FINAL

OVERVIEW REPORT OF A SERIES OF FACT FINDING MISSIONS CARRIED OUT IN FOUR MEMBER STATES IN THE PERIOD JANUARY TO DECEMBER 2011 IN ORDER TO GATHER INFORMATION REGARDING THE OFFICIAL CONTROL SYSTEM IN RELATION TO THE PRODUCTION OF FARMED AND WILD GAME MEAT AND PRODUCTS THEREOF
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA(s)</td>
<td>Competent Authority(ies)</td>
</tr>
<tr>
<td>CC</td>
<td>Collection Centre</td>
</tr>
<tr>
<td>CS</td>
<td>Caesium</td>
</tr>
<tr>
<td>DG(SANCO)</td>
<td>Health and Consumers Directorate General</td>
</tr>
<tr>
<td>EC</td>
<td>European Community(ies)</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>FBO(s)</td>
<td>Food Business Operator(s)</td>
</tr>
<tr>
<td>FVO</td>
<td>Food and Veterinary Office</td>
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<tr>
<td>GHE</td>
<td>Game Handling Establishment</td>
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<tr>
<td>HACCP</td>
<td>Hazard Analysis Critical Control Points</td>
</tr>
<tr>
<td>MS(s)</td>
<td>Member State(s)</td>
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<td>OV</td>
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1. **REPORT SUMMARY**

A series of fact finding missions took place between January and December 2011 to four Member States (MSs) in order to:

- to gather information regarding the implementation of official control systems governing the production of wild and farmed game meat and products thereof in the framework of the Hygiene Package;
- To collect information concerning the existence and the implementation of national provisions regarding wild game and farmed game.

Based on the information collected during these missions the following can be concluded:

The majority of the wild game shot in the MSs visited was exempt from the Hygiene Package requirements as it was categorised as small quantities. Small quantities of wild game are exempt from the requirements of Regulation (EC) No 852/2004 and (EC) No 853/2004. Similarly, small quantities of wild game meat are also exempt from the requirements of Regulation (EC) No 853/2004. However, small quantities are either not defined, or when defined, the limits set were substantially high. In practice, therefore, most game and game meat escapes controls under the Hygiene Package.

The classification of wild and farmed game is imprecise as farmed game can be considered wild in some circumstances. On the other hand wild game can be kept and fed in enclosures in all MSs visited. This creates risks of misleading information for consumers who often have a preference and pay a premium for wild game. In one MS the consumer had to be informed when the game meat originated from farmed game.

Official controls over collection centres (CCs) when exercised of game handling establishments (GHEs) and farmed game slaughterhouses were generally satisfactory. However, the official controls did not always ensure that the general and specific hygiene requirements were fully met in relation to operational hygiene and carcass hygiene in the GHEs.

The training available to be qualified in order to endorse the qualified person declaration was generally satisfactory. However, procedures to carry out official verification of the effectiveness of this training were not in place.

The post-mortem examination of wild game was generally not carried out in accordance with the requirements of Regulation (EC) No 854/2004. The health marking of carcasses of wild and farmed game was not fully carried out in compliance with the requirements of Regulation (EC) No 854/2004. Testing of wild boar carcasses destined for trade was generally done in accordance with Regulation (EC) No 2075/2005.

The official controls did not ensure in some cases that traceability of wild and farmed game was maintained at all times.

Animal welfare controls regarding slaughter of farmed game were generally satisfactory.

National provisions regarding ante-mortem inspection of farmed game and labelling of game were in place in the MSs. National provisions regarding *Trichinella* testing of small quantities of wild game were in place in two MSs but were not fully implemented. Official controls over national rules applicable to small quantities of game and game meat did not always ensure the implementation of such rules.

The trade of wild game supplied to the GHEs is carried out through CCs as defined by the repealed Council Directive 92/45/EEC. The CCs supplying GHE were not always registered and therefore were not subject to official controls. The provision that large wild game bodies
must be transported to a GHE as soon as possible after examination by a trained person was not generally fulfilled as the bodies were usually transported to a CC. National provisions containing requirements for CCs were in place in two out of four MSs visited.

Large scale Intra-Union trade of unskinned large wild game bodies was noted. The bodies were accompanied by commercial documents and trained person declarations.

2. **INTRODUCTION**

The Food and Veterinary Office (FVO) has undertaken a series of fact finding missions to four MSs (Annex 1) between January and December 2011 in order to gather information regarding the official control systems governing the production of wild and farmed game meat and products thereof (mammals excluding domestic rabbits). Particular attention was paid to the national rules regarding wild game and farmed game and the specific official control procedures in these sectors.

The trade patterns of unskinned wild game bodies within the European Union (EU) were reviewed. The views of stakeholders regarding some aspects of the legislation in place are reflected in this report.

The individual mission reports have been forwarded to the MSs visited but are not being published. No recommendations were made in individual reports; however, recommendations of a wider nature are made in this overview report. These recommendations are considered relevant for consideration by all Member States and not only the four who were audited in the current series. It was the second time that the FVO reviewed specifically the production of wild and farmed game. The previous series of missions was carried out during the period 2000-2002 and an overview report (DG(SANCO)/9003/2002) was published on the FVO website: [http://ec.europa.eu/food/fvo/index_en.cfm](http://ec.europa.eu/food/fvo/index_en.cfm)


3. **BACKGROUND**

These missions were carried out in light of a possible review of the hygiene requirements in relation to wild and farmed game.

4. **PRODUCTION AND TRADE INFORMATION**

4.1. **Wild game**

According to information received from the MS authorities, the following number of animals was shot during the hunting season 2009-2010 in the four MSs visited:

<table>
<thead>
<tr>
<th>Species</th>
<th>MS 1</th>
<th>MS 2</th>
<th>MS 3</th>
<th>MS 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wild boar</td>
<td>30 212</td>
<td>217 941</td>
<td>440 354</td>
<td>65 596</td>
</tr>
<tr>
<td>Red deer</td>
<td>50 744</td>
<td>50 513</td>
<td>67 356</td>
<td>4 480</td>
</tr>
<tr>
<td>Roe deer</td>
<td>253 828</td>
<td>176 196</td>
<td>1 153 073</td>
<td>114 700</td>
</tr>
<tr>
<td>Fallow deer</td>
<td>-</td>
<td>5 132</td>
<td>59 052</td>
<td>16 300</td>
</tr>
<tr>
<td>Mouflon</td>
<td>-</td>
<td>336</td>
<td>7 219</td>
<td>-</td>
</tr>
<tr>
<td>Chamois</td>
<td>20 530</td>
<td>-</td>
<td>4 550</td>
<td>-</td>
</tr>
<tr>
<td>Moose</td>
<td>-</td>
<td>-</td>
<td>88 015</td>
<td>-</td>
</tr>
</tbody>
</table>
4.2. Farmed game

The main species of farmed game kept in the MSs visited were reindeer, fallow deer, sika deer, red deer and farmed wild boar. The production of farmed game was not significant in quantity if compared with the wild game production. The figures for slaughtered farmed game in 2010 in the MSs ranged from 31,524 (reindeer) to 1,894 (deer). It was noted that the consumption of farmed game mainly takes place locally with the exception of one MS.

5. FINDINGS AND CONCLUSIONS

5.1. Implementation of European Union legislation

5.1.1. Classification of wild game and farmed game

'Wild game' is defined in Point 1.5 of Annex I to Regulation (EC) No 853/2004.

'Farmed game' is defined in Point 1.6 of Annex I to Regulation (EC) No 853/2004.

Main findings:

- In all the MSs wild game and farmed game were defined in line with points 1.5 and 1.6 of Annex I to Regulation (EC) No 853/2004.
- In one MS all fenced game was considered wild game under national provisions.
- In some areas of one MS wild game was kept in fenced areas during the winter both to protect the environment and to feed the game who might otherwise starve due to scarcity of feed.
- This practice of feeding wild game was common in all MSs, especially during adverse weather conditions. In one MS the Competent Authority (CA) expressed their concern that in a neighbouring MS the practice of treating wild game for infestation by parasites with anthelmintic took place. Consequently, this could lead to the presence of anthelmintic in the meat.

Conclusions:

In all MSs visited wild and farmed game were defined as in points 1.5 and 1.6 of Annex I to Regulation (EC) No 853/2004. The classification of wild and farmed game is imprecise as farmed game can be considered wild in some circumstances and wild game can be kept and fed in enclosures in all MSs visited.

5.1.2. Labelling of wild and farmed game

Directive 2000/13/EC sets out the requirements related to the labelling, presentation and advertising of foodstuffs to be delivered as such to the final consumer.

Main findings:

- In three out of the four MSs visited wild and farmed game was generally labelled as game meat without specifying its wild or farmed origin. However, in two MSs national provisions were in place to inform the consumer of the species of game offered for consumption. In one MS the consumer had to be informed when the game meat was sourced from farmed game. This requirement was put in place after an interpretation of the requirement to not mislead the consumer, which was based on the expectation of the consumer that game meat is normally of wild origin. In this MS the mission team noted
that this requirement was generally implemented.

- In one MS imported farmed game meat was labelled with statements implying wild origin. In another MS farmed game meat that was labelled in different languages only stating the farmed origin clearly on some labels.

- In two MSs the Hunter Associations expressed concerns that the consumer could be misled by unclear labelling and could purchase farmed game as wild. On the other hand farmers interviewed in two MSs claimed that considering the advantages of farmed game, it should be labelled as such.

Conclusions:

Misleading labelling of farmed game as wild was noted. In two MSs national provisions were in place to inform the consumer of the game species purchased. Also in one of the MSs national provisions to inform the consumer of the farmed origin of game meat were in place.

5.1.3. Design and implementation of programmes for training of hunters in health and hygiene

Hunter training programmes should meet the requirements of Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004.

Main findings:

- In the four MSs visited the requirements to become a trained person within the meaning of Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004 differed significantly. In two MSs and in three out of four regions visited in another MS there was a compulsory exam to be passed before becoming a trained person. Comprehensive training programmes were in place in these three MSs. However, in another MS the examination was not a requirement and in one out of two training centres visited the content of the training is considered too theoretical and moreover contained information largely irrelevant to the target group.

- Verification on the effectiveness of the training to ensure that the training had been provided to the satisfaction of the CA did not take place in is examinations. In two MSs officials from the CA were involved to different degrees on the implementation of the programmes without carrying out a formal verification of effectiveness.

Conclusions:

The requirements and the training available to become a trained person within the meaning of Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004 was generally satisfactory. However, in one case the training available was not fit for purpose. Apart from examinations no formal systems of verification of the effectiveness of training programmes were in place in the MSs visited.

5.1.4. Approval/registration of establishments

Article 31 of Regulation (EC) No 882/2004 requires MSs to establish procedures for the registration/approval of food and feed businesses, for reviewing compliance with conditions of registration and for the withdrawal of approvals.

Main findings:

- Game Handling Establishments
GHEs were approved in all four MSs visited. Significant differences between the stated number of approved GHEs and the official lists were noted in two MSs. Deficiencies regarding the approval conditions and the documentation of flexible provisions were identified.

- **Farmed Game Slaughterhouses**

In one MS with 963 approved farmed game slaughterhouses the mission team noted that the establishments in the three regions visited did not carry out any killing and bleeding as this activity was performed on the farm. Significant discrepancies between the stated number of farmed game slaughterhouses and the numbers on the official list were noted in one MS.

**Conclusions:**

In one MS the farmed game slaughterhouses approved did not carry out any killing activities as the animals were killed on the farm. In two MSs significant discrepancies between the approved GHEs and/or farmed game slaughterhouses and the listed approved establishments were noted.

### 5.1.5. Organisation of official controls

*Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. Controls shall be carried out at any of the stages of the production and processing chain and, in general, are to be carried out without prior warning.*

**Main findings:**

- Regarding GHEs and farmed game slaughterhouses the official controls were carried out according to risk based procedures and the frequencies of controls were generally met in three MSs visited. However, in one region of the other MS only 50% of the scheduled official controls were carried out.

- Farmed game holdings were subject to regular official controls in two of the MSs visited. However, in another MS no official controls were scheduled in farmed game holdings. In the other MS fenced game considered wild under national provisions was subject to animal welfare controls.

**Conclusions:**

Regular official controls were carried out in the GHEs and farmed game slaughterhouses visited. In one MS farmed game holdings were not subject to regular official controls.

### 5.1.6. Official controls of Food Business Operators’ obligations

#### 5.1.6.1. General and specific hygiene requirements

*Article 4(2) of Regulation (EC) No 852/2004 establishes that a food business operator (FBO) carrying out any stage of production, processing and distribution of food after the stage of primary production/associated operations shall comply with general hygiene requirements as set out in Annex II to Regulation (EC) No 852/2004.*

*Article 3 of Regulation (EC) No 853/2004 sets out that FBOs shall comply with the specific requirements of Annexes II and III to this Regulation. In addition, Article 4(2) of Regulation (EC) No 854/2004 specifies that the CA shall carry out official controls in respect of products of animal origin to verify FBO compliance with these requirements.*
Main findings:

- The official controls regarding general hygiene requirements in relation to the design, facilities and equipment were satisfactory in respect of most aspects in the GHEs and farmed game slaughterhouses visited. However, in several establishments the mission team noted shortcomings in relation to structural requirements and operational hygiene requirements which had not been noted by the CAs.

- All the GHEs and farmed game slaughterhouses had Hazard Analysis Critical Control Points (HACCP) based systems in place which were subject to regular official controls. In one GHE the official controls carried out did not identify issues that could have immediate public health implications such as crossing of flows between hide-on and dehided bodies and storage of exposed ready to eat products in proximity to raw meat.

- In GHEs in three MSs and in farmed game slaughterhouses in two MSs hygiene during operations was inadequate (dragging carcasses along the ground, rolling of the skin, carcasses coming in contact with unclean surfaces and inadequate knife hygiene) resulting in contamination of the carcasses. These issues were not identified by the CAs.

- Trimming of the contamination on the carcasses was inadequate in most of the GHEs visited. Moreover, in some cases carcasses were hosed with water in an unhygienic manner.

Conclusions:

The system of official controls in all MSs was generally capable of ensuring that the general requirements of Regulation (EC) No 852/2004 were met in GHEs and farmed game slaughterhouses. However, the implementation of the system did not ensure in some cases that the requirements were met.

The official controls did not ensure that the specific requirements in relation to operational hygiene and carcass hygiene were always met.

5.1.6.2. Traceability of wild and farmed game

According to Article 18 of Regulation (EC) No 178/2002, the traceability of food and food producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution.

Main findings:

The basis of traceability of wild game in the different MSs varied between attaching the trained person declaration to the bodies and viscera of the game or the identification of the body and/or the viscera with a number linked to the trained person declaration. Internal traceability systems in GHEs and farmed game slaughterhouses ranged from very basic systems to elaborate IT systems. The systems were subject to official controls which were carried out frequently. However, the following issues were identified:

- In one MS correlation of the different data between documentation of incoming wild game bodies and documentation available in the GHEs (dates of shooting, reception and cutting and species missing) could not be ensured in all cases.

- In one MS the traceability checks generally focused on the identification of the wild game body. However, the trained person declaration was not routinely part of the official controls to determine the origin of the carcasses.

- In some establishments in one MS the traceability systems were poor and did not allow for verification.
• Unidentified game and game products were observed in all the MSs.
• In one MS some of the traceability systems in place in the CCs did not record the date of arrival of wild game bodies.

Conclusions:
In the MSs visited the official controls over traceability did not always ensure that the traceability of wild and farmed game was maintained at all stages of production, processing and distribution.

5.1.7. Ante-mortem inspection, post mortem inspection and animal welfare controls of farmed game

5.1.7.1. Ante-mortem inspection and certification at the holding of provenance

Article 5 of Regulation (EC) No 854/2004 establishes that the official veterinarian (OV) should carry out ante-mortem inspection of farmed game.

Main findings:
• In two MSs derogations were in place for the slaughter of farmed game within 28 days of the ante-mortem inspection carried out by the OV (see section 5.2).
• The live animals brought to the slaughterhouse were accompanied generally by Food Chain Information and Health Certificates in compliance with the model certificate given in Regulation (EC) No 854/2004. The bodies of farmed game slaughtered on the farm were generally accompanied by a declaration from the owner regarding the administration of veterinary treatments to the animals and a veterinary certificate in accordance with Section IV, Chapter X, B of Annex III to Regulation (EC) No 854/2004. However, the following issues were noted:
  o In one holding visited where on farm slaughter took place the ante-mortem inspection record was not provided in the format prescribed in Annex I to Regulation (EC) No 854/2004. In this MS the mission team also noted that one farmer endorsed the documentation required under the national derogation without the required authorisation and training to carry out the examination of the animals.
  o In one large farmed game slaughterhouse and holding, animals were slaughtered more than three days after the ante-mortem inspection contrary to the requirement to chapter VII (A), point 3 of Section IV of Annex I to Regulation (EC) No 854/2004. In the same establishment discrepancies were noted between the ante and post-mortem inspection records.

5.1.7.2. Post-mortem inspection

Article 5 of Regulation (EC) No 854/2004 establishes that the OV should carry out post-mortem inspection of farmed game in accordance with the general requirements of Section I, Chapter II, D, of Annex I, and with the specific requirements of Section IV, Chapter VII, B.

Main findings:
Post-mortem inspection of farmed game was generally carried out by the OV in charge in accordance with the requirements of Regulation (EC) No 854/2004. However, the following was noted:
• In one MS in the only slaughterhouse visited in operation the OV did not carry out the
visual inspection of the gastro-intestinal tract which is required by Regulation (EC) No 854/2004.

- In two MSs a special arrangement had been agreed to allow evisceration and partial post-mortem examination by the OV at the farm of origin. This is an option that is not foreseen in Regulation (EC) No 853/2004. Nevertheless, this could be a good practice in case of geographical constraints for transportation to the slaughterhouse.
- In two MSs carcasses with contamination (hairs) were declared fit for human consumption at post-mortem inspection.

5.1.7.3. Animal welfare

Article 5 of Regulation (EC) No 854/2004 establishes that the OV should carry out animal welfare inspections of farmed game.

Article 3 of Regulation (EC) No 1/2005 states that no person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them.

Article 3 of Council Directive 93/119/EC states that animals shall be spared any avoidable excitement, pain or suffering.

Main findings:
- In three out of four MSs visited the slaughter of farmed game on the farm was common in order to avoid animal welfare issues during transport. Moreover, in two of these MSs all the farmed game slaughterhouses visited received only farmed game bodies. In the other two MSs the animal welfare controls over the slaughter of farmed game were carried out by the OV in accordance with the requirements.
- In all MSs national provisions regarding farmed game animal welfare at holding level and at transport were in place and were generally subject to regular official controls (see section 5.1.5.)

Conclusions:

Ante-mortem inspection of farmed game was generally in line with the EU requirements.

Post-mortem inspection of slaughtered farmed game was generally carried out in accordance with Article 5 of Regulation (EC) No 854/2004. However, in two MSs evisceration of farmed game and post-mortem of the viscera took place in the holding of origin which is not foreseen by Regulation (EC) No 853/2004.

Animal welfare official controls regarding slaughter of farmed game were satisfactory.

5.1.8. Post-mortem inspection of wild game

5.1.8.1. Trained person declaration

A trained person must attach to large wild game bodies a numbered declaration in line with the requirements of Point 4, Chapter II, Section IV of Annex III to Regulation (EC) No 853/2004.

Point 2, Chapter III, Section IV of Annex III to Regulation (EC) No 853/2004 states that in the case of small wild game that if abnormal characteristics are found during the examination, abnormal behaviour was observed before killing, or environmental contamination is suspected, then the trained person must inform the CA.
Main findings:

- In three MSs requirements for the trained person declarations in line with Regulation (EC) No 853/2004 were laid down in national provisions while in the other MS the requirements of Regulation (EC) No 853/2004 were directly applied. In two MSs the format of the trained person declaration was laid down while in the other two MSs different formats were available, always in line with the requirements.

- In one MS the trained person declaration was attached to the animal bodies while in the other MSs the bodies and viscera, if relevant, were identified with a numbered tag providing a link to the trained person declaration. When the declaration was not attached individual or group declarations were available. The following issues were identified:
  - The declarations attached to the bodies were not numbered in one MS as required by Point 4, Chapter II, Section IV of Annex III to Regulation (EC) No 853/2004. However, in their response to the draft report the CA informed the FVO that the game tags had been modified to ensure compliance. Around 10% of the declarations checked in this MS were incomplete or incorrect and tags in some cases were no longer legible.
  - In the other three MSs the declarations were generally satisfactory.
  - Only in one MS did the mission team note trained person declarations identifying abnormalities. In the other MSs the CAs stated that the bodies were abandoned in the forest or sent to the Veterinary School for possible post-mortem investigation when abnormalities were identified.
  - The mission teams noted difficulties for the officials to ascertain the training of the person endorsing the declarations originating from another MS.

Conclusions:

The trained person declaration met in most cases the requirements of Point 4, Chapter II, Section IV of Annex III to Regulation (EC) No 853/2004. In three MSs abnormalities were rarely recorded in the trained person declaration.

5.1.8.2. Post-mortem inspection of wild game

Article 5 of Regulation (EC) No 854/2004 establishes that the OV should carry out post-mortem inspection of wild game, in accordance with the general requirements of Section I, Chapter II, D, of Annex I, and with the specific requirements of Section IV, Chapter VIII.

Main findings:

- The following was noted:
  - Post-mortem inspection was observed in three MSs visited. The post-mortem procedures generally did not ensure that the carcasses were free of contamination (large amounts of hair and contamination from the evisceration process) before declaring them fit for human consumption.
  - In one MS the mission team noted that some parts of the carcasses were removed before post-mortem inspection in one GHE while in another two GHEs the health mark was applied on the carcasses before unfit parts were removed.
  - In the MSs visited the *Trichinella* testing of wild boar processed in GHEs was carried out generally in line with the requirements of Regulation (EC) No 2075/2005. However, in one official laboratory in one MS the sample size of wild boar to be used in the pooled sample for digestion was not in accordance with the requirements of Regulation (EC) No
2075/2005 and deficiencies were noted in relation to the actions taken after negative proficiency test results. In another MS shortcomings regarding the sample traceability and documentation of the tests performed, procedures available and proficiency tests were noted by the mission team.

Conclusions:
The post-mortem examination of wild game was generally not carried out in accordance with the requirements of Regulation (EC) No 854/2004. Testing of wild boar carcasses destined for trade was generally in accordance with Regulation (EC) No 2075/2005.

5.1.9. Health marking and identification marking of game

Article 5 of Regulation (EC) No 854/2004 establishes that the health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs, and large wild game, as well as half-carcasses, quarters and cuts produced by cutting half-carcasses into three wholesale cuts, shall be carried out in slaughterhouses and GHEs in accordance with Section I, Chapter III, of Annex I. Health marks shall be applied by, or under the responsibility of, the OV when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

In the cases where Regulation (EC) No 854/2004 does not provide for the application of a health mark, Article 5 (1b) of Regulation (EC) No 853/2004 establishes that FBOs shall not place on the market food of animal origin handled in an establishment subject to approval in accordance with Article 4(2), unless it has an identification mark applied in accordance with Annex II, Section I of Regulation (EC) No 854/2004.

Main findings:

- Game carcasses were health marked after post-mortem inspection had taken place. In the three MSs evaluated for this aspect the mission teams noted that the health mark was applied to contaminated carcasses. This is contrary to Annex I, Section I, Chapter III, point 2(a) of Regulation (EC) No 854/2004. Moreover, in one slaughterhouse in the other MS the post-mortem procedures allowed for carcasses to be brushed and hosed. Furthermore, in one MS it was observed that the OV applied the health mark before the inspection of offal had been completed. Also in the same MS wild boar carcasses without a negative Trichinella test and without a formally approved procedure in place as required by Article 4(3) of Regulation (EC) No 2075/2005 were health marked.

- In one MS (DE) a round health mark was applied to farmed game slaughtered under the national derogation (see section 5.2).

- The identification mark was applied generally in accordance with the requirements of Article 5 and Annex II, Section I of the Regulation (EC) No 854/2004.

Conclusions:
The health marking was not always carried out in accordance with Annex I, Section I, Chapter III, point 2(a) of Regulation (EC) No 854/2004 as it was applied in some cases to contaminated carcasses. The identification mark was applied generally in accordance with Annex II, Section I of the Regulation (EC) No 854/2004.

5.2. National provisions applicable to the production and placing on the market of farmed game

Point 1 of Section III of Annex III to Regulation (EC) No 853/2004 establishes that the provisions from Section I of Annex III to Regulation (EC) No 853/2004 apply to the
production and placing on the market of even-toed farmed game mammals (Cervidae and Suidae) unless the CA considers them inappropriate.

Main findings:

In all MSs visited the provisions of point 1 of Section III of Annex III to Regulation (EC) No 853/2004 applied for the production and placing on the market of farmed game. However, the following national provisions had been notified to the Commission by the MSs:

- In two MSs provisions were in place to enable the owners of small farmed game holdings to slaughter animals within 28 days of the performance of ante-mortem inspection by an OV. In this case the holding owner must undergo specific training to the satisfaction of the CA in order to declare the animals fit for slaughter. The meat originating from these animals could only be marketed locally in one case and within the MS in the other one. Many holdings that cannot avail of the derogation described above slaughter a few animals on a regular basis (e.g. weekly) and the frequent ante-mortem inspections required were highlighted as a heavy economic burden. The inclusion in the Hygiene Package of practices allowing the validity of the ante-mortem inspection for farmed game for a period up to 28 days, under conditions such as those described in the national derogations available for small farms, were suggested as a solution to the financial burden.

- In one MS provisions were in place excluding the OV and auxiliaries from the requirement to be present during the slaughter process of farmed game. In the same MS provisions were in place regarding the application of flexibility in relation to small throughput farmed game slaughterhouses.

- In one MS provisions were in place to allow slaughtering on the farm of bison that were kept outside for the whole year. This MS required proof of expertise for the slaughter of farmed game on the farm. The CA issued proof of expertise to persons that were in possession of a hunting licence or that had successfully passed a specific exam.

- In one MS testing for the presence of radioactive $^{137}$Caesium was carried out in accordance with national requirements. The hunting areas were divided into control and monitoring areas which implied different levels of testing. In another MS similar testing applied to reindeer.

Conclusions:

In all MSs visited the provisions of point 1 of Section III of Annex III to Regulation (EC) No 853/2004 apply for the production and placing on the market of farmed game. However, national provisions were in place regarding ante-mortem inspection of farmed game, slaughter on the farm, and application of flexibility on farmed game production and testing farmed game for the presence of $^{137}$Caesium.

5.3. National provisions applicable to small quantities of wild game and wild game meat

Article 1 of Regulation (EC) No 852/2004 states that MSs shall establish, under national law, rules governing the direct supply, by the producer, of small quantities of primary products to the final consumer or to local retail establishments directly supplying the final consumer.

Article 1 of Regulation (EC) No 853/2004 states that MSs shall establish, under national law, rules governing the activities of hunters who supply small quantities of wild game or wild game meat directly to the final consumer or to local retail establishments directly supplying the final consumer.

Such national rules shall ensure the achievement of the objectives of these Regulations.
5.3.1. Definition of small quantities of wild game and wild game meat

In all MSs visited the consumption of wild game by the hunter and the direct supply to the consumer of small quantities of wild game exempt from the requirements of Regulation (EC) No 852/2004 and (EC) No 853/2004 and wild game meat exempt from the requirements of Regulation (EC) No 853/2004 form part of a tradition and have a strong cultural component. In fact, the majority of shot animals in MS 1 (61-70%), MS 3 (60-70%) and MS 4 (high according to the MS) were considered as small quantities exempt from the above requirements. However, in the case of MS 2 only 10-50% of shot large wild game (depending on the species) was classified as small quantities.

Main findings:

- In two MSs visited there was no definition in place of small quantities of wild game exempt from the requirements of Regulation (EC) No 852/2004 and (EC) No 853/2004 and wild game meat exempt from the requirements of Regulation (EC) No 853/2004. In practice the definition was widely defined and most game was exempted from official controls.

- In one MS the national provisions defined the small quantities of wild game and wild game meat as the equivalent of 25 adult moose and 1,000 small game per hunter/year. In another MS the small quantities were defined as quantities of wild game that a hunter may hunt in a given day. Therefore, no quantitative limit as such was established.

5.3.2. National rules

Main findings:

- In all the MSs wild game for direct sale must be inspected by a trained person according to Regulation (EC) No 853/2004 and tested for the presence of *Trichinella* if relevant. Only in two of these MSs must wild game for own consumption be tested for the presence of *Trichinella*. No data regarding testing of wild boar for own consumption was available in one of these MS. The data provided in the other MS indicated that approximately 25% of the wild boar destined for own consumption was not tested. Regarding the other two MSs no data was available in one MS and in the fourth MS 84% of the wild boar carcasses were tested.

- The use of the compression method to test small quantities of wild game for the presence of *Trichinella* was allowed in two MSs. In addition, in two MSs the hunter was allowed to take samples of small quantities of wild game for the presence of *Trichinella* when conditions for training specified in the national legislation had been fulfilled.

- In all MSs national rules in line with Article 1 of Regulations (EC) No 852/2004 and 853/2004 were in place for small quantities of wild game and wild game meat. Such rules apply mainly to *Trichinella* testing. The official controls in all MSs did not ensure the implementation of such rules.

Conclusions:

Small quantities of wild game exempt from the requirements of Regulation (EC) No 852/2004 and (EC) No 853/2004 and wild game meat exempt from the requirements of Regulation (EC) No 853/2004 were defined in two out of the four MSs visited. As the limits set by the definition were rather high, the direct sales of wild game and wild game meat were in practice not restricted. Official controls over national rules applicable to small quantities of wild game and wild game meat exempt from the requirements of the Regulations did not always ensure that such rules were implemented. National provisions regarding compulsory *Trichinella*
testing of small quantities of wild game were not in place in two MSs visited. In the other two MSs provisions for *Trichinella* testing were not fully implemented or implementation data was not available. The use of the compression method for testing of small quantities of wild game meat for the presence of *Trichinella* was allowed in two MSs.

**5.4. Other issues not covered in the current EU legislation**

**5.4.1. Collection Centres**

- In all MSs visited CCs as defined by repealed Council Directive 92/45/EEC were widely used for the collection of large wild game to be supplied to GHEs. Also in three MSs these facilities were used for the cutting of small amounts of wild game.
- Criteria in line with Regulation (EC) No 852/2004 for the direct supply of wild game and wild game meat to the final consumer or to local retail establishments supplying to the final consumer were in place in three MSs visited. These requirements include the use of CCs with suitable refrigeration and sufficient space to carry out de-hiding and cutting activities. In one MS the CA considered this activity as part of a hunting tradition and no specific requirements were in place.
- The activity of the CCs was considered by the CAs as primary production. Different situations were observed in relation to the use and registration of these facilities:
  - In two MSs all the CCs supplying to the GHEs had to be registered according to Article 6 of Regulation (EC) No 852/2004 and had to fulfil national provisions and the requirements of Regulation (EC) No 852/2004 for primary production. However, in one of these MSs CCs operating for several years had been registered only before the mission.
  - In another MS there was no active registration of CCs in place and therefore the number and location of these facilities was not known to the CA.
  - In another MS the CA informed the mission team that CCs were not used to any great extent and only three were registered in the entire country. However, in the GHEs visited the FBOs stated that CCs were used extensively. The unregistered CC visited was not adequate and carcasses were kept in unhygienic conditions at an ambient temperature.

**5.4.1.1. Official controls over collection centres**

- In one MS controls over the CCs supplying GHEs were not carried out. When the hunters cut meat for direct sale, this activity must be registered and controlled by the CA in accordance with Regulation (EC) No 852/2004. No evidence was seen that the CA was systematically informed or that routine controls were carried out on these activities.
- In another MS the majority of the CCs were not registered and were not subject to official controls. Also the supply of small quantities of wild game meat was not subject to official controls. The general hygiene standard was unsatisfactory in one non-registered CC visited.
- In another MS the CCs were registered and classified as low or very low risk. Therefore, they were visited once a year or at least once every two years by the CA. In order to carry out direct sales of wild game the FBO had to be registered and subject to official controls. The CCs visited complied with the general requirements of Regulation (EC) No 852/2004 and operated HACCP based procedures.
- In another MS the registered CCs supplying wild game to GHEs and wild game meat to the final consumer were classified according to risk and scheduled visits were
programmed. The scheduled visits, however, were not carried out in many cases. The CCs visited complied with the general requirements of Regulation (EC) No 852/2004 and operated HACCP based procedures.

- According to Annex III, Section IV, Chapter II, point 3 of Regulation (EC) No 853/2004 “Meat of large wild game may be placed on the market only if the body is transported to a game handling establishment as soon as possible after the examination referred to in point 2”. In all the MSs visited the majority of wild game bodies were transported to CCs after the examination or the examination took place at the CC. In one MS the CA stated that the above requirement was met as the CCs were under the control of the GHEs. The view of some FBOs interviewed was that the Hygiene Package should include provisions to enable bodies to be transported as soon as possible after the examination also to a CC. According to the data reviewed wild game bodies stayed in the CCs for periods of between 1 and 7 seven days and in exceptional circumstances up to 15 days.

- In one MS the requirement of bodies to be transported between the CC and the GHE on hooks to avoid heaping was part of the national provisions.

- In two CCs visited in one MS temperatures below 0°C (down to -8°C) were recorded. This is not in line with the requirements of point 8(a), Chapter II, Section IV, of Annex III to Regulation (EC) No 853/2004 as freezing of the bodies can take place.

5.4.2. Trade of unskinned large wild game

Intra-Union trade activities of unskinned large wild game bodies were noted in three MSs. Typically small numbers of unskinned large wild game bodies are collected from neighbouring areas of other MSs by CCs and GHEs situated close to the border. However, significant amounts of unskinned bodies were traded from one of the MSs to another two MSs visited. In particular this activity took place from one large CC which traded over 90 000 unskinned large wild game bodies in 2010. The mission teams noted that this trade also takes place from other MSs not visited during this series of missions.

- Unskinned bodies subject to Intra-Union trade were accompanied by a commercial document and corresponding trained person declaration.

- In one large CC visited dispatching unskinned large game bodies to other MSs, the OV's carried out an inspection of the bodies in line with repealed Council Directive 92/45/EEC. The CA stated that this inspection and the Trichinella testing of wild boar were carried out at the FBO's request. No certificate was issued in relation to this inspection.

Conclusions:

CCs were widely used as part of the supply chain of wild game to the GHEs and for the cutting of small quantities of wild game meat. However, only two out of four MSs required registration according to Article 6 of Regulation (EC) No 852/2004. Provisions in line with Regulation (EC) No 852/2004 for the use of CCs and other premises for the supply of small quantities of wild game and wild game meat were in place in three out of four MSs visited. However, in one of the three MSs the provisions were not enforced.

In two MSs the organisation of official controls did not ensure that the CCs supplying wild game to GHEs were subject to official controls.

Significant intra-Union trade of unskinned large game bodies was observed in three of the MSs visited.
6. **OVERALL CONCLUSIONS**

The majority of the wild game shot in the MSs visited was exempt from the Hygiene Package requirements as it was categorised as small quantities. Small quantities of wild game are exempt from the requirements of Regulation (EC) No 852/2004 and (EC) No 853/2004. Similarly, small quantities of wild game meat are also exempt from the requirements of Regulation (EC) No 853/2004. However, small quantities are either not defined, or when defined, the limits set were substantially high. In practice, therefore, most game and game meat escapes controls under the Hygiene Package. The official controls over national rules applicable to small quantities of game and game meat did not always ensure the implementation of such rules.

The classification of wild and farmed game is imprecise as farmed game can be considered wild in some circumstances. On the other hand wild game can be kept and fed in enclosures in all MSs visited. In one MS the consumer had to be informed when the game meat originated from farmed game. Official controls over CCs when exerted, GHEs and farmed game slaughterhouses were generally satisfactory.

The training available to be qualified to endorse the trained person declaration was generally satisfactory. However, procedures to carry out official verification of the effectiveness of this training were not in place. The post-mortem examination of wild game was generally not carried out in accordance with the requirements of Regulation (EC) No 854/2004. The health marking of carcasses of wild and farmed game was not fully carried out in compliance with the requirements of Regulation (EC) No 854/2004. Testing of wild boar carcasses destined for trade was generally done in accordance with Regulation (EC) No 2075/2005.

In the MSs visited the official controls did not ensure in some cases that traceability of wild and farmed game was maintained at all times.

Animal welfare controls regarding slaughter of farmed game were generally satisfactory in the MSs visited.

Official controls over CCs when exerted, GHEs and farmed game slaughterhouses were generally satisfactory. However, the official controls did not ensure that the general and specific hygiene requirements were fully met in relation to operational hygiene and carcass hygiene in the GHEs.

National provisions regarding ante-mortem inspection of farmed game and labelling of game were in place in the MSs. National provisions regarding *Trichinella* testing of small quantities of wild game were in place in two MSs but were not fully implemented.

The trade of wild game supplied to the GHEs is carried out through CCs as defined by repealed Council Directive 92/45/EEC. The CCs supplying GHE were not always registered and therefore were not subject to official controls. The provision that large wild game bodies must be transported to a GHE as soon as possible after examination by a trained person was not generally fulfilled as the bodies were usually transported to a CC. National provisions containing requirements for CCs were in place in two out of four MSs visited.

Large scale Intra-Union trade of unskinned large wild game bodies was noted. The bodies were accompanied by commercial documents and trained person declarations.

7. **RECOMMENDATIONS**

In order to address issues arising in relation to the implementation of EU provisions and national provisions the following recommendations are made for consideration by all Member States:
1. The CA should ensure that no misleading labelling within the meaning of Directive 2000/13/EC takes place in wild and farmed game and meat thereof.

2. The CA should ensure that a system of verification of the effectiveness of the training provided in line with Section IV, Chapter I of Annex III to Regulation (EC) No 853/2004 is in place to comply with point 4 of the same Section.

3. The CA should ensure that food business operators have comprehensive registration systems in place regarding the production of wild game in line with the requirements of Article 18 of Regulation (EC) No 178/2002 in order to ensure reliable traceability systems of wild game.

4. The CA should ensure that the general hygiene requirements of Regulation (EC) No 852/2004 and the specific requirements of Regulation (EC) No 853/2004 are fully met in game handling establishments.

5. The CA should ensure that the post-mortem inspection of wild and farmed game is carried out fully in line with the general requirements of Section I, Chapter II, D of Annex I and the specific requirements of Section IV of Regulation (EC) No 854/2004 and health marking of game carcasses is carried out in accordance with the requirements of Article 5 of Regulation (EC) No 854/2004.

6. The CA should ensure compliance with the national provisions of game and game meat destined for own consumption including testing requirements for the presence of Trichinella.

7. The CA should ensure that the cutting operations of wild game meat by the hunter intended for direct supply to the final consumer or to local retail establishments directly supplying the final consumer comply with the requirements of Regulation (EC) No 852/2004.
### ANNEX 1 – PROGRAMME OF MISSIONS

<table>
<thead>
<tr>
<th>Country visited</th>
<th>Mission dates</th>
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<td>25 January to 4 February 2011</td>
</tr>
<tr>
<td>Austria</td>
<td>31 January to 11 February 2011</td>
</tr>
<tr>
<td>Sweden</td>
<td>29 November to 9 December 2011</td>
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<td>Germany</td>
<td>5 to 14 December 2011</td>
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## ANNEX 2 – LEGAL REFERENCES

<table>
<thead>
<tr>
<th>Legal Reference</th>
<th>Official Journal</th>
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