

THE DEER FARM & PARK DEMONSTRATION PROJECT



The hygiene regulations for deer farms and parks.

John Fletcher

Venison Advisory Services Ltd



The funding is being made available through the SRDP Skills Development Scheme which is jointly funded by the Scottish Government and the European Union





All venison is controlled by the EU Food Hygiene Regulations:
Reg (EC) 852/2004 and Reg (EC) 853/2004

Farmed game is defined in Regulation 853/2004 and includes deer produced by farming.

All meat from farmed game placed on the market must be produced in approved slaughterhouses.

Further details can be found in the
'Guide to the Food Hygiene and Other Regulations for the UK Meat Industry'.
See: <http://www.food.gov.uk/business-industry/meat/guidehygienemeat>

The distinction between parks (wild) 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.'

The Wild Game Guide.

Produced and published by the Food Standards Agency

June 2014 revision available on following site:

<http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf>

The Wild Game Guide concerns only wild game although it offers the UK interpretation of farmed deer.....

The UK Food Standards Agency interprets the EU Regulation within the Wild Game Guide as follows:

'Some animals, such as deer, may live in an enclosure such as a large estate or park. If they are hunted, the fact that they are enclosed does not prevent them from being classified as wild game.'

Game animals with sufficient grazing to enable them to live throughout the year without supplemental feeding are also considered to be wild. All these animals must be killed by hunting to be eligible for human consumption. Wild game animals killed in other ways, e.g. by road traffic, cannot be supplied for human consumption.'

This interpretation is so worded that virtually all deer parks should be classed as deer farms which would obviously be disastrous for parks.

Verbal re-assurance has been given that FSA printed this in error and that it will not be enforced as written. The Guide is to be revised in November 2016.

It was pointed out by the BDFPA 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.

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 (‘game dealers’ not ‘game larder’)

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







Legislation for farmed deer was introduced 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.
3. Vets consider that deer reared on farms may pose a higher disease risk than wild venison

Farmed deer can be killed by rifle on the farm OR in an abattoir but they must then be processed in a Farmed Game Handling Establishment.



Crucially, in abattoir
killed deer the hide
is removed before
evisceration







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?

Infrastructure

- Water & Waste disposal –butchery waste
- Business rates – may be discounted
- Fire & Electrical certification
- Health & Safety at Work Regulations
- Public and product liability insurance
- Venison dealer's licence (from EHO) -records
- Environmental health – register as food business
- Food safety training for staff handling food.
- HACCP planning and preparation
- Planning permission & warrants
- Access for deliveries/collections &public access
- Road signage

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

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



The present..... New parks being established with assistance from Higher Level Stewardship to provide environmental benefits and revenue from venison, trophies, etc