

# Policy Statement

RE: Charitable Donation of Field-Dressed Game Meats

## **Policy:**

The Department of Agriculture and Food (UDAF) supports all efforts to alleviate need through charitable donation of food. It is our policy to accept rules for the donation of food that is fit for consumption to charities and avoid needless waste of any agricultural products, including food. The Department (UDAF) supports direction in the Utah Code Annotated (UCA) Title 4, Chapter 34, Charitable Donation of Food. (See enclosed copy) It is also our policy to carefully screen food products intended for general public consumption, making sure it is wholesome, well labeled, and properly prepared.

The Utah Department of Agriculture and Food (UDAF) considers the charitable donation or movement in commerce of field-dressed game meats and/or meat products a potential risk. Though we have no direct control of hunter/harvester of wild game meats, the charitable donation of this product is questionable from a food safety perspective. The following factors support this policy:

- Field-dressed game is often subjected to temperature abuse in transportation, unsanitary conditions in the field, unknown home/field storage conditions, and uninspected/unsanitary game processing facilities.
- Field-dressed game does not have the benefit of antemortem and/or postmortem examination for animal health or carcass inspection by a competent veterinarian.
- Field-dressed game may contain certain potentially pathogenic agents, such as prions, bacteria, and/or parasites.
- Populations typically receiving these products at charitable food distribution sites, may include clients with compromised immune systems and challenging life styles that could lead to suppressed disease prevention capability. These populations may have greater risk of food-borne or vector-borne disease.

- The rights of all clients to wholesome food should be the same for all segments of the population. The individuals consuming donated field-dressed game may not be given the choice to decide whether or not to eat uninspected game meat as would the individual hunter/harvester for his personal use.
- The Utah Division of Wildlife Services' policy allows for game processors to "re-coup" the processing expense, if an owner/hunter fails to pick up and pay for their personally harvested products. Another individual may pay the processing fee, accept the products, and assume liability/risk for the product. Movement of this product into charitable institutions may not allow the ultimate recipients to make a conscious decision to eat the product and accept the inherent results based on full knowledge of the product's origin and handling.
- Field-dressed game product often does not bear full labeling. This could include several added ingredients such as smoking/curing agents, spices, monosodium glutamate (MSG), or nitrates. Many of these are potentially serious allergens. Unknowing consumers may be placed at risk.
- Reduced Oxygen Packaging (ROP) greatly limits the growth of normal food bacterial populations, which in turn allows the potential unrestricted growth of harmful pathogens. The Food Protection Rule (FPR) requires full HACCP plans for all ROP packaged products. This consumer safety control is not readily available at most custom game meat processors.
- In addition, The Utah Food Protection Rule (FPR), R-70-530 Chap. 4-2(1)(g) states: "If game animals or other animals are received for sale or service they shall be: Commercially raised for food and: (A) Raised, slaughtered, and processed under a voluntary meat inspection program by UDAF, Division of Animal Industry, or (B) Under a voluntary inspection program administered by the USDA for game animals such as exotic animals (reindeer, elk, deer, antelope, water buffalo, or bison) that are "inspected and approved" ...(C) Raised, slaughtered, and processed under a routine inspection program conducted by UDAF, Division of Regulatory Services. Game meat under this program shall be: (i) slaughtered in a facility approved by UDAF and with considerations of an antemortem and postmortem examination done by a veterinarian, a trained veterinarian's designee, or as approved by the regulatory authority. (ii) processed under a HACCP plan...."

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Director Regulatory Services Division

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