

AUDIT REPORT

Audit of the Wild Game Food Supply Chain

DECEMBER 2019



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1. GLOSSARY

FSAI	Food Safety Authority of Ireland
HACCP	Hazard analysis and critical control point
FBO	Food business operator
NPWS	National Parks and Wildlife Service

2. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of food law in Ireland, which is predominantly carried out through service contract arrangements with official agencies. The FSAI carries out targeted audits of food businesses to determine the level of compliance with food law and the effectiveness of its implementation.

This targeted audit of the wild game food supply chain was undertaken as part of the FSAI's programme of audits. Audits were conducted in twenty-two food businesses between December 2017 and October 2018. The primary objective of the audit was to assess the traceability and supplier controls in place for wild game by food business operators (FBO's) in Ireland. Each FBO was provided with an individual report following the audit of its business and these reports were copied to the relevant supervising official agency.

During the audit, operational controls, documented procedures and records relating to the supply of wild game into and out of the food businesses were examined. The FBOs supplying wild game to the restaurants and butcher were requested to carry out a number of checks on traceability for wild game which they had processed or sold.

The main category of game in the twenty-two establishments audited was wild deer. Of these, twelve restaurants and one butcher were selling wild deer and nine wild game wholesalers, game handling establishments, collection centres and wild game dealers were handling wild deer. 85% of the restaurants and the butcher were selling wild game on a seasonal basis only, from December to January inclusive each year. The restaurants and the butcher audited purchased wild game from approved game handling establishments, wholesalers or butchers; with none purchasing directly from hunters.

Supplier controls conducted by the wild game wholesalers, game handling establishments, collection centres and wild game dealers were assessed as part of the audit. Controls assessed included the maintenance of a list of hunters supplying the establishment, maintenance of the hunters' licenses and training certificates, tagging of carcasses, intake checks performed at the establishment, completion of the wild game intake document and carcass traceability. The level of detail included in the FBOs' documented controls varied across the nine wild game wholesalers, game handling establishments, collection centres and wild game dealers. Some documented controls were not reflective of the level of operational controls that were being implemented. All had implemented systems to maintain records in relation to the hunters that were supplying wild game to them. This included records of the training received and the license to hunt wild game.

The overall outcome of this audit was found to be satisfactory. However, there were twenty-two breaches of legislative requirements identified during this audit. These breaches related to tagging of carcasses, records related to hunter training, documented procedures, traceability and use of an identification mark. The FSAI is aware of allegations of illegal activity associated with the hunting of wild game, in particular venison. The FSAI, working with official agencies and other state bodies continues to investigate and take enforcement action, as appropriate, in order to ensure that public health continues to be protected.

Five recommendations are made to strengthen controls in this area.

3. INTRODUCTION

The Food Safety Authority of Ireland (FSAI) is responsible for the enforcement of food law in Ireland, which it carries out predominantly, through service contracts with the Government Departments and Agencies. The FSAI carries out targeted audits of food businesses each year to determine levels of compliance with current food law and the effectiveness of its enforcement. This audit examined the food law compliance within the wild game supply chain in Ireland. Twenty-two FBO's were audited, these included restaurants and butchers (a butcher and a number of restaurants and hotels), wild game wholesalers, game handling establishments and collection centres as well as wild game dealers and hunters.

Wild game can be split into two main categories: large wild game and small wild game. The following species of wild game were included in this audit:

Large wild game

- Wild Deer

Small wild game

- Hares, Rabbits, Grouse, Wild Duck, Snipe, Pheasant, Partridge, Woodcock, Woodpigeon, Goose, Pigeon, Widgeon, Quail

Wild game meat is taken from an animal that has been shot by a hunter, the primary producer. Hunters are permitted to do no more than the necessary preparation that is part of normal hunting practice before supplying the game into the food chain. It is permitted for such preparation to be done 'in the field' or in a 'game larder'. This necessary preparation includes killing, and where appropriate, bleeding and removing the stomach and intestines. For trained hunters; this preparation will also involve the removal of the heart, lungs and associated tissues and the head; as part of the examination of the wild game body and viscera for abnormal characteristics or suspicion of environmental contamination. 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 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.

Individuals and food businesses involved in hunting wild game with the intention of placing it on the market are considered FBOs and the food they produce has to meet all requirements of food law. In the context of hunting and related operations, the following are all considered to be FBOs and must be registered 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 with 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

Restaurants and butchers, wild game wholesalers, game handling establishments, collection centres and wild

game dealers are supervised by authorised officers who enforce food law. The hunters (who are also FBOs) fall outside of such supervisory arrangements; however, when presenting wild game at game handling establishments or dealers, the hunter's license and training certification is checked by the food business receiving the wild game as part of their own controls on suppliers and incoming carcasses. These FBO controls are then reviewed and assessed by the authorised officers during official control inspections.

The FSAI has produced a guidance document on the hunting and processing of wild game for human consumption. The Guidance is written to assist people who hunt, shoot or process wild game to aid their understanding of their legal obligations in this area. It also outlines the responsibility of retail and wholesale premises, including restaurants and hotels accepting wild game meat and their obligations to ensure it is sourced from registered or approved suppliers. The Guidance document can be accessed here: [Guidance on Hunting and Processing of Wild Game for Human Consumption](#).

3.1. Audit Objective

The objective of the audit was to assess FBO compliance with food legislation applicable to their business; with particular emphasis on traceability and supplier controls related to wild game.

3.2. Audit Scope

The primary objective of the audit was to assess the traceability and supplier controls in place for wild game by food business operators (FBO's) in Ireland. The team assessed whether FBOs were complying with the criteria against which the audit was being carried out. Farmed game and other meat were excluded from the scope of this audit.

3.3. Audit Criteria and Reference Documents

- [Regulation EC \(No\) 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended](#)
- [Regulation EC \(No\) 852 of 2004 on the hygiene of foodstuffs, as amended](#)
- [Regulation EC \(No\) 853 of 2004 on the hygiene rules for food of animal origin, as amended](#)
- [Regulation EC \(No\) 854 of 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, as amended](#)
- [European Communities \(Food and Feed Hygiene\) Regulations 2009 \(S.I. No. 432 of 2009\), as amended](#)
- [European Communities \(Hygiene of Foodstuffs\) Regulations 2006 \(S.I. No. 369 of 2006\), as amended](#)
- [European Communities \(General Food Law\) Regulations 2007 \(S.I. 747 of 2007\), as amended](#)
- [Regulation \(EU\) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, as amended](#)
- [Statutory Instrument No. 556 of 2014, European Union \(Provision of Food Information to Consumers\)](#)

[Regulations 2014](#)

- [FSAI Guidance on Hunting and Processing of Wild Game for Human Consumption](#)

3.4. Audit Methodology

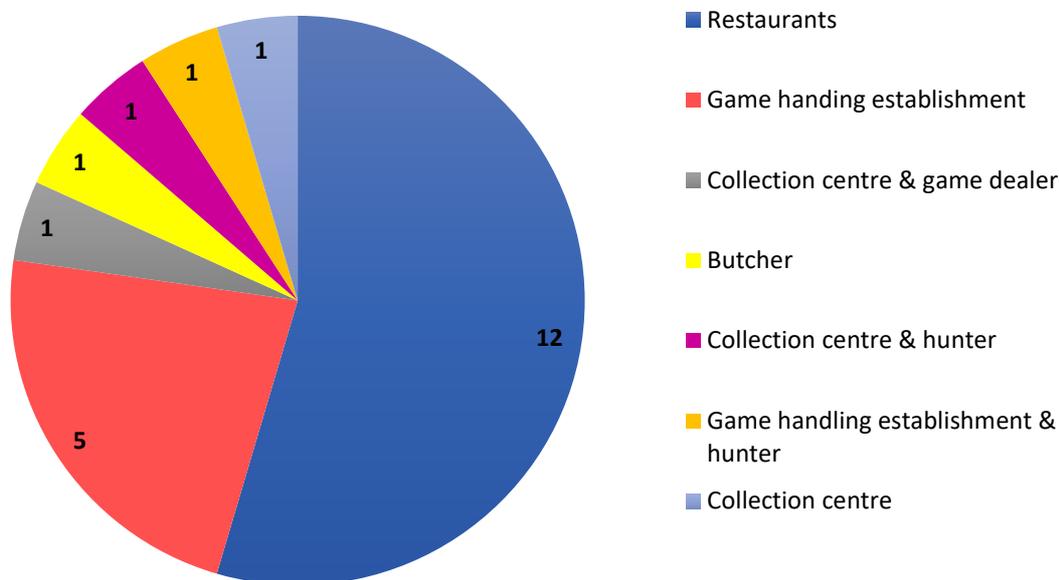
This audit was undertaken using documented procedures which are included in the FSAI Business Management System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI audit obligations and are in accordance with the requirements of Regulation 882/2004 (including Article. 6.1 of Commission Decision 677/2006) and Section 48 (9) of the FSAI Act.

This audit covered the wild game food supply chain from hunters through to restaurants and butchers. The audit team generated a list of FBOs involved in the wild game food supply chain. This included restaurants and butchers selling wild game, wild game wholesalers, game handling establishments, collection centres, wild game dealers and hunters. One butcher and twelve restaurants were audited and the wild game suppliers were established. The audit team then proceeded to follow the wild game traceability trail back along the food chain to game handling establishments, collection centres and hunters.

At each opening meeting, the audit team provided an explanation of the audit to the FBO, outlining that it was a targeted audit of food businesses, focusing on the assessment of controls regarding traceability and supplier controls along the wild game food supply chain. During the audit, operational controls, documented procedures and records relating to the supply of wild game into and out of the food business were examined. The FBOs supplying wild game to the restaurants and butcher were then requested to carry out a number of checks on traceability for wild game which they had processed or sold.

On site activity took place over two hunting seasons, commencing in December 2017 and ending in November 2018. The supervising official agency was informed in advance of the audit so that the relevant inspector could accompany the audit team. The audits were unannounced to the FBOs.

Figure 1: Number and type of food businesses audited



A total of twenty-two food businesses were audited. Some of these businesses were engaged in dual activities; for example, trained hunters that also operated a collection centre or a game handling establishment; or a wild game dealer that also operated as a collection centre. In such cases, both aspects of the activities were audited.

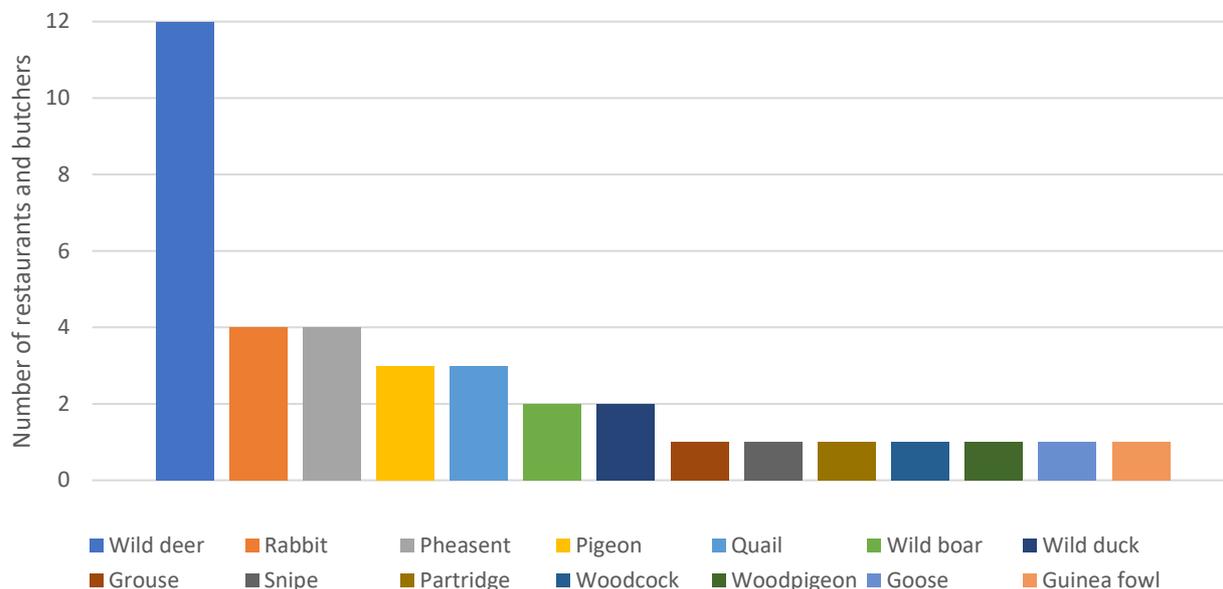
The main category of game in the establishments audited was wild deer. The twelve restaurants and one butcher were selling wild deer and the other nine establishments were handling wild deer. Five of the restaurants and butcher only sold wild deer (venison) as part of their menu. Four of the wild game wholesalers, game handling establishments, collection centres and wild game dealers dealt exclusively with wild deer. Those establishments (both retail and processing) that were handling other wild game did so to a much lesser degree than the volume of wild deer.

4. AUDIT FINDINGS

4.1. Audit Findings in Restaurants and Butchers Audited

During the audits of the twelve restaurants and one butcher, the following were evaluated; the species of wild game being handled in the premises, suppliers of the wild game, FBO controls and the format (in-fur/in-feather or dressed) of the wild game at each establishment.

Figure 2: Types of wild game sold in the restaurants and butcher audited



85% of the restaurants and butcher were selling wild game on a seasonal basis only, from December to January inclusive each year. The butcher and one of the restaurants, sold some wild pigeon and wild rabbit on a year-round basis.

Many of the restaurants were purchasing wild game from multiple suppliers. Eleven purchased directly from game handling establishments, five purchased from meat wholesalers and one purchased from a butcher shop. In each case, details of the suppliers and the products being supplied were assessed by the audit team. There was no evidence of supply of wild game directly from hunters to the retail food businesses audited.

The handling of ‘in the fur’ or ‘in the feather’ wild game bodies at restaurants poses particular challenges in relation to preventing cross-contamination. All twelve of the restaurants were purchasing dressed wild game, with the majority of the incoming product already portioned into steaks, cubed meat or fillets.

The FBOs controls relating to traceability and supply of wild game implemented in the restaurants and butcher, at the time of this audit, were found to be effective.

4.2. Audit Findings in Wild Game Wholesalers, Game Handling Establishments, Collection Centres and Wild Game Dealers

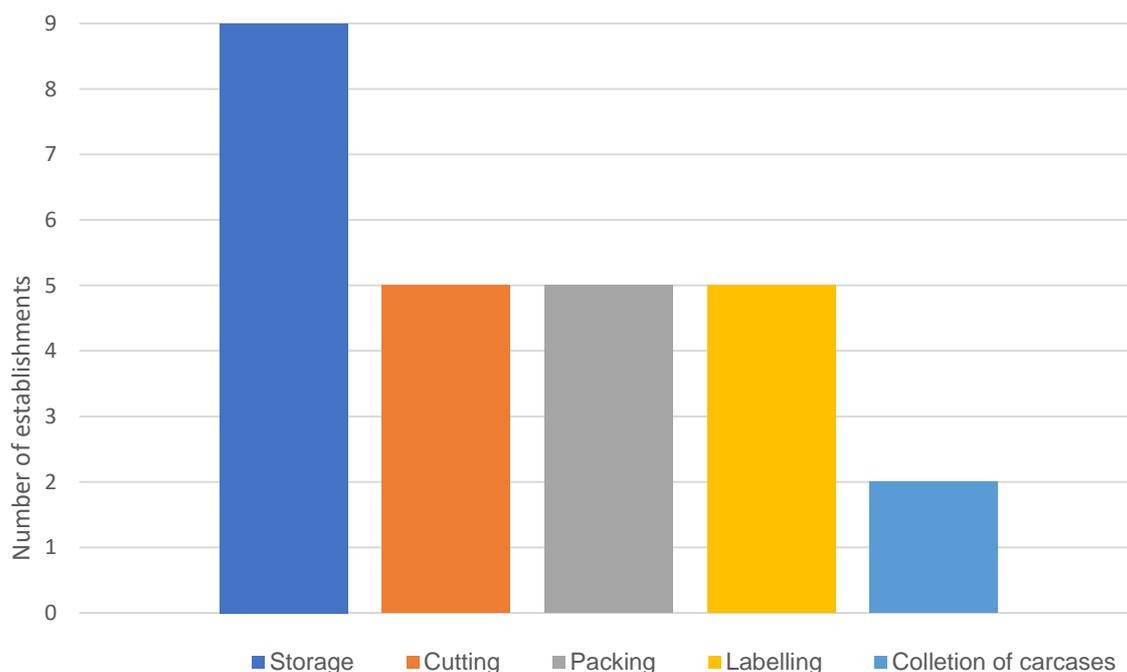
The focus of the audits in the wild game wholesalers, game handling establishments, collection centres and wild game dealers included;

- assessment of the species of wild game being handled,
- the activities being undertaken in the premises,
- the destination and format (in-fur or dressed) of wild game leaving the establishment

- supplier and hunter control procedures,
- tagging of carcasses,
- intake checks including completion of the wild game intake document, and
- a number of traceability exercises for product which had been identified as being supplied to one of the restaurants or the butcher audited as part of the project.

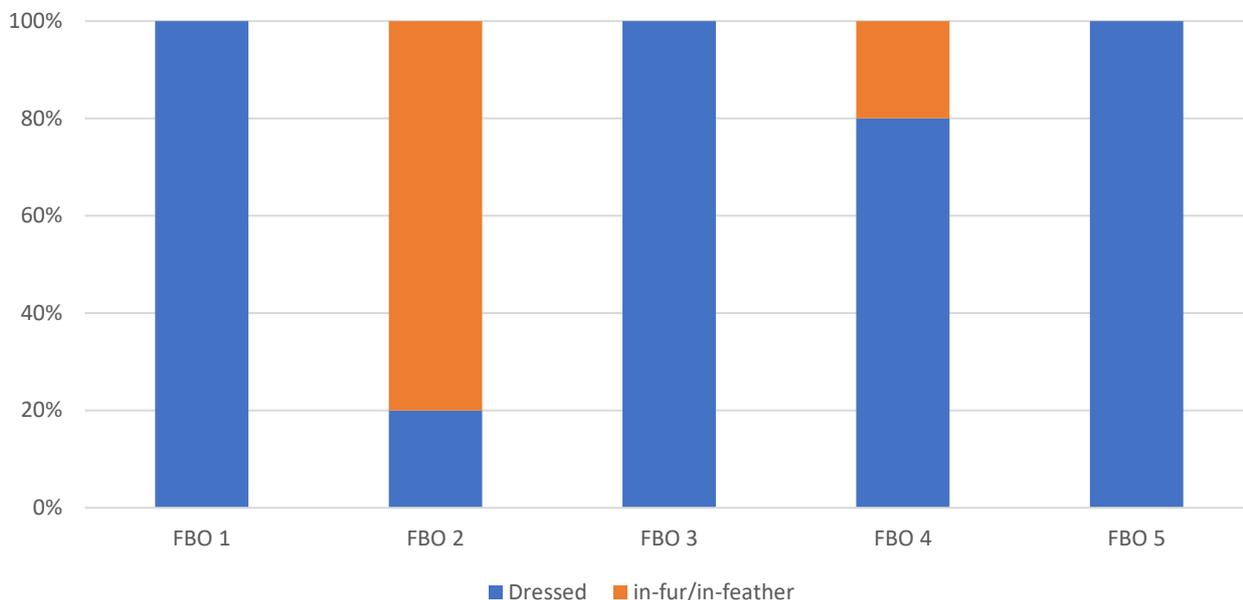
The nine wild game wholesalers, game handling establishments, collection centres and wild game dealers were carrying out some or all of the following activities; collection of carcasses, storage, cutting, packing and labelling.

Figure 3: Activities being carried out in wild game wholesalers, game handling establishments, collection centres and wild game dealers audited



In the five game handling establishments, wild game may be skinned and cut (dressed) or may be sent to customers in carcass form with the skin still on (in-fur/in-feather).

Figure 4: Format of wild game leaving game handling establishments



The main destinations for the wild game from collection centres and game traders was to wild game handling establishments. The game handling establishments then sent the wild game on to meat and wild game wholesalers, restaurants and butchers. None of these wild game establishments were engaged in direct sale to consumers.

4.2.1. Food Business Operator (FBO) Controls

Supplier controls conducted by the wild game wholesalers, game handling establishments, collection centres and wild game dealers were assessed as part of the audit. Controls assessed included the maintenance of a list of hunters supplying the establishment, maintenance of the hunters’ licenses and training certificates, tagging of carcasses, intake checks performed at the establishment, completion of the wild game intake document and carcass traceability.

The level of detail included in the FBOs’ documented controls varied across the nine establishments. The elements outlined above were not always included, with only 29% referencing the requirement for all carcasses to have a trained hunters’ tag at the point of intake to the game handling establishment in their documented procedure. As part of the assessment of this audit criterion, many of the game handling establishments noted the difficulty for trained hunters to get access to carcass tags. To resolve this problem and to ensure that untagged carcasses did not arrive at the game handling establishment or collection centre, three game handling establishments supply hunters’ tags directly to the hunters supplying their business. The audit team noted that this was a practical measure to ensure control and traceability was established prior to accepting the carcasses into the game handling establishment.

As part of the intake controls established for game handling establishments, a wild game intake document must be completed by trained hunters. The wild game intake document records details of the location and time of the kill, as well as a trained hunter declaration. Following examination of the body, and of any viscera removed, to identify

any characteristics that may indicate that the meat presents a health risk; the hunter declaration confirms that:

- No abnormal behaviour observed before killing
- No abnormal characteristics during examination of the body and of any viscera removed, and
- No suspicion of environmental contamination.

The game handling establishments noted that since the implementation of the hunter training programme there had been no carcasses accompanied by the head and viscera as no abnormal characteristics were observed at time of shooting and thus rarely are any anomalies noted on the intake document.

Traceability for the wild game which had been identified by the audit team at the retail and catering outlets were assessed at the game handling establishments. In six of the nine food businesses audited, traceability to the wild game intake document was established, and in each case the trained hunter had signed the declaration to indicate that there were no anomalies. Traceability information was provided by the six FBOs in a timely manner for the wild game which had been identified at the restaurants and the butcher. In the remaining establishments, there were non-compliances in relation to some of the traceability information being assessed. This included some unidentified product in one game handling establishment and documentation not being fully completed or being incorrectly completed which meant that traceability from customer back to supplier (hunter) was not possible for all products being assessed.

86% of the game handling establishments audited had implemented a system for maintaining records regarding the hunters training and licences. One game handling establishment did not maintain records of hunters training or licences. In the remaining game handling establishments, the trained hunters listed on the wild game intake documents for the respective products were cross-referenced by the audit team with the records held on file and found to be satisfactory.

The two hunters that were subject to audit also operated a game handling establishment and a collection centre, respectively. Both were found to be knowledgeable of the legal requirements regarding the hunting and handling of wild game.

Hunters of wild game are legally required to be registered as FBOs. It should be noted that there is no designated body or agency for hunters to register with. However, there are a number of bodies that maintain lists of hunters for their own purposes. For example, training bodies maintain lists of those hunters that have undergone the hunter training programme in animal health and hygiene relevant to wild game. Game handling establishments maintain lists of suppliers (hunters) as part of their food safety management systems. The National Parks and Wildlife Service (NPWS) maintain lists of those hunters that have been granted a license to hunt wild game.

4.2.2. Intra-EU Trade of Wild Game

The FSAI Guidance on Hunting and Processing of Wild Game for Human Consumption outlines that intra EU trade in unskinned or 'in-fur' large wild game bodies should only take place provided that in addition to the requirements of Regulation (EC) No 853/2004, that:

- 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, and
- 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 and a health certificate. 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.

One game dealer and one game handling establishment were exporting in-fur wild game (venison only) to the UK. The game handling establishment also imported in-feather wild game birds from the UK for the Irish market. The documentation regarding a number of consignments of wild game which had been exported to the UK were examined as part of the audit and were found to be satisfactory.

4.2.3. Breaches of Legislation

There were twenty-two breaches of the following legislative requirements identified during this programme of audits:

- Thirteen breaches of Regulation (EC) No 853/2004 laying down specific hygiene rules for foods of animal origin, Annex III, Section IV, Chapter II, relating to wild game meat. Seven of these breaches relate to the tagging of carcasses not taking place at the time of shooting and six related to hunter training records not being adequately maintained.
- Six breaches of Article 5 of Regulation (EC) No 852/2004 on the hygiene of foodstuffs, relating to hazard analysis and critical control points. These six breaches related to the food business' documented procedures not being adequate, or not accurately describing the operational controls that had been implemented.
- Two breaches of Article 18 of Regulation (EC) No 178/2002 laying down the general principles and requirements of food law, relating to traceability. The two breaches of traceability requirements related to some unidentified product in one game handling establishment and documentation not being fully completed or being incorrectly completed which meant that traceability from customer back to supplier (hunter) was not possible for all products being assessed.
- One breach of Regulation (EC) No 853/2004 laying down specific hygiene rules for foods of animal origin, specifically, Annex II, Section I relating to identification marking. This breach related to the inclusion of an oval mark on tags supplied by the game handling establishment to hunters for application to wild game at the time of shooting.

5. Illegal Activity Associated with Wild Game

Notwithstanding the overall satisfactory outcome for this audit, the FSAI is aware of allegations of illegal activity associated with the hunting of wild game, in particular venison. Illegal activity in the context of wild game may involve either the illegal hunting 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 endanger public health and damage the image of Irish food in general, both in Ireland and abroad.

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 authorities. The FSAI, working with official agencies and other state bodies continue to investigate and where appropriate take enforcement action, in order to ensure that public health is not compromised.

6. Conclusions

The outcome of this programme of audits was found to be satisfactory despite some legislative breaches. In 85% of the restaurants, wild game was being sold on a seasonal basis only, between December and January. All of the restaurants and the butcher audited purchased wild game from approved game handling establishments, wholesalers or butchers. The FBO controls relating to traceability and the supply of wild game implemented in the restaurants and butchers, at the time of this audit, were found to be effective. Supplier controls assessed as part of the audit varied in the level of detail in documented procedures; in many cases the documented procedure did not reflect the level of operational controls that were in place in the game handling establishments, wholesalers, collection centres and dealers. All had implemented systems to maintain records in relation to the hunters that were supplying wild game to them. This included records of the training received and the license to hunt wild game.

Following audits in which non-compliances with legal requirements were identified, the FBO was informed of these non-compliances and was required to implement corrective actions which were reviewed for close-out by the supervising official agency.

7. Recommendations

Five recommendations are made

1. FBOs must put procedures in place to ensure full compliance with all the relevant requirements of food law.
2. FBOs are advised to ensure that any wild game purchased by them has been legally hunted and handled.
3. There is a need to establish an official register of trained hunters as FBOs. Hunters are legally required to be registered but have no agency to register with.
4. Game handling establishments need to ensure that only carcasses that have been tagged at the time of the kill are accepted into their premises.
5. The competent authorities need to ensure that any allegations of illegal activity associated with the hunting of wild game is investigated and prevented. A cross-agency approach to this illegal activity should be employed.



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