

# Primary producers: requirements and exemptions

The food hygiene regulations regard hunting of wild game for human consumption as a primary production activity.

Primary production is defined as the production, rearing or growing of primary products including harvesting, milking and farmed animal production prior to slaughter. It also includes hunting, fishing and the harvesting of wild products.

An individual who shoots game alone, or as an active member of a hunting party or a shooting estate that organises shooting of wild game, is considered a primary producer. Therefore, hunters, members of hunting parties and estates who organise shoots are all primary producers.

Primary wild game products are the products of hunting. Primary products in the wild game sector include:

- large wild game which includes wild game land mammals (wild deer, wild boar)
- small wild game which includes wild game birds and wild game lagomorphs (rabbits, hares and rodents)

The general requirements for the hygiene of foodstuffs applying to all food businesses and the specific hygiene rules applying to businesses producing food of animal origin provide the food hygiene regulatory framework and requirements by which all food businesses dealing with wild game must comply. These regulations are underpinned by the general principles and requirements of food law and procedures in matters of food safety. However, there are exemptions included in these regulations aimed at primary producers (hunters and people actively involved in the hunting process).

Whether any of the exemptions apply to you will depend on:

- whether you keep all the wild game you hunt for your own private domestic consumption
- whether you supply the wild game you hunt as primary product or you prepare it to be supplied as wild game meat
- who you choose to supply your wild game and/or wild game meat to (i.e. whether the supply is directly to final consumers; or to retail establishments; or to AGHEs, etc)

## Primary producer: requirements and exemptions table

The original version of this table was produced by the Scottish Office of the British Deer Society (BDS) and FSS (FSA) are grateful to BDS for allowing its use.

Nature of supply	Restrictions on supply	Applicable Food Hygiene Regulations and Competent Authority	Trained person status	Food Business Registration with LA	HACCP Plan
Keeping wild game for private domestic consumption	Wild game kept either for your own private domestic consumption or restricted to supply only to family and friends for their own private domestic consumption. Family and friends you supply wild game to must not supply the wild game to anyone else	Exempt from the scope of Food Hygiene Regulations (852/2004 and 853/2004)	Not required but encouraged	Registration as a food business is not required.	A Food Safety Management System (FSMS ) based on Hazard Analysis and Critical Control Points ( HACCP). Principles is not required.

Nature of supply	Restrictions on supply	Applicable Food Hygiene Regulations and Competent Authority	Trained person status	Food Business Registration with LA	HACCP Plan
<p>Direct supply by the producer of wild game to the final consumer and/or to local retailers who directly supply to the final consumer</p>	<p>Supply must be, by the producer, of small quantities of hunted wild game (primary product) Supply must be direct to the final consumer or to a local establishment who directly supply to the final consumer. (for example, butchers, restaurants) Supply from the producer to local retail establishments (who directly supply to the final consumer) can be no further than your own LA, a neighbouring LA or 50 km/30 miles from the boundary of your LA.</p>	<p>Exempt from the scope of Food Hygiene Regulations (852/2004 and 853/2004).  Your LA is the Competent Authority.</p>	<p>Not required but encouraged.</p>	<p>Registration as a food business is not required but you are encouraged to contact your LA to ensure you can make use of this exemption</p>	<p>A FSMS based on HACCP Principles is not required but you are still bound by the obligation to supply safe food and should have systems in place to manage food safety risks</p>

Nature of supply	Restrictions on supply	Applicable Food Hygiene Regulations and Competent Authority	Trained person status	Food Business Registration with LA	HACCP Plan
<p>Direct supply of wild game meat to the final consumer or to local retail establishments directly supplying to the final consumer</p>	<p>Supply must be of small quantities of wild game meat  Supply of wild game meat must be direct to the final consumer or to local retail establishments who directly supply to the final consumer (i.e. butchers, restaurants).  Supply to local retail establishments can be no further than your own local authority, a neighbouring Local Authority or 50 km/30 miles from the boundary of your Local Authority.</p>	<p>Regulation 852/2004 apply.  Exempt from 853/2004.  Your LA is the competent authority.</p>	<p>Not required but encouraged.</p>	<p>Yes, registration with your LA as a food business is required.</p>	<p>You must have FSMS based on HACCP principles.</p>

Nature of supply	Restrictions on supply	Applicable Food Hygiene Regulations and Competent Authority	Trained person status	Food Business Registration with LA	HACCP Plan
Supply of wild game to approved game handling establishments (AGHEs)	Not applicable	Regulations 852/2004 and 853/2004 apply. Competent Authority LA (Supplier) and FSA at AGHE	'Trained person' status required	Yes, registration with your LA as a food business is required.	You must have a FSMS based on HACCP principles. You are also required to comply with the criteria set out in the receiving establishment's HACCP plan.

## 2.1 Primary production for private domestic consumption

If you hunt, prepare, handle or store wild game for your own private domestic use, you are exempt from the general principles and requirements of food law and procedures in matters of food safety, as set out in Article 1(3), as well as from the general requirements for the hygiene of foodstuffs applying to all food businesses and the specific hygiene rules applying to businesses producing food of animal origin, as set out in Article 1(2)(a) and Article 1(3)(a) respectively. Private domestic use refers to the personal preparation, handling, storage and consumption of hunted wild game, with any supply restricted to family and friends for their own private domestic consumption only. You are not required to register as a food business with your LA but you are encouraged to contact them to ensure you are eligible for this exemption.

Exemption summary:

- you are exempt from the scope of the above-mentioned regulations
- you are not required to be registered or approved

To be eligible for this exemption the wild game you hunt must only be kept for own private domestic consumption, or that of your family and friends.

## 2.2 Direct supply, by the producer of Wild Game to the final consumer and/or to Local Retail Establishments supplying to the final consumer

If you are a primary producer (for example, hunter, shooting estate) that supplies all of your hunted wild game directly to the final consumer or to local retail establishments who directly supply to the final consumer (for example, butchers, restaurants or farm shops):

- you **must abide** by the rules of the general principles and requirements of food law and procedures in matters of food safety including the legal obligation to supply safe food and to comply with traceability principles and requirements
- you are **exempt** from the general requirements for the hygiene of foodstuffs applying to all food businesses and the specific hygiene rules applying to businesses producing food of animal origin as set out in Article 1(2)(a) and Article 1(3)(a) respectively
- you do not need to register as a food business with your [Local Authority](#). However, you are encouraged to contact your Local Authority to ensure you are eligible for this exemption
- your supply of wild game must be of small quantities direct to the final consumer, or to local retail establishments directly supplying the final consumer
- the definitions of wild game, final consumer, local, retail and small quantities can be found in the Glossary

## 2.3 Direct supply of Wild Game Meat to the final consumer and/or to Local Retail Establishments supplying the final consumer

Wild game becomes wild game meat when it undergoes any further preparation (e.g. evisceration, skinning and/or plucking). If you hunt, handle and/or prepare wild game to supply wild game meat directly to the final consumer and/or local retail establishments who directly supply the final consumer:

- you **must abide** by the general principles and requirements of food law and procedures in matters of food safety and by the general requirements for the hygiene of foodstuffs applying to all food businesses, including primary producers. In principle this means:
  1. Having a food safety management system based on HACCP (Hazard Analysis and Critical Control Point) principles
  2. Having adequate structures and operations in place for the processing of wild game
  3. Having adequate facilities in place for the appropriate storage, including the ability to maintain the cold-chain, of wild game bodies and wild game meat
- you must comply with the above-mentioned requirements to provide safe food and to maintain traceability
- you must have hygienic facilities to transport the wild game meat to the final consumer or local retailer
- you must be registered as a food business with your [Local Authority](#)
- hunters supplying wild game with a view for placing it on the market for human consumption must be trained in health and hygiene by a recognised training provider. Please see section on training
- you are **exempt** from the requirements under the specific hygiene rules applying to businesses producing food of animal origin, however in order for this exemption to apply:
  1. the supply of wild game meat needs to be of small quantities (for definition see Glossary) direct to the final consumer, or to local retail establishments who directly supply to the final consumer
  2. the wild game meat must be prepared by a trained person who has received Training
  3. this exemption does not apply if the retailer you supply your wild game to goes on to supply other retailers and not just final consumers