

Venison and Deer Larders

Aim

The aim of this guide is to outline the appropriate legislation associated with the supply of venison and specifically clarify the different obligations imposed by the Deer (Scotland) Act 1996 and the Food Hygiene Regulations.

Venison Dealers Licence

According to the Deer (Scotland) Act 1996, an individual who sells, offers, or exposes for sale the carcass of a deer or any part of a carcass, must hold a venison dealer's licence (VDL) (unless they are selling it directly to or have bought it directly from an LVD).

To apply for a VDL you must contact your Local Authority. A VDL is valid for three years and is granted only once the Local Authority have satisfied themselves the applicant is suitable. Every Licensed Venison Dealer must keep records of all transactions under the licence. If giving venison as a gift you do not require a VDL.

Venison Dealers and Producer Responsibilities

The following scenarios provide a summary of the venison producer's responsibilities in the most common situations.

1. Stalkers selling in-skin carcasses to an Approved Game Handling Establishment (AGHE)

Note:

- No restrictions on amount of carcasses sold.
- A venison dealer's licence is not required, provided the operator of the AGHE is an LVD.

Note any abnormal behaviour before culling.

- A carcass must be inspected by a 'trained' person after death for abnormal signs of disease, parasites, or contamination. Holding an approved qualification such as updated DSC Level 1 or the Level 2 Certificate in Game Meat Hygiene, is the most

robust way in which stalkers can show that they have the appropriate knowledge to be considered “trained”. A declaration tag must be signed by a trained person (available from the licensed processing plant).

- Keep records that ensure traceability. Should return records of deer culled to Scottish Natural Heritage (Section 40 Deer (Scotland) Act 1996).
- A carcass should reach the processor as soon as possible. Keep the carcase free from contamination throughout the whole process.
- It is the responsibility of the producer to ensure they know that any food they produce is to be handled in accordance with the law in the next stage of the food production process.

Larder Requirements

- Larder must be registered with the Local Authority. Follow general hygiene principles laid out in the Food Hygiene Regulations.
- Carcass core temperature should be brought down to 7°C as soon as reasonably possible and be kept below this temperature. Access to a chill will be required in most cases.
- For both the carcass and the larder, the producer must fulfil HACCP* (Hazard Analysis Critical Control Point) requirements demanded by the Venison Dealer.

2. Stalkers directly supplying in-skin carcasses to others (i.e., not to an Approved Game Handling Establishment)

- Food standards legislation requires that anything put into the food chain must be safe to eat.
- Can only supply small quantities.
- Cannot process the carcasses beyond gralloching, removing the head & feet and removing the pluck.

- Can only supply to a final consumer or supply to a retailer (that is itself supplying a final consumer) who is in the same or neighbouring local authority area or is within 50 km radius of the producer's property, whichever is the greatest.
- **If selling the carcass other than to a Venison Dealer, then must have a Venison Dealers Licence* obtained from the Local Authority.** Must return cull records to SNH and maintain records of venison traded, the latter to be made available for inspection by SNH (Sections 40 & 34, Deer (Scotland) Act 1996).

Larder Requirements

- Premises will need to be registered with Local Authority.
- Carcass core temperature should reach 7°C as soon as reasonably possible and be kept below this temperature. Access to a chill will be required in most cases. Follow general hygiene principles as laid out in the Food Standards Regulations. **
- Will not need to have a HACCP system, but it is recommended that they apply HACCP principles as far as possible.

3. Stalkers supplying venison skinned or cut by themselves

- Can only supply small quantities to final consumer.
- Must implement general hygiene principles laid out in the Food Standards Regulations.
- Can only supply to a final consumer or only supply to a retailer (that is itself supplying a final consumer) who is in the same or neighbouring local authority area or is within 50 km radius of the producer's property whichever is the greatest.
- **If selling the venison, then must have a Venison Dealers Licence obtained from the Local Authority.** Return cull records to SNH and maintain records of venison traded, the latter to be made available for inspection by SNH (Sections 40 & 34, Deer (Scotland) Act 1996).

Larder Requirements

- Larder must be registered with the local authority. Follow general hygiene principles laid out in the Food Standards Regulations.
- Follow larder construction standards laid out in the Hygiene Regulations** (detailed advice is available from Food Standards Agency).¹
- For both the carcass and the larder, the producer must have a HACCP (Hazard Analysis Critical Control Point) plan in place. Carcass core temperature should reach 7°C as soon as reasonably possible and be kept below this temperature. Access to a chill will be required in most cases.
- Must ensure that the cold chain is maintained throughout the whole process of supply (i.e., the temperature of the meat is never allowed to go up after being chilled).
- Ensure that processed and unprocessed meats are effectively separated to avoid contamination (e.g., by adequate space in the chiller, separate processing area, lardering and processing not carried out at the same time in the same area).

DEER LARDER Design Criteria

The size and design of the larder should consider the number of carcasses it will be required to hold and the number of people expected to be working at any one time. For those that shoot only a small number of deer a purpose-built larder may not be essential. It is the responsibility of everyone supplying venison however to ensure that it is safe and that the hygiene principles set out below are adhered to.

Outside area:

A sloped concrete apron will allow for ease of washing and drainage.

- Keep areas clean, tidy, and free from weeds.
- Outside lighting is recommended.

Site Selection

It may be possible to use an existing structure but may be cheaper and easier to build from new.

- Where possible, site within easy access to an electricity and water supply.
- Ensure adequate vehicular access and consider the vehicle that may be used by the game dealer.
- Consider allowing for future expansion.
- Retain and use natural screening such as trees to shade the building.

Power

Industrial three phase supply is recommended.

- Ensure electrical fittings are waterproof.

Water

- Clean water must be used.
- Ensure a supply of potable water if any processing of the carcass (e.g., skinning) is to take place in the larder.
- Ensure a continuous supply at an adequate pressure all year round.

Effluent Disposal

Inside drains should allow the free flow of water down to a central drain. Drain covers should allow for ease of cleaning. Drainage from these internal drains should incorporate a 'trap' that captures solids.

- Dispose of larder waste according to BPG Larder Hygiene and Waste Disposal.

Roof

The main criteria for the roof is to ensure adequate height for rails and ventilation.

- Ensure roof/ceiling is adequately insulated to aid temperature control.
- Incorporating a ceiling may prevent dirt and dust from falling into the workspace.

Floors

The cheapest acceptable flooring is concrete however other materials are available such as polymer coating or non-slip tiles.

- The floor must be non-slip, anti-corrosive and all joints and junctions with walls etc. should be sealed.

- Floors should have a fall of around 1 in 60 to suitably located drains and such falls constructed to ensure that water does not flow into other work areas.

Walls

- Ensure walls have a coating that is washable, impervious, and smooth to a height suitable for operations (2 metres is usually adequate).
- All joints and edges should be sealed and capable of being cleaned.
- Non-corrodible metal or plastic sheeting should be used on walls at points subject to impact damage.

Windows

- Windows which can be opened should be fitted with screens to prevent entry from insects.
- Window frames should be impermeable and non-corroding.
- Keep ledges free of clutter.

Doors

- Doors should be cleanable and lockable.
- Consider fitting an insect-proof screen if the door is to be left open to aid ventilation.

Lighting

- Lights should be fitted with shatter proof guards.
- Ideally situate artificial lighting on the ceiling.

Ventilation

Adequate ventilation is required and should be based on the principle of a large volume of air moving slowly through the work areas.

- Air inlets and outlets (e.g., vents and extractors) should be screened to prevent entry from insects and yet be cleanable.
- Any ventilation equipment must be resistant to corrosion.

Materials, surfaces, and equipment

All materials, surfaces and equipment should meet the following criteria:

- Be easily cleaned, allowing for no crevices or angles that allow contamination to accumulate.
- Bare timber should not be used as a surface construction material it is not impermeable. Wood is however acceptable when a chopping board is required.
- Any materials used must be unaffected by water, disinfectants, detergent, blood, and fatty acids.
- Equipment to control flies is recommended.

Sinks

Provide the following

- At least one stainless steel sink.
- Hot and cold water with non-hand operated taps.
- Wastewater ducted to a closed, trapped drain.

Wash hand basin

Provide the following

- At least one stainless steel basin.
- Hot and cold water and non-hand operated taps.
- Soap and disposable hand towels.
- Wastewater ducted to a closed, trapped drain.

Refrigerated Units

- It is a requirement under the Hygiene Regulations that the internal temperature of a carcass is brought down to and maintained at below 7°C as quickly as possible (suggested temp 1-3°C).
- Active chilling will be required unless the air temperature and flow can ensure the carcass temperature is maintained below 7°C.

- A regular and timely uplift by the game dealer must be guaranteed if no active chilling takes place.
- Carcasses must be hung to allow free flow of air i.e., not touching.
- Chill rooms should follow the same construction requirements as per the larder.
- Carcasses should not be frozen.

Rail Systems

- Rails should be installed overhead throughout larder to maximise hanging space and ease carcass handling.
- Ensure rails are easily and safely accessible using a hoist.
- The height of rails should allow the largest species to be larded to hang with adequate floor clearance.
- Ideally extend rails out of the larder to the pick-up/drop off point.

Hoists/Winches

- Ensure hoists and winches can be easily cleaned and are constructed in such a way as to prevent contaminants such as grease from the hoist/winch coming in contact with the carcass.

DEER LARDER Hygiene and cleaning

Basic hygiene principles should be applied to working in the larder. In particular you should:

- Identify points in the larding procedure that are critical to ensuring food safety.
- Implement effective control and monitoring procedures at these points.
- Review these procedures as required.

Cleaning between carcasses (should take place before and after carcass processing)

- Ensure that the larder floor and 'in-use' knives and scabbards are visibly clean between dressing each carcass where batch processing.

Examples of acceptable cleansing options for knives, saws and scabbards include:

- Immersion in water at 82°C.
- Ultraviolet light cabinets.
- Steri-wipes.
- Do not allow blood, waste material and hair to build up on other equipment as you process carcasses.
- Place waste removed during larding, including heads and legs, in impervious containers with well-fitting lids. Mark these containers “Not fit for Human Consumption”. Empty and disinfect these containers regularly.

Cleaning at end of session

- Hose down walls, floors, and equipment.
- Use fat-dissolving food-approved detergents and disinfectants approved for use in the food industry.
- Thoroughly clean and disinfect knives, saws, and all protective equipment such as aprons and chain mail gloves.

Weekly cleaning

Larder areas should be empty of all carcasses.

- As above but ensure that in addition all nooks and crevices are disinfected and hosed down with a low-pressure hose.
- Disinfect all equipment.
- Empty and disinfect all drainage traps.
- Disinfect and wash down the outside concrete aprons.
- Ensure there is no waste material on hoist chains.
- The level of record keeping should be directly linked to the scale of the processing operation however cleaning records should be maintained.

Personal hygiene

- Wash hands, before larding each carcass or after touching contaminated meat.

- Wear clean, washable, light-coloured, protective over-clothing such as an apron.
- Cover any wound with a clean waterproof plaster or wear disposable gloves.
- Wash down and disinfect footwear before entering the larder.
- Do not dress carcasses or enter the larder If suffering from food poisoning, septic lesions that cannot be covered, or any other disease likely to be transmitted to the carcass.
- Remain aware of the need to maintain high standards of personal hygiene throughout the whole process. Do not eat, drink, or smoke in the larder.

General disposal options

This guidance relates to disposal of waste from larders only, not from Approved Game Handling Establishments (AGHE)

- Dispose of waste from larders is in a manner that minimises the risks to the environment and is in accordance with legislative requirements (see box below).
- When disposing of waste ensure you do not pollute the environment, or cause harm to human or animal health.
- There may be a high risk of contaminating private drinking water with harmful micro-organisms.
- Disposal of wild animals not suspected of being infected with diseases harmful to humans or animals falls outside the regulations2.

The table below summarises options for safe disposal.

Although not required by the Animal By-Products Regulation, there are three disposal routes that are approved and could be considered:

- Rendering plant or knacker's yard.
- Incineration.
- Landfill.

Burial

Where the above disposal routes are not an option then bury in compliance with the following terms of the Code of Good Practice for the Prevention of Environmental Pollution from Agricultural Activity:

No burial should take place:

- Within 20 metres of a watercourse.
- Within 10 metres of a field drain.
- Within 250 metres from any well, spring or borehole used as source of drinking water.
- On waterlogged sites.

Burial should only take place if:

- At least 1 metre of subsoil is present below the bottom of the burial pit.
- At least 1 metre of covering soil is used to cap the site.

If a burial pit is used, fence the area, and cover each item/load with soil, to avoid access for flies/birds etc.

Seek advice from SEPA if there are any difficulties meeting the above criteria.