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# FOOD SAFETY AND HUNTED GAME IN THE NETHERLANDS: LEARNING FROM OTHER EU MEMBER STATES

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*Margriet Montizaan compiled data on Germany and the U.K. Delphine Nourisson compiled data for an earlier version of this document. Jolianne Rijks compiled data on Belgium, Luxembourg and France.*

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## 1. BACKGROUND AND AIM

At the turn of the century, Europe revised its strategy in matters of food safety for products of animal origin. A number of European laws ensued, including the Regulation (EC) No. 178/2002 (revised on 27/07/2014,) laying down the procedures in matters of food safety, the Regulation (EC) No. 852/2004 (revised on 20/04/2009) providing the guidelines for the hygienic production of all foodstuffs, and, for certain products of animal origin, the Regulation (EC) No. 853/2004 (revised on 01/06/2014), defining specific hygiene rules for food of animal origin. Finally, the Regulation (EC) No. 2075/2005 (revised on 01/06/2014) lays down specific rules on official controls for *Trichinella* in meat. These European laws were subsequently deployed amongst others in the hunted game value chain, where they are referred to as ‘the Hygiene package’.

The Dutch Ministry of Economic Affairs (Min EZ) and the Dutch Agency for Food and Consumer Products (NVWA) wished to assess the progress made in the Netherlands and to identify possible improvements to further ensure food safety. The evaluation focused on the wild game value chain (in-fur or in-feather), in particular on the role of hunters in ensuring food safety and how this was implemented and perceived, as well as on how traceability of hunted wild game in-fur or in-feather was assured in the food chain. The Dutch Wildlife Health Centre performed the evaluation (further referred to as the ‘Dutch evaluation’). Four subjects where improvements can be made were identified: 1) the basic training of hunters, 2) the training of ‘trained persons (TP)’<sup>1</sup>, 3) communication and feedback to stakeholders, clarification of concepts and grey areas, and 4) traceability. Insight into how other European countries are dealing with certain aspects of these subjects would be useful, and lessons could be learnt.

The aim of this document was therefore to collate information from other European countries on certain points relating to the four subjects mentioned above, so that the Netherlands take this into account in the undertaken process to improve food safety in the wild game meat value chain in the Netherlands. For points that cannot be covered due to time restraints, or points for which there lacked information on internet, the aim was to indicate where to find/whom to contact.

## 2. APPROACH

The selection of countries was convenience-based. Expert opinion was used to identify Western European countries where Dutch hunters hunt regularly. In addition, the Benelux countries with which the Netherlands have a convention were considered. Countries were retained based on a language criteria (official documents in English, German, Dutch or French). The countries retained were Belgium (BE<sup>2</sup>), France (FR), Germany (DE), Luxembourg (LU), and the United Kingdom (GB). For France the focus was on Metropolitan France, and the specific legislation of the Crown Dependencies was not considered under the U.K.

The chapter introduction for each of the four subject areas, is 1) the principles of the Hygiene package, 2) the relevant findings in the Dutch evaluation, and 3) report recommendations summarized of the Dutch evaluation on this topic. Legislation and other data were searched for on internet using the Google search engine and e-mails were sent to hunters-organisation (UK, DE). The key words used in this online search are specified per country in Annex 1. The collated data was provided as text per country and in overview tables. Links to relevant on-line data sources were specified. Interesting points for improving the situation in the Netherlands were then summarized.

The document was made in English, so that findings may be verified/amended by the competent authorities of the countries investigated.

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<sup>1</sup> a ‘trained person’ is a hunter who has successfully completed the locally recognized training in food hygiene and safety, as specified in Regulation (EC) 853/2004.

<sup>2</sup> Country names are abbreviated in tables using the official ISO 1366 Alpha-2 code (<https://www.iso.org/obp/ui/#search>).

### 3. SUBJECT 1- BASIC TRAINING OF HUNTERS

Hunters have a certain role in assuring wild game meat is safe for consumption. Specifically, Regulation (EC) 853/2004 specifies that if the TP is not present when the animal is killed, the hunter must inform the TP of any abnormal behaviour observed before killing (Section IV, Chapter I point 3). In the Netherlands, hunters have to complete this information on declaration part 1, together with their name and contact details, the animal details (species, age, gender) and identification number, and date and location where the animal was shot.

During the Dutch evaluation, it was clear that hunters perform most of the initial actions that ensure meat contamination is limited (good placement of shot, hygienic evisceration, timely proper cooling). However not much attention is given to best hygiene practice in the initial training to become hunter ('Jachtopleiding'). In general, apart from descriptions of normal behaviour of animals, the Hygiene package and the hunters role in it is poorly covered. In addition, much hunted meat is handled and consumed by hunters themselves, and therefore the most relevant diseases from public health perspective should be known to them. It was recommended to see if the basic training for hunters could be revised to meet some of these points.

To be able to take views and experience from other countries into account, data was compiled on the situation in other countries with regards to the level of information that the hunter receives on best hygiene practices and on diseases of public health relevance during the initial training to become hunter.

#### BELGIUM

The law on hunting in Belgium is regionalized (3 regions: Flanders, Brussels and Wallonia). The law on hunting '*Loi sur la chasse*' of 28/2/1882 was modified by decree in Flanders on 24/7/1991<sup>3</sup>, in Brussels on 29/8/1991 (hunting prohibited) and in Wallonia on 30/6/1994<sup>4</sup>. A person must pass an exam to become a hunter. However, it is not mandatory to follow a course to be able to pass the hunting exam. The contents of the exam are defined for Flanders in the *Jachtadministratiebesluit* of 25/4/2014<sup>5</sup>. The exam consists of a theoretical test and a practical test. The theoretical test covers legislation (but not the laws relating to the Hygiene package), fauna (external features, normal behaviour/way of life, some info on diseases) and firearm use and munitions. The practical test focuses on safe and secure shooting techniques. The contents of the exam in Wallonia are largely similar<sup>6</sup>.

#### FRANCE

The law on hunting is national. It is the '*Code de l'Environnement*'. A person must pass an exam to become a hunter (i.e., to obtain a hunting license). The exam is organized by the *Office National de la Chasse et de la Faune Sauvage*, together with the Departmental and Interdepartmental hunting federations. By law, the exam covers knowledge on wildlife, hunting regulations and the safety rules to respect when handling weapons, the latter tested in practice (Art. L423-5 *Code de l'Environnement*, modified by Art. 16(V) of Law No. 2009-526 of 12/05/2009). Training is mandatory and given by the Departmental hunting associations (Art. L423-8 *Code de l'Environnement*). The theoretical questions cover the themes 'arms and munition', 'knowledge about hunting', 'knowledge about wildlife' and 'laws and regulations' and can be practised on-line (<http://reussite-permisdechasser.com/>).

#### GERMANY

The law on hunting is based on a national legislative framework, the *Bundesjagdgesetz (BJagdG)*. This forms the basis for the regional legislation, the *Landesjagdgesetz*, which is elaborated at the level of the 16 federal states (*Bundesländer*). A person must pass an exam to become a hunter. A hunter who successfully passed the hunter-exam after 2008 is automatically a trained person ("*Kundige Person*") and meets the requirements stipulated in the

<sup>3</sup> <http://www.codex.vlaanderen.be/Zoeken/Document.aspx?DID=1002550&param=inhoud&ref=search>

<sup>4</sup> <http://environnement.wallonie.be/legis/dnf/chasse/chasse001.htm>

<sup>5</sup> [http://www.jachtinfo.be/UserFiles/file/JAB\\_BS-2014-06-25.pdf](http://www.jachtinfo.be/UserFiles/file/JAB_BS-2014-06-25.pdf)

<sup>6</sup> <http://www.chasse.be/la-chasse-en-region-wallonne/permis-et-licence-de-chasse/examen-pour-le-permis-de-chasse-2/>

Regulation (EC) 853/2004. A hunter who passed the hunters-exam between 1987 – 2008 needs a short additional training to obtain the status of Trained Person (TP) (*“Kundige Person”*), but he is automatically a so called *“Ausreichend geschulte Person”*<sup>7</sup>. This person (*“Ausreichend geschulte Person”*) is allowed to sell directly small quantities of primary products to the final consumer or to local retail establishments directly supplying the final consumer (National supply according to the exception of the Regulation (EC) 853/2004, Art. 1, point 3c). There are currently plans to make game meat hygiene (*Wildbrethygiene*) in the national legislative framework a *“Sperrfach”*, which means that if a hunter fails on this part, he doesn’t succeed the exam. In some federal states (*Bundesländer*) this is already come into force.

The hunters-examination consists of a written test, an oral-practical test and a gun test. The theoretical part includes questions on regulations on hunting and conservation, agriculture and forestry, hygienic-sanitary rules and correct handling of the animal, transport, evisceration techniques, wildlife disease, wildlife biology, wild animals and hunting dogs, weapons, ammunition, damage control, and hunting ethics. The practical test focuses on safe and secure shooting techniques. The pre-exam training requirements differ per federal state. Training is mandatory in most federal states (11), but in five (5) federal states you can do the exam without a mandatory training. In some federal states a practical training is compulsory, for example learning how to eviscerate. The candidate may even be required to undergo a field training-period. This field training is done in specific locations and is mentored by an official certified supervisor.

## LUXEMBOURG

The law on hunting in Luxembourg is *the Loi du 25 mai 2011 relative à la chasse*. A person must pass an exam to become a hunter (i.e., to obtain a hunting license). The exam has a written, oral-part and a practical part<sup>8</sup>. The theoretical part covers legislation, ecology and human activities, wildlife, hunting practice, firearms and munition, security. Training is mandatory, including a practical stage (minimal 20 field visits under supervision of a mentor) and a theoretical part (60 hours, organised by the *Administration de la nature et des forêts*).

## THE NETHERLANDS

The law on hunting in the Netherlands is the *Flora- en faunawet* of 25/5/1998 (currently in the process of being replaced by the *Wetgeving voor natuurbescherming in Nederland*). A person must pass an exam to become a hunter (*Jachtdiploma*). The exam set-up is defined in the *Jachtregeling* of 14/12/2001. There is a theoretical part and a practical part. The exam is organized by the *Stichting Flora- en faunawetexamen*, together with *Stichting Jachtopleiding Nederland* (SjN). By law, a hunter must have knowledge of wildlife, its habitat, management, the main legal requirements in the field of hunting and conservation, the main laws about possessing guns, crops susceptible to damage by wildlife and limiting measures, firearms, hunting methods, hygiene rules and proper techniques for handling wildlife meant for consumption, as well as any other knowledge necessary to become a good hunter (*Jachtbesluit* 28/11/2000). Ten percent of the exam questions should deal with the last two points (*Jachtregeling* of 14/12/2001). Training is mandatory.

## UNITED KINGDOM

The laws on shooting/hunting<sup>9</sup> in the UK are multiple and regional (4 devolved administrations). In England and Wales, the legislation is in *the Wildlife and Countryside Act (1981) (WCA)*. Scotland and Northern Ireland produced their own amending legislation to the WCA called *the Wildlife and Natural Environment (Scotland) Act 2011* and *the Wildlife and Natural Environment (Northern Ireland) Act 2011 (the WANE acts)*. For game species, parts of *the Game Act (1831)* is still in law in England and Wales, whereas in Scotland and Northern Ireland it’s been included in *the WANE acts*. For deer specifically there are also other laws, which include *the Deer act (1991)*<sup>10</sup> in England, Wales, and Northern

<sup>7</sup> *Tierische Lebensmittel-Hygieneverordnung vom 8. August 2007 (BGBl. I S. 1816, 1828), on the hygiene of foodstuff of animal origin, revised on 10/11/2011.*

<sup>8</sup> <http://www.guichet.public.lu/citoyens/fr/loisirs-benevolat/permis-licences/pratique-chasse/certificat-aptitude-chasse/index.html>

<sup>9</sup> In the UK, the term ‘hunting’ may refer sometimes only to hunting with dogs.

<sup>10</sup> Source: <http://www.legislation.gov.uk/ukpga/1991/54/crossheading/offences-relating-to-deer?view=extent>

Ireland, and *the Deer (Scotland) Act 1996*<sup>11</sup> for Scotland. There are all sorts of other laws about poaching, badgers and others that are covered in small acts of law<sup>12</sup>. In England, Wales, Scotland and Northern Ireland, there is also Hares Preservation Act, 1892<sup>13</sup> which describes in which months of the year it is allowed to sell hare. In England, Scotland, Wales and Northern Ireland, no licence is required to kill game. But in Scotland it is necessary to have a venison dealer's licence to deal in venison, although deer stalkers can sell their venison directly to a venison dealer without the need for a licence.<sup>14</sup>

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<sup>11</sup> Source: <http://www.legislation.gov.uk/ukpga/1996/58/contents>

<sup>12</sup> Source: based on e-mail correspondence with British Association for Shooting and Conservation (BASC).

<sup>13</sup> Sources: <http://www.legislation.gov.uk/ukpga/Vict/55-56/8/section/1>; <https://www.gov.uk/hunting>

<sup>14</sup> Source: <http://basc.org.uk/game-and-gamekeeping/quarry-species-shooting-seasons/>

**Table 2. Training of hunters**

	Law on hunting	Hunting License Exam	Mandatory training before exam	Level of education on food hygiene and food safety in training to obtain a hunting licence
BE	Regional (3)	Yes	No	Low (*) <ol style="list-style-type: none"> <li>1. No information on the Hygiene package ('legislation')</li> <li>2. Information on external anatomical features &amp; behaviour ('fauna')</li> <li>3. Some information on diseases ('fauna')</li> <li>4. No information on hygiene rules and handling techniques.</li> </ol>
FR	National	Yes	Yes, Regional (101)	Low (*) <ol style="list-style-type: none"> <li>1. During the training for the hunting exam, information is given on the legislative requirements to place wild game on the market (hygiene package and national legislation).</li> <li>2. No information on external anatomical features &amp; behaviour.</li> <li>3. No information on diseases, except heightening awareness about <i>Trichinella</i>.</li> <li>4. Hygienic handling of carcasses is a topic raised during training.</li> </ol>
DE	National & Regional (16)	Yes	Yes (11 states)/No (5 states).	High <ol style="list-style-type: none"> <li>1. Teaches about legislation and administrative provisions on the animal and public health conditions governing the placing on the market of wild game.</li> <li>2. Covers anatomy, physiology and behaviour of wild game.</li> <li>3. Provides information on abnormal behaviour and pathological changes in wild game due to diseases, environmental contamination or other factors which may affect human consumption.</li> <li>4. Teaches the hygiene rules and proper techniques for the handling, transportation, and evisceration of wild game animals after killing.</li> </ol>
LU	National	Yes	Yes	Middle? (Training includes at least 20 field visits with mentor...) <ol style="list-style-type: none"> <li>1. Possibly some information on the Hygiene package and the hunter's role ('legislation')?</li> <li>2. Probably information on external anatomical features &amp; behaviour ('wildlife')?</li> <li>3. Possibly information on diseases ('wildlife')?</li> <li>4. Possibly hygiene rules and handling techniques ('hunting practice')?</li> </ol>
NL	National	Yes	Yes	Low (#) <ol style="list-style-type: none"> <li>1. Hygiene package briefly introduced, and role hunter stated (chapters 5 and 13).</li> <li>2. Information on external anatomical features &amp; behaviour (Chp 2.).</li> <li>3. Limited information on diseases, not primarily from the public health perspective (Chp. 8).</li> <li>4. Hygiene rules and handling techniques limited to a few sentences and techniques (Chp. 13). No basic concepts.</li> </ol>
GB	Regional	No	No	Not applicable

(\*) based on the legal requirements;

(#) based on the legal requirements and training document.



## 4. SUBJECT 2 – THE TRAINING OF ‘TRAINED PERSONS’

Reg. No. 853/2004 establishes that, if hunted game is to be sold on the EU market for human consumption, a TP has to undertake an initial examination. At least one hunter participating to the hunting team is a TP. To become a TP, a hunter has to follow a training on food hygiene and safety. This training has to be approved by the Competent Authority.

The Dutch evaluation concluded that TP in the Netherlands had clearly perceived and largely taken on their role, but that their training could be further improved by 1) more focus on practicing systematic observation and description of abnormalities than on information on specific diseases, 2) organising regular refresher courses for trained persons, and 3) providing opportunities for accredited practical training.

To be able to take the views and experience from other countries into account, data was compiled on the situation in other countries with regards to these three points. This was put into context by specifying the number of hunters per country according to the European Federation of Associations for Hunting & Conservation (FACE)<sup>15</sup>.

### BELGIUM

The TP training is accredited at national level by the Federal Agency for the Safety of the Food Chain (FASFC)<sup>16</sup>. The exam is valid throughout Belgium, but can be passed either in Wallonia or Flanders. The exam consists of 21 multiple choice questions (14/21=pass). Two questions are on normal anatomy, physiology and behaviour of wild game animals. Seven questions are on abnormal behavior and pathological changes in wild game due to diseases, environmental contamination or other factors which may affect human health after consumption. Six questions are on hygiene rules and proper techniques for handling, evisceration and transportation of wild game. And the last six questions are on legislation and administrative provisions.

The pre-exam training course is mandatory. This course is arranged in Wallonia by the hunting association *Royal Saint-Hubert Club of Belgium* (RSHCB)<sup>17</sup>, and in Flanders by the *Instituut van de Jachtopleidingen* (IJO)<sup>18</sup>, that collaborates where possible with the Flemish hunting association *Hubertus Vereniging Vlaanderen* (HVV). Courses consist of two half days. The IJO training manual 2008 is available on internet<sup>19</sup>, and its focus is on observation and description of the abnormalities rather than on specific diseases. A new edition has just come out in 2015. The French training manual can be ordered by internet. There are no TP refresher courses or accredited practical training opportunities. However, on 2/9/2014 there was an official letter reminding trained persons of their duties and requesting vigilance for tuberculosis<sup>20</sup>, and the Federal Agency also published posters and took part in events of hunters.

### FRANCE

There are a lot of hunters in France (see Table 3). A good oversight on the TP (‘personne formée’) and their training is obtained by formalizing the position of TP trainer (‘formateur référent’). The contents and duration of the TP training and of the training received by the TP trainers are specified in the *Arrêté of 18/12/2009 (NOR: AGRG0927648A)*<sup>21</sup>. In fact, the TP training is an abbreviated (3 hour) version of the training received by TP trainers (3 days). Persons who

<sup>15</sup> <http://www.face.eu/about-us/members/across-europe/census-of-the-number-of-hunters-in-europe-september-2010>. FACE annual report 2009-2010.

<sup>16</sup> <http://www.afsca.be/legislation/>; The TP training is also accepted in the Netherlands by the Netherlands Food and Consumer Product Safety Authority (NVWA) of the Ministry of Economic Affairs. The Belgian TP has to register in FRS and has to have a Dutch hunting permit to act as a trained person in the Netherlands.

<sup>17</sup> <http://www.chasse.be/formations/formation-sante-hygiene/>

<sup>18</sup> <http://www.jachtopleiding.be/>

<sup>19</sup> The training manual of 2008 can be downloaded, [http://www.jachtopleiding.be/downloads/cursus\\_gp\\_2008.pdf](http://www.jachtopleiding.be/downloads/cursus_gp_2008.pdf)

<sup>20</sup> 2014\_09\_02\_OmzendverplichtingenGP\_V1\_NL

<sup>21</sup> <http://legifrance.gouv.fr/eli/arrete/2009/12/18/AGRG0927648A/jo/texte>. Training details in Appendice 1 de l’Annexe VII, Cahier des charges relatif à la formation des personnes à l’examen initial du gibier sauvage.

want to become trainers of TP can apply for this through their Departmental Hunter Federation (FDC) to *the Fédération Nationale des Chasseurs (FNC)*. The training of the TP trainer must be conducted by an authorized training organization. Trainers of TP who have successfully passed their exam can train TP in 'their' Department and potentially in neighbouring Departments. The 3 hour course covers regulations (45 min.), the anatomy and disease (1 hr 15min), correct hygienic procedures during handling (30 min; videos) and the filling in of the declaration and the procedures to follow if abnormalities are observed (30 min). For the disease part, the legal document clearly specifies the focus should be on abnormality and never on a specific disease<sup>22</sup>. Hunters receive a manual covering regulation in 1 page, max 10 photos of normal organs only, a decision tree and a copy of the declaration forms to use (*Arrêté of 18/12/2009, Appendix 1 of Section VII; Notification DGAL/SDSSA/N2009-8267 of 24/9/2009*). The possibility of refresher courses is foreseen in the *Arrêté of 18/12/2009, Appendix 1 of Section VII, Sommaire, point 2, B*<sup>23</sup>:

## GERMANY

As previously mentioned under Subject 1, every hunter who passed the hunting-examination after the beginning of 2008 is considered as being adequately trained according to the requirements stipulated in the Regulation (EC) 853/2004 and is a Trained Person ("*Kundige Person*"); and a hunter trained between 1987 and 2008 needs only a short additional training (one evening, no exam)<sup>24</sup> to become a Trained Person. The main focus of the short training is on current legislation, game hygiene and the distinction between normal and abnormal organs is dealt with briefly. There are currently plans to make game meat hygiene (*Wildbrethygiene*) in the national legislative framework a so called "*Sperrfach*" ", which means that if a hunter fails on this part, he doesn't succeed the hunters-exam. In some Federal States game meat hygiene (*Wildbrethygiene*) is already a "*Sperrfach*". For the direct supply of small quantities to the local market, the hunting-examination after 1 February 1987 is sufficient ("*Ausreichend geschulte Person*")<sup>25</sup>.

## LUXEMBOURG

The TP training is given by veterinarians from the *Division de l'Inspection vétérinaire, Administration des Services vétérinaires, Ministère de l'Agriculture, de la Viticulture et de la Protection des consommateurs*<sup>26</sup>. Additional data on the training was not found.

## THE NETHERLANDS

The TP training is national and is accredited by the Netherlands Food and Consumer Product Safety Authority (NVWA) of the Ministry of Economic Affairs. The pre-exam training course is mandatory. It is given by *Stichting Jachtopleidingen Nederland (SJN)*<sup>27</sup>. The trainer has to be a Veterinair who is also a hunter. The duration of the course is two evenings with a written (multiple choice) examination on the second evening. For contents, the legislation refers to the Regulation (EC) 853/2004<sup>28</sup>.

## UNITED KINGDOM

The Food Standards Agency (FSA) recognizes the certificates of three different TP training options<sup>29</sup>. The first training option is organised by the National Gamekeepers Organisation (NGO). NGO organizes one-day courses to teach

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<sup>22</sup> *Arrêté of 18/12/2009, Appendix 1 of Section VII, Support no.2, B: 'Le formateur référant abordera de manière théorique uniquement les aspects liés au tri des carcasses en peau/plumes et abats, à l'aide de diapos. Il ne devra en aucun cas faire de diagnose de pièces ou de maladies. Seul l'aspect normal ou anormal de la carcasse ou de l'organe devra être discuté en sera basé sur un référentiel défini par le DGAL.*

<sup>23</sup> *Arrêté of 18/12/2009, Appendix 1 of Section VII, Sommaire, point 2, B 'La mise à jour de la formation des chasseurs est envisageable dans la mesure où l'évolution des données épidémiologiques ou scientifiques le justifie.'*

<sup>24</sup> This short training is also given in the Netherlands for Dutch hunters, so that these can be show their German TP training certificate when hunting in Germany (though not obliged by German legislation, some German hunting areas will require it).

<sup>25</sup> *Tierische Lebensmittel-Hygieneverordnung vom 8. August 2007 (BGBl. I S. 1816, 1828), on the hygiene of foodstuff of animal origin, revised on 10/11/2011.*

<sup>26</sup> The TP training is also accepted in the Netherlands by the Netherlands Food and Consumer Product Safety Authority (NVWA) of the Ministry of Economic Affairs. The Luxembourg TP has to register in FRS and has to have a Dutch hunting permit to act as a trained person in the Netherlands.

<sup>27</sup> <http://www.jachtopleiding.com/index.php/wildhygiene>

<sup>28</sup> *Besluit Dierlijke Producten 2/11/2012, Hfdstk 2, Art.2.3, punt 3* (<http://wetten.overheid.nl/BWBR0032335/>)

<sup>29</sup> Wild game guide point 73, pg. 25 (<http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf>)

gamekeepers the requirements of Regulation 853/2004 and other relevant legislation, and practical solutions to help meet the needs of the legislation<sup>30</sup>. The course has a short multiple choice test at the end of the day to ensure competency. The second training option is a Vocational Related Qualification (VRQ), developed by Lantra (the Sector Skills Council). This training is given by different organisations. The training is a 1-day training (Wild Game Meat Hygiene Level 2) focussing is on hygiene issues relating to small and/or large game, in particular on knowledge of the signs of abnormality that could indicate the game meat may not be fit for human consumption<sup>31</sup>. With achieving the Level 2 Award in Wild Game Meat Hygiene, a person obtains the status of TP for both small and large game.

Certification is awarded via Lantra Awards or the Royal Society for the Promotion of Health (RSPH). For large game, there is a third training option since 2005. The TP training is included in the training for Deer management (Deer Stalking certificate level 1)<sup>32</sup>. The topics in this training are deer biology and ecology, the law, stalking techniques and taking the shot, deer identification, safety, shooting, trained hunter. For this last topic they learn knowledge of the inspection of carcasses and the legal requirements enabling an individual to sell venison for human consumption<sup>28</sup>. Overall, it remains unclear exactly how training on abnormalities is given. No evidence was found for regular TP refresher courses, or for accredited practical training opportunities. However already qualified TP may subsequently train for the deer stalking certificate and in the process refresh their knowledge on wild large game meat hygiene.

**Table 3. Training of TP**

	Food Safety Authority	Mandatory training before TP exam	No. of hunters in 2010	In the course, approach disease or abnormality	Refresher courses	Optional accredited practical training
BE	National	Yes, Regional (2)	28,000	Abnormality (*)	No.  Official reminder letter to all GPs on their role and TB vigilance.	Not found
FR	National	Yes, Regional (ca. 101).  Given by official TP trainers, whose training program is also specified in legislation.	1,331,000	Abnormality, never disease (#)	Not found, but law foresees possibility #.	Not found
DE	National & Regional (16)	Not applicable (because incorporated in hunting training since 1 February 1987)	351,000	See hunter training	No	See hunter training (Some federal states obliged)
LU	National	?	2,000	?	?	?
NL	National	Yes	28,170	Both*	No	No
GB	Regional	Yes	800,000	Abnormality?	Not found.  Possible refresher effect achieved by for large wild game meat hygiene if a TP follows the deer stalking course.	Not found

(\*) based on training document.

(#) based on the legal requirements.

<sup>30</sup> <http://www.nationalgamekeepers.org.uk/events/game-meat-hygiene---trained-hunter-qualification>

<sup>31</sup> <http://www.traineast.co.uk/Food-Hygiene-Processing/wild-game-meat-hygiene.html>;  
<http://basc.org.uk/events/wild-game-meat-hygiene-level-2-scotland/>

<sup>32</sup> [http://www.bds.org.uk/deer\\_stalking\\_certificate\\_1.html](http://www.bds.org.uk/deer_stalking_certificate_1.html)

## 5. SUBJECT 3 - COMMUNICATION AND FEEDBACK TO STAKEHOLDERS, AND THE CLARIFICATION OF CONCEPTS AND GREY AREAS

Regulation (EC) No. 853/2004 (Art. 1, point 3) establishes that the described hygienic procedures do not apply to (a) primary production for private domestic use and (b) hunters who supply small quantities of 'in-fur' or 'In-feather' wild game/birds directly to the final consumer or to local retail establishments directly supplying the final consumer. Member States (MS) were required to establish, according to national law, rules governing the activities and persons referred to under b) that ensured the achievement of the hygienic objectives of the EC regulations (Art. 1, point 4).

The recommendations grouped in Dutch evaluation under communication and feedback were often related to the knowledge/understanding of, and the compliance to, the rules for hunters who supply small quantities of wild game or wild game meat directly to the final consumer or to local retail establishments directly supplying to the final consumer. Grey areas requiring further clarification concerned best practice with regards to hygiene and to abnormalities, e.g., when is a thickened joint on an extremity reason to discard an animal, why/when is water not allowed to be used for cleaning soiled carcasses?

Data was compiled for comparison on the rules in other countries for delivery by the hunter of small quantities of wild game or wild game meat to the end-consumer or the local retailer that sells to the end-consumer.

### BELGIUM

The national legislation complementary to the EU hygiene package was initially prescribed in the *Arrêté Royal of 22/12/2005* on the hygiene of foodstuffs of animal origin<sup>33</sup>, but this decree is currently in the process of being replaced: Article 12 of *Arrêté Royal of 22/12/2005* has already been amended by Article 16 of the more recent *Arrêté Royal of 7/01/2014*<sup>34</sup> on the direct supply of foodstuffs of animal origin by the primary producer to the final consumer. And article 13 will be covered by a new decree. Neither the the *Arrêté Royal of 22/12/2005* or the *Arrêté Royal of 7/01/2014* apply to small quantities of game consumed by the hunter and his direct family<sup>35</sup>.

A hunter can deliver small quantities directly to the end-consumer, 'small quantities' being defined as up to 10 animals for small wild game, 1 animal for large wild game, obtained shot on a single day in one hunting location ('*jachtterrein*')<sup>36</sup>. No distance limit was specified for direct delivery to the end consumer in this *Arrêté*. An initial examination by TP is always required and a declaration must always accompany game<sup>37</sup>. Game presenting abnormalities may never be delivered directly to the end consumer<sup>38</sup>. If it is a wild boar or another species susceptible to *Trichinella* infection, the GP must take a sample for *Trichinella* from three to five tissues and send it for testing to a certified laboratory<sup>39</sup>. The result must be known before delivery to the end-consumer, or the end-consumer must be informed the test is on-going and be strongly advised to await a negative test result before consuming the meat of the animal<sup>40</sup>.

A hunter can supply small quantities of game directly to a retailer if the retailer has a game-handling establishment (GHE)<sup>41</sup> annexed, and the meat is subsequently only sold by the retailer to the end consumer. Supplying to a retailer

<sup>33</sup> <http://www.favv.be/legislation/hygiene/>

<sup>34</sup> [http://www.ejustice.just.fgov.be/cgi/article\\_body.pl?language=nl&caller=summary&pub\\_date=14-01-24&numac=2014018021](http://www.ejustice.just.fgov.be/cgi/article_body.pl?language=nl&caller=summary&pub_date=14-01-24&numac=2014018021)

<sup>35</sup> *Arrêté Royal of 22/12/2005*, Chap. 1, Art. 2

<sup>36</sup> *Arrêté Royal of 7/01/2014*, Chap. 2, Section IV, Art. 16 point 3

<sup>37</sup> *Arrêté Royal of 7/01/2014*, Art. 16 point 4

<sup>38</sup> 2014\_09\_02\_OmzendverplichtingenGP\_V1\_NL

<sup>39</sup> *Trichinella* controls in 91.786 wild boars sampled in the period 2001-2009 showed only 2 infection cases, which means an estimated prevalence at 0,0022% (AFSCA: Agence Federale pour la Sécurité de la Chaîne Alimentaire).

<sup>40</sup> *Arrêté Royal of 7/01/2014*, Art. 16 point 5

<sup>41</sup> defined in Annex 1 of Regulation (EC) 853/2004 as any establishment in which game and game meat obtained after hunting are prepared for placing on the market.

who sells directly to the end consumer is limited to one piece of big wild game and 10 pieces of small wild game slaughtered in a same hunting day and on a same hunting ground. Belgium does not apply the notion "local" to game (i.e., *Arrêté Royale of 7/01/2014, Chap 1, Art. 2, point 6*, does not apply to game). An initial examination by TP is always required and a declaration must always accompany game. Game presenting no abnormalities has to be delivered in the case of large game with liver and one kidney (and in case of wild boar also the head) and will undergo veterinary inspection in the GHE. The meat has to be stamped accordingly (with a specific stamp that is used only for sale by the retailer). A hunter cannot cut a carcass of game except for his personal consumption and can therefore not deliver meat to a retailer<sup>42</sup>.

## FRANCE

The national legislation complementary to the EU hygiene package is prescribed in the *Arrêté of 18/12/2009 (NOR: AGRG0927648A)*, revised on 01/05/2015, and *Arrêté of 21/12/2009 (NOR: AGRG0927709A)*, revised on 08/05/2010. The instruction DGAL/SDSSA/N2012-8158 specifies the provisions of the *Arrêté of 18/12/2009*.

A hunter, or a so-called 'premier détenteur'<sup>43</sup>, may deliver small quantities of hunted game to the end-consumer without initial examination or declaration or *Trichinella* testing. However, if it is a wild boar or other species susceptible to *Trichinella* infection, the hunter must inform the end consumer of the risk<sup>44</sup>.

A special case concerns the delivery of wild boar or other *Trichinella* susceptible species for a meal prepared by a group of hunters or by an association. Prior to consumption, the hunter must make sure a *Trichinella* test is performed at an accredited laboratory and it has been found negative<sup>45</sup>. The hunter pays for the test.

A hunter (or 'premier détenteur') can supply small quantities of game (carcass in hide or feathers<sup>46</sup>) directly to a local retailer for selling directly to the end consumer, 'small quantities' being defined as all game killed by the hunter during one hunting day<sup>47</sup>, and 'local' as the territory in the 80 km around the hunting area, with some possible derogations if the location has specific geographical constraints if authorized by the Prefect<sup>48</sup>. A *Trichinella* test should always be performed on wild boar or other *Trichinella* susceptible species<sup>49</sup> and be found negative before meat can be sold to the end-consumer<sup>50</sup>. The TP may take the sample to be sent to the official laboratory. According to the *Arrêté of 21/12/2009*, a local retailer may not accept game from a hunter without a declaration by a TP, and in case of wild boar or other *Trichinella* susceptible, species proof that the *Trichinella* test was negative.

Awaiting delivery to the end-consumer or to the local retailer, carcasses in hide and feathers may be stored in a collection centre with the required cooling facilities. This collection centre should be declared to the competent authorities and registered by them (*Arrêté of 18/12/2009, Annex IV, Section I, Art. 3*).

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<sup>42</sup> *Arrêté Royal of 22/12/2005, Chap. III, Art. 13, has been deleted. A new decree will soon take the place of the decree of 22/12/2005.*

<sup>43</sup> 'Premier détenteur' is defined in Annex IV, Section I, Art. 2c. (any natural person or legal holder of hunting rights on a given hunting territory, appointed by internal regulation, or considered owner of game killed by way of usage).

<sup>44</sup> *Arrêté of 18/12/2009, Annex IV, Section III. The last cases of human infections in France ascribable to wild boar meat consumption were in 2006, when 6 persons in the Department of Alpes-Maritimes were successfully treated after having eaten wild boar meat (<http://www.eurosurveillance.org>). Data indicates a low, but diffuse presence of the parasite.*

<sup>45</sup> *Arrêté of 18/12/2009, Annex IV, Section II*

<sup>46</sup> Always as carcass and not as meat, except if hunting was performed in the mountains and the carcass had to be cut for transport., *Arrêté of 18/12/2009, Annex IV, Section IV. Point 4. No Organs Arrêté of 18/12/2009, Annex IV, Section IV. Point 7.*

<sup>47</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 1*

<sup>48</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 2*

<sup>49</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 8*

<sup>50</sup> *Arrêté of 18/12/2009, Annex IV, Section VI. Point 1*

## GERMANY

In Germany Reg. (CE) No. 852/2004 and Reg. (CE) NO. 853/2004 were implemented by *Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (LFGB) von 1 September 2005*, revised on 5 December 2014 and by '*Lebensmittelhygiene-Verordnung (LMHV) vom 8. August 2007 (BGBl. I S. 1816, 1817)*', revised on 14/07/2010 (BGBl. I S 929), both laws concern the hygiene of foodstuffs, and "*Tierische Lebensmittel-Hygieneverordnung (Tier-LMHV) vom 8. August 2007 (BGBl. I S. 1816, 1828)*", on the hygiene of foodstuff of animal origin, revised on 10/11/2011.

In the 'Tier-LMHV' the following definitions are given:

- 'small quantities': bag of one hunting day;
- 'local level': the territory in the 100 km around the hunting area or 100 km from the domicile of the hunter.

Small quantity is defined but can be very large when animals are shot on drive-hunts. The definition of local is 100 km, this is the same 'range' as the 80 km in Belgium and France. But because the 100 km is not only around the hunting area but can also be from the domicile of the hunter, the animal can be sold far away from the hunting area.

A first examination made by an "*Ausreichend geschulte Person*" is sufficient to sell small amounts of game locally. A first examination by a Trained Person is necessary to sell game to approved establishments. For private consumption of large game, the hunter has to examine the animal and to inform the authority when abnormal behaviour or/and pathologic changes were observed (Tier-LMHV §2b)

Concerning the controls for *Trichinella*, they are mandatory for all wild boars and badgers when they are to be consumed, also the wild boar and badgers for private consumption (Tier-LMHV §2b). The hunter is allowed to take the *Trichinella* sample. If he does so, the law (Tier-LMHV §4a) prescribes the declaration ('*Wildursprungsschein*') which has to be used and prescribes the use of a 'game-tag' ('*Wildmarke*'). The hunter is also allowed to pass on the obligation for the *Trichinella* sampling to the retail establishment or the hunter who he sells his wild boar to. In some areas, written/electronic communication of negative test results by the laboratory are not compulsory.

The competent authority can oblige the hunter who sells game to a game-handling establishment that the head and viscera have to accompany the carcass for controlling purposes (named in 85/358/EG; 86/469/EG; 89/187/EG en 91/664/EG) or when necessary for surveillance of zoonosen and zoonotic organism (Tier-LMHV § 13).

## LUXEMBOURG

In Luxembourg the National legislation is the *Règlement grand-ducal du 4 février 1994 concernant les problèmes sanitaires et de police sanitaire relatifs à la mise à mort du gibier sauvage et à la mise sur le marché des viandes de gibier sauvage*, and the modification of this law on 1/12/1994.

The Règlement of 4/2/1994 determines the conditions for trade of wild game and wild game meat but is not applicable to the delivery by the hunter of small quantities of wild game in-fur or in-feather or wild game meat directly to the end-consumer or to a local retailer that sells directly to the end-consumer. With regards to local retailers, the Règlement of 4/2/1994 specifies that the rules for retail commerce apply (with an amendment in the law on 1/12/1994).

## THE NETHERLANDS

In the Netherlands Reg. (CE) No. 852/2004 and Reg. (CE) NO. 853/2004 are implemented by the 'Besluit dierlijke producten<sup>1</sup>.

A hunter can deliver small quantities directly to the end-consumer or to a local retailer for selling directly to the end consumer. Small quantities and local are not further defined. An initial examination by TP is always required and a declaration must always accompany game<sup>51</sup>. If it is a wild boar, the TP must take and submit samples for *Trichinella* testing to an accredited reference laboratory and receive confirmation of a negative test result before delivering the carcass with the test result to the end-consumer or the local retailer.

<sup>51</sup> *Besluit Dierlijke producten 2/11/2012, Chap. II, Art. 2.3*

## UNITED KINGDOM

In the United Kingdom, the Hygiene Package was implemented under the form of Statutory Instruments in England (SI 2006/14), Scotland (SSI 2005/505, SSI 2006/3) and Wales (WSI 2005/3292, SI 2006/31) and Northern Ireland (SR 2006/3). These regulations are cited as Food Hygiene (country) Regulations 2006. Besides the Food Hygiene Regulation, there are different Food Safety and Hygiene Regulations. The Food Safety Act 1990 requires that stakeholders take their responsibility in supplying safe food.

In the wild game guide of 6 June 2011 (section 1: producers, processors and distributors of wild game, paragraph 14 and 16), the following definitions apply:

- private domestic use regards not only to the own consumption, but also to the hunted wild game that you give away to family and friends for their domestic consumption.
- 'small quantities' is regarded as self-defining because demand for in-fur or in-feather carcasses from final consumers and local retailers is limited;
- 'local level' is within the supplying establishment's own county plus the greater of either the neighbouring county or counties or 50km/30miles from the boundary of the county, but never beyond the UK, except supply from Northern Ireland to the Republic of Ireland. When the supplying establishment is located in the Scottish islands, local is interpreted as anywhere within Scotland.
- direct supply to the final consumer is not restricted by what is local. An individual or an estate can supply final consumers who order from them via the internet/mail order as well as those who collect themselves.

According to the EU-law, 10 g muscle sample from diaphragm or foreleg has to be taken. The sample can be put in a container and be send by post. Containers and freepost envelopes can be obtained by the Food Standards Agency.<sup>52</sup> For private consumption and direct sale to local retail shops the test is not mandatory, but is voluntary. If the hunter voluntary test for *Trichinella*, the Agency is paying for the sampling kit, the cost of posting the sample and the cost for the testing, when the wild boar is for private consumption.<sup>53</sup>

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<sup>52</sup> <https://www.food.gov.uk/sites/default/files/multimedia/pdfs/trichinellatestingwildboar.pdf>

<sup>53</sup> <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf>, paragraph 75

**Table 3. Rules for for delivery by the hunter of small quantities of wild game or wild game meat to the end-consumer or the local retailer that sells to the end-consumer**

	<b>Domestic consumption by the hunter and direct family</b>	<b>Direct delivery of small quantities to end-consumer</b>	<b>Direct delivery of small quantities to local retailer</b>
BE	<ul style="list-style-type: none"> <li>No formal initial examination required.</li> <li>No declaration required.</li> <li><i>Trichinella</i> test recommended.</li> </ul>	<ul style="list-style-type: none"> <li>Initial examination and declaration required (no abnormalities). Wild game can only be delivered as carcass in fur and feathers (i.e., not as meat).</li> <li>Wild boar and other species susceptible to <i>Trichinella</i> infection: obliged <i>Trichinella</i> testing. TP takes sample. Carcass may be delivered but end-consumer must be advised to await negative lab test result before consuming.</li> <li>Small quantities defined as 1 piece of large game and 10 pieces of small game from one hunting site on one day.</li> <li>Local not defined.</li> </ul>	<ul style="list-style-type: none"> <li>Initial examination and declaration required. Game has to be in fur and feathers and present no abnormalities and large game has to be delivered with liver (in practice a piece of 200g of liver adherent to the carcass) and one kidney. It will undergo veterinary inspection in the GHE. (If game has abnormalities but TP wants to trade it, it should go straight to a GHE with all organs except stomach and intestines).</li> <li>The hunter can only deliver a small quantity of game to a retailer if a GHE is annexed to this retail business. This retailer may sell the inspected game only directly to the end-consumers.</li> <li>Trichine test at GHE.</li> <li>Small quantities defined as 1 piece of large game and 10 pieces of small game from one hunting site on one day.</li> <li>The notion "local" is not relevant for game.</li> </ul>
FR	<ul style="list-style-type: none"> <li>No formal initial examination required.</li> <li>No declaration required.</li> <li><i>Trichinella</i> test recommended.</li> </ul>	<ul style="list-style-type: none"> <li>No formal initial examination required.</li> <li>No declaration required.</li> <li>Wild boar and other species susceptible to <i>Trichinella</i> infection: TP must inform end-consumer about risk.</li> <li><i>Special case:</i> If the wild boar is to be consumed during a meal organized by a group of hunters or by an association, it should always have been tested beforehand for <i>Trichinella</i> and found to be negative. TP may be the one taking and submitting the sample.</li> <li>Small quantities not defined.</li> <li>Local not defined.</li> </ul>	<ul style="list-style-type: none"> <li>Initial examination and declaration required. Game has to be in fur or feathers, identified individually for large wild game or as group for small wild game by a unique number, also on the declaration.</li> <li>Negative <i>Trichinella</i> test results need to be attached. TP may be the one taking and submitting the sample.</li> <li>Small quantities defined as wild game that was shot during a single day by a hunter.</li> <li>Local defined as within 80 km of the producer, further only if the Préfet authorises it.</li> </ul>



	<b>Domestic consumption by the hunter and direct family</b>	<b>Direct delivery of small quantities to end-consumer</b>	<b>Direct delivery of small quantities to local retailer</b>
DE	<ul style="list-style-type: none"> <li>• TP examination required. Abnormalities have to be reported to competent authority.</li> <li>• For wild boar declaration is required.</li> <li>• <i>Trichinella</i> test mandatory</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination by a “<i>Ausreichend geschulte Person</i>” or a trained person, and declaration required. Wild game can be delivered as carcass in fur and feathers, or as game meat.</li> <li>• Wild boar and other species susceptible to <i>Trichinella</i> infection: obliged <i>Trichinella</i> testing. This obligation can be transferred to the person who buys the animal.</li> <li>• Small quantities defined as bag of one hunting day.</li> <li>• Local defined as 100 km around the hunting area or 100 km from the domicile of the hunter.</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination by Trained Person and declaration required. Wild game can be delivered as carcass in fur and feathers, or as game meat</li> <li>• Wild boar and other species susceptible to <i>Trichinella</i> infection: obliged <i>Trichinella</i> testing. This obligation can be transferred to the retailer who buys the animal.</li> <li>• Small quantities defined as bag of one hunting day.</li> <li>• Local defined as 100 km around the hunting area or 100 km from the domicile of the hunter.</li> </ul>
LU <sup>54</sup>	<ul style="list-style-type: none"> <li>• No declaration required.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
NL	<ul style="list-style-type: none"> <li>• No formal initial examination required.</li> <li>• No declaration required.</li> <li>• <i>Trichinella</i> test recommended.</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination and declaration required. Wild game can be delivered as carcass in fur and feathers or as game meat.</li> <li>• Negative <i>Trichinella</i> test results need to be attached. Test results have to be kept for 3 years by submitter of the test.</li> <li>• Small quantities not defined.</li> <li>• Local not defined.</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination and declaration required. Wild game can be delivered as carcass in fur and feathers or as game meat.</li> <li>• Negative <i>Trichinella</i> test results need to be attached. Test results have to be kept for 3 years by submitter of the test.</li> <li>• Small quantities not defined.</li> <li>• Local not defined.</li> </ul>
GB	<ul style="list-style-type: none"> <li>• No declaration required</li> <li>• <i>Trichinella</i> test recommended (for free).</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination and declaration recommended. Identification with minimal information required. Wild game can be delivered as carcass in fur and feathers, or as game meat.</li> <li>• Small quantities is ‘self defining’</li> <li>• Local is defined as within the supplying establishment’s own county, plus the greater of either the neighbouring county or counties or 50km from the boundary of the county.</li> <li>• Obligatory wild boar testing for <i>Trichinella</i> is obliged.</li> </ul>	<ul style="list-style-type: none"> <li>• Initial examination and declaration recommended. Identification with minimal information required. Wild game can be delivered as carcass in fur and feathers, or as game meat.</li> <li>• Small quantities is ‘self defining’</li> <li>• Local is defined as within the supplying establishment’s own county, plus the greater of either the neighbouring county or counties or 50km from the boundary of the county.</li> <li>• Wild boar testing for <i>Trichinella</i> is obliged.</li> </ul>

<sup>54</sup> In: ‘Wildhygiëneregels in de Benelux’. Team Interne Markt en Economische Unie, Secretariaat-Generaal van de Benelux, Brussel

## 6. SUBJECT 4 - TRACEABILITY

Traceability of wild game and wild game meat must be assured throughout the value chain (Regulation (EC) 178.2002).

With regards to traceability, the Netherlands is working on a digitalized registration system (FRS©) where declarations and *Trichinella* test results are securely stored electronically and can be accessed by different stakeholders according to their roles in the value chain. Recommendations focussed on requirements to improve the system.

Data was compiled for comparison on the identification procedures used, in particular for large game.

### BELGIUM

Pre-printed declarations with already inscribed unique numbers can be ordered at the two regional hunting associations<sup>55</sup>.

The declaration mentions:

- 1) the name and address and registration number of the TP;
- 2) the species;
- 3) the number;
- 4) the unique identification number if large game;
- 5) the location, date and time of killing;
- 6) the result of the initial examination; If the TP has no suspicion of environmental contamination, if no abnormal behaviour was observed before killing, and if no abnormal characteristics were examined the TP fills this in square 4. Otherwise, he fills in square 5 and submits all organs except intestines and stomachs.
- 7) the signature of the TP<sup>56</sup>.

The declaration is attached to the animal or the number of the declaration is attached to the animal. The TP keeps a copy of declaration for 5 years, a GHE keeps the declaration for 2 years.

### FRANCE

Game that is delivered to a local retailer selling directly to the end consumer<sup>57</sup> or to a game handling unit<sup>58</sup> must be identified, either per animal if large game, or as group if small wild game. The unique number should start with the number of the Department where the animal was shot, followed by the number of order. If shot as part of a management plan, the animal may be identified according to the number of that plan if it is unique in the department<sup>59</sup>. This unique identification should accompany the animal from shot to end-consumer<sup>60</sup>.

The declaration mentions:

- 1) the name of the TP (or of the 'premier détenteur');
- 2) the species;
- 3) the identification number of the animal or group of animals;
- 4) the location of killing;
- 5) the date of killing;
- 6) the destination of the animal(s)<sup>61</sup>.

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<sup>55</sup> [http://www.jachtopleiding.be/downloads/cursus\\_gp\\_2008.pdf](http://www.jachtopleiding.be/downloads/cursus_gp_2008.pdf)

<sup>56</sup> [http://www.jachtopleiding.be/downloads/cursus\\_gp\\_2008.pdf](http://www.jachtopleiding.be/downloads/cursus_gp_2008.pdf)

<sup>57</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 3a.*

<sup>58</sup> *Arrêté of 18/12/2009, Annex VII, Section I. Point 3a*

<sup>59</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 3c. and Section VII Point 3c*

<sup>60</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 3a. and Section VII Point 3a*

<sup>61</sup> *Arrêté of 18/12/2009, Annex IV, Section IV. Point 3d and Section VII Point 3d*

## GERMANY

Since 2010, a game tag with number (Wildmarke) must be applied to the carcass of each wild boar, and this number must correspond to the number of the declaration (Wildursprungsschein). This is compulsory, because of the *Trichinella*. For other large game, the 'Bundesrat' ended up not implementing it nationally, because the value chain argued that hunters sell most of the large game locally for local consumption and therefore it is easily traced back to the hunter. However, in some federal states a declaration and game-tag is also obliged for other large game (deer).

For game for which no declaration is required, the hunter must deliver it with a standard form called *Rückverfolgbarkeit*. (Regulation (EC) 931/2011). On this form are filled in the fields for the name and address of the person who sells the game, the animal (species), the number of animals, the name and address of the person/retailer to whom the animal(s) is/are sold, and the date of their delivery. It should be possible to link the form to the animals delivered (e.g., through a number).

## LUXEMBOURG

Data not found.

## THE NETHERLANDS

The use of a numbered declaration is obliged for all game that is supplied to the end consumer, a local retail establishment or an approved game handling establishment. For large game every animal has to be identified by a unique number, for small game the unique number is for a batch (shot in the same area and on the same day). In some provinces the use of a numbered game-tag, distributed by only one organisation in the Netherlands to ensure the number is unique, is obliged. The TP keeps a copy of declaration for 3 years.

Concerning the controls for *Trichinella*, a paper copy of the test-result only has to accompany the animal, when the wild boar is sold to an end consumer/local retailer/GHE that lacks the license to use the digital system FRS.

## UNITED KINGDOM

The information that the value chain stakeholders, from hunter onwards until end-consumer, need to provide on demand to the competent authority, are:

- 1) Accurate description of the food;
- 2) Volume/quantity;
- 3) Name and address of Food Business Operator (FBO) dispatching food
- 4) Name and address of consigner (if different)
- 5) Name and address of FBO receiving the food
- 6) Name and address of consignee (if different)
- 7) Reference identifying lot, batch or consignment
- 8) Date of dispatch<sup>62</sup>

Copies of invoices and a game book or something similar may be sufficient, but the key information that needs to be recorded is the name and address of the supplier and the customer and the date, nature and volume of the products supplied.

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<sup>62</sup> <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf>, paragraph 43-46).

## 7. LESSONS LEARNT

1. **Training of hunters** is not required everywhere. Where required, the training focuses on a safe and good shot, and hardly on what to do from the shot onwards, with exception of Germany and possibly Luxembourg via the 20 compulsory field visits. It is difficult to directly compare the situation in Germany with the Netherlands, because in Germany the training for trained person is included in the training of hunters, but elements may be of interest. Also, possibly much could be learnt from parts of Germany and from Luxembourg in terms of mentorships.

Legislation on hunting in the Netherlands explicitly provides a window of opportunity to address hygiene and food safety, by indicating that hunters should be trained on hygiene rules and proper techniques for handling wildlife meant for consumption, as well as any other knowledge necessary to become a good hunter. Such precisions were not present in the legislations of the other countries examined, with exception of Germany.

2. The **TP training** is as short as the Dutch training or shorter in all countries. Of interest is the legally formalized two-step approach to training TPs adopted in France: TPs are trained by TP trainers 'formateurs référents'. These TP trainers follow a more extensive course than the TPs, and are registered at national level while TPs are registered locally, at departemental level. This example of a formalized structure can be of interest for the concept of 'wildziektencoördinator' at game management unit level that stakeholders put forward during the Dutch evaluation.

Regarding abnormalities/diseases, only the Flemish training manual was accessible through internet. The manual is organized into four chapters corresponding to the four training requirement points for TPs mentioned in the Regulation (EC) 853/2004. The manual is as elaborate as the Dutch manual. However, there was a much stronger focus on abnormalities rather than disease than in the Dutch manual, and could serve as inspiration. In general the focus seemed clearly on teaching about describing abnormalities. In France, legislation even specifically states that the focus should be on abnormality and never on a specific disease, and that the TP training manual should only provide photographs of healthy organs.

No evidence was found to indicate that the other countries formally adopted a system for refresher courses or had accredited practical training opportunities.

3. Concerning **the delivery by the hunter of small quantities of wild game or wild game meat to the end-consumer or the local retailer that sells to the end-consumer**, there are no consistent patterns among countries.

Many Dutch hunters hunt in other European countries and observe how elements of the Hygiene package are implemented in other European countries. They compare the measures applied abroad to those required in the Netherlands. This is usually enriching but in this case may act confusing, and contribute to down play the relevance of adhering to the national rules.

Acquiring the information on best practice was not compiled. Compiling data via internet was unlikely to be the most appropriate method.

4. In all countries there are systems in place for **traceability**. In most countries but not all, this implies the use of unique numbers (tag numbers and/or declaration numbers).

## ANNEX 1 – KEYWORDS USED FOR DATA SEARCH AND MOST USED SOURCES

Country	Keywords	Most used sources of information
<b>BG</b>	Belgique, formation sanitaire chasseurs, législation gibier, définition petites quantités et niveau local, contrôles sanitaires, permis de chasser, contrôles <i>Trichinella</i> , hygiene and public health.	
<b>FR</b>	France, formation sanitaire chasseurs, législation gibier, définition petites quantités et niveau local, contrôles sanitaires, permis de chasser, contrôles <i>Trichinella</i> .	
<b>DE</b>	Wildbrethygiene, <i>Trichinella</i> , Lebensmittelhygiene, Bundesgesetz, Landesgesetz, Kundige Person, Wildmarke, Jagdgesetz, Direktvermarktung, EU-Verordnung	
<b>LU</b>	Luxembourg, formation sanitaire chasseurs, législation gibier, définition petites quantités et niveau local, contrôles sanitaires, permis de chasser, contrôles <i>Trichinella</i> .	
<b>NL</b>		Dutch evaluation report
<b>GB</b>	United Kingdom, hygienic-sanitary training hunters, regulation game, definition small quantities and local level, sanitary controls, hunting/shooting license, controls <i>Trichinella</i>	<p>Most of the information was obtained from the “The Wild Game Guide, Revision 2014”, published by the ‘Food Standard Agency’ of the United Kingdom in 2014. This guide gives an interpretation of the regulation.  <a href="http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf">http://www.food.gov.uk/sites/default/files/multimedia/pdfs/guidance/wild-game-guide.pdf</a></p> <p>In the Guide to the Food Hygiene and Other Regulations for the UK Meat Industry, the interpretation is given for those who buy wild game shot by others and produce meat from it  <a href="http://www.thedeerinitiative.co.uk/uploads/guides/137.pdf">http://www.thedeerinitiative.co.uk/uploads/guides/137.pdf</a></p>