

THE DEER FARM & PARK DEMONSTRATION PROJECT



The differences between deer parks and farms, respective advantages and disadvantages, and their history in Scotland and the UK.

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Perhaps the earliest deer 'parks' were the systems used for catching wild deer like this one on the Isle of Rum.



Or this one on the Isle of Jura.....



Image courtesy Iain Thornber

Over 3000 medieval deer parks at a time when the human population was only about three or four million.

(Acknowledgments to the late Oliver Rackham)



Kincardine park pale – 13th century or earlier – enlarged 1266

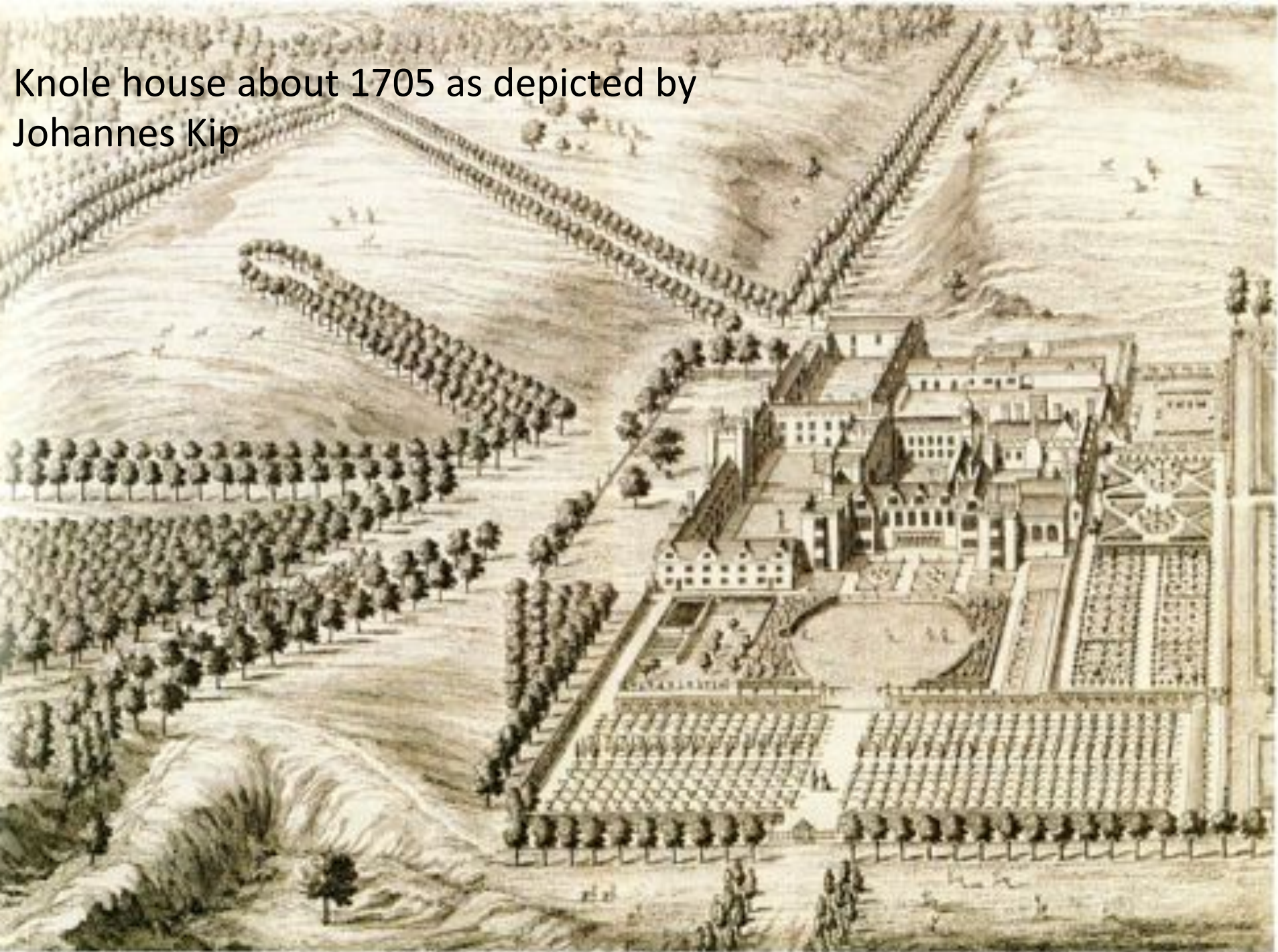


Coursing stags at Nonsuch palace in about 1620





Knole house about 1705 as depicted by Johannes Kip





In England some new parks have been established with assistance from Higher Level Stewardship to provide environmental benefits and revenue from venison, trophies, etc whilst many deer farms were created to produce venison – how could they be distinguished?

Legislation was introduced to distinguish farms from parks because:

1. Deer **farmers** wanted their venison to be treated as 'red meat', that is to say like beef, lamb or pork, with the option to kill their animals in an abattoir
2. European vets argued that in that case the meat must be ante-mortem inspected and handled in appropriate facilities yet they could not compel deer farmers to send their deer to abattoirs
3. Vets considered that deer reared on farms may pose a higher disease risk than wild venison

The distinction between parks and farms:

The EU Regulation No 853/2004 Annex 1 defines wild game as ***'wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild under the applicable law in the Member State concerned, including mammals living in enclosed territory under conditions of freedom similar to those of wild game.'***

Pronounced differences between regions within UK and Europe – thus Germany claims to have 5,600 deer ‘farms’ but their average size is 2 ha.

Are these parks or farms?

The FSA's proposed criteria in 2007 ran as follows:

- 1. There should be sufficient room for deer to roam naturally*
- 2. The enclosed area should provide sufficient natural foodstuffs for the herd to survive.*
While the provision of additional foodstuffs during (harsh) winter months is acceptable, the herd should be able to survive without any such additional food.
- 3. The herd should be self maintaining. Numbers should be kept up through natural reproduction from animals within the herd. If culled deer are replaced with deer brought in from outside then the herd would not be considered as living in conditions of freedom similar to those of wild game.*
- 4. The deer must be killed by 'hunting' i.e. by use of a free bullet.*

This proposed definition was so worded that virtually all deer parks would be classed as deer farms which would obviously be potentially disastrous for parks.

The discussion focussed on paragraph 2 and it was pointed out that not feeding deer in parks would be an infringement of the welfare legislation, was a practice dating back to medieval times and was good practice. Indeed, deer feeding should commence in the autumn in order for them to build up condition for the winter; last minute emergency feeding was bad practice and unlikely to be effective.

It was proposed that clause 2 be dropped.

In December 2013 the following advice was distributed by FSA:

'The conclusion as to whether animals are wild or farmed should be reached with reference to the conditions and circumstances in which the deer live. Each operation should be judged on its own merits with consideration of local issues including the following:

- There should be sufficient room for the herd to roam naturally*
- The enclosed area should provide sufficient natural foodstuffs for the herd to survive. However the provision of additional foodstuffs is acceptable as long as the animals are not fed continuously throughout the year.*
- Numbers of deer should be kept up through natural reproduction from animals within the herd. However culled deer may be replaced with deer brought in from outside subject to animal health rules.*

If the herd does not meet the above criteria then all relevant requirements applicable to the supply of farmed game for human consumption apply. All farmed game meat intended to be put on the market for human consumption must be produced in approved slaughterhouses. However the Regulation also permits the slaughter of farmed game to take place on farm under certain conditions.'

Venison – the hygiene regulations:

FARMS

1. Ante-mortem inspection by a vet
2. Signed statement that bleeding carried out correctly (welfare), occasional checks by vets
3. Carcase eviscerated in Approved **Farmed** Game Handling Establishment
4. Meat then categorised as 'red meat'.
5. Deer can be killed without hunting seasons.
6. Cannot legally be sold to game dealer

PARKS

1. No control over slaughter provided hunter is 'trained'.
2. Carcases can be eviscerated in the field
3. Carcases can be sold through an **Approved Game Handling Establishment (AGHE)** or if within '**hunter exemptions**' (i.e. small and local sales) can be sold without any restriction other than Food Hygiene Regulations enforced by Local Authority (EHO)
4. The close seasons regulations must be obeyed

Approved Game Handling Establishment

- Administered by Food Standards Agency
 - Structural improvements may be needed
 - Inspection and audit costs ongoing
 - Cannot process other domestic meat
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- No restriction on sales within EU
 - Can buy & process venison from other estates
 - Can work co-operatively with other estates' venison

Hunter Exemption

- Sales must be local & small quantities.
- Must sell direct from the estate to consumer.
- Cannot sell from a local butcher's premises
- No exports.
- Cannot buy in venison from other estates
- Cannot form an estate co-operative
- Cannot process other domestic meat

Hunter Exemption

- 'Local' = a very large area.
- Can process in a local butcher's premises
- Can buy in primal cuts from AGHEs
- Can sell through markets throughout UK
- Can do mail order throughout UK
- Can sell under 1 tonne/week to other retailers and caterers

*'We have been advised by the European Commission that current negative list rules would mean that even if a farm has just one day of sporting activity it would be ineligible for farm payments. **This is clearly not acceptable.** I will continue to press for more flexibility in the system and for the removal of obstacles that are, at this stage, preventing us from adding sporting estates to the negative list.'*

Cabinet Secretary Richard Lochhead

11th March 2015

“Scotland’s venison sector has yet to realise its full potential and the Scottish Government is committed to developing that promise and securing a sustainable future for the industry.”

Richard Lochhead, Cabinet Secretary for Rural Affairs