

The Wild Game Guide

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

December 2021



Version Control

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Consultation Draft	September-December 2020	N/A	N/A	
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Summary

Intended audience:	<ul style="list-style-type: none"> • Those who shoot and/or supply wild game • Enforcement officers • Retailers and processors
Which UK nations does this cover?	This guidance covers Scotland. Please visit the FSA website for the wild game guide covering England, Wales and Northern Ireland.
Purpose:	To provide guidance on the food hygiene legal requirements that apply in the various circumstances in which wild game is hunted and supplied for human consumption.
Legal status:	This guidance explains the food hygiene legal requirements which apply to wild game. It does not place legal requirements upon parties nor should it be read as legal advice. Where possible therefore, this guidance should be read in conjunction with the relevant regulations.
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1. Introduction and Intended Audience

1.1. Introduction

The hygiene requirements for ensuring the safety of foodstuffs, including wild game meat, are set out in the following Retained EU law (REUL): Retained Regulations 178/2002, 852/2004 and 853/2004. However, which of these requirements applies to a given person or business can differ depending on specific circumstances, with various exemptions to the rules also set out in these regulations. This guidance will explain how these regulatory requirements apply to wild game which is intended for human consumption.

The application of many of these requirements depends on whether you are a primary producer (i.e. a hunter, member of a hunting party etc.) or a processor (i.e. producing wild game meat) and whether you supply wild game directly to final consumers (defined as 'the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity') or to approved game handling establishments (AGHEs). The circumstances in which you may require approval as an AGHE will also be explained.

1.1.1 Purpose of this guidance

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

1.2 Intended audience

This guidance is intended for:

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

2. Legal Status of Guidance and Legislation Overview

2.1 Legal status of guidance

This guidance has been produced to explain the legal requirements of REUL- in particular, **Retained Regulations [178/2002](#), [852/2004](#) and [853/2004](#)** as they relate to wild game. This guidance does not place legal requirements upon parties nor should it be read as legal advice. It is not possible for this guidance to cover every scenario and it is therefore advised that you also consult the relevant regulations in conjunction with this guide to understand how they apply in your circumstances. You may also wish to seek your own independent legal advice. This guidance will, however, assist you in understanding how to comply with the law. Businesses with specific queries may wish to seek the advice of their local enforcement authority.

2.1.1 Legal references

Most of the legal references used in this guidance refer to REUL (i.e. Retained Regulations 178/2002, 852/2004, 853/2004 etc.). EU law became REUL at 11pm on the 31st of December 2020, meaning that the requirements held within these regulations continue to apply in Scotland. The legal references in this guidance have been updated to read 'Retained Regulation 178/2002', indicating EU law which has been retained in UK law and continues to apply in Scotland. REUL should be read alongside any EU Exit legislation that was made to ensure retained EU law operates correctly in the UK context. REUL can be found at the [EU Exit Web Archive - The National Archives](#), whilst associated EU exit legislation can be found at [Legislation.gov.uk](#). It should be noted that the links to legislation throughout this guidance lead to the EU exit web archive linked above. This site displays the relevant EU regulations as they were on the 31st of December 2020 when they were retained. Consequently, any changes made to REUL in the future may not be reflected on the EU exit web archive and efforts should therefore be made to check the up to date position of relevant REUL. The most appropriate way to link to the relevant legislation will be reviewed annually.

Any retained regulation cited in this guidance refers to the consolidated version of the regulation at the time of its retention into UK law on the 31st of December 2020. Therefore, all amendments made to the regulation prior to its retention should be included in the consolidated version in [EU Exit Web Archive - The National Archives](#). For example, Regulation (EU) 150/2011 amended Annex III of Regulation (EC) 853/2004 as it applies to wild game. For clarity and simplicity, it is therefore best to refer to Retained Regulation

853/2004, which will contain the amendments made by Regulation (EU) 150/2011 and any other amendments made before the 31st of December 2020.

2.2 Legislation

This sub-section sets out the relevant regulations referred to in this guidance. You can click on the various links to give you access to these regulations, including the retained versions of EU law. We advise that you consult the relevant regulations in conjunction with this guide to see how they apply in your circumstances.

- [Retained Regulation 178/2002](#) which sets general food law requirements, including establishing traceability of food, feed and food producing animals and the legal obligation to supply safe food
- [Retained Regulation 852/2004](#) which sets general hygiene rules applying to all food businesses, including primary producers
- [Retained Regulation 853/2004](#) which sets additional hygiene rules applying to businesses producing food of animal origin. Section IV of Annex III of this regulation covers wild game supplied to and processed in AGHEs
- [Retained Regulation 1069/2009](#) which sets out the rules which apply to animal by-products
- [Retained Regulation 2017/625](#) **and associated regulations** which set out the official controls requirements performed to ensure the application of food and feed law
- [Retained Regulation 931/2011](#) which implements the traceability requirements of Retained Regulation 178/2002 by setting out specific traceability requirements for food of animal origin
- [Food Safety Act 1990](#)
- [The Food Hygiene \(Scotland\) Regulations 2006](#)
- [The Deer \(Scotland\) Act 1996](#)
- [Animal By-Products \(Enforcement\) \(Scotland\) Regulation 2013](#)

3. Wild Game Food Safety

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

Safe and hygienic carcase handling practices are crucial to ensuring that the contamination of wild game is kept to a minimum. [Best practice guidance](#) produced by the wild game industry provides useful information and guidance on the various stages involved in hunting and handling deer, however some of the content may also be useful to hunters of small wild game.

- [Visit the 'Best Practice Guidance' website](#)

Thorough cooking together with the correct handling and storage of food are important factors in controlling the hazards which may be present in wild game meat. [The Food Safety section](#) of our website provides guidance on how to safely cook and handle your food.

Preventing cross contamination is a crucial aspect of the correct handling of wild game. Cross contamination is the process by which bacteria and other microorganisms are unintentionally transferred from one surface, substance or object to another and it should be avoided at all stages of wild game production.

- [Access guidance](#) to help consumers avoid cross contamination

4. Primary Producers: Requirements and Exemptions

The food hygiene regulations regard shooting or hunting of wild game for human consumption as a primary production activity. Primary production is defined in Article 3(17) of [Retained Regulation 178/2002](#) as “the production, rearing or growing of primary products including harvesting, milking and farmed animal production prior to slaughter. It also includes hunting and fishing and the harvesting of wild products”.

An individual who shoots game alone, or as an active member of a hunting party or a shooting estate which organises shooting of wild game, is considered a primary producer. **Therefore, hunters, members of hunting parties and estates who organise shoots are all primary producers.**

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

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

Any further preparation beyond normal hunting practices is considered to be the processing of wild game, meaning the game has ceased to be a primary product and is now wild game meat. This is an important distinction as the processing of wild game introduces additional legal requirements.

The food hygiene regulations (Retained Regulations [852/2004](#) and [853/2004](#)) provide the regulatory framework and requirements by which all food businesses dealing with wild game must comply. These regulations are underpinned by general food law, [Retained Regulation 178/2002](#). However, there are several exemptions included in these regulations aimed at primary producers (hunters and people actively involved in the hunting process).

Whether any of the exemptions apply to you will depend on:

- Whether you retain all the wild game you hunt for your own private domestic consumption

- Whether you supply the wild game you hunt in fur/feather or process it into wild game meat
- Who you choose to supply your wild game to (i.e. whether you supply it locally to final consumers and retail establishments, or to AGHEs)

Safe and Hygienic Carcase Handling Practices

Regardless of whether you are operating under any of the exemptions which are outlined in the rest of this section, you should still ensure that you are using safe and hygienic carcase handling practices.

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

For those who hunt deer, [these industry best practice guides](#)* provide practical advice on issues ranging from deer health and welfare, to firearms, culling and carcase preparation.

***Please note that FSS do not have control of the content of external websites**

4.1 Primary Producer: Exemptions and Requirements Table¹

Nature of Wild Game Supply	Restrictions on Supply	Applicable Food Hygiene Regulations and Competent Authority	Trained Hunter status	Food Business Registration and Venison Dealer's License (VDL)	HACCP Plan	Official record keeping & Traceability
<p>Keeping the in fur/feather (i.e. unprocessed) carcase for private domestic use</p> <p>(See Section 4.2 for further details)</p>	<p>The wild game must be kept for your own private domestic consumption or restricted to supply only to family and friends for their private domestic consumption on an occasional basis. The family and friends you supply game to must not supply the game to anyone else.</p>	<p>Exempt from: 178/2002, 852/2004 & 853/2004</p>	<p>Not required but encouraged</p>	<p>Registration as a food business is not required</p> <p>VDL not required</p>	<p>You do not require a food safety management system based on HACCP principles</p>	<p>Not required</p>
<p>Direct supply of in fur/feather wild game carcasses (i.e. unprocessed) to the final consumer and/or local retail establishments</p>	<p>Supply must be of small quantities of in fur/feather wild game</p> <p>Supply must be to direct to final consumers or local retail</p>	<p>Applicable: 178/2002</p> <p>Exempt from: 852/2004 & 853/2004</p>	<p>Not required but encouraged</p>	<p>Registration as a food business is not required but you are encouraged to contact your Local Authority</p>	<p>You do not require a food safety management system based on HACCP principles.</p>	<p>Must maintain traceability records of supply as outlined in Section 9</p>

¹ The original version of this table was produced by the Scottish Office of the British Deer Society (BDS) and FSS are grateful to BDS for allowing its use.

<p>directly supplying the final consumer</p> <p>(See Section 4.3 for further details)</p>	<p>establishments directly supplying the final consumer</p> <p>Supply to local retail establishments can be no further than your own local authority, a neighbouring Local Authority or 50 km/30 miles from the boundary of your Local Authority. (For Scottish Islands, local means all of Scotland)</p>	<p>Local Authority is Competent Authority</p>		<p>to ensure you are eligible for this exemption</p> <p>VDL required if the purchaser isn't a VDL holder</p>	<p>However, you are still bound by the obligation to supply safe food and should have systems in place to ensure this</p>	
<p>Direct supply of wild game meat (i.e. processed carcasses) to the final consumer and/or local retail establishments directly supplying the final consumer</p> <p>(See Section 4.4 for further details)</p>	<p>Supply must be of small quantities of wild game meat</p> <p>Supply of wild game meat must be direct to final consumer or local retail establishments directly supplying the final consumer (i.e. butchers, restaurants).</p> <p>Supply to local retail establishments can be no further than your own local authority, a neighbouring Local Authority or 50 km/30 miles from the boundary of your Local Authority. (For Scottish Islands, local means all of Scotland)</p>	<p>Applicable: 178/2002 & 852/2004</p> <p>Exempt from: 853/2004</p> <p>Local Authority is Competent Authority</p>	<p>Not required but encouraged</p>	<p>Yes, registration with your Local Authority as a food business is required</p> <p>VDL required if the purchaser isn't a VDL holder</p>	<p>You must have a food safety management system based on HACCP principles</p>	<p>Must maintain traceability records of supply as outlined in Section 9</p>

<p>Supply of in fur/feather (i.e. unprocessed) wild game carcasses to an AGHE</p> <p>(See Section 5 for further details)</p>	<p>N/A</p>	<p>Applicable: 178/2002, 852/2004 and relevant requirements of 853/2004</p> <p>Local Authority is Competent Authority for Supplier and FSS is Competent Authority in AGHEs</p>	<p>Trained hunter status required</p>	<p>Yes, registration with your Local Authority as a food business is required</p> <p>VDL required if the purchaser isn't a VDL holder</p>	<p>You must have a food safety management system based on HACCP principles</p> <p>You are also required to comply with the criteria set out in the receiving establishment's HACCP plan</p>	<p>Must maintain traceability records of supply as outlined in Section 9</p>
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4.2 Primary production for private domestic use

If you hunt, prepare, handle or store wild game for your private domestic use, **you are exempt** from [Retained Regulation 178/2002](#), as set out in **Article 1(3)**, as well as Retained Regulations [852/2004](#) and [853/2004](#), as set out in **Article 1(2)(a) and Article 1(3)(a)** respectively. Private domestic use refers to the personal preparation, handling, storage and consumption of hunted game, with any supply restricted to family and friends for their private domestic consumption only.

You are not required to register as a food business with your Local Authority but you are encouraged to contact them to ensure you are eligible for this exemption. If you hunt wild game under this exemption you must not then go on to supply to other consumers.

For primary producers who hunt deer, you are not required to hold a Venison Dealer's License (VDL), if you only keep the deer you hunt for your own private domestic consumption.

Exemption summary- Private domestic use

- You are not required to be registered or approved
- You are exempt from Retained Regulations 178/2002, 852/2004 and 853/2004
- To be eligible for this exemption the wild game you hunt must only be kept for private domestic consumption, or that of you family and friends
- You are not required to hold a VDL

4.3 Direct supply of small quantities of in fur/feather wild game carcasses to the final consumer or local retail establishments

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

- You **must abide** by the requirements of [Retained Regulation 178/2002](#), including the legal obligation to supply safe food and maintain traceability
- You are **exempt** from the requirements of [Retained Regulation 852/2004](#) and [Retained Regulation 853/2004](#) as set out in **Article 1(2)(c) and Article 1(3)(c)** respectively.

This exemption only applies to the direct supply of small quantities of in fur/feather wild game (i.e. primary products). The supply of wild game meat, which is considered as wild game which has been processed (i.e. plucked, skinned, butchered etc.) introduces additional legal requirements.

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

Examples of local retail establishments who may supply the final consumer are restaurants, butchers and farm shops. These local retail establishments must be registered as food businesses with their Local Authority. In fur/feather wild game refers to wild game carcasses which have not undergone any further processing beyond normal hunting practices (i.e. they may have been gralloched and bled but not skinned or butchered).

Primary producers who wish to operate under this exemption are encouraged to contact their Local Authority to ensure that the exemption does apply to their operations. Local Authorities can also assist primary producers in understanding the food safety and traceability requirements which apply to them under Retained Regulation 178/2002. Primary producers operating under this exemption still need to demonstrate traceability in their supply has been maintained in line with Article 18 of Retained Regulation 178/2002 and section 9 of this guide.

Moreover, if the primary producer's circumstance were to change and they began processing the wild game they hunted (beyond normal hunting practices such as bleeding and gralloching), or they began supplying to anyone other than the final consumer or local retail establishments who supply the final consumer, they would need to register as a food business with their Local Authority.

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

For those who hunt deer, there is a requirement under [the Deer \(Scotland\) Act 1996](#) that at least one party to the transaction (i.e. supplier or receiver) holds a valid VDL. To apply for a VDL or to find out more information about what holding a VDL entails, please contact your Local Authority.

Exemption summary– Direct supply of small quantities of in fur/feather wild game

- You are not required to be registered or approved by enforcement authorities
- You must abide by the requirements of Retained Regulation 178/2002, including:
 - The legal requirement to supply safe food
 - Traceability requirements
- Your supply of wild game must be of small quantities direct to the final consumer, or to local retail establishments directly supplying the final consumer
 - The definitions of final consumer, local and small quantities can be found in the glossary
- The wild game you supply must be in fur/feather and not processed in any way beyond normal hunting practices (i.e. bleeding, gralloching etc.)
- If you are supplying deer, one party in the transaction must hold a valid VDL

4.4 Direct supply of wild game meat by the primary producer to the final consumer or local retail establishments

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

- You **must abide** by the requirements of **Retained Regulations [178/2004](#)** and **[852/2004](#)**
- you are **exempt** from the requirements of Retained Regulation 853/2004 as set out in **Article 1(3)(e) of Retained Regulation [853/2004](#)**.

The final consumer is defined by **Article 3(18) of Retained Regulation 178/2002** as *“the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity”*. The local retail establishments supplied must be registered as food businesses with their Local Authority and abide by the relevant requirements set out in Retained Regulation 852/2004.

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

These requirements include having a food safety management system based on hazard analysis and critical control point (HACCP) principles, having adequate structures and operations in place for the processing of wild game and having adequate facilities in place for the appropriate storage, including the ability to maintain the cold-chain, of wild game bodies and wild game meat. As the competent authority for these operations, your Local Authority can advise whether specific operations meet these legal requirements, as set out in Annex II of Retained Regulation 852/2004.

This exemption (Article 1(3)(e) in Retained Regulation 853/2004) differs from the exemption outlined in section 4.3 as it applies to those who are supplying wild game **meat** and not solely in fur/feather wild game carcasses. Wild game carcasses become wild game

meat when they undergo any further processing beyond normal hunting practices (e.g. skinning, plucking or cutting).

This exemption applies to those persons processing wild game and supplying wild game **meat** from their own retail establishment, such as a farm shop, providing that the supply is of small quantities direct to the final consumer or local retail establishments who directly supply the final consumer. To be eligible for this exemption, the preparation and processing of wild game meat must be performed by somebody who played an active part in the hunting process.

Persons supplying wild game **meat** direct to the final consumer or local retail establishments directly supplying the final consumer **must register** with their Local Authority as a food business. They therefore must implement a food safety management system based upon HACCP principles.

For those who hunt deer, there is a requirement under [the Deer \(Scotland\) Act 1996](#) that at least one party to the transaction (i.e. supplier or receiver) holds a valid VDL. To apply for a VDL or to find out more information about what holding a VDL entails, please contact your Local Authority.

[Visit our website](#) for contact details for your Local Authority.

Exemption summary – Direct supply of small quantities of wild game meat

- You must be registered as a food business with your Local Authority but do not need approval from FSS
- You must abide by the rules of Retained Regulation 178/2002 including the legal requirement to supply safe food and the requirement to maintain traceability
- You must abide by the rules of Retained Regulation 852/2004, which include:
 - Having a food safety management system based on HACCP principles
 - Having adequate structures and operations in place for the processing of wild game
 - Having adequate facilities in place for the appropriate storage, including the ability to maintain the cold-chain, of wild game bodies and wild game meat
- Your supply of wild game meat must be of small quantities direct to the final consumer, or to local retail establishments directly supplying the final consumer
- The meat must be prepared by someone who played an active part in the hunting process
- If you are supplying venison, one party in the transaction must hold a valid VDL

Gifting and donating wild game

The gifting and donation of wild game, whether for charitable purposes or to family and friends, still falls within the food hygiene regulatory framework. Consequently, if you gift or donate wild game in fur/feather or as processed wild game meat, you should abide by the relevant requirements outlined in this guide.

5. Supplying Wild Game to Approved Game Handling Establishments (AGHEs)

The majority of wild game hunted in Scotland is supplied to AGHEs. If you supply the wild game carcasses you hunt to an AGHE:

- You **must abide** by the requirements of general food law, [Retained Regulation 178/2002](#)
- You must abide by the relevant requirements in **Retained Regulations 852/2004 and 853/2004**
- The exemptions laid out in the food hygiene regulations **do not** apply to you
- Any persons involved in the supply of wild game to AGHEs must abide by the relevant requirements in these regulations, including hunters, estates, transporters and larders.

Those who supply wild game to an AGHE **must be registered as a food business** with their Local Authority. This includes intermediaries, such as transporters or middlemen who transport game to AGHEs or buy up game from estates for sale to AGHEs. Individual hunters in this context need not be registered with their Local Authority, on the condition that the estate they shoot for or the organiser of the shoot they partake in is supplying the AGHE and is registered with the Local Authority. However, if the individual hunter is supplying the AGHE himself and not hunting on behalf of an estate or shoot, they would also need to be registered with their Local Authority.

Supplying wild game outwith the exemptions laid out in sections 4.2- 4.4 means there are additional hygiene requirements you must meet, including those related to trained persons and temperature.

Moreover, those who supply wild game to AGHEs must comply with the specific requirements relating to the handling of wild game intended for supply to AGHEs as set out in **Section IV, Annex III of Retained Regulation 853/2004**. These include the requirement that wild game which is supplied to an AGHE must have been hunted with at least one active member of the hunting party fulfilling the role of a trained hunter, as well as specific provisions related to the handling of large and small wild game. Details of these requirements are set out in the following sub-sections (5.1- 5.4).

Middlemen who buy up wild game from different hunters, estates or shoots must supply this wild game to an AGHE. They must be registered as a food business with their Local Authority, abide by the relevant requirements of Annex II in Retained Regulation 852/2004 and ensure the game they buy has been hunted in accordance with the requirements set out in this section. Moreover, if they wish to process the wild game any further to produce wild game meat, they must gain approval from FSS as an AGHE, as they cannot be considered primary producers and therefore cannot operate under the primary producer exemption set out in Section 4.4.

For those who hunt deer, there is a requirement under the Deer (Scotland) Act 1996 that at least one party to the transaction (i.e. supplier or receiver) holds a valid VDL. To apply for a VDL or to find out more information about what holding a VDL entails, please contact your Local Authority.

[Visit our website](#) for contact details for your Local Authority.

Summary of requirements for supply to AGHEs

- You must be registered as a food business with your Local Authority
- You must abide by the rules of Retained Regulation 178/2002 including, the requirement to supply safe food and the requirement to maintain traceability
- You must abide by the minimum hygiene standards set out in Annex I of Retained Regulation 852/2004 and retain records relating to measures implemented to control hazards (i.e. a well maintained and recorded HACCP system)
- If you are a primary producer, you must abide by the specific requirements of Section IV, Annex III of Retained Regulation 853/2004 (see sections 5.1- 5.4)
- If you are supplying venison, one party in the transaction must hold a valid VDL

5.1 Trained persons

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

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

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

The trained person's responsibility is to make an initial assessment of the carcass after killing, to determine whether or not the meat may present a health risk. This examination must occur as soon as possible after killing. They must also be in a position to confirm that no abnormal behaviour was observed before killing and there was no suspicion of environmental contamination. Full details regarding official training requirements, courses and providers are available in Section 10 of this guide.

5.2 The trained person's declaration (large wild game)

The trained person's declaration **only applies to large wild game** and is required by **Chapter II, Section IV, Annex III of [Retained Regulation 853/2004](#)**. This declaration is a numbered statement affirming that the trained person has identified no abnormal characteristics during their examination of the carcass and that no abnormal behaviour was observed before killing, and there is no suspicion of environmental contamination. This declaration must also indicate the date, time and place of killing and be signed by the trained person.

Generally the declaration comes in the form of a tag attached to the carcass. However, the declaration does not have to be attached to the animal and may cover more than one animal, provided that each carcass is appropriately tagged and identified, with the declaration bearing an indication of the identification number of each animal it covers, with the corresponding date, time and place of killing. All animal bodies covered by a single declaration may only be sent to a single AGHE. An example of how these declarations might look can be found in Annex 1 of this guide.

The operator of the AGHE will wish to check that carcasses are accompanied by the necessary declaration from a trained person. Operators may wish to see proof of training, such as a copy of certificate with the trained person's signature, to ensure they are receiving carcasses from an identified trained person. Enforcement officers may also wish to verify that the trained person is suitably qualified.

5.3 Handling large wild game for supply to AGHEs

The specific requirements for the handling of large wild game for placing on the market through AGHEs are set out in **Chapter II, Section IV, Annex III of [Retained Regulation 853/2004](#)**.

The steps which should be followed when hunting large wild game for supply to an AGHE are set out below:

- After killing, large wild game must have their stomachs and intestines (green offal) removed as soon as possible (gralloched) and, if necessary, be bled. The stomach, intestines and other body parts including the head, may either be disposed of safely at the kill site, or at a larder provided this does not compromise the need for prompt removal.
- A trained person must carry out an examination of the body and of any viscera removed to identify any characteristics that may indicate that the meat presents a health risk. This examination must take place as soon as possible after killing.
- Following the examination, and providing no abnormal characteristics were found, no abnormal behaviour was observed before killing, and there is no suspicion of

environmental contamination, the trained person may issue their declaration in accordance with section 5.2.

- Chilling must begin within a reasonable period of time after killing and achieve a temperature throughout the meat of **not more than 7 °C**. However, the carcass should not be frozen. Where climatic conditions so permit, active chilling is not necessary. Consideration of this requirement in a Scottish context will depend on a number of factors including the season, the size of carcass, the number of carcasses in each transport, and the time which elapses between the kill and onward transport to an AGHE. These considerations should be factored in to the food safety management plan of the receiving establishment concerned and applied accordingly.
- The carcass should then be transported to an AGHE as soon as possible after this examination. During transport to the AGHE, heaping must be avoided and once the large wild game has been delivered to an AGHE, it must be presented to the competent authority for inspection. The competent authority in AGHEs is FSS, represented by an Official Veterinarian (OV) who will oversee the inspection process.

The carcasses of large wild game, including deer and wild boar, should be chilled to a temperature of not more than 7°C throughout the meat

Generally, the head and viscera **need not accompany** the body to an AGHE. However, in the following circumstances, the head (except for tusks, antlers and horns) and viscera (except the stomach and intestines) must accompany the body:

- If the trained person identifies abnormal characteristics, abnormal behaviour or suspects environmental contamination. In this case, the trained person must inform the competent authority of the abnormal characteristics, abnormal behaviour or suspicion of environmental contamination they observed
- If no trained person is available to carry out an examination
- If the carcass is of a species susceptible to trichinosis (such as wild boar and any other porcine species), whose heads (except for tusks) and diaphragm must accompany the body.

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

Unskinned large wild game may be skinned and placed on the market if, before skinning, it is stored and handled separately from other food and it is not frozen; and after skinning, it passes a final inspection in an AGHE and has a health mark applied by the OV, as

required by **Article 5 of Retained Regulation 853/2004** and **Article 48 of Retained Regulation 2019/627**.

For the **hunting of deer**, you can [access industry guidance](#) which provides helpful advice on hygienic and effective gralloching and carcase preparation, as well as guidance on deer health and notifiable diseases.

Wild game food safety best practice

- You should check all wild game externally for disease and infection
- It is important that gralloching is carried out as soon as possible after killing and in a hygienic and careful fashion so as to ensure that the carcase is not contaminated by the green offal or its contents. Prompt gralloching will also help the chilling of the carcase to happen more efficiently.
- It is important that the cold chain is maintained throughout larding and transportation.
- Consideration should be given to how different methods of transportation and storage will affect cooling times (i.e. hanging carcasses, holding them in trays etc.). Appropriate carcase separation, allowance for airflow and removal of heat sources (i.e. internal organs) will aid the cooling process.

5.4 Handling small wild game for supply to AGHEs

The specific requirements for the handling of small wild game for placing on the market through AGHEs are set out in **Chapter III, Section IV, Annex III of [Retained Regulation 853/2004](#)**.

The steps which should be followed when hunting small wild game for supply to an AGHE are set out below:

- The trained person must carry out an examination to identify any characteristics that may indicate that the meat presents a health risk. The examination must take place as soon as possible after killing.
- If abnormal characteristics are found during the examination, abnormal behaviour was observed before killing, or environmental contamination is suspected and the primary producer still chooses to send the carcase to the AGHE, the trained person must inform the FSS OV at the AGHE. Moreover, signs of environmental contamination, abnormal behaviour or notifiable diseases should be reported to the relevant Local Authority.
- Chilling must begin within a reasonable period of time of killing and achieve a temperature throughout the meat of **not more than 4 °C**. Where climatic conditions so permit, active chilling is not necessary. Consideration of this requirement in a Scottish context will depend on a number of factors including season and time taken between kill and transport to an AGHE. These considerations should be

factored in to the food safety management plan of the receiving establishment concerned and applied accordingly.

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

The carcasses of small wild game, including rabbits, grouse, pheasants and other game birds, should be chilled to a temperature throughout the meat of not more than 4 °C

5.5 Handling of offal intended for human consumption

Offal is defined in **Annex I of [Retained Regulation 853/2004](#)** as the “fresh meat other than that of the carcass, including viscera and blood”.

For large wild game, in most cases the carcass will be presented with a hunters declaration and the offal need not be present. If no hunter’s declaration is present, the offal must be presented with the carcass. Neither the carcass nor the offal will be accepted unless clear identification and correlation between carcass and offal are present; this is usually by tagging or labelling to link them to each other. If the offal is not clearly linked to the carcass, it cannot be used for human consumption.

Where the offal from large wild game is intended for human consumption, the supplier to the AGHE must be able to demonstrate to the satisfaction of the receiving establishment that it has been handled hygienically and that full correlation and traceability of body parts and carcasses can be made. The onus is on the receiving establishment to ensure that its product intake meets the requirements set out in its own HACCP plan. This should include ensuring that the supplier has the necessary infrastructure to ensure that the cold chain is maintained as necessary and cross contamination is avoided.

Best Practice

Given that offal will deteriorate more quickly than whole carcasses, it is unlikely that the onward supply of offal into the food-chain will be possible unless active chilling takes place at the larder and unless the carcass and offal is transported to the larder immediately after killing.

Avoiding cross contamination will be aided by keeping offal separate to in fur/feather carcasses, whilst ensuring the offal is handled hygienically is also paramount.

6. Game Larders

The term 'game larder' is not defined in the hygiene regulations but is generally understood in the UK as a place where wild game carcasses are stored after hunting, as an associated primary production operation. Dressing and handling which is part of normal hunting practice (including bleeding, gralloching etc.) and which is necessary to carcass preparation is permitted within these premises.

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

If a game larder is used to store in fur/feather game carcasses for supply to AGHEs, the owner or operator of this game larder, which could be an individual primary producer or an estate, must be registered as a food business with their Local Authority. Moreover, **Section IV, of Annex III in Retained Regulation 853/2004** requires that wild game which is to be supplied to an AGHE must, within a reasonable period of time:

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

To this end, game larders should be adequately refrigerated and ventilated, with a record of chiller temperatures kept. Should climatic conditions be so cold as to maintain these temperatures, active refrigeration may not be required. They should have sufficient space and capacity to handle the number of carcasses passing through the facility, as well as the capacity to store, handle and dispose of waste and animal by-products as necessary.

Game larders which are used solely for private domestic use, or for storing carcasses which are supplied direct to the final consumer or local retail establishments supplying the final consumer, are exempt from the regulatory requirements set out in Retained Regulation 852/2004, and in line with the exemptions set out in Section 4.2 and 4.3, do not need to be registered with the Local Authority. Nevertheless, primary producers are encouraged to contact their Local Authority to ensure they are eligible for this exemption.

Should a game larder be used to process wild game in any way beyond normal hunting practice, it ceases to be a primary production operation and will require registration with the relevant Local Authority as a Food Business or approval from FSS as an AGHE, depending on the operations and supply. Moreover, should a game larder be used in any other form of supply (i.e. to an AGHE), registration with your Local Authority is required.

For those who hunt deer, please [access helpful industry guidance](#) on lardering.

Game larder requirements- Annex I, Retained Regulation 852/2004

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

7. Transporting Wild Game

It is important that hygiene standards are maintained not just during the storage and processing of wild game but also during its transport. Managing risks to food safety begins at primary production (i.e. hunting) and good hygiene should be maintained during the transport of wild game at all stages of its production and processing. Care should be taken when moving carcasses from the kill site to reduce contact with faeces, dirt, pests and other sources of contamination

The hygiene requirements which apply to the transport of wild game from the place of production (i.e. the kill site) to an establishment are set out in Annex I of [Retained Regulation 852/2004](#), as determined by Paragraph(1)(c) of Part A in the same Annex. Unless you are exempt from the requirements of Retained Regulation 852/2004 (i.e. under the exemptions set out in sections 4.2 and 4.3) you must abide by the basic hygiene requirements in this Annex. Those transporting wild game must also abide by the traceability requirements set out in section 9 of this guide

Moreover, if you transport wild game carcasses to an AGHE, you will need to be registered as a food business with your Local Authority and comply also with the specific provisions set out in **Section IV, of Annex III in [Retained Regulation 853/2004](#)** for the handling of wild game intended for supply to an AGHE. These require that the bodies of wild game are accompanied by the required trained person's declaration and are transported to the AGHE as soon as possible after the trained person's examination. Moreover, wild game being transported to an AGHE must, within a reasonable period of time:

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

During transport, game must not be piled, heaped or stacked at any stage as this will facilitate cross-contamination and make cooling the wild game difficult.

- [Download examples](#) of good and bad practices

As the transport of wild game from an AGHE to a retailer or from a retailer to its customers is no longer considered an associated act of primary production, different requirements apply. These are set out in **Chapter IV of Annex II in Retained Regulation 852/2004**.

8. Approved Game Handling Establishments

An 'Approved Game-handling establishment' (AGHE) is defined in **Annex I of [Retained Regulation 853/2004](#)** as *“any establishment in which game and game meat obtained after hunting are prepared for placing on the market”*. If you intend to process wild game and supply wild game meat and

- You are **not** a retailer or;
- You are **not** a primary producer supplying small quantities of wild game meat directly to the final consumer or to local retail establishments that directly supply the final consumer

You must seek approval as an AGHE under Retained Regulation 853/2003.

Retained Regulation 853/2004 requires that meat of large and small wild game may only be placed on the market if transported to an AGHE as soon as possible after being examined by a trained person. The only exemptions from this requirement for wild game to be processed in an AGHE are outlined in Section 4, and consequently most wild game in Scotland is supplied and processed through an AGHE.

AGHEs can process and supply an unlimited quantity of wild game meat to retail suppliers. An AGHE receives wild game carcasses from primary producers before processing and supplying on to retailers such as shops, supermarkets and butchers.

As well as complying with Retained Regulations [178/2002](#) and [852/2004](#), AGHEs must comply with the specific provisions of [Retained Regulation 853/2004](#), including those requirements relating to the operational and structural nature of the business and premises. The wild game carcasses and AGHE processes, must have been produced and supplied in accordance with Section 5 of this guide. Moreover, AGHEs are subject to official veterinary controls from FSS, in line with the requirements set out in [Retained Regulation 2017/625](#) and associated acts. These controls include official post-mortem inspection and the application of the health mark.

In terms of the rules which apply to the cutting and boning of wild game in AGHEs, the following regulatory requirements apply:

- The rules laid down in Section I, Chapter V, of Retained Regulation 853/2004 apply to the cutting and boning of large wild game
- The rules laid down in Section II, Chapter V, of Retained Regulation 853/2004 apply to the cutting and boning of small wild game

Unskinned large wild game may be skinned and placed on the market only if, before skinning it is stored and handled separately from other food and it is not frozen; and after skinning, it passes a final inspection post-mortem inspection and has a health mark applied by the OV, as required by **Article 5 of Retained Regulation 853/2004 and Article 48 of Retained Regulation 2019/627**.

Evisceration of small wild game must be carried out, or completed, without undue delay upon arrival at the AGHE, unless the competent authority permits otherwise. For example, wild game birds may be frozen uneviscerated for processing at a later date or supply to another AGHE.

An AGHE may sell on unprocessed (i.e. unskinned) game that has not been subject to an inspection **but only to another AGHE in Great Britain** (i.e. Scotland, England and Wales). An identification mark should be applied to small wild game if it has been handled in some way in an AGHE before it is sent on to another AGHE.

8.1 Retail to retail sales: exemption from approval as an AGHE

In general terms, if you are wholesaling wild game (i.e. your supply is not direct to the final consumer or local retail establishments directly supplying the final consumer) then you will require approval from FSS. However, there are exceptions from this requirement set out in law. The criteria which must be met for you to carry out wholesale supply of wild game without receiving approval from FSS are that your supply of wild game meat is **marginal, localised and restricted**. These terms are defined in the [Scottish National Protocol](#) as the following:

- **Marginal** means supply to other retailers of food of animal origin of **up to 25%** of total food sales, calculated by weight or by value if measurement by weight is impractical for the range of products. To meet this criterion, you as the retailer must sell at least 75% of all the food you supply direct to the final consumer through your own retail outlet. Any wild game or wild game meat you sell otherwise than through your own retail outlet must be sold to other retailers such as butchers' shops and restaurants.
- **Localised** means supply which is limited to within your own Local Authority plus the greater of either: the neighbouring Local Authority or Local Authorities; or 30 miles/50 km from the boundary of your Local Authority. When the supplying establishment is located in the Scottish islands, local is interpreted as anywhere within Scotland.
- **Restricted** means the supply of game meat to other retail establishments is restricted by the requirements to be marginal and localised as above.

For more information on when you might need to seek approval and the decision making process applied by enforcement authorities, see the [Scottish National Protocol on approved establishments](#).

AGHE Requirements Summary

- Must be approved by FSS;
- Must comply with the relevant requirements of Retained Regulations 178/2002, 852/2004 and 853/2004;
- Official veterinary controls must be carried out by FSS, including audit of structural and operational hygiene requirements and post mortem inspection and health marking of carcasses of large wild game;
- Must only process wild game which has been initially examined by a trained person, with a trained person's declaration accompanying large wild game;
- Must keep traceability records to identify from whom they have received in fur/feather wild game, including verification of the primary producer's status as a trained person;
- Must have a food safety management plan based on HACCP principles which includes wild game intake criteria, recognising the flexibilities which exist in law for supply to AGHE direct from primary producers.

9. Traceability Information and Requirements

Traceability is defined in **Article 3(15) of [Retained Regulation 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”*.

Retained Regulation 178/2002 also defines the food safety legal obligations for food business operators (FBOs) and all those involved in the food chain. It specifically outlines these requirements with regards to traceability in **Article 18**. These traceability requirements apply to all stages of the food chain and comprise part of the legal responsibility to supply safe food. Consequently, primary producers, intermediate actors (including those who transport or store wild game), processors and retailers must all meet these traceability requirements.

Therefore, if you are involved at any stage of the wild game food chain, you are required to have in place systems and procedures, such as appropriate record keeping, that allow for traceability information to be made available to competent authorities on demand. The basic principle is that as game moves through the supply chain there should be a “one step forward, one step back” record at each stage (i.e. both the source and the destination should be identified and a record kept). Copies of invoices and a game book or something similar may contribute to the fulfilment of this requirement.

Additionally, [Retained Regulation 931/2011](#) sets the traceability requirements for products of animal origin and applies to all stages of the wild game food chain. This covers all aspects of the food chain up until the point of sale, just as with the requirements of Retained Regulation 178/2002. FBO’s, primary producers, hunters and retailers must pass the information outlined in the box below onto the next FBO and have it available for the competent authority on demand. It should also be updated daily and be kept at least until it can be reasonably assumed that the food has been consumed.

Traceability Requirements- Retained Regulation 931/2011

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

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

10. Options for Training as a Trained Person

When wild game is hunted for supply to an AGHE, at least one active member of the hunting party (i.e. hunter, beaters, ghillie) must meet the requirements of being a 'trained person'. [Retained Regulation 853/2004](#) requires that anyone who fulfils the role of a trained person must be trained to the satisfaction of the competent authority. This training must cover at least the following subjects:

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

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

- **Scottish Qualifications Authority (SQA) 'Game Meat Hygiene Unit'**
 - This option will provide trained hunter status for hunting both large and small wild game
 - <https://www.sqa.org.uk/sqa/files/nq/FN5J12.pdf>
- **'Game Meat Hygiene Course'- National Gamekeepers Organisation (NGO)**
 - This option will provide trained hunter status for hunting both large and small wild game
 - <https://www.nationalgamekeepers.org.uk/training/game-meat-hygiene-course>;
- **'Level 2 Award in Wild Game Meat Hygiene'- LANTRA**
 - This option will provide trained hunter status for hunting both large and small wild game
 - <https://www.lantra.co.uk/course/level-2-award-wild-game-meat-hygiene#course-providers>
- **Deer Stalking Certificates (DSCs)**
 - This option will provide trained hunter status **for deer species only**
 - [Deer Management Qualification – Setting the standards for wild deer management \(dmq.org.uk\)](http://www.dmq.org.uk)

11. Animal By-Products

Animal by-products (ABPs) are defined in **Article 3(1) of [Retained Regulation 1069/2009](#)** as: “*entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen*”.

This regulation sets out the legal requirements for ABPs, including their categorisation and the rules which apply to their handling, processing and disposal. ABPs are enforced by domestic regulation: the Animal By-Products (Enforcement) (Scotland) Regulation 2013.

ABP's generated from wild game as part of normal hunting practice (i.e. green offal, blood etc.) and not collected after killing are out of scope of the ABP regulations and can be left in the field. ABPs of wild animals collected after killing and/or generated during carcass processing must be collected, stored and disposed of according to the ABP regulations.

The processing of wild game produces ABPs, so it is important that if you are an FBO which processes wild game, you are aware of the legal requirements and obligations set out in Retained Regulation 1069/2009. These requirements include the correct categorisation of ABP, it's safe and correct disposal or onward supply and the requirement to ensure that all ABP received or supplied by an FBO is traceable. Once something is identified as ABP, it must be stored separately from products intended to be sold as food for human consumption and cannot be diverted back into the human food chain.

ABP's can be in one of three categories, with category 1 being the highest risk and category 3 being the lowest risk. Category 3 ABP's can be used to produce pet food and animal feed, whilst Category 1 and 2 cannot. Category 1 ABPs include high risk material and must therefore be handled with extreme care. You should therefore ensure you have adequate knowledge to handle and dispose of different ABPs appropriately.

Any operator handling or processing ABPs must seek registration or approval from the Animal and Plant Health Agency (APHA) and you should [contact them](#) in the first instance if you have any ABP queries. This includes any business using animal by-products to produce pet food and you can [read guidance](#) from DEFRA which applies to these circumstances. However, if you are already registered or approved as a food business and you only produce ABPs through your processes as a food business, **you do not need to seek additional approval for ABPs from APHA.**

For further advice on the categorisation, handling and disposal of ABP, please see the ABP section [of this industry guide on edible co-products and ABPs](#). You may also consult [this UK government webpage](#) on ABPs. [Contact APHA](#) in the first instance for any ABP related enquiries and regarding ABP registration and approval.

12. Trichinella Testing in Feral Wild Boar and Other Species Susceptible to Trichinosis

Wild boar which are not farmed and live in the wild are classified as 'feral'. As feral wild boar will scavenge for food which might be infected with *Trichinella*, there is a possibility that these boar will become infected with *Trichinella*. Similarly, there is a possibility that other animals, including feral porcine species (i.e. feral pigs), may become infected with *Trichinella*.

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

Just as pigs slaughtered in approved premises must be tested for *Trichinella*, wild boar and other species susceptible to trichinosis should also be tested and it is the responsibility of the primary producer to ensure that this takes place.

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

The following guidance document provides advice on how a sample should be taken from feral wild boar and details of how to get a sampling/sending kit prior to hunting: [Guidance for Trichinella testing in feral wild boar | Food Standards Scotland](#)

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

Phone: **07584111971**

E-mail: NRL.Parasitology@apha.gov.uk

13. Wild Game Research and Further Information

This section includes further information regarding wild game and food safety.

13.1 STEC in wild venison

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

- [Read the report](#)

This project had three key objectives:

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

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

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

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

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

13.2 Lead shot game

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

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

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

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

Read the research which was undertaken to understand consumer behaviour in relation to the consumption of lead shot wild game:

- [Habits and behaviours of high-level consumers of lead-shot wild game meat in Scotland](#)

14. Contacts, Approvals and Registration

14.1 General

If you need clarification on anything included in this guide or have further questions regarding the food hygiene legal requirements which apply to wild game, please contact the meat hygiene policy team using the following email address: foodenquiries@fss.scot

14.2 Approval

For approval as an AGHE please contact the approvals team at FSS using the following email address: approvals@fss.scot

For more information on when you might need to seek approval, the process for gaining approval, different types of approval and much more, please consult the [Scottish National Protocol](#) on approved establishments.

14.3 Registration

If you supply wild game into the food chain and you do not fall within the relevant exemptions you will need to be registered as a food business with your Local Authority. To find out whether these exemptions apply to you or not and to register as a food business, you will need to contact your Local Authority. You will also need to contact your Local Authority if you wish to acquire a VDL.

[Visit our website](#) for contact details for your Local Authority.

15. Further Sources of Wild Game Information

- For practical guidance on **hunting deer**, including helpful advice on deer health and welfare, firearms, culling, carcase preparation and larding, please utilise these industry Best Practice guides: [Best Practice Guides | Best Practice Guidance](#)
- For guidance on a range of topics including deer, game, firearms and pest control, please visit the British Association for Shooting and Conservation (BASC) website: [Advice | The British Association for Shooting and Conservation \(basc.org.uk\)](#)
- For advice on **shooting game**, please see 'The Code of Good Shooting Practice': [The Code of Good Shooting Practice](#)
- For advice on a range of topics related to **wild deer**, visit The British Deer Society website: [About our advice & education \(bds.org.uk\)](#)
- Scottish Quality Wild Venison (SQWV) provide an assurance scheme for suppliers and processors of venison. For information on the assurance scheme, visit the SQWV website: [Scottish Quality Wild Venison – Quality. Assured. \(sqwv.co.uk\)](#)

16. Acronyms

Abbreviation	Full Title/Name
ABP	Animal By-Products
AGHE	Approved Game Handling Establishment
APHA	Animal and Plant Health Agency
FBO	Food Business Operator
FSS	Food Standards Scotland
OV	Official Veterinarian
REUL	Retained European Union Law
VDL	Venison Dealer's License

17. Glossary

- **‘Animal and Plant Health Agency (APHA)’** means the UK government agency which is part of the Department for Environment, Food and Rural Affairs and responsible for animal and plant health in the UK. You can contact APHA using this [link](#).
- **‘Animal by-product (ABP)’** means entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen (Retained Regulation 1069/2009)
- **‘Approval’** refers to the requirement set out in Article 4 of Retained Regulation 853/2004 for food business operators to only place products of animal origin on the market if they have been produced in premises approved by the competent authority
- **‘Approved Game Handling Establishment (AGHE)’** means any approved establishment in which game and game meat obtained after hunting are prepared for placing on the market
- **‘Competent Authority’** means the authority responsible for ensuring compliance with the relevant food hygiene regulations. FSS is the overarching competent authority for Scotland in relation to wild game. However, Local Authorities act as competent authorities for most food businesses, whilst FSS are responsible for approved premises which require veterinary supervision (i.e. AGHEs, abattoirs and cutting plants).
- **‘Cross Contamination’** means the process by which bacteria or other microorganisms are unintentionally transferred from one substance, surface or object to another
- **‘Evisceration’** means the process of removing viscera from the bodies of wild game. Also known as gralloching.
- **‘Feral Pig’** means a domestic/farmed pig which has escaped or has been released into and is living in the wild. This also includes the offspring of such animals.
- **‘Feral Wild Boar’** means the species of wild boar which live in the wild and which are not farmed.
- **‘Final consumer’** means “the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity” (Retained Regulation 178/2002)

- **‘Food business operator’** means “the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control” (Retained Regulation 178/2002)
- **‘Food safety management system’** means a permanent procedure put in place by a food business operator, based on the HACCP principles, and used as an instrument to help food business operators attain a higher standard of food safety
- **‘Game Larder’** means a premises where game carcasses are prepared and stored after hunting and before for further transport
- **‘Green Offal’** means the stomach, intestines and related tissues of the wild game body, which are the contents of the abdominal cavity of the wild game body
- **‘HACCP’** means Hazard Analysis and Critical Control points. The principles on which your food safety management system should be based. This refers to identifying hazards and establishing critical control points to mitigate these hazards
- **‘In fur/feather wild game’** means wild game which has been shot and killed but not had its fur or feathers removed, or any further processing beyond normal hunting practices
- **‘Large wild game’** means wild land mammals living freely in the wild that do not fall within the definition of small wild game, such as deer, goats and wild boar (Retained Regulation 853/2004)
- **‘Local Supply’** means supply within the same Local Authority, in immediately neighbouring Local Authorities or those situated no more than 30 miles/50 kilometres from the boundary of the supplier’s Local Authority , whichever is greater – but never beyond the UK, except supply from Northern Ireland to the Republic of Ireland. When the supplying establishment is located in the Scottish islands, local is interpreted as anywhere within Scotland
- **‘Marginal Supply’** means supply to other retailers of food of animal origin of up to a quarter of total food sales, calculated by weight or by value if measurement by weight is impractical for the range of product. This means that at least 75% of your sales must be made up by sales to the final consumer. Any wild game or wild game meat you sell otherwise than through your own retail outlet must be sold to other retailers such as butchers’ shops and restaurants
- **‘Normal hunting practices’** means any process regularly carried out in the process of hunting, including bleeding and gralloching
- **‘Offal’** means “fresh meat other than that of the carcass, including viscera and blood” (Retained Regulation 853/2004)

- **‘Primary producers’** means hunters of wild game. This refers to those people involved in the killing of the wild game in the field. This includes active members of the hunting party but not spectators
- **‘Primary Production’** means the production, rearing or growing of primary products including harvesting, milking and farmed animal production prior to slaughter. It also includes hunting and fishing and the harvesting of wild products (Retained Regulation 178/2002)
- **‘Primary Products’** means “products of primary production including products of the soil, of stock farming, of hunting and fishing” (Retained Regulation 852/2004)
- **‘Red Offal’** means the other parts of the offal which do not fall under the definition of green offal, including the liver, heart, lungs etc.
- **‘Registration’** refers to the requirement set out in Article 6 of Retained Regulation 852/2004 for food business operators to register premises involved in food production with the relevant authority (this is your Local Authority in Scotland)
- **‘Restricted Supply’** means the supply of game meat to other retail establishments is restricted by the requirements to be marginal and local
- **‘Small quantities’** is regarded as self-defining because demand for in-fur or in feather carcasses from final consumers and local retailers is limited
- **‘Trained person’** refers to persons who have undertaken appropriate training to be able to carry out an initial inspection of the wild game carcass in the field, to identify any characteristics that may indicate that the meat presents a health risk
- **‘Small wild game’** means wild game birds and lagomorphs living freely in the wild (Retained Regulation 853/2004)
- **‘Venison Dealers Licence (VDL)’** means the license required by the Deer (Scotland) Act 1996 for the sale, offer or exposure for sale of venison meat. This license is not required venison is sold to or bought from the holder of a VDL, meaning only one party in the transaction must possess a VDL. VDLs are issued by Local Authorities
- **‘Viscera’** The organs of the thoracic, abdominal and pelvic cavities, as well as the trachea and oesophagus, and, in birds, the crop (Retained Regulation 853/2004)

- **‘Wild Game’** is defined in Annex I of Retained Regulation 853/2004 as:
 - *“wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild game. These include mammals living in enclosed territory under conditions of freedom similar to those of wild game” and;*
 - *“wild birds that are hunted for human consumption”*
 - *‘Wild ungulates’ are hooved animals such as wild deer and feral wild boar but can also include certain feral populations of sheep and goats.*
 - *‘Lagomorphs’ means rabbits, hares and rodents*
 - *‘Other land mammals’ are animals such as squirrels*
 - *‘Wild Birds’ includes birds such as pheasants, partridge and grouse which have been hatched/reared under controlled conditions before being released into the wild to be hunted.*

- **‘Meat’** is defined by Annex I of Retained Regulation 853/2004 as
 - *the “edible parts of the animals referred to in points 1.2 to 1.8, including blood”.* This is what is referred to when ‘wild game meat’ is used.
 - Those animals specified in points 1.2 to 1.8 are domestic ungulates, poultry, lagomorphs, wild game, farmed game, small wild game and large wild game. Wild game carcasses are converted from primary product to meat once they have undergone any processing beyond normal hunting practices such as killing, bleeding and gralloching. Processing therefore includes practices such as skinning, plucking and cutting.

Annex 1

SAH0001553		COST CENTRE	504	I declare in accordance with EU regulation 853/2004 that no abnormal behaviour was observed before killing and there is no indication of environmental contamination. I have inspected the head, pluck and viscera without observing abnormalities.	***COPY***			Forestry and Land Scotland Coilltearachd agus Fearann Alba
Rannoch	SAH000155350403654400042	RANGER	John McLulty					
Red Deer	Female	GRID REF	NI 62535	SIGNED				
NET WEIGHT	44.0 Kg	CUSTOMER	Highland Game					
GROSS WEIGHT	44.0 Kg	LARDER DATE	04/Dec/2020	***COPY***				
COPY		LARDER TIME	12:30	SA-				
		DATE SHOT	04/Dec/2020	FM/COC-007002&SA-				
		TIME SHOT	09:00					



**For safe food and
healthy eating**

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