p> <ul style="list-style-type: none"> • Best practice guides do not seem to have been consulted, by stating head shots reduce carcass contamination, AGHE will push to only take head shots. This is a DDM disciplinary matter and not in the Deer’s welfare interest (the head is a very small target and can result in injuries – it is not compatible with deer welfare best -practice). • Recommend the removal of ‘local consumers and local retailers’; if you have registered as a food business you should be able to supply directly to who you choose. • Recommend removal of the restriction of county border / plus 30 Mile rule; as a 	Comments noted and may be considered for publication of guidance.

Respondent	Comment	Response
	<p>minimum this must be removed for effective culling and disposal of invasive species.</p> <ul style="list-style-type: none"> • The examples of processing and sale of game meat by hunters are very poor, this will lead to confusion but most importantly probably unenforceable. Some of the exemptions explained contradicts the examples gives. • Waste disposed should be according to existing Animal by-product regulations and Best Practice guides. • Transportation to an AGHE requirement for stalking, the examples are poor, a trailer across country would be unworkable. Best practice guides on transportation should be consulted. 	
Imperial Game Meats	<p>There are many things that we consider need a look at some small and some not so small, the trouble is that people don't seem to understand that all game is a food product and not all courses and qualifications are teaching that, also many people know nothing about the trained hunter qualification.</p>	<p>Comments noted and may be considered for the review of the guidance.</p>
Imperial Game Meats	<p>The people that attend a trained hunter course or the dsc level one course don't have any dead animals there to show you its all slides and photos which is not right and having seen what some carcasses look like from people</p>	<p>Comments noted.</p>

Respondent	Comment	Response
	that have level one and twos in deer stalking there are many that are not fit for the food chain.	
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	<p>Intended audience</p> <p>Retail definition – ‘Retail definition repeated below at end of guidance.’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	<p>Approved Game Handling Establishments</p> <p>Title – ‘As this guidance is mostly for hunters and the like, surely it would be better not to start with AGHE’s but to start with hunters and Primary producers exemptions to avoid panic, confusion and to ensure onward reading?’</p> <p>Paragraph 2 – ‘Depends on if you need approval or not. Feeds into the above comment.’</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Environmental Health Officer, Teignbridge District Council,	<p>Processing and supply of meat – AGHE</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘Not a clear sentence/paragraph. Reword an consider bullet pointing 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
Newton Abbot, Devon	<ul style="list-style-type: none"> ○ A retailer ○ A hunter supplying small quantities of game meat direct to ○ Or to a local retail establishments that supply the final consumer <p>You are required to be</p>	
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	<p>Processing and supply of meat – AGHE</p> <ul style="list-style-type: none"> ○ Bullet point 7 – ‘not specified anywhere how long a suitable period of time actually is.’ ○ Last sentence – ‘Not entirely correct. I can be a member of a hunting party, sell my carcass to an AGHE but not be a trained hunter if someone else on the shoot was a trained hunter and has completed a declaration.’ 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
Environmental Health Officer, Teignbridge District Council,	<p>Trained hunters examination</p> <p>Title – ‘It might be good to include what to look for as some trained hunters had training 10+ years ago and have forgotten the majority of things to be looking at. If</p>	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
Newton Abbot, Devon	not it would be good to direct people where to get this info from / what to do if they notice an issue that may make the meat unfit. Like a what to do guide. Or at least specify what training is required (the content of the training) as some may just think training is how to shoot properly.'	
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Trained hunters declaration: large wild game Paragraph 1 – 'It would be nice if the FSA actually enforced this and AGHE were told not to accept them where the place the animal was shot is withheld (poaching, hunters not wanting other to know there profitable grounds etc).'	Comment noted.
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Trained hunters declaration: large wild game Note section: 'I assume you mean the FSA/OV/Meat inspector? Please state.'	Comment noted. We will aim to provide further clarification within the guidance.
Environmental Health Officer, Teignbridge	Head and viscera	Comment noted and where appropriate will be considered for incorporation into the revised guidance

Respondent	Comment	Response
District Council, Newton Abbot, Devon	Paragraph 1 – ‘Might be better as a separate / stand-alone paragraph where wild boar is discussed separately below as its not a big part of the UK hunting scene, but it is important and niche.’	
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Acceptance at AGHE Paragraph 4 – ‘Like what? Is there anything else they can use other than a certificate?’	Comment noted. We will aim to provide further clarification within the guidance.
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Trained person (hunter) unexpectedly delayed Paragraph 1 – ‘The only difference in this paragraph to what you have said above are the words ‘unexpectedly delayed’. This could be included in the text above.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Offal Paragraph 2 – ‘Nor can the carcass?’	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Contamination on carcasses and belly shots Paragraph 1 – ‘and the area around the pelvis, sternum and cut flanks.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Exemptions – primary production for domestic use <ul style="list-style-type: none"> ○ Paragraph 1 – ‘remove all of this’ – the game is regarded as primary production for private use. ○ Last sentence – ‘only where the game is sold or supplied to another person or business will the requirements of the regulations apply.’ 	Comment noted and where appropriate will be considered for incorporation into the revised guidance
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Exemptions – primary production for direct or local sale by a hunter (in-fur/in-feather) <ul style="list-style-type: none"> ○ Registration/approval – remove the word approval ○ Paragraph 1 – ‘Considered to be a food business under the regulations. Whether you supply for profit or not, you must register.....’ 	Comments noted and where appropriate will be considered for incorporation into the revised guidance

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ Paragraph 2 – ‘Makes it sound as if the game can go from one person to another to another. Consider re-wording.’ 	
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Exemptions – primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <p>Bullet point 2 – ‘Which is, or can be found where?’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Processing and sale of game meat by hunters</p> <ul style="list-style-type: none"> ○ Bullet point 5 – ‘Hygienic controls’ ○ Bullet point 6 – ‘carcass’ not body 	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Summary</p> <ul style="list-style-type: none"> ○ ‘Maybe summarise the need to register if skinning / prepping game meat’. ○ Bullet point 1 – ‘Not mentioned above so why is it in the summary section?’ 	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance</p>

Respondent	Comment	Response
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	<p>Summary</p> <p>Bullet point 2 – ‘Incorrect. The place its hunted is irrelevant. I don’t have to shoot locally to supply locally. I can shoot in Scotland and sell local to where I’m registered in Devon.’</p>	Comment noted. We will aim to provide further clarification within the guidance.
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	<p>Exemptions explained</p> <ul style="list-style-type: none"> ○ Bullet point 1 – ‘Not true. A retailer can supply meat from an AGHE to another business. if a butcher gets a carcass from an AGHE they can sell it to a hotel or pub.’ ○ Bullet point 1 – ‘Person supplying the final consumer such as a ...’ ○ Bullet point 2 – ‘there used to be a primary producer exemption as well.’ ○ Bullet point 3 – ‘Unless you are a retailer sourcing your wild game meat through an aghe, you cannot supply wild game meat to another retailer.(full stop) You can only...’ 	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Exemptions explained</p> <ul style="list-style-type: none"> ○ Bullet point 3 – last sentence – ‘Not true.’ ‘Unless it’s from an AGHE.’ ○ Last paragraphs – ‘Then you clearly haven’t been to Devon. Don’t make assumptions. AGHE’s are used by our hunters as a last resort when they can’t get rid of the game themselves.’ 	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Separate area for de-feathering or de-skinning</p> <p>‘If you ‘de-skin’ something you put the skin back on don’t you if ‘skinning’ something removes it?’</p>	<p>Comment noted. We will revise the wording in the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Temperature control</p> <p>‘No mention of the continuous cooling curve for recently shot game?’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Waste</p> <p>‘It would be useful to have more info on waste and what hunters can and cannot do (dead pits, burning etc). don’t forget you’re aiming this at people who are operating from home mostly who won’t want to spend money on proper disposal unless they have to.’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Processing and supply of game meat by retailers</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘From a hunter. Those retailers who are supplied by an AGHE can sell it to anyone.’ ○ Paragraph 2 – ‘What? This doesn’t make sense. Retailers can only supply the final consumer where the game they supply is from a hunter supplied under the hunters exemption. Where from an AGHE they can supply anyone.’ 	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Food safety management documentation</p> <ul style="list-style-type: none"> ○ Paragraph 1 – ‘May be better as a standalone heading with what info needs to be on the invoice etc.’ ○ Paragraph 1 - You also mentioned pest control above? why do retailers get it easier than bill blogs 	<p>Comments noted and where appropriate will be considered for incorporation into the revised guidance.</p>

Respondent	Comment	Response
	<p>hunting and cutting game in his garage at home as part of his hobby?</p>	
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <ul style="list-style-type: none"> ○ Column 2 – ‘Its actually 178 not 852. Article 14 – food shall not be placed on the market if its unsafe. 852 is about food hygiene so if you said supplying hygienic food under 852 you’d be on safer ground.’ 	<p>Comment noted. We will review this section of the guidance and make any required corrections accordingly.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <p>Column 2 – ‘Not true. The supply of in fur and in feather game only is primary production (PP) and as such is exempt from 852 (it says so right at the beginning of the regs). Therefore if 852 doesn’t apply to PP then the requirement to register, which is article 6 in 852, cant apply either. If the hunter skins the game then they need to be registered as this is considered processing and is more than PP.’</p>	<p>Comment noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Supply of in-fur/in-feather game carcasses to approved game handling establishments Column 2 – ‘852, Annex 1’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Supply of in-fur/in-feather game carcasses to approved game handling establishments Column 2- ‘More of a should than a must unless the viscera and head is submitted as well.’	Comment noted. We will aim to provide further clarification within the guidance.
Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon	Direct supply of wild game meat by the hunter to the final consumer or local retailers Please note section – ‘Remove this. Not required to be here as we would still expect compliance with the two bullet points above as the requirements for these types of premises are still in 852.’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Supply of unlimited quantities of game meat to processors, retailers and wholesalers</p> <ul style="list-style-type: none"> ○ Column 2 – ‘be approved as an AGHE’ ○ Column 2 – ‘and 852 and 178’ ○ Column 2 – ‘No mention of the middle-men buying up game?’ 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Transport</p> <ul style="list-style-type: none"> ○ Paragraph 2 – 7°C – ‘only where 853 is concerned’ ○ Paragraph 2 – ‘Again, only where 853 is concerned. Those operating as registered businesses can be under 8c (legally – but even then, it’s not a product that the temp control requirements would necessarily apply to).’ 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Traceability</p> <ul style="list-style-type: none"> ○ Bullet point 1 – ‘You need to be careful here with your indiscriminate use of these words. Primary producers are those that supply in fur and in 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
	<p>feather game. as soon as the game is skinned it is no longer primary production.'</p> <ul style="list-style-type: none"> ○ Regulation (EU) 931/2011, Article 3 – 'Do you really need all this? Summarise and state we recommend its kept for XX months.' 	
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Testing/examination</p> <p>Sample preparation – the steps – 'Probably not required in this document and could instead accompany the sample kit you send out on request.'</p>	<p>Comment noted and where appropriate will be considered for incorporation into the revised guidance.</p>
<p>Environmental Health Officer, Teignbridge District Council, Newton Abbot, Devon</p>	<p>Waste</p> <ul style="list-style-type: none"> ○ Paragraph 3 – 'Contact details would be good at the end of this doc.' ○ Bullet point 1 – 'What can they do with these then? I have several estates that shoot pheasant and as there is no money in them I am concerned they go into a dead pit. Is this allowed?' 	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>
<p>Environmental Health Officer, Teignbridge</p>	<p>Definitions</p>	<p>Comments noted. We will aim to provide further clarification within the guidance.</p>

Respondent	Comment	Response
District Council, Newton Abbot, Devon	<ul style="list-style-type: none"> ○ Wild game – ‘what about pet food?’ ○ Hunter/hunting party – ‘so what are you called then if you only hunt for yourself?’ ○ Small quantities – ‘Hence the reason we don’t register them - You have also mentioned ‘small quantities’ above when talking about game meat.’ ○ Small quantities – ‘This contrary to what you have written above.’ <p>Retailer – ‘you have defined this above in the first few steps.’</p>	
British Deer Society	<p>Legal status of guidance</p> <p>‘Add these – Regulation (EC) 931/2011 – The requirement to provide traceability of food and feedstuffs and Regulation (EC) 2015/1375 – Trichinella testing of wild boar.’</p>	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Approved Game Handling Establishment</p> <p>First sentence – ‘change to an Approved Game Handling Establishment.’</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
British Deer Society	<p>Processing and supply of meat</p> <ul style="list-style-type: none"> ○ Add 'Game meat passing through an AGHE is subject to examination by a qualified veterinary surgeon (VO) or meat hygiene inspector (MHI).' ○ Final paragraph – 'needs clarity.' 	Comments noted. We will aim to provide further clarification within the guidance.
British Deer Society	<p>Trained hunters declaration: large wild game</p> <ul style="list-style-type: none"> ○ Paragraph 2 – 'needs clarity.' ○ Note section – 'At a trained hunter, anything abnormal, should be accounted for, either by informing the APHA if notifiable or noting on the tag if appropriate to do so. If contaminated the Trained Hunter can dispose of without entering the food chain.' 	Comments noted. We will aim to provide further clarification within the guidance.
British Deer Society	<p>Trained person (hunter) unexpectedly delayed</p> <p>Paragrah 1 and Title - 'This makes no sense, as hunters should tag things before leaving their care, suggest complete removal.'</p>	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
British Deer Society	Offal – ‘The word "Offal" needs including in the Definitions section, include "Gralloch and pluck".’	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Primary production for direct or local sale by a hunter (in-fur/in-feather)</p> <ul style="list-style-type: none"> ○ Change ‘local consumers’ to ‘final consumers.’ <p>Processing and sale of game by hunters</p> <ul style="list-style-type: none"> ○ Add "and have suitable facilities, they" ○ Remove, to leave "final consumers" 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Summary</p> <p>Both these bullet points could be merged into: 'Hunters of wild game can supply small quantities of their wild game meat directly to the final consumer, either on-line or by direct sales'.</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Examples</p> <ul style="list-style-type: none"> ○ Add ‘local’ butcher etc. 	Comments noted and where appropriate will be considered for incorporation into the revised guidance.

Respondent	Comment	Response
	<ul style="list-style-type: none"> ○ 'As a wholesaler cannot supply the meat to a caterer (and presumably, Retailer or Butcher), this is irrelevant, unless you are an AGHE.' 	
British Deer Society	<p>Exemptions explained</p> <p>Add 'local retailer.'</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Temperature control</p> <p>'Add at or'</p>	Comment noted and where appropriate will be considered for incorporation into the revised guidance.
British Deer Society	<p>Processing and supply of game meat by retailers</p> <p>'Retailers receiving game or game meat from local hunters under the local hunter exemption can only supply this to the final consumer.'</p>	Comment noted. We will aim to provide further clarification within the guidance.
British Deer Society	<p>Direct supply of small quantities of in-fur/in-feather game carcasses to the final consumer or local retailers</p> <p>Column 2 – 'More emphasis on being a Food Buisness.'</p>	Comment noted. We will aim to provide further clarification within the guidance.

Respondent	Comment	Response
British Deer Society	<p>Definitions</p> <ul style="list-style-type: none"> ○ Food Business and Food Business Operator – need full definition ○ A better definition for the words used such as Gralloch, Offal etc. 	Comments noted. We will aim to provide further clarification within the guidance.

Actions to be implemented

- Revise the guidance document for the supply of wild game for human consumption to ensure clear and consistent terminology throughout and ensure further clarity is provided particularly in the following areas of the document :-
 - The Introduction
 - The Approved Game Handling Establishment (AGHE) requirements including the requirements for acceptance of wild game
 - The requirements of a trained hunter's declaration
 - Trained hunter's requirements to include training and certification
 - The exemptions that are available to hunters
 - Details of when registration as a food business operator (FBO) is required
 - Temperature requirements
 - Transportation requirements
 - Traceability requirements including documentation and retention
- Review the key words section and consider adding further key words to this section
- Review and revise the intended audience section
- Add the references to further applicable legislation the Legal status section of the guidance to include:-

- Regulations (EC) 2017/625 – Official Controls Regulations
- Regulations (EC) 931/2011 - The requirement to provide traceability of food and feedstuffs
- Regulations (EC) 2015/1375 Trichinella testing of wild boar.
- Provide a definition of a trained hunter to include details of the training
- Provide examples of acceptable reasons for if the trained person (hunter) is unexpectedly delayed
- Revise the wording in the offal section of the guidance to provide more clarity
- Where applicable, provide details of the relevant competent authority
- Add best practice to advise that it is considered good practice for a trained hunter's declaration to be provided after inspecting small wild game
- Review the section on Contamination on carcasses and belly shots to amend the wording in order to discourage head shots on welfare grounds
- Provide differentiation between waste and animal by-products and what the requirements are for each
- Review and update the table for the supply of wild game/wild game meat to provide more clarity
- Review the section on Trichinella testing to provide more clarity and correct information with regards to contact details for obtaining a sampling kit.
- Provide further clarity in the definitions section
- Add [England and Wales Deer and Wild Boar best practice guides](#) to the references section
- Review Annex A – specimen declaration forms and add the requirement to include the hunters certificate number
- Review Annex B – Bibliography to consider including the references to the following: -
 - [The British Deer Society – The Deer Initiative](#)
 - [The British Game Alliance](#)
 - [Game and Wildlife Trust Code of Good Shooting Practice](#)
 - [SNH Wild Deer Best Practice guides](#)