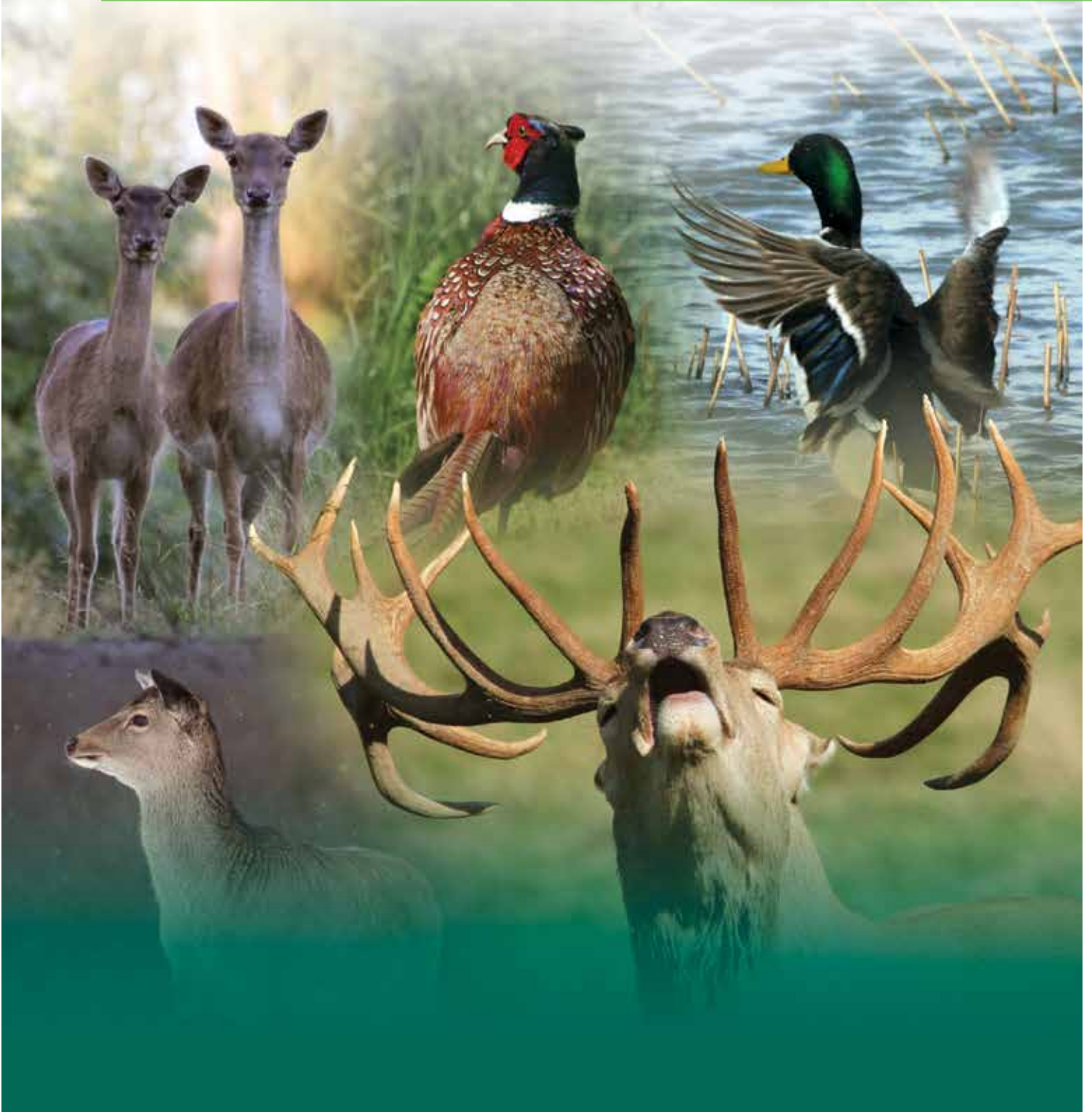


Guidance on Hunting and Processing of Wild Game for Human Consumption





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1. Introduction and Background

This guidance document is produced to provide advice on the legal requirements and responsibilities of all individuals producing wild game as food.

Individuals and food businesses involved in hunting wild game with the intention of placing it on the market are food business operators and the food they produce has to meet food safety requirements. This will be achieved by ensuring compliance with relevant requirements of the legislation.

This guidance document does not provide advice on other non-food legislation such as firearms, wildlife management and conservation legislation, the licensing of hunters or the hunting of wild game as a sporting activity where game hunted is not placed on the market.

FURTHER GUIDANCE AND READING

Throughout this document, reference will be made to reading material in Food Safety Authority of Ireland (FSAI) publications, legislation or other websites that can be read in conjunction with this document. FSAI publications are available through the FSAI website www.fsai.ie. The FSAI Advice Line may be contacted at info@fsai.ie

2. Legislation Overview

Under food law, hunting wild game **with a view to placing it on the market for human consumption**, whether as an individual hunting game alone or as part of an organised hunting party, is regarded as a food business.

Both European Union (EU) and national legislation apply and place primary responsibility for food safety with the food business operator.

The main pieces of legislation that apply are: (please note that this is a non-exhaustive list)

European Union Legislation

Regulation (EC) No 178/2002 which sets general food law requirements, including establishing traceability of food, feed and food producing animals

Regulation (EC) No 852/2004 which sets general hygiene rules applying to all food businesses

Regulation (EC) No 853/2004 which sets additional hygiene rules applying to businesses producing food of animal origin. Section IV of Annex III of this regulation covers wild game supplied to and processed in approved game handling establishments

Regulation (EC) No 854/2004 which lays down the official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare

National Legislation

Food Safety Authority of Ireland Act, 1998 (S.I. No. 29 of 1998)

European Union (Food and Feed Hygiene) Regulations, 2009 (S.I. No. 22 of 2020)

3. Primary Producers, Primary Production and Primary Products

Primary producers (which include hunters) are those involved in the production of primary products. Primary products in the wild game sector include:

- 'In-fur' large wild game
- 'In-fur' small wild game
- 'In-feather' wild game birds

These primary products may be eviscerated or non-eviscerated.

These products are no longer regarded as primary products following the removal of fur or feathers or any further preparation going beyond normal hunting practice.

This has important implications as it indicates the point where hunting (primary production) activities end and where processing wild game into meat begins.

An individual who processes game with the intention of placing the game on the market beyond the point at which they are considered primary products, has additional food safety legislative obligations and responsibilities, above that demanded of a primary producer, which must be complied with in order to operate legitimately. Please see Section 5 – Hunters Supplying Game into the Food Chain, for further details.

NOTE

Primary production in the context of hunting, encompasses the hunting, killing and evisceration on-the-spot or in a game larder of wild game, the gathering and keeping of 'in-fur' large wild game, 'in-fur' small wild game and 'in-feather' wild game birds prior to transport to an approved game handling establishment and the transport of game to an approved game handling establishment.

4. Exemptions from Legislative Requirements

4.1 Final Consumer and Private Domestic Consumption

The final consumer is defined in Regulation (EC) No 178/2002 as *“the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity”*.

Private domestic consumption is the domestic preparation, handling or storage of hunted game for private domestic consumption. To explain where private domestic consumption ends and running a food business starts, EU food law speaks of *“undertakings, the concept of which implies a certain continuity of activities and a certain degree of organisation.”*

A typical private domestic consumption scenario for wild game is a hunter who prepares and consumes game that he/she has personally hunted and the game is not used for supply to anyone else as part of a food business. As products from such hunting are not placed on the market, hunting for private domestic consumption therefore falls outside the scope of food law and such activity is not regarded as a food business operation.

It should be noted that it is an offence to mislead the authorities regarding the nature of one’s activities, for example, to claim that wild game was hunted for personal consumption if in reality it is intended to be supplied for eventual consumption to consumers, retailers or other businesses.

Such offences are a breach of food legislation and prosecution may result.

4.2 Hunter Exemption for the Supply of Small Quantities of Primary Products

European food law makes provision for the scenario where **small quantities** of wild game primary products, e.g. in the fur or in the feather eviscerated, or non-eviscerated wild game bodies, may be supplied by the hunter either direct to the final consumer or to local retail establishments, e.g. a retail butcher or restaurant who directly supply the final consumer.

A hunter supplying in such a manner is exempt from Regulation (EC) No 852/2004 which sets general hygiene rules applying to all food businesses; and Regulation (EC) No 853/2004 which sets additional hygiene rules applying to businesses producing food of animal origin but must comply with the requirements of Regulation (EC) No 178/2002 such as the obligation to produce safe food and have a traceability system in place.

Small quantities are established under Irish Law (S.I. 22 of 2020) as follows:

- No more than one large wild game or no more than three small wild game can be supplied in a week, with a maximum of three large wild game or thirty small wild game supplied in a year, **and**
- The wild game is supplied only to final consumers, or to retail establishments that supply the final consumer, located no more than 100 kilometres from where the wild game was hunted.

It is important to note that a hunter invoking this exemption but also supplying **game meat** other than primary product would have to comply with, at a very minimum, the requirements of Regulation (EC) No 852/2004 involving among other things: registration, general hygiene requirements, including appropriate storage and would be required to have a food safety management system in place.

4.3 Hunter Exemption for the Supply of Small Quantities of Wild Game Meat

European food law also makes provision for the scenario where small quantities of wild game meat are supplied direct by the hunter, i.e. the primary producer, who hunted the wild game to the final consumer or to local retail establishments directly supplying the final consumer.

NOTE

This exemption differs from that outlined in Section 4.2 The Hunter (primary producer) Exemption, in that this exemption (relating to small quantities of wild game meat) deals with the scenario where the hunter is supplying small quantities of wild game meat, rather than supplying small quantities of hunted 'in-fur' or 'in-feather' eviscerated or non-eviscerated wild game bodies.

Under Irish Law (S.I. No. 22 of 2020) the supply of wild game meat is restricted as follows;

- The supply must be to the final consumer or retail establishments that supply the final consumer located no more than 100 kilometres from where the wild game was hunted
- The supply is limited to the meat of no more than one large wild game or no more than three small wild game **in a week**
- The supply is limited to the meat of no more than three large wild game or thirty small wild game **in a year**

It is important to note that this exemption merely exempts the food business operator from the requirements of Regulation (EC) No 853/2004, but not from Regulation (EC) No 852/2004 or Regulation (EC) 178/2002 which require among other things:

- Notification to the appropriate competent authority, i.e. local authority, of the relevant food business establishment under their control with a view to the registration of this establishment
- Compliance with the traceability obligations of Regulation (EC) No 178/2002, which includes both the maintenance of records relating to suppliers and businesses they supply, and the ability to make such information available rapidly to the competent authority on request
- The responsibility for producing safe food and ensuring that all stages of the production, processing and distribution of food under their control complies with the relevant hygiene requirements of Regulation (EC) No 852/2004
- Having a food safety management system based on HACCP (Hazard Analysis and Critical Control Point) 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
- Having hygienic facilities to transport the wild game or wild game meat to the final consumer or local retailer
- The hunter having completed training to the satisfaction of the competent authorities in order to be deemed a 'trained person' within the meaning of Regulation (EC) No 853/2004 (see Section 5.5 for further details on hunter training)

It is expected that the vast majority of wild game processing will be conducted at approved game handling establishments.

5. Hunters Supplying Game into the Food Chain

5.1 General

The hunter is permitted to do no more than the necessary preparation that is part of normal hunting practice before supplying the game into the food chain. Such preparation may be done 'in the field' or in a 'game larder'.

This necessary preparation includes killing and where appropriate, bleeding and the removal of stomach and intestines ('the green offal').

For trained hunters (trained person), this preparation will also involve the removal of the heart, lungs and associated tissues and the head, as part of the examination of the live wild animal, wild game body and viscera for abnormal behaviour characteristics or suspicions of environmental contamination (please see Section 5.5 Hunter Training for further information on this).

If good hunting practices are observed, the stomach, intestines and other body parts of wild game may be disposed of safely on the site of hunting unless circumstances dictate that these parts must accompany the wild game body to the approved game handling establishment.

Except in the case of private domestic consumption, any further processing (such as skinning, plucking, cutting) of the wild game must be performed in an approved game handling establishment.

Approved game handling establishments have been approved by the relevant competent authority (Department of Agriculture, Food and the Marine (DAFM) or local authority) and are obliged to have the necessary structures and operations in place to carry out the further processing of wild game, including the inspection of the game by an official veterinarian, to ensure that food safety is not compromised.

Information on where to find details of approved game handling establishments in Ireland is available in Appendix IV.

Hunters selling game to a middleman or intermediary must be confident that the game will be transported as soon as possible to an approved game handling establishment. Such an intermediary may not further process the game and place game meat on the market without having the necessary approval.

5.2 The Hunter and the Intermediary

The hunter is regarded as a person who hunts alone or is an active member of a larger hunting party (which in the case of estate/tourist hunting could include beaters, ghillies and game keepers). A hunter is not however, a mere spectator to any such activity.

An intermediary who obtains wild game bodies from hunters with the intention of placing them on the market cannot be regarded as the hunter or the primary producer of these primary products as they do not have any direct involvement in the hunting process.

5.3 Registration, Traceability and Record Keeping

5.3.1 REGISTRATION

To protect public health, competent authorities need to be able to identify food business operators. In the context of hunting and related operations, the following are all considered to be food business operators and must be registered as such with the competent authorities:

- A hunter (primary producer) who hunts wild game with the intention of placing it on the market
- A person (or in some cases, an estate) who larders or stores wild game bodies pending transport to an approved game handling establishment
- A person who transports wild game to an approved game handling establishment
- An intermediary or middleman who acquires hunted wild game bodies from hunters within the intention of placing them on the market, e.g. by supplying them to an approved game handling establishment
- An operator of an approved game handling establishment

Why is registration important? The competent authorities need to know the:

- Identity of the food business operators
- Addresses of the food business operators
- Activities carried out

In many cases, this is all the information that is required. In some cases, additional details will be required, e.g. for more complex operations such as the processing of wild game in an approved game handling establishments.

5.3.2 TRACEABILITY AND RECORD KEEPING

The traceability requirements of Regulation (EC) No 178/2002 must be met.

Hunters and also those storing and transporting wild game to approved game handling establishments must keep records of the food businesses that they supply to in order to assure traceability and must be able to rapidly make this information available to the authorities on request.

Hunters should keep the following traceability records:

- Date, time and location of the hunting and consequent harvesting of wild game bodies and a description of the type of wild game bodies harvested. This could be in the form of a copy of the Wild Game Intake documents or the Hunter Declaration (see Section 8 for further details)
- Approved game handling establishments (and intermediaries, if applicable) to whom they have sold wild game

And specifically, a record should be kept of:

- The contact details of the approved game handling establishment or intermediary, i.e. the food business/food business operator name, address of the food business, and where appropriate, the approval number of the food business, supplied
- A description, e.g. deer, pheasant, and rabbit, of the wild game including quantity and where applicable, any identification number used for the large wild game body or batch number in the case of small wild game(s)
- The date of when the transaction with the approved game handling establishment or intermediary took place

Intermediaries should keep the following traceability records:

- The contact details of the hunters who have supplied game, i.e. the hunters name, address and where applicable, the hunters registration or licence number
- A description of the game, e.g. deer, pheasant, rabbit, including quantity and where applicable, any identification number used for the large wild game body or batch number in the case of small wild game(s). It must be possible to relate such a number to the hunter who supplied the intermediary with the hunted wild game bodies
- The dates on which the transaction took place
- Details of the approved game handling establishments to whom they have sold wild game bodies. This should include the name of the food business/food business operator, address of the approved game handling establishments and the approval number of the approved game handling establishments supplied

5.4 Hunters Supplying Approved Game Handling Establishments

This includes persons transporting and storing primary products of hunting, i.e. hunted 'in-fur' or 'in-feather' eviscerated or non-eviscerated wild game bodies.

GENERAL REQUIREMENTS

Any hunter supplying an approved game handling establishment must comply with the food **business operator's responsibilities**, namely:

- Be registered with the competent authorities under S.I. No. 22/2020
- Meet the traceability requirements of Regulation No 178/2002
- Comply with the general hygiene provisions of Annex 1 of Regulation No 852/2004 - the food business operator, in this case the hunter, must take adequate measures as appropriate in relation to the following matters:
 - The primary products, i.e. the hunted 'in-fur' or 'in-feather' eviscerated or non-eviscerated wild game bodies, must be protected from contamination from the point of production (hunting) onwards, having due regard to the processing that primary products of hunting will subsequently undergo at an approved game handling establishments
 - Any facilities used in connection with this primary production activity (including equipment, transport facilities and storage facilities) must be kept clean using potable water and where necessary disinfected
 - Preventing pests, animals, waste and hazardous substances from causing contamination to the primary products
 - Reporting suspected outbreaks of contagious disease to the relevant competent authority (in practical terms such reporting would be done via the hunter declaration)
 - Ensuring that persons involved in the handling of such primary products are in good health and undergo training on health risks
 - Store and handle waste and any hazardous items so as to prevent contamination of the primary product
- Hunters supplying wild game to approved game handling establishments must be trained in health and hygiene (it is recommended that all hunters undertake such training)

5.5 Hunter Training

Management of food safety risks in relation to wild game begins with the individual hunter.

Food law makes provisions for hunters who intend to place wild game on the market for human consumption to conduct an initial examination of wild game on the spot with a view to identifying abnormal behaviour of the live wild game animal, abnormal characteristics of the dead large or small wild game body and any suspicions of environmental contamination.

A trained person is somebody who has 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.

If they carry out this initial examination and identify no anomalies or hazards and make a declaration to this effect (trained person declaration form – see Section 5.6 and Section 8 for further information), it is not necessary to require such trained persons to deliver all viscera to the approved game handling establishments for post-mortem examination.

Hunters must complete training to the satisfaction of the competent authorities in order to be deemed a 'trained person' within the meaning of Regulation (EC) No 853/2004. Such training must include at a minimum, the following subjects:

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

In Ireland, the trained person and the hunter are usually the same person.

However, in a party of hunters hunting together, it is sufficient if at least one person of a hunting team is a trained person and may thus make declarations for wild game killed by hunting colleagues with whom he/she has been hunting with on that occasion.

The trained person may also be the gamekeeper or the game manager if he or she is part of the hunting team or located in the immediate vicinity of where hunting is taking place. In such a case, i.e. the gamekeeper is in the immediate vicinity, the hunter must present the wild game to the gamekeeper or game manager and inform them of any abnormal behaviour observed before killing.

The gamekeeper or manager may then complete the relevant declarations for wild game killed by such hunters.

Veterinary surgeons registered with the Veterinary Council of Ireland are regarded as having already the necessary knowledge required by 'trained persons'. Hence, they may act in the capacity of trained persons, complete relevant declarations/information as a bona-fide trained person and are not required to complete a training course for trained persons.

TRAINING OPTIONS FOR HUNTERS

The competent authorities have encouraged hunter's organisations to provide such training for their members and some hunter's organisations have developed training courses which train hunters (primary producers) in accordance with the requirements of Regulation (EC) No 853/2004.

Within the Irish Republic, training courses in this area are currently provided by the following hunter organisations:

National Association of Regional Game Councils - NARGC

BrosnaWay, Fermanagh Business & Technology Park,
Ballycumber Road, Fermanagh, Co. Offaly
Tel: 090 6453623
Fax: 090 6453697
Email: nargc@iol.ie

Country Sports Ireland

Online booking via www.countrysportsireland.org
Tel: 00353 87 6509598
Email: ronan@countrysportsireland.org

Any hunters organisation or group of hunters or individual hunter or any other person that wishes to provide training to hunters in accordance with the relevant requirements of Regulation (EC) No 853/2004 is advised to contact the Food Safety Authority of Ireland, through the FSAI website www.fsai.ie or the FSAI Advice Line at 1890 336677 or email info@fsai.ie for advice on how to proceed.

5.6 Killing, Evisceration and Examination of Game

LARGE WILD GAME

After killing, large wild game must have their stomachs and intestines removed as soon as possible and, if necessary, are bled. If good hunting practices are observed, stomach, intestines and other body parts including the head of wild game may be disposed of safely on the site of hunting unless circumstances dictate that these parts must accompany the wild game body to the approved game handling establishment.

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. The examination must take place as soon as possible after killing.

Meat of large wild game may be placed on the market only if the body is transported to an approved game handling establishment as soon as possible after this examination.

In certain circumstances, viscera must accompany the body to the approved game handling establishment. In such cases, the viscera must be identifiable as belonging to a given animal.

If, during the trained person examination:

- No abnormal characteristics are found
- No abnormal behaviour was observed before killing
- There is no suspicion of environmental contamination

The trained person must complete a numbered declaration stating that this is the case. This declaration must also indicate the date, time and place of killing.

In such cases, the head and the viscera need not accompany the body to the approved game handling establishments. However, the competent authority reserves the right to require this in certain circumstances.

The declaration does not need to be attached to the wild game animal body and may cover more than one wild game animal body, provided that each wild game animal body is appropriately identified and the declaration bears an indication of the identification number of each animal body covered by it with the corresponding date, time and place of killing.

All wild game animal bodies covered by such a single declaration may only be sent to a single approved game handling establishment.

In certain circumstances, viscera must accompany the body to the approved game handling establishments:

- Where a trained person has not examined the wild game body
- Where the trained person who carried out the examination suspects abnormal characteristics, abnormal behaviour or environmental contamination

In such circumstances, the head (except for tusks, antlers and horns) and all the viscera except for the stomach and intestines, must accompany the body to the approved game handling establishment.

In the case of detection of abnormal characteristics, abnormal behaviour or suspicion of environmental contamination, the trained person who carried out the examination must inform the competent authority of the reasons that prevented him or her from making a declaration.

During transport to the approved game handling establishment, heaping must be avoided. Large wild game delivered to an approved game handling establishment must be presented to the competent authority for inspection.

'Skin-on' large wild game may be skinned and placed on the market only if:

- Before skinning, it is stored and handled separately from other food,
- After skinning, it undergoes a final veterinary inspection in an approved game handling establishment

NOTE

'Skin-on' large wild game must not be frozen at any time.

SMALL WILD GAME

Regarding the handling of small wild game, the following specific provisions must be complied with.

A trained person must carry out an examination to identify any characteristics that may indicate that the meat presents a health risk. This examination must take place as soon as possible after killing. The trained person must inform the competent authority if:

- Abnormal characteristics are found during the examination
- Abnormal behaviour was observed before killing
- Environmental contamination is suspected

Meat of small wild game may be placed on the market only if the body is transported to an approved game handling establishment as soon as possible after this examination.

Evisceration must be carried out or completed without undue delay upon arrival at the game handling establishment, unless the competent authority permits otherwise.

Small wild game delivered to a game-handling establishment must be presented to the competent authority for inspection.

NOTE

An approved game handling establishment is entitled to refuse to accept carcasses where the *bona-fide* involvement of a trained person (as set out in Regulation 853/2004) cannot be established and is under no obligation to accept any wild game bodies presented.

In addition, approved game handling establishments are entitled to insist that all wild game bodies supplied to them by hunters or intermediaries have been: examined by a trained person, are adequately identified and are accompanied by a completed trained person declaration.

Consignments of 'in the fur'/unskinned large wild game bodies exported from Ireland to the UK must be all be accompanied by the relevant trained person declarations and relevant commercial documentation for the game bodies.

5.7 Storage of Wild Game before Dispatch to an Approved Game Handling Establishment

The term 'game larder' is not explicitly defined in food hygiene legislation but is regarded as a place where primary products, in this case, the primary products of hunting, are stored.

A hunter is also permitted to perform any necessary carcass preparation that is part of normal hunting practice in a 'game larder'.

If a primary producer operates a 'game larder' he/she must ensure that:

- The primary products, i.e. the hunted 'in the fur' or 'in the feather' eviscerated or non-eviscerated wild game bodies, must be protected from contamination, having regard to the processing that primary products of hunting will subsequently undergo
- Any facilities used in connection with this primary production activity must be kept clean using potable water and where necessary, disinfected
- Pests, animals, waste and hazardous substances are prevented from causing contamination to the primary products
- Suspected outbreaks of contagious disease are reported to the relevant competent authority
- Persons involved in the handling of such primary products are in good health and undergo training on health risks
- Waste and any hazardous items are stored and handled so as to prevent contamination of the primary product
- The cold chain is maintained so that large wild game bodies are stored at 7°C or below and small wild game bodies are stored at 4°C or below

'Game larders' should have facilities for active chilling of hunted wild game bodies, as it is unlikely except at the coldest times of the year, that the temperature objectives (for large wild game bodies, storage at 7°C or below and for small wild game bodies storage at 4°C) will be met by relying on ambient temperatures.

'Game larders' should be of an appropriate size and capacity for the amount of hunted wild game bodies they are expected to store. They should not be overfilled as this increases the time taken for the hunted wild game bodies to cool to 7°C or 4°C as appropriate.

'In-fur' and 'in-feather' hunted wild game bodies should be separated from each other in the larder.

CHILLING

For large wild game, chilling must begin within a reasonable period of time after killing and achieve a temperature throughout the meat of not more than 7°C. Food law states that “*Where climatic conditions so permit, active chilling is not necessary*”. There may be occasions or times of the year in Ireland when active chilling may not be required to reduce the temperature of large wild game to below 7°C. For small wild game, the required temperature is 4°C.

However, it is likely that active chilling of the wild game bodies will be required to meet this temperature objective, for example, if:

- 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
- Transportation from the place of primary production or place of storage of the primary product is prolonged

5.8 Transport of Wild Game Bodies to the ‘Game Larder’, Collection Centre or Approved Game Handling Establishment

Managing food safety risks begins with the hunter and this should continue during the transport of wild game bodies, whether that be direct to an approved game handling establishment or to a ‘game larder’ pending transport to an approved game handling establishment.

Care must be taken to prevent contamination of game from faeces, dirt, animals, pest and other sources of contamination as it is taken away from the site of hunting.

NOTE

Dogs may be used for the initial pick up of small wild game and also for locating shot large wild game.

Any vehicles used for the transport of wild game must be kept clean and where necessary after cleaning, disinfected. The hunter (primary producer) must endeavour to meet the specified objectives for maintaining the cold chain for hunted wild game bodies, namely:

- 4°C or below for small wild game
- 7°C or below for large wild game

These temperatures must be achieved within a reasonable period of time after killing.

The game must be transported to an approved game handling establishment (or a ‘game larder’ where the above temperatures can be achieved) as soon as possible after killing.

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

6. Collection Centres or Temporary Storage Facilities

There may be instances where hunters, i.e. the primary producer, transfers the ownership of primary products (hunted 'in the fur' or 'in the feather' eviscerated or non-eviscerated wild game bodies) to an intermediary or middleman who then intends to supply such hunted wild game animal bodies on to an approved game handling establishment for further processing.

Hunters (primary producers) selling game to such a middleman or intermediary must be confident that the game will be transported as soon as possible to an approved game handling establishment.

The operator of a collection centre or temporary storage facility is regarded as a food business operator. As such, this person has obligations as a food business operator which includes the following requirements:

- Notification to the appropriate competent authority, i.e. local authority, of the relevant food business establishment under their control, with a view to the registration of this establishment
- Compliance with the traceability obligations of Regulation (EC) No 178/2002, which includes both the maintenance of records relating to suppliers and businesses they supply, and the ability to make such information rapidly available to the competent authority on request
- The responsibility for producing safe food and ensuring that all stages of the production, processing and distribution of food under their control complies with the relevant hygiene requirements of Regulation (EC) No 853/2004
- Have adequate facilities in place for the appropriate storage-including the ability to maintain the cold chain of wild game bodies. Collection centres or temporary storage facilities used to collect and store the bodies of hunted wild game animals before sending them to an approved game handling establishment must meet the requirements regarding the storage of wild game animal bodies outlined in Section 12, including the the temperature objectives (for large wild game bodies, storage at 7°C or below and for small wild game bodies storage at 4°C)
- Have hygienic facilities to transport the hunted wild game animal bodies to an approved game handling establishment

It is especially important to note:

Such an intermediary may not further process the hunted wild game animal bodies and place game meat on the market without approval from either the relevant local authority or DAFM (see Section 15 Approved Game Handling Establishments for more detail)

A wildlife dealer's licence issued under Section 48 of the Wildlife Act, 1976 should not, on its own, be construed as permitting the bearer to engage in the operation of a food business as described here. This license is issued under conservation legislation and is unrelated to the food legislation and responsibilities of the food business operator described here.

NOTE

In either a 'game larder' or a collection centre, if it is planned to pluck, skin or further prepare hunted wild game bodies with the intention of placing these products on the market, these processes go beyond what is permitted in primary production. In such circumstances, except for some very minor exemptions (described in Section 4); these processes must be carried out in an approved game handling establishment.

7. Approved Game Handling Establishments

If a food business operator wishes to pluck, skin or further prepare hunted wild game bodies (beyond what is accepted as part of the necessary carcase preparation that forms part of normal hunting practice), with the intention of placing these products on the market, he/she is advised in the first instance to contact either his/her local authority or DAFM to discuss the proposed activities before beginning production with a view to obtaining approval for these activities.

Approval requires the food business operator to comply with, among other things, the specific provisions of Regulation (EC) No 853/2004 which include specific operational and structural requirements for the food business.

Other than in the case of some very minor exemptions, food law provides that meat of large and small hunted wild game may be placed on the market for human consumption only if, after the killing, the body is transported to an approved game handling establishment to be handled (including unskinning or defeathering or any other processing apart from the necessary preparation that is part of normal hunting practice) and subject to post-mortem inspection by an official veterinarian.

Supervision ('official controls') of an approved game handling establishment is carried out by veterinary officers from the relevant local authority or from DAFM.

Contact details for local authorities and DAFM are included in Appendix III.

In general, food businesses involved in the handling of wild game where a maximum of:

- 40 red deer over 12 months of age or 80 other deer are handled in one week
- 1,000 red deer over 12 months of age or 2,000 other deer are handled in one year will be approved and supervised by the relevant local authority

Game handling establishments handling greater quantities than those specified here will be approved and supervised by DAFM.

An approved game handling establishment:

- Must comply with, among other legislation, Regulation (EC) No's 178/2002, 852/2004 and 853/2004
- Must be approved by the relevant competent authority, which is the local authority for establishments with lower throughput and DAFM for higher throughputs. Approval must be sought **before** any activities commence
- Is subject to official controls by either of the two competent authorities referenced above, which includes veterinary inspections and audits, and post-mortem inspection of the game by an official veterinarian
- Can sell on unprocessed game, e.g. 'in-fur'/'in-feather', to another approved game handling establishment either in Ireland or elsewhere in the EU
- Can export freely within the European Community
- Must ensure that animal-by products are handled and disposed of in accordance with Regulation (EC) No 1069/2009 and related legislation

In relation to transactions with hunters (primary producers) or relevant intermediaries who supply hunted large or small wild game bodies to the approved game handling establishments, the approved game handling establishments must keep a record of the:

- Quantities of hunted large or small wild game bodies supplied
- Identity of the suppliers. They must have some means of identifying these bodies, either individually or by means of batches

If a trained person is submitting hunted large or small wild game bodies together with completed hunter declarations, the approved game handling establishment should keep a certificate of the trained person's qualification on file and make this available to the competent authority on request.

8. Specific Documentation for Hunters Supplying Wild Game to Approved Game Handling Establishments

In the case of the trained person (as described in Section 5.5), for:

Large Wild Game

A numbered declaration (or where appropriate, an individual wild game body identifier) must be attached by the trained person to each large wild game body.

- (a) If, during the trained person examination:
- No abnormal characteristics are found
 - No abnormal behaviour was observed before killing
 - There is no suspicion of environmental contamination

The trained person must complete a numbered declaration stating that this is the case. This declaration must also indicate the date, time and place of killing.

INDIVIDUAL WILD GAME BODY IDENTIFIER

In general, this means that the large wild game bodies are identified by the hunter, via means of an individual tag. The information which must be contained on such a tag is as follows:

- The provider's name/emblem, which should be pre-printed on the tag. Generally, such tags are provided by hunters' organisation on behalf of their members
- The trained person's number which each trained person should receive on successful completion of their training
- A unique number which should be pre-printed on the tag, identifying the wild game body

The tag must be durable and not easily removed.

Control of tags

- Generally, tags are issued by the relevant hunters' organisation to their members.
- Such organisations should keep a record correlating tag numbers to the persons they have been given to, including the hunters name, licence number and trained person's number.

(b) The declaration does not need to be attached to the wild game animal body and may cover more than one wild game animal body provided that each wild game animal body is appropriately identified (see the text box "Individual Wild Game Body Identifier", above) and the declaration bears an indication of the identification number of each animal body covered by it with the corresponding date, time and place of killing.

(c) All wild game animal bodies covered by such a single declaration may only be sent to a single approved game handling establishment.

(d) The head and the viscera need not accompany the body to the approved game handling establishment. However, the competent authority reserves the right to require this in certain circumstances.

In other circumstances, e.g. where abnormalities are detected, the head (except for tusks, antlers and horns) and all the viscera except for the stomach and intestines, must accompany the body. The trained person who carried out the examination must inform the competent authority of the abnormal characteristics, abnormal behaviour or suspicion of environmental contamination that prevented him or her from making a declaration.

If no trained person is available to carry out the trained person examination, the head (except for tusks, antlers and horns) and all the viscera except for the stomach and the intestines, must accompany the body.

CURRENT INTAKE DOCUMENTATION IN USE AT APPROVED GAME HANDLING ESTABLISHMENTS

In Ireland, as part of the legislation and administrative provisions on the animal and public health and hygiene conditions governing the placing on the market of wild game, and notwithstanding any other record keeping obligations that may apply to hunters, the completion of certain specific documentation for hunters supplying wild game bodies to approved game handling establishments, is required.

From 1st September 2011, an intake document was introduced that must be completed by hunters who supply wild game to approved game handling establishments. This document has a number of important functions:

It can assist hunters, intermediaries and operators of approved game handling establishments towards fulfilling their traceability obligations required by Regulation (EC) No 853/2004. It is the format in which the trained person (hunter) declaration will be validly accepted by both operators of approved game handling establishments and the relevant competent authorities

Small Wild Game

In the case of small wild game, the trained person must carry out an examination 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, before the game is submitted to the approved game handling establishment.

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.

A sample of a document that may be used to inform the competent authority is reproduced here. It forms part of an intake document that hunters (primary producers) are requested to complete or present completed on presentation of small wild game bodies to an approved game handling establishment.

The form is titled 'WILD GAME INTAKE DOCUMENT' and 'INDIVIDUAL SERIAL NUMBER E.G. FBO1234567'. It includes a 'PLANT DETAILS' section with a table for recording species. The 'To be completed by THE HUNTER' section includes fields for Hunter Name, Tag No, Sex, and Species. The 'To be completed by THE HUNTER alone as a TRAINED PERSON?' section includes a declaration section. The 'To be completed by the PERSON PRESENTING the wild game to the Game Handling Establishment' section includes a declaration section. The bottom section is a table for recording plant details.

9. Retail¹ Food Establishments, including Restaurants and Hotels involved in placing Wild Game Meat on the Market²

Food business operators of such establishments must ensure that any wild game meat or primary products they source comes from a food business operator who is either registered or approved for the relevant activities in question, i.e. game handling.

Retail and wholesale food premises should discuss the sourcing of wild game meat or their intention to accept wild game bodies with the intention of processing them into meat with their enforcement officer from the relevant competent authority. This is most likely to be an environmental health officer (EHO) from the Health Service Executive (HSE).

In particular, the processing of 'in the fur' or 'in the feather' wild game bodies at a retail establishment poses particular challenges in relation to preventing cross-contamination which will require appropriate structures and operations to be in place, and the food business operator's food safety management system will need to be reviewed and changed with respect to this new activity.

Wild game meat must not, under any circumstances, be accepted by the food business operator of a retail establishment from an unregistered or unapproved source. In general, it would be advised that retail establishments source their wild game meat from approved game handling establishments.

Sourcing wild game meat from hunters or accepting wild game bodies with the intention of processing them into meat by retail establishments.

A common scenario in hunting may be hunting for private domestic consumption but with occasional surpluses arising. However, the supply of this surplus wild game, whether in the form of primary product (eviscerated or non-eviscerated 'in the fur' or 'in the feather' small or large wild game) or prepared wild game meat therefrom to a retailing food business operator, e.g. local catering establishment such as a hotel, restaurant or a local butcher), even if on an occasional basis, must comply with all of the food legislative requirements as outlined in Sections 9 and 10. In particular, such a hunter must be registered with the relevant local authority as a food business operator.

Retail or wholesale establishments accepting wild game bodies or wild game in small quantities are required to document this practice with particular attention given to the recording of quantities, locality and registration of hunters who are supplying them.

¹ 'Retail' means the handling and/or processing of food and its storage at the point of sale or delivery to the final consumer, and includes distribution terminals, catering operations, factory canteens, institutional catering, restaurants and other similar food service operations, shops, supermarket distribution centres and wholesale outlets.

² 'Placing on the market' means the holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves.

10. Intra-EU Trade of 'In-fur' Large Wild Game

The intra EU trade in unskinned or 'in-fur' large wild game bodies should take only place provided that in addition to the requirements of Regulation (EC) No 853/2004 outlined in Section 7:

- The movement is authorised by the competent authorities of the Member States of origin taking into account the epidemiological situation on animal diseases and based on an appropriate risk assessment
- The competent authorities of the Member State of destination (and transit) accept the reception of the consignments

All unskinned or 'in-fur' large wild game bodies carcasses from the Republic of Ireland that are intended to be exported, must originate from an approved game handling establishment and be accompanied by a commercial document in line with the requirements of Regulation (EC) No 931/2011³ and a health certificate in line with the requirements of Regulation (EC) No 636/2014.

This health certificate must be supplied and signed by the official veterinarian who has conducted a preliminary examination of the game.

Game bodies must be transported directly to an approved game handling establishment in the destination Member State accompanied by the commercial document and health certificate.

NOTE

In addition, consignments of unskinned or 'in the fur' deer exported from Ireland to the UK must be accompanied by a trained person declaration, or will otherwise be treated as animal by-products and disposed of accordingly at the point of reception at an approved game handling establishment in the UK.

It is important to note that for the transport of such products, the general hygiene provisions outlined in Section 5 must be complied with and also in view of the time required to transport hunted large wild game bodies long distances, a suitable transport vehicle will be a requirement.

Such a vehicle must have chilled transport facilities capable of reaching and maintaining a temperature of 7°C or below and structures in place which allow hunted large wild game bodies to be transported without being piled, heaped or stacked.

A hunter (primary producer), middleman or intermediary, or an operator of an approved game handling establishment, or anybody else who is considering exporting hunted large wild game bodies outside the territory of the Irish Republic, should contact either his/her local authority county veterinary officer or DAFM for further information.

Contact details of these agencies are available in Appendix III.

³ Commission Implementing Regulation (EU) No 931/2011 of 19 September 2011 on the traceability requirements set by Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin

11. Illegal Wild Game Hunting and Illegal Trade in Wild Game and Wild Game Meat

Illegal activity in the context of wild game may involve either the illegal hunting and taking of wild game and also illegal trade in wild game meat through non-registered or non-approved food establishments or other meat handling facilities.

While viewed by those involved in such a trade as a low-risk, high-gain activity, these activities have the potential to damage the image of Irish food in general, both in Ireland and abroad, endanger public health and public safety and interfere with both legitimate wild game management and wild game processing activities.

Individuals and food businesses involved in the hunting of wild game and also those involved in the storage, transporting, processing and retailing of wild game and wild game meat have a civic responsibility to bring any evidence of such illegal activity to the attention of the appropriate competent authorities.

The appropriate competent authorities are as follows:

- In the case of wild game where there is a suspicion that it has been illegally hunted or taken (for example, lamed or poached), or where there is suspicion that this activity is taking place in a given area or involving particular individuals, it is advised that individuals reports be made such activity to an officer of the National Parks and Wildlife Service (NPWS) and/or the Garda Síochána. Contact details of the NPWS are included in the Appendices
- Where there is suspicion that an unlawful trade in wild game meat exists, it is advised that a report be made to DAFM, a County Veterinary Officer of the local authority veterinary service, or an Environmental Health Officer of the Health Services Executive (HSE). Relevant contact details are included in the Appendices

Strong measures are required by all stakeholders to make the sale, trade or supply of illegally hunted and/or processed wild game bodies or wild game meat untenable, and to ensure that competent authorities are provided with sufficient information to allow sanctions, e.g. prosecution, to be taken against those responsible for these activities.

Appendix 1: Glossary of Important Terms used in this Document

(Approved) game handling establishment: Any establishment in which game and game meat obtained after hunting are prepared for placing on the market.

Anatomy: The study of the structures of animals

Animal by-products: Entire bodies or parts of animals, products of animal origin or other products obtained from animals which are not intended for human consumption

Approval: In general, if a food business handles and/or processes foods of animal origin, approval under Regulation (EC) No 853/2004 from the appropriate competent authority is required

Cold chain: Keeping raw materials, ingredients, intermediate products and finished products at temperatures necessary to minimise risk to human health. This cold chain must be maintained at all times

Collection centre: Any place where killed wild game is kept prior to being transported to an approved game handling establishment

Commercial documentation: A document containing information regarding a consignment of food of animal origin including an accurate description of the food; the volume or quantity of the food; the name and address of the food business operator from which the food has been dispatched; the name and address of the consignor (owner) if different from the food business operator from which the food has been dispatched; the name and address of the food business operator to whom the food is dispatched; the name and address of the consignee (owner), if different from the food business operator to whom the food is dispatched; a reference identifying the lot, batch or consignment, as appropriate; and the date of dispatch

Competent authority: The central authority of a Member State (or third country) responsible for the organisation of official controls

Critical control points: The step or steps in a process at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels

Cross-contamination: The transfer of micro-organisms from a source to the food

DAFM: Department of Agriculture, Food and the Marine

DAHG: Department of Arts, Heritage and the Gaeltacht

Declaration: A document completed by a trained person which records the trained person's findings following their examination of a hunted and killed wild game animal, and of any viscera removed from the animal, which is carried out to identify any characteristics that may indicate that the meat presents a health risk

EC: European Community

EHO: Environmental Health Officer of the Health Services Executive (HSE)

EU: European Union

Evisceration: The process of removing the viscera from the bodies of wild game

Final consumer: The ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity

Food business operator: The natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control

Food safety management system: 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

FSAI: Food Safety Authority of Ireland

'Game-larder': The place where the primary products of hunting are stored

Green offal: 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: Hazard Analysis and Critical Control Points (see also, food safety management system)

Hazard: A biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect, or a condition or physical situation with a potential for an undesirable consequence

HSE: Health Service Executive

Hunter: A person who hunts alone or is an active member of a larger hunting party (which in the case of estate/tourist hunting could include beaters, ghillies and game keepers). A hunter is not however, a mere spectator to any such activity

'In-feather' wild game: Wild game birds which have been killed by hunting but have not been de-feathered

'In-fur' wild game: Mammalian small or large wild game which have been killed by hunting but not skinned. 'In-fur' wild game may be eviscerated or non-eviscerated

Intermediary/middleman: A person who obtains wild game bodies from hunters with the intention of placing them on the market and includes suppliers to and operators of approved game handling establishments. This person cannot be regarded as the hunter or the primary producer of these primary products, as he/she does not have any direct involvement in the hunting process

Lagomorph: Rabbits, hares and rodents

Large wild game: Wild land mammals living freely in the wild that do not fall within the definition of small wild game. This would be mainly deer in Ireland. Note that because an animal such as deer may live in an enclosure does not prevent them from being classified as being wild game, if they are living under conditions of freedom similar to those of wild deer, i.e. 'living freely in the wild'

Licence number: The number of the deer hunting licence issued to a hunter by the National Parks and Wildlife Service under Section 29(1) of the Wildlife Act, 1976

Local retail establishments: Retail establishments that supply the final consumer, and are located no more than 100 kilometres from where the wild game was hunted

Meat: The edible parts of the animal including blood

Normal hunting practice: The necessary preparation that is part of normal hunting practice, before supplying the game into the food chain. Such preparation may be done 'in the field' or in a 'game larder'. This necessary preparation includes killing and where appropriate, bleeding and the removal of stomach and intestines

NPWS: National Parks and Wildlife Service of the Department of Arts Heritage and the Gaeltacht

Official control: Any form of control that the competent authority or the Community performs for the verification of compliance with feed and food law, animal health and animal welfare rules

Official veterinarian: A veterinarian qualified, in accordance with Regulation (EC) No 854/2004, to act in such a capacity and appointed by the competent authority

Pathological changes: The structural or functional changes that occur in an animal body as a result of disease processes

Physiology: The study of the normal functions a living animal and its parts and includes the study of the way in which an animal body and its parts function

Placing on the market: The holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves

Prerequisites: Hygiene practices and procedures required prior to and during the implementation and ongoing operation of HACCP-based procedures, e.g. relating to premises, equipment, staff training, pest control, waste management

Primary producer: The hunter and also persons transporting and storing primary products of hunting, i.e. hunted 'in the fur' or in the feather eviscerated or non-eviscerated wild game bodies

Primary production: 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. Primary production, in the context of hunting, encompasses the hunting, killing and evisceration on-the-spot or in a 'game larder' of wild game, the gathering and keeping of 'in-fur' large wild game, 'in-fur' small wild game and 'in-feather' wild game birds prior to transport to an approved game handling establishment, and the transport of game to an approved game handling establishment

Primary products of hunting: 'In-fur' large wild game, 'in-fur' small wild game, 'in-feather' wild game birds. These primary products may be eviscerated, or non-eviscerated. These products are no longer regarded as primary products following the removal of fur or feathers or any further preparation going beyond normal hunting practice

Private domestic consumption: Hunting for private domestic use, or the domestic preparation, handling or storage of food for private domestic consumption

Registration: The process by which a food business operator notifies the appropriate competent authority of each establishment under its control with a view to being registered with the competent authority. The purpose of registration is to allow the competent authorities in the Member States to know where establishments are situated and what their activities are so as to enable official controls to be carried out whenever judged necessary by the national competent authority

Retail: The handling and/or processing of food and its storage at the point-of-sale or delivery to the final consumer. This includes distribution terminals, catering establishments, factory canteens, institutional catering, restaurants and other similar food service establishments, shops, supermarket distribution centres and wholesale outlets

S.I.: Statutory Instrument

S.I. No. 22/2020: European Union (Food and Feed Hygiene) Regulations, 2020 (S.I. No. 22 of 2020)

Small wild game: Wild game birds and lagomorphs living freely in the wild

Temporary storage facility: See 'Collection Centre'

Traceability under Regulation (EC) No 178/2002: "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"

Trained person: Somebody that has 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 and has completed training to the satisfaction of the competent authorities in order to be deemed a 'trained person' within the meaning of Regulation (EC) No 853/2004

Trained person number: The unique number provided to a 'trained person' on successful completion of training to the satisfaction of the competent authorities which allows such a person to be deemed a 'trained person' within the meaning of Regulation (EC) No 853/2004

Trichinella: Parasitic nematode worm that can cause disease in people who have eaten raw or undercooked meat from *Trichinella*-infected domestic animals or game

Ungulate: An animal with hooves

Viscera: The organs of the thoracic, abdominal and pelvic cavities, as well as the trachea and esophagus, and, in birds, the crop

Wild birds: Both free living wild birds and also birds that have been hatched/reared under controlled conditions before being introduced into the wild, e.g. pheasants reared and released

Wild game: Wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild under the applicable law in the Member State concerned, including mammals living in enclosed territory under conditions of freedom similar to those of wild game and wild birds that are hunted for human consumption

Exotic wild game species such as wild boar*, are not normally expected to be hunted in Ireland for human consumption.

Wild game bodies: 'In-fur' large wild game, 'in-fur' small wild game and 'in-feather' wild game birds. These bodies are primary products may be in an eviscerated, or non-eviscerated state

Wild game body identifier: Is the means by which each wild game animal body is appropriately identified correlated with the declaration which bears an indication of the identification number of each wild game animal body covered by it, with the corresponding date, time and place of killing

Wildlife dealers: A license granted by the National Parks and Wildlife Service under Section 48 of the Wildlife Act, 1976 (as amended)

* **A note on the European Wild Boar (*Sus scrofa* spp.)**

Wild boar, while once native to Ireland, has been extinct for many centuries and while there have been some recent cases of wild boar having been released into the wild in Ireland, to do so is illegal under the European Communities (Birds and Natural Habitats) Regulations, 2011, and the persons responsible are committing an offence and are liable to prosecution.

In addition, anyone farming or keeping wild boar in the Republic of Ireland must be registered with DAFM in order to be issued with a valid pig herd number. Only persons so registered are allowed to own or trade in pigs including wild boar, no matter how small the number.

In addition, an approved game handling establishment that wishes to process wild boar must have prior written approval from the relevant competent authority (DAFM or the relevant local authority) before accepting these animals or wild game bodies, into the establishment. In particular, arrangements must be put in place to test such animals for the presence of *Trichinella*.

Trichinella is a parasitic nematode worm that can cause disease in people when eating raw or undercooked meat from *Trichinella*-infected domestic animals or game. These diseases are collectively called trichinellosis. It may infect pigs, horses, wild boar, foxes, wolves, bears, skunks, raccoons, rats and other mammals including sea mammals and carnivore birds.

Appendix 2: Food Safety and Wild Game

Food Safety Hazards

The hazards associated with wild game, although primarily microbiological (mainly disease causing bacteria known as pathogens), also include chemical and physical hazards. If we wish to manage the food risks associated with wild game then it is obvious that the management of these hazards must begin with the individual hunter.

Healthy wild game has the potential to carry organisms which can cause disease in humans. Such animals will not be clinically ill and will not show any visible signs of carrying these organisms, before or after they are killed. Example of such organisms could include the bacterial species *Campylobacter jejuni*, *Salmonella* spp., *E. coli* O157 H7 and the parasites *Trichinella* and *Toxoplasma gondii*.

These hazards may be present in the animals gut, their hide, skin or feathers and may be shed in their faeces.

These bacteria have the potential to cause foodborne illness in people if they are allowed to contaminate and multiply on wild game meat. It is safe to assume that all wild game carry these organisms and therefore, all wild game should be handled and stored in a manner that minimises the risk of an infective dose of these organisms being present on the food in question.

In general, the symptoms of foodborne illness in humans include vomiting, diarrhoea, high temperature and stomach cramps. They can last several days and in some cases, can give rise to long term health problems. Foodborne illness can be especially severe and dangerous in the elderly, very young and people who are immunocompromised.

While thorough cooking will kill most food poisoning bacteria, meat may be handled frequently in the stages between killing and cooking and there is obvious potential for bacteria to spread to other foods (cross-contamination).

Often, low numbers of these bacteria may cause illness. Table 1 summarises the type of illness caused by some food poisoning bacteria.

Table 1: Symptoms of Foodborne Illness caused by Common Food Poisoning Bacteria

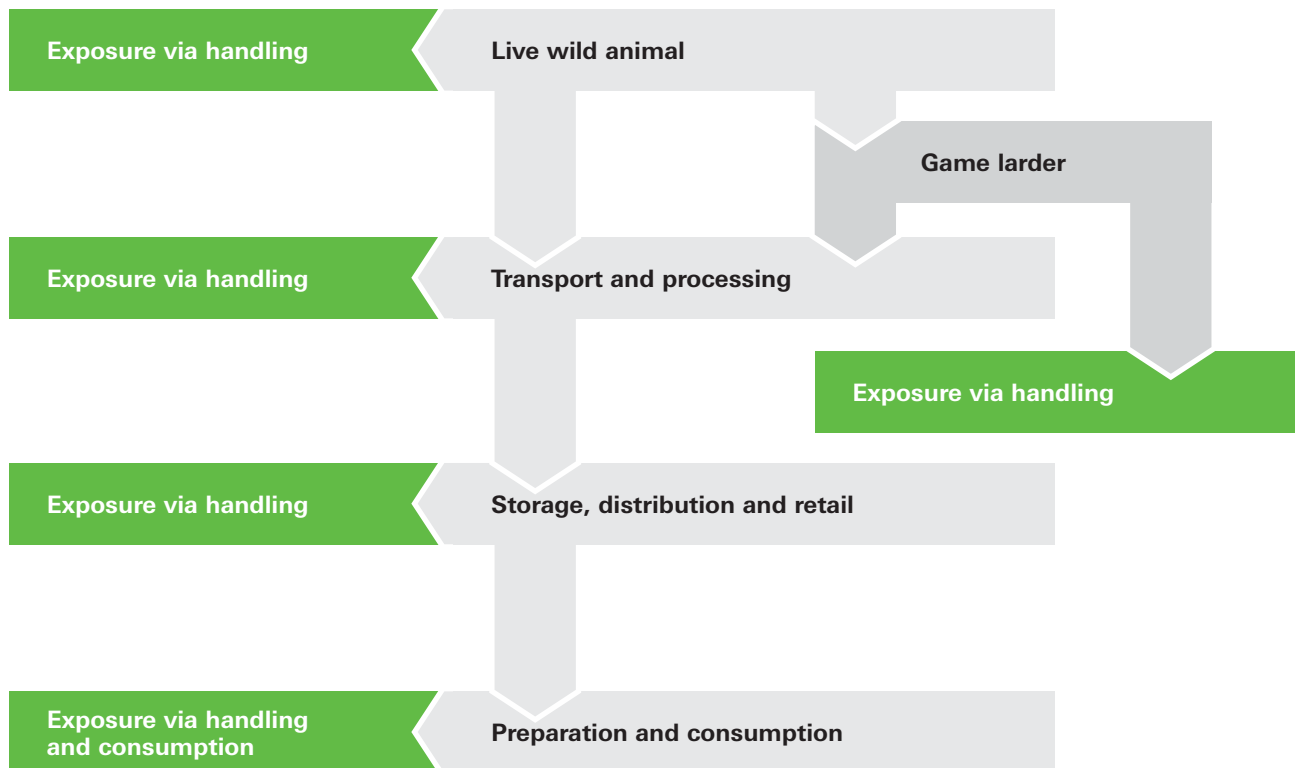
| Bacteria | Incubation Period | Duration of Illness | Common Clinical Manifestations |
|--------------------------------|-------------------|----------------------------|--|
| <i>Campylobacter</i> spp. | 3-5 days | 2-7 days | Abdominal cramps, diarrhoea, headache, fever |
| <i>E. coli</i> O157 H7 | 12 hours-10 days | Often of extended duration | Abdominal pain, diarrhoea, occasionally long term kidney damage and other serious health effects |
| <i>Salmonella</i> spp. | 12-36 hours | 2-20 days | Abdominal cramps, nausea, fever, bloody diarrhoea |
| <i>Yersinia enterocolitica</i> | 3-7 days | 1-3 weeks | Diarrhoea, fever, abdominal pain, vomiting |

There are many ways in which these infections can be acquired.

These bacteria can be transferred to the meat when the carcass is being de-hided, plucked, eviscerated etc. These bacteria could be transferred to the meat from human hands, tools and other equipment, water, working surfaces etc.

These bacteria can also grow during storage and transport if conditions are suitable, e.g. if the cold chain is not adequately maintained.

It is important to remember that foodborne illness can occur from both the consumption and the handling of wild game. Indeed cross-contamination, especially in the domestic kitchen, is a major source of foodborne illness.

Figure I: Exposure Pathways for Hazards from Wild Game Animals*

Hazards are not identical for all wild game species that are commonly hunted as can be seen from Diagram I. The information presented in this diagram was gathered as part of a major study conducted by the Veterinary Laboratories Agency (UK) which assessed the hazards and risks associated with wild game.

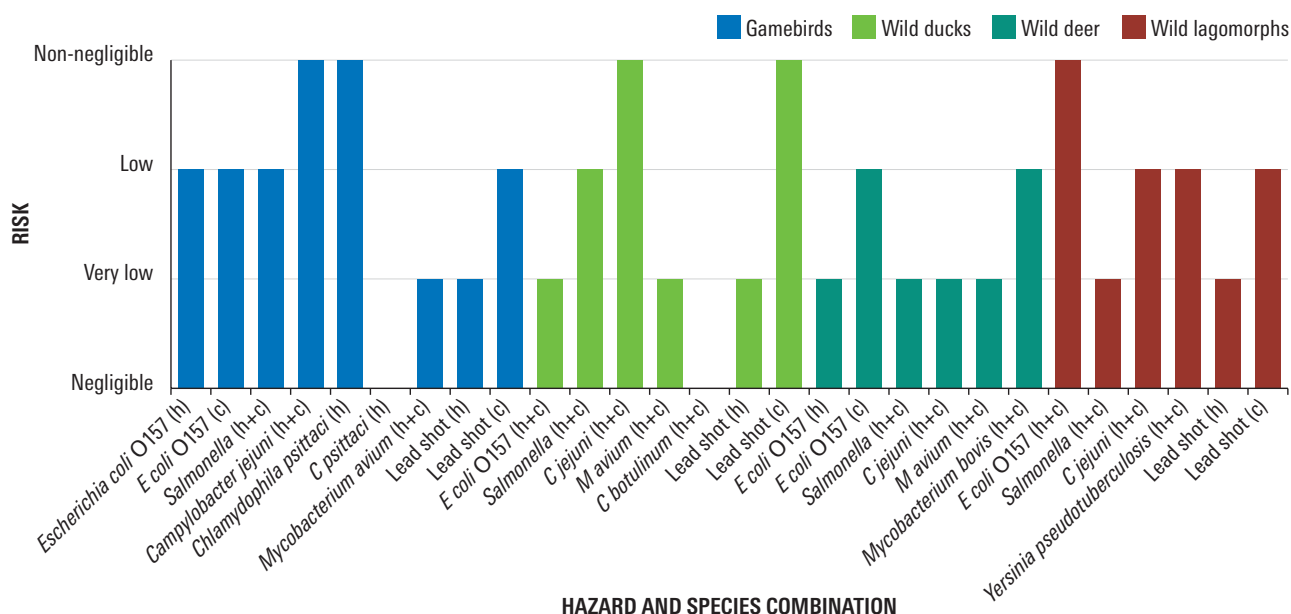
For example:

- *Campylobacter jejuni* (a microbiological hazard) would be more commonly associated with birds
- Lead shot (both a physical and chemical hazards) has been shown to be most commonly associated with waterfowl
- *Mycobacterium bovis* (a microbiological hazard) is associated with deer
- Residues of persistent organochlorine pesticides (such as DDT) and residues of chemicals used for cleaning and disinfection

* *Veterinary Record* (2005) 157, 321-322

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Figure II: Assessed Risk to Human Health from Handling (h) and Consumption (c) from the Identified Hazards in Wild Game*



Key hazards that could potentially be found in particular wild game animals are listed in the table below:

Table 2: Hazards Associated with Particular Wild Game Species*

| Hazard | Wild game species |
|------------------------------------|--|
| <i>Escherichia coli</i> O157 | All |
| <i>Salmonella</i> species | All |
| <i>Campylobacter jejuni</i> | All |
| <i>Mycobacterium avium</i> | Gamebirds, wild ducks, wild deer |
| <i>Chlamydomphila psittaci</i> | Gamebirds |
| <i>Clostridium botulinum</i> | Wild ducks |
| <i>Mycobacterium bovis</i> | Wild deer |
| <i>Yersinia pseudotuberculosis</i> | Wild lagomorphs |
| Lead shot | Gamebirds, wild ducks, wild lagomorphs |
| <i>Toxoplasma gondii</i> | Wild deer |

The risks associated with these hazards can be reduced by:

- The application of good hygiene practices following shooting to the point of delivery to the game handling establishment
- Implementing procedures based on HACCP principles where appropriate, i.e. at the game handling establishment
- The removal of obviously unfit carcasses
- Veterinary post-mortem inspection (where carried out)
- Thorough cooking

* *Veterinary Record* (2005) 157, 321-322
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It is clear that the hunter has an important role to play regarding points (a) and (c).

The hazards alluded to have to be managed after the game has been supplied to an approved game handling establishment and indeed, up until it is eaten by the final consumer.

Food businesses operating processing or handling wild game beyond the primary product stage, i.e. 'in-fur' or 'in-feather', eviscerated or non-eviscerated carcasses, are required to have more formal, documented procedures in place which they must follow in order to identify and manage the food safety risks associated with their operations – so called food safety management systems.

Formal food safety management systems must be based on the principles of HACCP.

The basic objective of implementing HACCP- based procedures is to identify and control hazards that are critical to ensuring the production of safe food - in this case, wild game. This is called a hazard analysis and is the starting point for all such food safety management systems.

The hazards could be physical, chemical or microbiological (this has been discussed earlier).

The application of normal structural, operational and personal hygiene procedures (so called prerequisite hygiene requirements) will, if implemented correctly, control the majority of hazards.

Examples include: pest control, cleaning and sanitation, the personal hygiene of workers in the plant. Many hazards can be managed effectively in this way.

Some hazards cannot be managed by prerequisite programs and must be managed by full application of the seven HACCP principles.

Critical control points (CCPs) are points, steps or procedures at which specific controls can be applied so that these food safety hazards are prevented, eliminated or reduced to acceptable (critical) levels.

Further information on HACCP is available from the Food Safety Authority of Ireland's website www.fsai.ie

A hunter who is supplying wild game to an approved game handling establishment is not required to operate a food safety management system based on the principles of HACCP. However, it is important to be aware of how hazards relating to wild game are managed throughout the food chain and the means by which the risks associated with these hazards are controlled.

Appendix 3: Documentary Requirements for Hunters supplying Approved Game Handling Establishments

Large Wild Game – Wild Deer

WILD GAME INTAKE DOCUMENT

A wild deer intake document must be completed for each wild deer received at approved game handling establishments. One document can be used for a number of deer but only when they were shot by the same hunter in the same locality within a reasonable timeframe, e.g. a day's shoot.

The hunter should complete the first part of the document. The second part of the document is to be completed by trained persons/hunters as prescribed by the EU Food Hygiene Regulations. See below for further detail on trained persons. An explanatory note on how to fill out the intake document is also provided.

Untrained hunters should tick the box for 'No', and a trained person is not in a position to sign the 'declaration' and leave the second part of the document blank. Untrained hunters must present the document along with the whole deer including the head and all viscera (internal organs), except for the stomach and intestines, to the approved game handling establishment.

Provision is also made on the intake document where the hunter is untrained but is accompanied by a trained person. Where a member of the hunting party is a trained person who has observed the deer prior to shooting and conducted an examination of the body and viscera after killing, they can sign the trained person section of the document. The hunter must still complete the first section.

TRAINED PERSONS – AS PER INTAKE DOCUMENT FOR WILD GAME

In accordance with EU Food Hygiene Regulations*, persons who hunt wild game with a view to placing it on the market for human consumption must be trained to undertake an initial examination of wild game on the spot. Training must be provided to the satisfaction of the competent authority to enable hunters to become trained persons. The significance of this specific training in conducting an initial examination on wild deer is the head and viscera (internal organs) need not accompany the body to the approved game handling establishment.

Trained persons, having completed a training course, will have received instruction as part of their training on how to fill out the trained person declaration. Currently, there are two training courses approved by the competent authorities in the Republic of Ireland provided by NARGC and Country Sports Ireland..

Trained persons must tag the wild deer body at the time of the kill with an approved trained person tag that is a specific colour with the trained person's certification number and a unique body number on it. This is then filled in on the intake document before presentation to the approved game handling establishment. Trained persons should keep a log of all wild deer bodies they tag and their use or who they were supplied to.

* Council Regulation (EC) No 853/2004 Annex III Section IV: Wild Game

Appendix 4: Competent Authority Contact Details

| County | Address | Phone | Email |
|-------------------------|---|-------------|---------------------------------|
| Carlow County Council | County Offices, Athy Road, Carlow | 059 9170300 | secratar@carlowcoco.ie |
| Cavan County Council | Courthouse, Farnham St, Cavan | 049 4378300 | info@cavancoco.ie |
| Clare County Council | New Road, Ennis, Co Clare | 065 6821616 | customerservices@clarecoco.ie |
| Cork County Council | County Hall, Carrigrohane Road, Cork | 021 4276891 | cosec@corkcoco.ie |
| Donegal County Council | Neil T, Blaney Road, Letterkenny | 074 9153900 | info@donegalcoco.ie |
| Galway County Council | County Buildings, Prospect Hill, Galway | 091 509000 | customerservices@galwaycoco.ie |
| Kerry County Council | Aras An Chontae, Rathas, Tralee | 066 7183500 | info@kerrycoco.ie |
| Kildare County Council | Aras Chill Dara, Devoy Park, Naas, Co Kildare | 045 980200 | customercare@kildarecoco.ie |
| Kilkenny County Council | County Hall, John's Street, Kilkenny | 056 7794000 | info@kilkennycoco.ie |
| Laois County Council | County Hall, Portlaoise, Co Laois | 057 8664000 | environmentadmin@laoiscoco.ie |
| Leitrim County Council | Courthouse, Carrick-on-Shannon, County Leitrim | 071 9620005 | customerservices@leitrimcoco.ie |
| Limerick County Council | County Hall, Dooradoyle, Limerick | 061 556000 | customerservices@limerick.ie |
| Longford County Council | County Secretary's Office, Great Water Street, Longford | 043 3343300 | info@longfordcoco.ie |
| Louth County Council | Millennium Centre, St. Alphonsus Road, Dundalk | 042 9335457 | info@louthcoco.ie |
| Mayo County Council | Aras An Chontae, The Mall, Castlebar | 094 9024444 | environment@mayococo.ie |
| Meath County Council | County Hall, Navan, Co Meath | 046 9097000 | customerservices@meathcoco.ie |

| County | Address | Phone | Email |
|--------------------------------|---|-------------|-----------------------------------|
| Monaghan County Council | County Office, The Glen, Monaghan | 047 30500 | info@monaghancoco.ie |
| North Tipperary County Council | Courthouse, Nenagh | 0761065000 | customerservices@tipperarycoco.ie |
| Offaly County Council | Courthouse, Tullamore | 05793 46800 | webmaster@offaly.ie |
| Roscommon County Council | Courthouse, Roscommon | 0906637100 | info@roscommoncoco.ie |
| Sligo County Council | County Hall, Riverside, Sligo | 071 9111111 | info@sligococo.ie |
| South Dublin County Council | Town Centre, Tallaght, Dublin 24 | 01 414 9000 | info@sdblincoco.ie |
| South Tipperary County Council | County Hall, Emmet Street, Clonmel | 076 1065000 | customerservices@tipperarycoco.ie |
| Waterford County Council | Waterford County Civic Offices, Dungarvan | 076 1102020 | contact@waterfordcouncil.ie |
| Westmeath County Council | County Buildings, Mullingar | 044 9332000 | customercare@westmeathcoco.ie |
| Wexford County Council | County Hall, Wexford | 053 9196000 | info@wexfordcoco.ie |
| Wicklow County Council | County Buildings, Wicklow | 0404 20100 | corporate@wicklowcoco.ie |

DEPARTMENT OF ARTS, HERITAGE AND THE GAELTACHT

National Parks & Wildlife Service (NPWS)
90 King Street North,
Arran Quay,
Dublin,
D07 N7CV

Tel: +353 1 888 3242

LoCall: 1890 383 000

(from Republic of Ireland only)

Local NPWS Regional Management Contact
Information (see below)

Email: nature.conservation@ahg.gov.ie

Website: www.npws.ie

DEPARTMENT OF AGRICULTURE, FOOD AND THE MARINE

Agriculture House
Kildare Street
Dublin 2

Tel: +353 1 6072000

Website: www.agriculture.gov.ie

FOOD SAFETY AUTHORITY OF IRELAND

The Exchange
George's Dock
IFSC
Dublin 1
D01 P2V6

Tel: +353 1 817 1300

Email: info@fsai.ie

Website: www.fsai.ie

Appendix 5: List of Approved Game Handling Establishments

Approved Food Establishments

Establishments handling products of animal origin for which hygiene conditions are laid down in [Regulation \(EC\) No 853/2004](#) must be approved by the competent authority of each Member State of the EU.

Member States are required by law to make up-to-date lists of such establishments available to other Member States and to the public.

Below are links to the lists of approved establishments for each competent authority in the Republic of Ireland, for each EU Member State as well as links to a list of EU approved establishments in third countries (outside EU).

Approved Establishments in Republic of Ireland

Local authority

- [Food Business Operators Approved by Local Authorities under S.I. No. 22 of 2020](#)

Department of Agriculture, Food and the Marine

- [Meat Establishments Approved by DAFM under S.I. No. 22 of 2020](#)

Approved establishments in the Member States of the European Union

- [Lists of Approved Food Establishments in EU Member States](#)

EU approved establishments in Third Countries (outside the EU)

- [List of EU approved establishments in Third Countries](#)



Food Safety Authority of Ireland


The Exchange, George's Dock, IFSC,
Dublin 1, D01 P2V6


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