



# AIM TO SUSTAIN GAME ASSURANCE LOW GROUND SHOOT MEMBERS HANDBOOK



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## INTRODUCTION

Aim to Sustain Game Assurance is a voluntary game assurance scheme. The schemes are open to members who operate low ground game shoots, upland grouse moors or rear game for release (game farms or shoots). Following an application for membership, the shoot, estate or game farm provide evidence during a visit to their site by the specialist assurance auditor to show they comply with the game assurance standards related to their scheme (low ground, upland or game rearing). The standards are varied, comprehensive, auditable, and focus on assessment of animal health and welfare, food quality, environmental enhancement and protection, staff training and health and safety. The standards are based on legislation, science and sector best practice and certified shoots, estates and game farms demonstrate a commitment to self-regulation at a high level.

The standards have been updated so they are easy to understand, logical and cover the things that good operations are already doing. The standards have been designed by panels of experts from across the game management and shooting sector and are regularly reviewed to ensure they are rigorous and keep pace with science and best practice developments. The standards are assessed through an independent audit by trained and experienced assessors from [Intertek SAI Global](#).

Intertek-SAI Global are a world-renowned, highly experienced, and accredited certification body who understand the game management and shooting sector. This gives confidence that the audit is robust, credible, independent and conducted to the highest standards in comparison with other assurance and accreditation schemes. It ensures gamebirds and the game meat from certified members have been produced to the highest standards, from breeding and rearing, through release, the shoot itself and the subsequent handling of the harvested wild food.

This handbook provides important information and guidance to ensure membership applications or renewals run smoothly, with the minimum of stress. The handbook covers guidance on the scheme, the standards the evidence required, how to prepare for the audit, the conduct of the visit by the assessor, post audit procedures and the scheme rules and Terms & Conditions.

Additionally, templates to assist with the gathering and recording of evidence to meet the standards are available from the Aim to Sustain website along with sort videos covering key aspects of being a scheme member. There is support available from the Aim to Sustain assurance advisor and staff from all the Aim to Sustain organisations'<sup>1</sup> staff to help members with any questions or issues they have. Contact details can be found at the end of this handbook and on the Aim to Sustain website.

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<sup>1</sup> British Association for Shooting and Conservation, Countryside Alliance, Country Land and Business Association, Eat Wild, Game Farmers Association, The Moorland Association, National Gamekeepers Organisation, Scottish Land and Estates. Game and Wildlife Conservation Trust (Scientific Advisor).

## HOW THE GAME ASSURANCE SCHEME WORKS

### Deciding to Join

A low ground shoot who decides to join the Aim to Sustain Game Assurance Scheme as a Member undertakes to follow the Scheme rules, maintain the Scheme standards as they operate their shoot and allow the Scheme's independent assessors (Intertek SAI Global) to visit the site(s) and review and discuss the evidence that confirms compliance with the Scheme standards. The assessment is robust, credible and independent and designed to demonstrate the high standards and best practice operating on your shoot. It also helps you to identify if there are areas where you can improve practices to comply with the sector best practice or legislation.

### Application Process

The application process is managed by Intertek SAI Global on behalf of Aim to Sustain. A shoot will complete an application form and Intertek SAI Global will contact the applicant to process the membership fee and arrange the initial assessment. This assessment is usually within 8 weeks of a membership application being completed and is at a time convenient to the shoot and Intertek SAI Global and will ensure the shoot has time to prepare and the assessor is able to collect the necessary evidence during the site visit.

Scheme Membership runs for 12 months from the point that the membership fee is processed. Intertek SAI Global will remind Members of the approaching renewal date approximately 8 weeks in advance each year. For shoots, the assessment cycle runs over an 18 month cycle to ensure a broad view of the shoot can be built up over the life of the membership.

Applicants (and Members) will prepare for the assessment and ensure they have the necessary evidence in place. They will be supported in this preparation by Aim to Sustain and its nine associated organisations with guidance and advice. Most of this can be accessed through the Aim to Sustain and partner's websites.

### Who is Involved with the Assessment

The assessment process will involve the keeper, manager or owner and the person who maintains and keeps the records. This could be one person or a combination of all depending on the shoot or game farm. The assessment will look at all aspects of the day-to-day operations against the published standards and cover physical evidence (paperwork and looking at equipment or facilities) and conversations about how the shoot or game farm runs and manages particular scenarios.

The key to any assessment is good record keeping, so whether these are maintained and held by the keeper or the estate/ farm office, ensuring the required records are up to date, clear and accessible on the day will ensure things run smoothly. Good record keeping is good practice and, in some cases, a legal requirement.

### Before the Assessment

- The assessor will contact you to arrange a date and time suitable to both.
- You will be sent a pre-assessment checklist to ensure you know what you need for the audit in good time.
- It is important that the person(s) who the assessor is meeting have read the standards before the assessment and understood the evidence that will be required on the day.
- Seek support and guidance from Aim to Sustain to help prepare: the Scheme Handbook provides explanations about each set of evidence or records required, there is on-line guidance and information about common issues and areas where shoots might want to focus evidence preparation.

- Ensures all the documents that will be required at the assessment are available beforehand. The Aim to Sustain Record Book will assist with this.

### The Assessment

- It is important to understand, the credibility of the Scheme relies on the assessor confirming there is evidence to meet the Scheme Standards. As an independent assessor, they are not able to provide advice to the shoot during the site visit. However, advice can be sought from Aim to Sustain and the organisations beforehand and after the assessment visit.
- After the introductions, the assessor will describe the format of the assessment process and what happens after the assessment.
- Depending on the nature of the shoot or game farm, the assessment should take around 2-4 hours.
- The next stage is for the person(s) representing the shoot to explain how the shoot works. Using the shoot map, showing the area the shoot covers (this can be from Google), the assessor will arrive with little knowledge as to how your specific shoot operates, but will have good understanding of the way shoots work in general having assessed many of them in the course of their work.
- The assessor will then discuss the facilities they would like to see – for example, if applicable, the rearing facilities, release pens, understand how some of the drives work, game handling facilities, larder and chiller, feed stores and medicine store.
- It will then be time to review the documents and records that are relevant to the shoot.
- If the assessor believes there are any areas where the shoot does not comply with the Scheme Standards, they will discuss it so there is the opportunity to better understand the issues.
- While an assessor cannot give direct advice, they can guidance a shoot to where they can find additional information – for example, links to a specific website. Advice and support are also available form Aim to Sustain and the organisations.
- At the end of the assessment, the assessor will sum up their findings and you will be left with a written record (the Visit Record), which you will be asked to sign. This includes any non-compliances that have been found and the evidence needed to achieve the standard concerned. The assessor will ensure you understand the details in the report and any actions the shoot needs to take.
- If there are significant or major areas of non-compliance, the Shoot's certification may be suspended until they are resolved.

### After the Assessment

- The assessor will complete a report, which will record any non-compliances found and the type of evidence required to demonstrate compliance. This will go through Intertek SAI Global internal validation and checking.
- If there are no areas requiring additional evidence, following Intertek SAI Global internal validation, your Shoot's Certified Membership will be confirmed and your certificate issued.
- If there are areas requiring your attention, you will have 28 days to submit the necessary evidence to Intertek SAI Global. Once this is received, Intertek SAI Global will confirm all is in

order and issue your Scheme Certificate. Depending on the type of evidence required for any non-compliant area, your Shoot may be subject to a re-audit to confirm that those improvements have been completed satisfactorily.

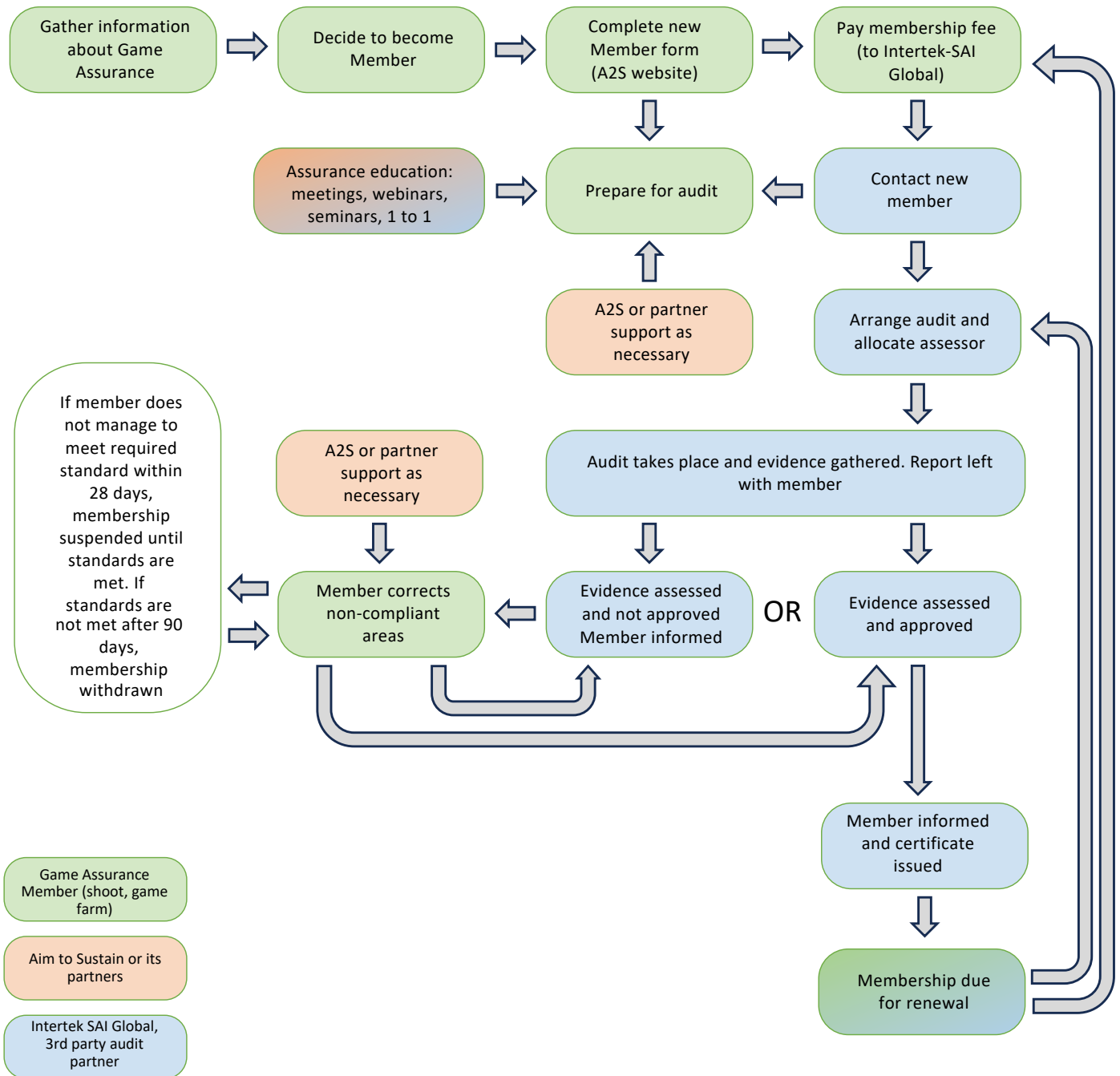
- If you are unable to submit the necessary evidence by the 28-day point, your Shoot's certified Member status will be suspended until the evidence is received. Where your Shoot has been suspended and failed to complete the required actions within 90 days, unless otherwise agreed, your Shoot's Membership will be withdrawn. If your Shoot wishes to re-join after this point, you will need to re-register and pay for a new audit and successfully comply with scheme requirements prior to regaining certification.
- Once all the evidence requested has been submitted and approved, you will then receive a certificate from Intertek SAI Global confirming your Certified Member status of the Scheme.
- Guidance can be sought from Aim to Sustain and the organisations and if there are difficulties, you are encouraged to discuss them early with Aim to Sustain and Intertek SAI Global so they can be resolved quickly.

### **Certified Membership and Renewal**

- Once you have your certificate, you can promote your status a certified member of the Game Assurance Scheme – which is the reason you joined in the first place.
- As your renewal date approaches (around 8 weeks beforehand), Intertek SAI Global will contact you to renew your membership and confirm when they need to arrange your next routine assessment to maintain your certified status.

If you have any queries or further questions, please do not hesitate to contact Aim to Sustain. Contact details can be found at the end of this manual.

# Game Assurance Membership Flow



## Preparation for the Assessment - Standards and Evidence

When the assessor makes the site visit to the shoot, they will need to see evidence that the shoot is meeting the standards that make up the low ground shoot scheme. This evidence will be a mix of evidence, both quantitative (i.e. physical records, such as registrations or licences) and qualitative (i.e. conversations with open questions about how the shoot conducts its operations). They will also need to see some of the facilities and areas of the shoot, such as food and medicine stores, release pens, and larder/chiller. The site visit will occur at different times of the year, when the shoot and the birds will be at different stages of the annual cycle of events. The following section provides the context and detailed advice on collecting and presenting the evidence needed to meet each standard. This section should be used in conjunction with the low ground shoot standards document available on the Aim to Sustain website <https://aimtosustain.org.uk/assurance/>.

### Section 1 - Shoot procedures & operation

Standard	This standard requires the shoot to...	You will meet this standard if you can...
1.1	Ensure all involved with the shoot are conversant with latest version of the CoGSP. This demonstrates that best practice is understood on the shoot. The shoot will need to ensure those working/volunteering on the shoot and visitors are informed about the code at an appropriate level of detail. <a href="https://www.codeofgoodshootingpractice.org.uk/">https://www.codeofgoodshootingpractice.org.uk/</a>	Explain to the assessor how you ensure the CoGSP is read, understood, and followed on your shoot. This can be through hard copies on shoot notice board and/or issued to participants through hard or electronic copies and discussed at shoot briefings.
1.2	Ensure all participants and visitors understand the layout of the shoot. The map is an aid for planning, and briefing so all shoot staff understand the layout, risks, and access on the ground. It enables visitor orientation and can be used to manage emergency service assistance in the event of an incident or accident. The details marked on the map ensure it is a useful tool for running the shoot. Use of an Ordnance Survey Map at 1:25,000 provides a useful level of detail. Identifying key points, RVs and access to the shoot ground in advance with grid references or What3Words is very useful for guiding emergency services and managing incidents.	Provide a copy of the marked shoot map for the assessor to see. They will discuss how you use it to manage shoot operations and how the shoot team are briefed and use the map and discuss what is given to visitors to orientate them to the ground.
1.3	Have a useable contact list and emergency plan in place and for it to be displayed (on shoot notice board and available for use on the ground in an emergency). The shoot has a duty to manage the health and safety of its participants and visitors. This requires a shoot to responsibly manage risks and be prepared for incidents and	Provide an up-to-date contact list and emergency plan to show the assessor. They will expect to discuss how it has been created and how it is updated (who by and how often), what type of incident it covers, how it is briefed to shoot staff, how staff can access it and



Standard	This standard requires the shoot to...	You will meet this standard if you can...
	emergencies, with clear pre-planning in terms of who to contact, shoot staff roles and responsibilities during any incident.	use it on a shoot day or day-to-day operations (i.e. all staff have hard copy or photo or stored contacts on phone).
1.4	To have a complaints procedure in place. A complaints procedure enables a shoot to show transparency and an ability to manage complaints and resolve them, rather than ignoring them. This includes complaints about adherence to CoGSP and the Aim to Sustain assurance standards. This is best practice and enables the shoot to provide evidence they are compliant with the standards. External support can be found to help create a suitable complaints procedure.	Show the assessor a copy of your complaints procedure and complaints records detailing how the issues have been managed.
1.5	Be registered on the UK poultry register. This is a legal requirement for all keepers of captive birds (greater than 50 (Feb 24)). Shoots who have birds in release pens for <u>any</u> time are holding captive birds and must register. Registering is straight forward, can be done on-line, by phone or post and is free. It must be done within 1 month of the first birds arriving, on APHA form IR81.  <a href="https://www.gov.uk/government/publications/poultry-including-game-birds-registration-rules-and-forms">https://www.gov.uk/government/publications/poultry-including-game-birds-registration-rules-and-forms</a> .	You will meet this standard if you have evidence of your registration (or application to register) to show the assessor.
1.6	Ensure they have records for all training that staff and participants /volunteers must have completed to operate safely and legally. It provides evidence that high risk tasks and safety are recognised and managed through the delivery or appropriate training and qualifications. Examples of training include: Use of dangerous machinery – chainsaws, strimmers, ATVs etc Use of chemicals – rodenticide, herbicide spraying. Bird health and welfare - administering medicines, euthanasia procedures. Relevant gamekeeping qualifications and training. Food handling First Aid training	Show the assessor the list of staff/volunteers who need to be trained, the training completed and qualifications held (and copies of certificates if issued), renewal dates and training provider information. The provision of broader CPD for staff and volunteers is evidence of best practice

Standard	This standard requires the shoot to...	You will meet this standard if you can...
1.7	<p>This standard requires shoots supplying any game to an AGHE to have a ‘trained person’ present on a shoot day to inspect the shot game in feather. This is a requirement under FSA guidelines and details are in the wild game meat guide (or FSS wild game guide for Scotland). For small shoots who operate under an exemption, the details are in Annex 1 of the standards.</p> <p><a href="https://www.food.gov.uk/our-work/guidance-for-primary-producers-and-food-business-operators-on-the-hygienic-production-of-wild-game">https://www.food.gov.uk/our-work/guidance-for-primary-producers-and-food-business-operators-on-the-hygienic-production-of-wild-game</a></p> <p><a href="https://www.food.gov.uk/sites/default/files/media/document/V7%20Guidance%20-%20supply%20of%20wild%20game%20for%20human%20consumption.pdf">https://www.food.gov.uk/sites/default/files/media/document/V7%20Guidance%20-%20supply%20of%20wild%20game%20for%20human%20consumption.pdf</a></p> <p><a href="https://www.foodstandards.gov.scot/downloads/FSS_Wild_Game_Guide-December_2021.pdf">https://www.foodstandards.gov.scot/downloads/FSS_Wild_Game_Guide-December_2021.pdf</a></p>	<p>Demonstrate to the assessor how the shoot ensures they have a trained person on site during a shoot day, or you can explain why you are able to operate under an exemption. If a trained person is required, a copy of the qualifications of the trained staff/volunteers will be checked.</p>
1.8	<p>Ensure that if they supply in-feather game to an AGHE <u>OR</u> processed game to local retail or consumers, they are registered as a food business with the local authority</p> <p><a href="https://register.food.gov.uk/new">https://register.food.gov.uk/new</a>).</p>	<p>Show the assessor evidence of your registration, or that the application process has begun but not yet been completed by the local authority.</p>
1.9	<p>Demonstrate they meet their obligations to provide a safe environment for visitors and staff/volunteers. This requires key risks to be identified, those key risks managed and the details documented. Detailed guidance can be found on the Health &amp; Safety Executive (HSE) website. External advice can be found to provide tailor made support for risk assessment and H&amp;S policies. Shoots must have a written health and safety policy in place, which is reviewed and update annually. The policy must be effectively communicated, at an appropriate level of detail, to all those on the shoot (staff/volunteers and guests) so they know what their roles and responsibilities are and how any risks are managed.</p>	<p>You will meet this standard if you show the assessor your in-date H&amp;S policy and explain how it is communicated to those on the shoot. It should be updated and reviewed at least annually, or if there are changes to the way the shoot operates that changes the key risks.</p>

Standard	This standard requires the shoot to...	You will meet this standard if you can...
1.10	Provide appropriate immediate first aid to staff, volunteers, and visitors in the event of an injury. Medical support will be part of the H&S policy and emergency action plan and will identify the appropriate levels of equipment required in shoot first aid kits and staff training. Kits must be maintained 'in date' and fully stocked and if necessary, provide appropriate food grade equipment.	Show the assessor the 'in date' first aid kits and eye wash. You will also need to explain how kits are made available for day-to-day operations and shoot days, how they are checked and kept serviceable and who is trained to provide first aid.
1.11	Understand if they have specified conservation and other regulated sites on or near their shoot (within 500m) <u>and</u> how this will affect shoot operations. This includes the requirements of the General Licence (GL) 43 or other licencing schemes for the release of game birds or consents for activities or management responsibilities. These designated sites must be marked on the shoot map. Guidance can be found on the DEFRA 'Magic' interactive mapping for the shoot area.  <a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a>	Show the assessor any designated sites on your shoot map (or within 500m) and can explain the definitions of the site (i.e. SPA, SAC, SSSI etc) You will be able to explain the implications for your shoot of this designation and if any licences or consents are required to operate, show them to the assessor.
1.12	To be able to show where their birds have come from to meet traceability requirements from DEFRA/APHA in the event of any disease outbreak.	Show the assessor the delivery records, or breeding records (if you rear your own birds) for all your stock. This will show how many birds were delivered on each date and the provider. Records must be kept for a minimum of 12 months.
1.13	Ensure all released birds have reached maturity and become acclimatised to their habitat before shooting commences. This means a minimum of a month between release and the first day of shooting. Birds should never be released during the season to top up stocks.	Show the assessor your game bird delivery information, associated release dates for each pen and the first shooting date for each species.
1.14	Comply with (and ensure its guns also do so), any legal restrictions on the use of lead shot for live quarry. E.g. lead shot banned for the shooting of wildfowl on inland waterways. There should be procedures in place to ensure guns are able to use non-toxic (sustainable) ammunition if required to, which will include providing pre-shoot information to the guns, clear instructions at the shoot briefing and potentially the provision of sustainable ammunition by the shoot organiser.	Explain to the assessor how you manage a shoot day to ensure guns do not use lead ammunition when it is not legal to do so.

## Section 2 - Bio security

Standard	This standard requires the shoot to...	You will meet this standard if you can...
2.1	<p>Be able to manage the disinfecting requirements imposed by DEFRA/APHA in the event of a disease outbreak. The shoot must have an action plan (which could be part of your emergency action plan) for managing access and visitors to the shoot to ensure they are following bio-security requirements. The shoot needs to have on site, or access to, the necessary equipment and approved disinfectants to meet the DEFRA bio-security requirements when necessary.</p> <p><a href="https://www.gov.uk/guidance/disease-prevention-for-livestock-farmers#biosecurity-measures">https://www.gov.uk/guidance/disease-prevention-for-livestock-farmers#biosecurity-measures</a></p> <p><a href="#">Defra, UK – Disinfectants</a></p>	<p>Show the assessor that you understand your responsibilities in the event of disease control measures being imposed, have an action plan in place and explain how you will have access to the necessary equipment and materials required to implement your action plan.</p>

### Section 3 Pest and predator control

Standard	This standard requires the shoot to...	You will meet this standard if you can...
3.1	<p>Demonstrate why and how pests and predators are controlled on the shoot. Shoot staff / volunteers must be conversant with the relevant regulatory and licencing regime that they use to enable this activity (e.g. Wildlife and Countryside Act 1981/General Licences). The shoot will have an action plan that details the species and control measures it is using. It will use relevant guidance from the sector’s codes of practice as published by organisations such as BASC, NGO, GWCT and CRRU.</p>	<p>Show the assessor that pest and predator control is planned and reviewed regularly for effectiveness, that staff / volunteers are trained where required and that the appropriate records (as detailed in the guides and game assurance standards) are available.</p>

## Section 4 - Feed & Water

Standard	This standard requires the shoot to...	You will meet this standard if you can...
4.1	Ensure the birds always have access to a suitable food source (1 of the 'five freedoms'). Shoots must have a plan and procedures in place to ensure that an adequate food supply is available to maintain the birds' health.	Explain/demonstrate to the assessor how you ensure sufficient feed is provided to your game birds both in the release pen and after release to maintain the birds' health.
4.2	Ensure the birds always have access to a fresh clean water source (1 of the 'five freedoms'). Shoots must have a plan and procedures in place to ensure that an adequate fresh clean water supply is available to maintain the birds' health.	Explain/demonstrate to the assessor how you ensure sufficient fresh clean water is provided to your game birds both in the release pen and after release to maintain the birds' health.
4.3	Ensure suitable food and fresh clean water are available for the life of the bird. The supply of suitable food and fresh clean water must continue until sufficient natural food is available for the birds to eat in the Spring.	Explain/demonstrate to the assessor your procedures for feeding/watering through the winter and beyond the end of the season and how you assess the availability of natural food.
4.4	Maintain appropriate records of feed deliveries for traceability in the event of disease, or quality issues. It also ensures the tracking of medicated feed to comply APHA/DEFRA requirements	Show the assessor the feed supply records (as detailed in the standard (4.4)) relating to the number of birds you have taken delivery of and released (including birds raised by your own operation).
4.5	Provide food that is suitable for the species raised and relevant to their age, which must be clean, palatable, and nutritious.	Show the assessor that your feed supplies come from an appropriately assured source.
4.6	Ensure all food is stored in a manner that keeps it clean, palatable, and nutritious, free from contamination (including by rodents, wild birds or other wild animals) and it remains useable throughout its shelf-life. There must be procedures in place to ensure medicated and non-medicated feed remain separate and that spoilt feed is disposed of appropriately.	Show the assessor your feed storage areas and discuss feed management procedures to demonstrate that you meet the requirements listed in the standard.

## Section 5 - Health and welfare

Standard	This standard requires the shoot to...	You will meet this standard if you can...
5.1	<p>Be registered with a veterinary practice to ensure there is access to appropriate professional advice and support to keep their birds healthy and free from pain, injury, and disease (1 of the 5 freedoms).</p> <p><a href="http://apha.defra.gov.uk/documents/surveillance/diseases/gamebirds-guidance.pdf">http://apha.defra.gov.uk/documents/surveillance/diseases/gamebirds-guidance.pdf</a></p>	<p>Show the assessor evidence that you are registered with a veterinary practice. Ideally this would include access to an appropriate game bird experienced vet.</p>
5.2	<p>Ensure that birds in release pens are checked regularly to ensure they remain healthy, (disease free, injury free, have access to food and water), can display natural behaviours and are stress free. The shoot must have procedures in place to ensure regular checks (minimum of once daily) occur and that issues can be resolved as soon as possible.</p>	<p>Demonstrate/discuss with the assessor when and how the pens and birds are checked and how issues are resolved.</p>
5.3	<p>Promptly manage all disease or injury in their birds. The regular pen checks will highlight these issues and the shoot must have procedures in place to get vet support/advice for treatment or other action, including euthanasia.</p>	<p>Demonstrate/discuss with the assessor how you manage incidents of disease or injury in the pen to ensure treatment is provided in a prompt manner.</p>
5.4	<p>Comply with best practice for the release of ducks as detailed in the standards.</p> <p><a href="https://basc.org.uk/wildfowling/advice/flight-ponds-code-of-practice">https://basc.org.uk/wildfowling/advice/flight-ponds-code-of-practice</a></p>	<p>Demonstrate to the assessor the numbers of duck released, when they are released and in relation to the locations and size of the open water used that the densities match best practice.</p>

## Section 6 - Veterinary Medicines

Standard	This standard requires the shoot to...	You will meet this standard if you can...
6.1	<p>Ensure that only <u>authorised</u> veterinary medicines are prescribed to the birds at any time, that they are correctly prescribed, and the appropriate records are held by the shoot. The shoot must ensure that the correctly qualified person provides any prescription, including for medicated feed. The definitions of POM-V and POM-VPS are below:</p> <ul style="list-style-type: none"> <li> <b>POM-V medicines</b> A Veterinary Medicinal Product (VMP) that has been classified as a POM-V may only be supplied to the client once it has been prescribed by a veterinary surgeon following a clinical assessment of an animal, or group of animals, under the veterinary surgeon's care.                     </li> <li> <b>POM-VPS</b> A veterinary medicines classified as POM-VPS may be prescribed by any Registered Qualified Person (RQP - a veterinarian, a pharmacist, or an appropriately qualified person SQP). A clinical assessment of the animal(s) is not required when prescribing this category of veterinary medicine and the animal does not have to be seen by the prescriber. However sufficient information about the animal and the way it is kept must be known to the prescriber to prescribe and supply appropriately.                     </li> </ul> <p><a href="https://www.gov.uk/guidance/retail-of-veterinary-medicines">https://www.gov.uk/guidance/retail-of-veterinary-medicines</a></p>	<p>Show the assessor the records (veterinary prescriptions) for all medicines. The assessor may need to check that they are authorised for use in the UK.</p> <p>Medicated feed should be used immediately based on a medical need assessed by your vet. Prophylactic use is no longer legal.</p> <p>The veterinary medicine records for standards 6.1-6.8 are related and must not show discrepancies.</p>
6.2	<p>Ensure that all veterinary medicines are administered correctly and strictly in accordance with any instructions from the vet or manufacturer. Where required, records for administering medicines must be held. Shoots must ensure un-used or out of date medicines are disposed of correctly and the disposal records held. If in doubt veterinary advice must be sought.</p>	<p>Demonstrate to the assessor how you manage the correct administration of any prescribed medicines and the disposal of un-used and out of date medicines. This will include showing the appropriate records, and where required, describing the processes involved. Disposal must be through a licenced contractor or your veterinary practice.</p>



Standard	This standard requires the shoot to...	You will meet this standard if you can...
	<a href="https://www.bva.co.uk/news-and-blog/blog-article/how-to-dispose-of-veterinary-medicines/">https://www.bva.co.uk/news-and-blog/blog-article/how-to-dispose-of-veterinary-medicines/</a>	
6.3	Ensure that all veterinary medicines are administered by a competent person. A discussion with the shoot’s vet will determine who the competent person is and any training or guidance required. This can be provided by the vet and further guidance is available from the British Veterinary Poultry Association (BVPA). <a href="https://bvpa.co.uk">https://bvpa.co.uk</a>	Demonstrate to the assessor how you have confirmed with your vet, who your competent person is and how they have been assessed as competent.
6.4	Ensure that records for purchasing all veterinary medicine are kept and held for a minimum of 5 years. It is a legal requirement of the Veterinary Medicines Regulations 2013 that the information detailed in the standard is recorded and available.  <a href="https://www.gov.uk/guidance/record-keeping-requirements-for-veterinary-medicines">https://www.gov.uk/guidance/record-keeping-requirements-for-veterinary-medicines</a>	Show the assessor the records for all medicines purchased.
6.5	Ensure that records for administering all veterinary medicine are kept and held for a minimum of 5 years. It is a legal requirement of the Veterinary Medicines Regulations 2013 that the information detailed in the standard is recorded and available.	Show the assessor the records for all medicines administered.
6.6	Ensure that records for disposal of all veterinary medicine are kept and held for a minimum of 5 years. It is a legal requirement of the Veterinary Medicines Regulations 2013 that the information detailed in the standard is recorded and available.	Show the assessor the disposal records for all medicines. This must be through a licenced contractor or your veterinary practice.
6.7	ensure that all veterinary medicines are stored correctly, in accordance with the manufacturer’s instructions. This includes any requirements for separation, security, or refrigeration.	Demonstrate to the assessor how all your medicines are stored (in accordance with the instructions) until they are used or disposed of.  Medicated feed should be used immediately based on a medical need assessed by your vet. Prophylactic use is no longer legal.

Standard	This standard requires the shoot to...	You will meet this standard if you can...
6.8	<p>Ensure that Highest Priority Critically Important Antibiotics (HP-CIA) are only used as a last resort under veterinary direction. There must be a vet report justifying their use. Antimicrobial resistance (AMR) is an issue of critical importance and responsible use of antibiotics and reducing use in game birds is essential.</p> <ul style="list-style-type: none"> <li>• HP-CIAs are defined by the European Medicines Agency as 3rd and 4th generation cephalosporins, fluoroquinolones and Colistin.</li> </ul>	<p>Show the assessor the necessary vet report for any incidence of any HP-CIA used.</p>

## Section 7 - Animal by products

Standard	This standard requires the shoot to...	You will meet this standard if you can...
7.1	Ensure that dead or euthanized birds are removed as soon as possible to reduce the chances of spreading disease. The shoot must have procedures in place to ensure regular checks occur (standard 5.2).	Discuss/demonstrate to the assessor when and how the pens and birds are checked and how dead birds are removed.
7.2	Ensure that dead birds (not fit for the food chain) are disposed of in accordance with the regulations. Shoots must have either a contract with a licenced collector, or access to an APHA approved incinerator.	Discuss/demonstrate to the assessor how you dispose of dead birds (not fit for the food chain) that meets the regulations.  <a href="https://www.gov.scot/publications/animal-by-products-disposal-guidance/">https://www.gov.scot/publications/animal-by-products-disposal-guidance/</a>  <a href="https://www.gov.uk/guidance/fallen-stock">https://www.gov.uk/guidance/fallen-stock</a>
7.3	Only feed dead birds to animals (that are not fit for the <u>human</u> food chain) if appropriate.	Explain to the assessor if you feed dead birds to animals. If you do so, it must be done in an appropriate fashion.

## Section 8 - Game handling, transport, and food hygiene

Standard	This standard requires the shoot to...	You will meet this standard if you can...
8.1	<p>Ensure that shot birds are treated as a food product and handled in accordance with the legislation irrespective of the number of birds shot. The shoot must be conversant with their responsibilities (and any exemptions allowed under the legislation) with regards to supply, trained person status, HACCP and traceability requirements (see Standards, Annex 1).</p> <p><a href="https://www.food.gov.uk/our-work/guidance-for-primary-producers-and-food-business-operators-on-the-hygienic-production-of-wild-game">https://www.food.gov.uk/our-work/guidance-for-primary-producers-and-food-business-operators-on-the-hygienic-production-of-wild-game</a></p> <p><a href="https://www.food.gov.uk/sites/default/files/media/document/V7%20Guidance%20-%20supply%20of%20wild%20game%20for%20human%20consumption.pdf">https://www.food.gov.uk/sites/default/files/media/document/V7%20Guidance%20-%20supply%20of%20wild%20game%20for%20human%20consumption.pdf</a></p> <p><a href="https://www.foodstandards.gov.scot/downloads/FSS_Wild_Game_Guide_-_December_2021.pdf">https://www.foodstandards.gov.scot/downloads/FSS_Wild_Game_Guide_-_December_2021.pdf</a></p>	<p>Explain/demonstrate to the assessor that you understand your responsibilities and have the correct procedures and people in place to ensure you meet all your legal requirements for food handling (inspection, cold chain, contamination - ground and vermin). You will explain how you assess and manage any contamination that has occurred on the shoot day and ensure these birds do not enter the food chain.</p>
8.2	<p>Ensure that shot birds are chilled as soon as possible after they are picked up. The shoot must have procedures in place to move birds to the larder/chiller as quickly as possible. The birds must be transported in a way to enhance the cooling process and remove opportunities for contamination. During early season shoot days the air temperature may require swift movement of shot birds (after each drive) to the larder/chiller to ensure the cooling process starts quickly.</p>	<p>Explain/demonstrate to the assessor how you ensure shot birds are cooled and stored in a way that maintains them as a food product in accordance with current legislation.</p>
8.3	<p>Ensure that shot birds are transported appropriately from the point of dispatch to the larder/chiller. Shoots must have procedures (collection</p>	<p>Show the assessor how you transport your shot birds (equipment and procedures) in accordance with the standard and current legislation.</p>

Standard	This standard requires the shoot to...	You will meet this standard if you can...
	plans) and equipment (game carts) in place to handle the birds in a way to enhance cooling and remove risk of contamination. Birds should be braced and hung to allow free airflow around them until they have been chilled to below 4 deg C.	
8.4	Ensure that shot birds are stored in a larder/chiller that is food safe and fit for purpose. Shoots must have procedures, equipment, and materials in place to ensure the larder/chiller is kept clean to house shot birds. The cleaning regime must ensure the larder/chiller is cleaned/sanitised after each batch has been collected/distributed and where necessary, cleaning records are kept.	Demonstrate to the assessor how your cleaning regime ensures the larder/chiller is kept food safe for all shot birds.
8.5	Ensure that when shot bird are stored in a chiller, it is food safe and fit for purpose. Shoots must have chillers that are designed for food use and are well maintained, sound and suitable to ensure the birds remain fit for human consumption while on the shoot site.	Demonstrate to the assessor how your chiller design and maintenance meets the requirements of the standard.
8.6	Ensure that water used within the larder/chiller is safe and suitable for food use. The shoot must use either a supply from the licenced water company (potable supply from the rising main) or a safe private supply (tested at least annually). The pipework, fixtures and fittings should be appropriate for use with food (i.e. not through a garden hose).	Confirm to the assessor where your water supply is from, and it is appropriately piped to use in the larder/chiller. If a private water supply is used, you will be able to provide the most recent test results (from an approved testing company) confirming the supply is safe.
8.7	Have appropriate handwashing facilities to ensure food hygiene standards are met and anyone using the facilities has the water and materials to wash their hands hygienically (hot and cold water, soap dispenser, disposable paper towels and lidded bin).	Show the assessor appropriate handwashing facilities at the larder/chiller.
8.8	Have an appropriate chiller and procedures in place to ensure all shot game going into the food chain is stored in a safe way that keeps it fit for human consumption. This requires the capacity and specification of the chiller to be able to chill the birds quickly to below 4 deg C and maintain this temp throughout their storage (maintaining the cold chain). The	Show the assessor your chiller and explain the procedures for managing shot birds and the cold chain before they are transported off site. Where required, chiller temperature records will be checked.

Standard	This standard requires the shoot to...	You will meet this standard if you can...
	<p>chiller must be able to cope with the volume of birds stored in it until it is emptied. If you are required to do so under the game handling regulations, when in use, twice daily checks of the chiller temperature must be made.</p>	
8.9	<p>Ensure all shot game that goes into the food chain is traceable (unless you are operating under the private use game handling exemption). Shoots must ensure the appropriate records are kept of each batch of birds they put into the food chain.</p>	<p>Show the assessor your traceability records for all shot birds that go into the food chain.</p>
8.10	<p>Ensure that if they supply shot birds to an AGHE, they have a plan in place based on the Hazard Analysis and Critical Control Point (HACCP) principles. Shoots need to a Food Safety Management System (FSMS) with procedures to ensure shot game birds are handled as food. Advice on creating a HACCP and FSMS can be found through the shooting organisations, the FSA website and specialist providers.</p> <ul style="list-style-type: none"> <li>• <b>HACCP.</b> HACCP is a system that helps you identify potential food hazards and introduce procedures to make sure those hazards are removed or reduced to an acceptable level.</li> <li>• <b>Food Safety Management System (FSMS)</b> has procedures in place, based on the HACCP principles, to help ensure high standards of food safety.</li> </ul>	<p>Show the assessor your HACCP plan and FSMS and explain how these documents and procedures are used to maintain the food safety for the shot birds entering the food chain.</p>

## Record Book and Templates

Templates for the records shoots are required to hold and other documents in the assurance scheme are downloadable from the Aim to Sustain website <https://aimtosustain.org.uk/assurance/>. These can be used by members in hard copy or electronic format to assist in the running of the shoot and preparing for the assurance audit/assessment.

### Templates

- Shoot key contact list
- Shoot emergency action plan
- Shoot complaints procedure
- Training records
- Health & safety policy
- Pest and Predator Control Plan
- Medicine purchase
- Medicine administered
- Medicine disposal
- Chiller cleaning
- Chiller temperature
- Game traceability

## Aim to Sustain Game Assurance Scheme - Membership Rules

### Background information

The Scheme is owned by Aim to Sustain; a strategic partnership of organisations sharing an interest in protecting, preserving, and promoting a sustainable game management and game shooting sector. These rules set out the conditions for participating in the Aim to Sustain Game Assurance Scheme and must be complied with to gain and retain certified membership of the scheme. Participation is voluntary and open to any low ground or upland shoot and any shoot or game farm rearing game birds for release. It is open to operations of any size who demonstrate compliance with the Scheme Standards. Verification of compliance is undertaken by a third-party assurance auditing specialist, Intertek SAI Global.

### Terminology

- **Applicant:** *the shoot/ game farm/ business applying to join the scheme.*
- **Member:** *the shoot/ game farm/ business that has joined the scheme.*
- **Certified Member:** *A member who has shown compliance with the Scheme standards.*
- **Site:** *the location of the shoot/ game farm.*
- **The Scheme:** *Aim to Sustain Game Assurance Scheme.*
- **Rules:** *the rules governing how the scheme operates and the requirements for being a Scheme Member.*
- **Standards:** *The Scheme requirements that applicants and Certified Scheme Members must comply with and maintain.*
- **Certified:** *achieved full compliance with the Standards following the assessment and approval process.*
- **Approval Process:** *the process following application to the scheme until a decision has been made to approve or not to approve.*
- **Scheme Rules:** *The rules that must be followed to achieve and maintain certified status.*
- **Assessment:** *an independent inspection that takes place to check compliance with the scheme Standards.*
- **Non-compliance:** *the requirements of the Scheme Standards are not met in part or in full (agreed with certification body).*
  - **Minor Non-compliance:** *attempt made to comply with the requirements of a standard clause, but not fully achieved.*
  - **Major Non-compliance:** *No attempt made to comply with a standard and/or total disregard for the standard / refusal to comply with standard.*
- **Assessment Type:**
  - **Full:** *assessment visit which has been booked in advance with the shoot/ game farm / business and where all the Scheme Standards are assessed. This is included within the Applicant/ Member membership fee.*
  - **Initial:** *the first full assessment after application which has been booked in advance (which will be a full assessment). This is included within the Applicant/ Member membership fee.*
  - **Routine:** *A full assessment which has been booked in advance and forms part of the ongoing routine surveillance of the Scheme Standards. This is included within the Applicant/ Member membership fee.*
  - **Re-visit:** *Subsequent assessment visit is necessary to check the corrective action for non-compliances raised at the assessment. It will be booked in advance and may attract additional charges for the Applicant/ Member.*
  - **Spot check:** *An announced or unannounced assessment to check against some or all the Scheme Standards where concerns have been identified, or a complaint made that requires investigation. This may attract additional charges for the Applicant/ Member.*



### **Scheme Rules-General**

1. Failure to comply with these Rules can lead to suspension of scheme membership or result in scheme membership withdrawal/termination.
2. To be a Certified Member of the Scheme all relevant Standards must always be complied with in full.
3. All legislation relevant to the scope of the Scheme must be complied with in full. Where reference has been made to legislation in Scheme Standards, Certified Member status does not imply that all aspects of referenced legislation is always met.
4. The Scheme Standards will be reviewed on a regular basis and may be updated consequently. Notice will be given of any changes. When the updated Standards come into effect, they must be complied with immediately.
5. A new Member is unable to claim Certified Member status before an assessment has taken place, satisfactory corrective action submitted, and confirmation of certified status issued (certificate). Prior to this they will be a registered member of the Scheme but not a certified member.

### **Application for Scheme membership**

6. The Scheme Membership is open to any Applicant that has a Shoot and/or Game Farm in the UK.
7. If an Applicant has more than one Shoot related to their organisation/ business, all Shoots must be included in the application for membership by that organisation/ business.
8. If an Applicant has more than one Game Farm related to their organisation/ business, all Game Farms must be included in the application for membership by that organisation/ business.
9. Shoots that fulfil the game rearing criteria will be required to make a separate application for the rearing operation to be a certified game rearing member and meet the game rearing standards.
10. At the point of application, the Applicant agrees to abide by the Scheme Standards and the Scheme Rules.
11. To apply for Scheme(s) membership Intertek SAI Global must be contacted and the scheme membership fee paid.
12. There must be a person responsible for maintaining the Scheme Standards and bird welfare, available at all times for all the locations in the application.
13. Any current, past or pending prosecutions relevant to the scope of the Scheme(s) must be declared at the point of application and again at the assessment. Failure to declare may result in rejection of the application.
14. If any relevant prosecutions arise during the membership of the Scheme, Aim to Sustain and Intertek SAI Global must be informed.
15. False or misleading statements made during the application, assessment or certification process may result in suspension or withdrawal from the Scheme.
16. Aim to Sustain reserve the right to refuse an Applicant a Scheme membership.

### **Assessment and Certification**

17. Assessors will make contact three times (which may include emails and phone calls), and if unable to book an appointment on the third attempt, will inform Intertek SAI Global and Aim to Sustain and the Membership status will be suspended. If Member has not booked an appointment within 28 days of suspension, and/or the assessment has not been completed with a period of 3 months due to the Applicant/ Member not engaging with the assessor, and then membership will be withdrawn.

18. A full assessment must take place, any non-compliances identified must be corrected and adequate evidence submitted to Intertek SAI Global before Certified Member status is achieved. Intertek SAI Global will confirm the status of Applicants/ Members with Aim to Sustain.
19. Any areas of non-compliance requiring rectification will have a 28-day rectification period to allow for remedial work or evidence gathering. A re-visit may be required by Intertek SAI Global to assess the new evidence
20. Extensions to the rectification period if requested from Intertek SAI Global, may be granted where major works are required; or when information to complete the non-compliance is reliant on actions outside the direct control of the Scheme Applicant/ Member. This must be requested within 28 days from the assessment.
21. If the Applicant/ Member is unable to submit satisfactory evidence of corrective action within the 28-day timescale allowed by the Scheme, this will result in suspension from the Scheme. The suspension will be in place for a maximum of 90 days, after which membership will be withdrawn unless satisfactory evidence of corrective action has been received by Intertek SAI Global.
22. At the assessment, the assessor must be able to access all the facilities and information relevant to the Scheme Standards and the application. This will include for example, all facilities related to laying, hatching and rearing, release pens, feed stores, chillers, medicine and other traceability records.
23. The assessors have the right to stop the assessment if:
  - a. a third party that may influence the outcome, is present at the assessment.
  - b. the assessor has been exposed to threatening or abusive behaviour at the assessment visit, or they are concerned for their safety.
  - c. the assessment cannot be completed in full due to reasons within the control of the Applicant/Member.
  - d. A significant non-compliance has been identified, or a significant and immediate risk to animal welfare, food safety or the environment is found.

### Assessments, re-visits and spot checks

24. To maintain Certified Membership, the interval between assessments must be no greater than 18 months for the Shoots Scheme and annually for the Game Farm Scheme (during the rearing season), and depending on circumstances, may be more frequent.
25. A re-visit may be required following corrective action by the Member to verify evidence that was not available at the time of the routine assessment. It will be booked in advance and may attract additional charges for the Applicant/ Member
26. Aim to Sustain retain the right to ask Intertek SAI Global to undertake a spot check at short notice or unannounced if there are concerns that Scheme standards may not be maintained at a site. This may be to inform a complaint investigation. Failure to permit access to facilities for a re-visit or spot check may result in suspension from the Scheme. If a Member requires an up-to-date assessment, outside the cycle of routine assessment, they may request a spot check at any time and they may be required to cover the cost of this assessment visit.
27. The assessor may be accompanied by an observer. The observer may be an assessor under training; an Aim to Sustain team member; or an assessor monitoring the quality of the Intertek SAI Global assessment. Any observer will have signed a confidentiality and conflict of interest agreement in advance.

### Assessment cancellation fee

28. Intertek SAI Global will charge a cancellation fee when an Applicant or Member cancels the assessment within 5 calendar days of the booked appointment. If the Applicant or Member has cancelled due to circumstances outside their control, the cancellation fee may be waived.

### Scheme membership renewals

29. To retain continuous Certified Membership of the Scheme, the membership fee must be paid annually by the renewal date. Renewal notices will be sent to all Certified Members by Intertek SAI Global 8 weeks in advance of the renewal date. There will be a 28-day membership fee payment grace period after the renewal date, before a member is withdrawn from the Scheme. The membership renewal date will continue to be the initial date of renewal irrespective of the date of payment within the grace period.

30. If a member fails to pay the renewal membership fee by the grace period date (unless agreed), they will be withdrawn from the Scheme.

### Suspension or Withdrawal of Certified Membership

31. Aim to Sustain may suspended or withdraw Membership or Certified Membership under certain circumstances. These include, but are not limited to:

- a. Scheme membership fees have not been received by the required date (see rule 23).
- b. Gross failure to comply with the Scheme Standards or Scheme Rules, such as a significant non-compliance, or multiple other non-compliances. This may be identified at an assessment or subsequently, if new evidence is found.
- c. There is a significant and immediate risk to animal welfare, food safety or the environment.
- d. There is threatening or aggressive behaviour towards the assessor when booking or conducting the assessment.
- e. The Applicant/Member makes no response to three contact attempts from the assessor, there is unreasonable delay or prevarication of booking the assessment by the Member, or the Applicant/Member refuses to be assessed.
- f. The assessment cannot be completed in full due to reasons within the control of the Applicant/Member.
- g. Following an assessment that identifies gaps or inadequate evidence to meet a standard(s), the necessary evidence is not provided to Intertek SAI Global by the end of the 28 days rectification period.
- h. If, following a third-party complaint, a full investigation reaches findings that confirm an Applicant/Member has not complied with the scheme rules and/or standards.
- i. Failure to declare a prosecution or conviction relevant to the operation of a shoot or game rearing operation or that relates to the Scheme Standards or animal welfare.
- j. There is evidence of gross negligence or fraud by the shoot, game rearing operation, business, or business owner.
- k. Behaviour which brings the Game Assurance Scheme into disrepute.

32. Where the Scheme Membership has been suspended, failure to undertake the required actions within the permitted timescale of 90 days (unless otherwise agreed) will result in withdrawal of Scheme Membership.

33. Where Scheme Membership has been withdrawn, there will need to be a new application. Aim to Sustain and Intertek SAI Global reserve the right to refuse an application or implement conditions at the cost of the applicant before re-entry to the Scheme. Any costs to re-join the Scheme will be borne by the Applicant.

34. When Certification has been suspended or withdrawn:

- a. Intertek SAI Global. will inform Aim to Sustain.
- b. Aim to Sustain / Intertek SAI Global reserve the right to request the return of the certificate.

- c. The Member does not have certified status, may not use the Certified status Mark, or make claims about membership of the Scheme.
- d. Should game dealers/ processors enquire about a participants' certified status, Aim to Sustain / Intertek SAI Global will confirm the status as certified or not certified. There will be no disclosure of further information.

### Assessment biosecurity

- 35. Assessors will operate at or above the Aim to Sustain biosecurity protocol.
- 36. Applicants/ Members must inform assessors of any disease outbreaks when booking the appointment and any change before the assessor arrive at the site. Failure to do so could compromise other flocks and is taken very seriously and may result in membership being withdrawn.
- 37. In the event of a serious disease risk to the national flock Aim to Sustain / Intertek SAI Global will review how assessment visits are conducted and decisions will be in line with DEFRA and APHA guidance or controls. Visits may be suspended in 'hot spots', or nationally. There may be a requirement for the Applicant/Member to undertake and submit a desk top self-audit to Intertek SAI Global long with any requested documentary information should assessments be suspended.

### Material changes to Members' Operations

- 38. Aim to Sustain and/or Intertek SAI Global must be informed of any material changes to the shoot, game farm, business or Scheme related activities that have an impact on their Scheme Membership. For example, change in management control, business name, points of contact, or Shoots/Game Farms relinquished or acquired.
- 39. If the Member's business is declared insolvent, bankrupt, goes into administration or a receiver is appointed, Aim to Sustain and Intertek SAI Global must be informed immediately and supplied with the relevant details of the contact.

### Confidentiality and the EU General Data Protection Regulation (GDPR)

- 40. All information gathered as part of the application, assessment and approval process will be treated in the strictest confidence and managed in line with GDPR requirements by Aim to Sustain and Intertek SAI Global. Information will not be shared with external parties unless:
  - a. Legally obliged to do so.
  - b. There is a legitimate business reason to share membership status, last assessment date and approval expiry date.
- 41. Aim to Sustain and Intertek SAI Global may use anonymised or aggregated Scheme information and publish statistical data about the scheme membership. This information and data will not allow individual Members to be identified.
- 42. In exceptional circumstances where the assessor discovers evidence that animal welfare, food or environmental safety is at immediate and significant risk, Aim to Sustain and Intertek SAI Global will be informed and in turn may notify the competent authorities.

### The BGA Logo and Kitemark

- 43. Aim to Sustain Game Assurance Certified Members (have had their routine assessment with no non-compliance issues un-resolved and whose membership fees are paid in full) may have full use of the Scheme 'Assured Game' Logo (below).



44. Any abuse or misuse of the Scheme logos, including false claims of Membership, may result in proportionate action being taken by Aim to Sustain to stop its use.

### Game Assurance Scheme Member Complaints and Appeal Process

45. A complaint may be lodged with Intertek SAI Global, if the Applicant/Member is not satisfied by the assessment and/or certification process. All complaints will be thoroughly and fairly investigated in accordance with the Intertek SAI Global complaints procedure and a response provided.

46. If the Applicant/Member would like to appeal an assessment decision this must be done in writing and lodged with Intertek SAI Global within 14 days of the decision. An initial independent review of the decision will be undertaken within 5 days and the outcome of any investigation, which will be notified to the Applicant/Member.

47. Aim to Sustain will be informed by Intertek SAI Global of all complaints, investigations, decisions, appeals and reviews.

48. Other complaints about the Scheme, not related to Intertek SAI Global, are to be lodged with Aim to Sustain. All complaints will be thoroughly and fairly investigated, and a response provided. Any Applicant/Member would like to appeal the outcome of any investigation, must do so in writing to the Chair of Aim to Sustain within 14 days of the decision. The Chair will review the decision and the outcome of any investigation, which will be notified to the Applicant/Member.

### Aim to Sustain Game Assurance Scheme – Complaints Against Scheme Members and Disciplinary Procedure

#### Complaints

49. An allegation of breach of the Standards may be raised and disciplinary proceedings maybe instituted, against any Member Shoot/ Game Farm and/or any of its owners, officers, or employees. Aim to Sustain will manage breaches of the Game Assurance Scheme rules and standards by Applicants and Members to maintain the integrity, credibility, and value of certified assurance to all Members. The Complaints Procedure as set out below will be employed in any case where a complaint is raised to Aim to Sustain or Intertek SAI Global:

- a. In respect of any matter arising out of any activity connected with game shooting (including any activity of the employees of the Member Shoot or Game Farm) or any other participant in such activity (including guns, beaters and pickers up) that causes or is alleged to have caused a breach of the Aim to Sustain Game Assurance Scheme Standards (“the Complaint”);
  - i. Is by any individual or any public or private body (“the Complainant”);
  - ii. Against any Member Shoot or Game Farm and/or, all or any of the owner(s) or, officers or, employee(s) of a Member Shoot or Game Farm (“the Owners, Officers or Employees”);
  - iii. Is made within 28 days of the events giving rise to the Complaint.
  - iv. The procedure set out below will not apply to any Complaint raised more than 28 days after the events giving rise to the Complaint if it came to the notice of, or should reasonably have come to the notice of, the Complainant in that time. However, the Aim to Sustain shall exercise their discretion to extend the said time limit in any case where there is:
    - (1) reasonable doubt as to whether or when the events in question came to the notice of the Complainant within the 28-day timeframe or

- (2) the Complainant has a reasonable explanation for the delay or
- (3) the strict imposition of the 28-day time limit would be likely to cause injustice to the Complainant.

50. If the Complaint is the subject of legal proceedings or an insurance claim, Aim to Sustain will be guided by the relevant authorities as to any action that can be taken. If the Complaint is not the subject of legal proceedings or an insurance claim, and it is made by the Complainant in accordance with the details above, then:

- a. Aim to Sustain must contact the Complainant as soon as practicable and in any event within 48 hours, to inform them that the Complaint has been received and is being dealt with by Aim to Sustain.
- b. Aim to Sustain must discuss the Complaint with the Complainant and attempt to deal with the Complaint by means of conciliation. If because of conciliation, the Complainant decides not to pursue the Complaint further the Complaint shall be closed.

51. If after the attempt at conciliation Aim to Sustain considers that the Complaint may disclose a sufficiently serious breach of the Aim to Sustain Game Assurance Scheme Standards [“the Standards”] to warrant investigation and potential disciplinary proceedings, then the matter shall proceed against the Member Shoot/ Game Farm in accordance with the investigation and disciplinary procedures set out in below.

### Investigation

52. An investigation will occur where:

- a. A Complaint is made by a Complainant against a Member Shoot/Game Farm and/or any of its owners, officers or employees that raises or includes or amounts to an allegation of a sufficiently serious breach of the Aim to Sustain Game Assurance Scheme Standards [“the Standards”] to warrant disciplinary proceedings if proven.
- b. Any allegation, indication or evidence of a sufficiently serious breach of the Standards by a Member Shoot and/or any of its owners, officers, or employees to warrant disciplinary proceedings is brought to the attention of Aim to Sustain during an assessment by Intertek SAI Global of an Applicant or Member Shoot/ Game Farm.

53. **Initial Enquiries and Report.** The relevant Member Shoot and/or any of its owners, officers, or employees against whom an allegation is raised and proceedings are instituted is hereafter referred to as “the Respondent”. On receiving notice of any sufficiently serious breach of the Standards to warrant disciplinary proceedings, Aim to Sustain with support from Intertek SAI Global, will:

- a. As soon as practicable (and within 72 hours of such notice) notify the Shoot/Game Farm (the “Respondent”) in writing, giving whatever detail is available of the nature and apparent extent of the alleged breach.
- b. Intertek SAI Global shall immediately carry out an enquiry into the facts and circumstances of the alleged breach including, in a manner it considers appropriate and proportionate to the nature and gravity of the allegation. They will:
  - i. Request copies of relevant records from the Member;
  - ii. Interview the owners, officers or employees of the Member;
  - iii. Identify and interview any material witnesses (including the Complainant) and obtain written statements or reports from any witnesses;
  - iv. Gather or inspect any material physical or documentary evidence;
  - v. Any further proportionate steps to determine any facts.

- c. At the conclusion of the investigation Aim to Sustain shall prepare a written report (supported by Intertek SAI Global). It shall:
- i. fairly and neutrally summarise the allegation;
  - ii. identify the Respondent(s);
  - iii. specify the Standards alleged to have been infringed;
  - iv. set out the steps taken, and the results of the investigation;
  - v. conclude as to the merits, gravity and ability to prove the allegation and if disciplinary proceedings are recommended;
  - vi. if disciplinary proceedings are recommended, propose an appropriate and proportionate method of dealing with the allegation under the disciplinary procedures.

### Disciplinary Procedures

54. The Aim to Sustain will manage breaches of the Game Assurance Scheme rules and standards, which may lead to action taken against a Scheme Member as regards their membership, or the refusal to accept an Applicant into the Scheme.
55. The procedures set out below will not apply to any allegation of breach raised more than three calendar months after the events giving rise to the allegation came to the notice of the person or body making or investigating the allegation.
56. At the conclusion of any investigation, Aim to Sustain will decide how the allegation and associated Complaint, will be dealt with according to any arguable merit and the severity of any infringement. Disciplinary proceedings will follow one of four options, where the findings of the investigation will be confirmed or dismissed:
- a. **Allegation of Minor or Trivial Nature.** If the allegation, the associated Complaint, and conclusion of any investigation shows it has no merit or is of such a minor or trivial nature as to render further action disproportionate, it should be dismissed. Aim to Sustain shall submit the report to the Aim to Sustain Chairman and unless the Chairman responds within 14 days stating that they consider the allegation should be managed by a Disciplinary Panel or Disciplinary Tribunal, Aim to Sustain shall write to the Respondent and if appropriate, the Complainant dismissing the matter, setting out the reasons for dismissal and confirming that the Chairman has seen and approved the reasons. Such dismissal is final.
  - b. **Level 1 – Aim to Sustain.** If the allegation has arguable merit and if proved is of a sufficiently serious nature that it, together with any associated Complaint, should be dealt with by Aim to Sustain, the penalties that Aim to Sustain is empowered to impose summarily are as follows. One or more of the following must be imposed:
    - i. **Level 1 – Penalties within the Jurisdiction of Aim to Sustain**
      - (1) To dismiss the allegation (if not proved);
      - (2) That the breach of the specified Standards be recorded in the minutes of Aim to Sustain but that no further action shall be taken;
      - (3) That the Respondent be reprimanded, or severely reprimanded and such reprimand be published in the Aim to Sustain Game Assurance newsletter or otherwise publicised in a similar manner.
      - (4) If Aim to Sustain decides that none of the above powers are sufficient in the light of the gravity of the breach as they have found it to be, the Aim to Sustain Chairman shall appoint a

Disciplinary Panel to consider the allegation with powers to impose all or any of the penalties set out below.

ii. **Right of Appeal.** The Respondent shall have the right to appeal to Aim to Sustain against the finding of breach or against any penalty ordered. Any appeal must be in writing to the Chair of Aim to Sustain within 14 days of being informed of the disciplinary decision. Such appeal shall be heard by a Disciplinary Panel appointed by the Aim to Sustain Chairman in accordance with the provisions below and shall be by way of review or re-hearing in a manner directed by the Aim to Sustain Chairman. The Panel may:

- (1) To dismiss the allegation (if not proved);
- (2) To uphold the allegation in whole or in part;
- (3) To reduce the penalty ordered by Aim to Sustain;
- (4) To impose additional or alternative penalties including all or any of the penalties set out below (Level 2).

c. **Level 2 – Disciplinary Panel.** In any case where Aim to Sustain or the Aim to Sustain Chair has agreed or directed that the allegation and any associated Complaint must be dealt with by way of hearing before a Disciplinary Panel, a Panel will be appointed. The Aim to Sustain Chairman will appoint a Chair of the Panel from the Aim to Sustain Board and two other members of the Aim to Sustain Board or Executive Committee to adjudicate upon the allegation. The penalties that the Disciplinary Panel is empowered to impose are as below. One or more of the following must be imposed:

i. **Level 2 – Penalties within the Jurisdiction of the Aim to Sustain Disciplinary Panel**

- (1) To dismiss the allegation (if not proved);
- (2) That the breach of the specified Standards be recorded in the minutes of Aim to Sustain but that no further action shall be taken;
- (3) That the Respondent be reprimanded, or severely reprimanded and such reprimand be published in the Aim to Sustain Game Assurance newsletter or otherwise publicised in a similar manner;
- (4) That the Respondent be suspended from membership of the Aim to Sustain Game Assurance Scheme and barred from participation in any of their activities for a period to be fixed by the Disciplinary Panel, or until such time as the Respondent can demonstrate that the Member Shoot / Game Farm is fully compliant with the Scheme Standards;
- (5) If the Disciplinary Panel decides that none of the above powers are sufficient in the light of the gravity of the breach as they have found it to be, the Panel will remit the case to the Aim to Sustain Chairman who shall appoint a Disciplinary Tribunal with powers to impose all or any of the penalties set out below.

ii. **Right of Appeal.** The Respondent shall have the right to appeal to Aim to Sustain against the Disciplinary Panel's finding of breach or against any penalty ordered. Any appeal must be in writing to the Chair of Aim to Sustain within 14 days of being informed of the disciplinary decision. Such appeal shall be heard by a Disciplinary Tribunal appointed by the Aim to Sustain Chairman in accordance with the provisions below and shall be by way of review or re-hearing in a manner directed by the Aim to Sustain Chairman.

- (1) To dismiss the allegation (if not proved);
- (2) To uphold the allegation in whole or in part;



- (3) To reduce the penalty ordered by the Disciplinary Panel;
- (4) To impose additional or alternative penalties including all or any of the penalties set out below (Level 3).

d. **Level 3 – Disciplinary Tribunal.** In any case where Aim to Sustain or the Aim to Sustain Chair has agreed or directed that the allegation and any associated Complaint must be dealt with by way of hearing before a Disciplinary Tribunal, a Tribunal will be appointed. The Aim to Sustain Chairman will appoint a Tribunal consisting of the Aim to Sustain Chair, or a commissioner appointed by them to act as Chair of the Tribunal and two other commissioners to adjudicate upon the allegation. The penalties that the Disciplinary Panel is empowered to impose are as follows, and one or more of the following must be imposed:

i. **Level 3 – Penalties within the Jurisdiction of the Aim to Sustain Disciplinary Tribunal.**

- (1) To dismiss the allegation (if not proved);
- (2) That the breach of the specified Standards be recorded in the minutes of Aim to Sustain but that no further action shall be taken;
- (3) That the Respondent be reprimanded, or severely reprimanded and such reprimand be published in the Aim to Sustain Game Assurance newsletter or otherwise publicised in a similar manner;
- (4) That the Respondent be suspended from membership of the Aim to Sustain Game Assurance Scheme and barred from participation in any of their activities for a period to be fixed by the Disciplinary Tribunal, or until such time as the Respondent can demonstrate that the Member Shoot / Game Farm is fully compliant with the Scheme Standards;
- (5) That the Respondent's Membership be terminated and permanently barred from Membership of the Aim to Sustain Game Assurance Scheme and permanently barred from participation in any of its activities.

e. The decision of the Aim to Sustain Disciplinary Tribunal is final and there is no right to further appeal by the Respondent.

### Disclaimer

57. Nothing in these Rules shall limit or exclude the liability of Aim to Sustain, or Intertek SAI Global and any of their respective officers, employees, agents, or subcontractors for (a) death or personal injury caused by the negligence of any such person; or (b) fraud or fraudulent misrepresentation.

58. Aim to Sustain, or Intertek SAI Global shall not be responsible under any circumstances for any financial losses or business interruption indirect or consequentially, whether in contract, tort or breach of statutory duty.

59. Aim to Sustain, or Intertek SAI Global shall, at their discretion, be entitled to alter the Standards, Scheme Rules and Operating Protocols where they consider the changes to be necessary.

60. The Scheme Rules and Standards represent the entire understanding between Aim to Sustain and the Member and in applying for the Scheme and paying Membership fees, the Member acknowledges this requirement.

## Points of Contact and Useful Links

### Aim to Sustain

General enquiries - [info@aimtosustain.org.uk](mailto:info@aimtosustain.org.uk)

Assurance Advisor – [m.fellows@aimtosustain.org.uk](mailto:m.fellows@aimtosustain.org.uk)

Operations Director – [s.butcher@aimtosustain.org.uk](mailto:s.butcher@aimtosustain.org.uk)

**Intertek SAI Global** (Scheme Assessors) - [agrifood@saiglobal.com](mailto:agrifood@saiglobal.com)

Useful weblinks to legislation, regulations and other guidance:

- <https://www.codeofgoodshootingpractice.org.uk/>.
- <https://www.gov.uk/government/publications/poultry-including-game-birds-registration-rules-and-forms>).
- <https://www.food.gov.uk/our-work/guidance-for-primary-producers-and-food-business-operators-on-the-hygienic-production-of-wild-game>
- <https://www.food.gov.uk/sites/default/files/media/document/V7%20Guidance%20-%20supply%20of%20wild%20game%20for%20human%20consumption.pdf>
- [https://www.foodstandards.gov.scot/downloads/FSS\\_Wild\\_Game\\_Guide-December\\_2021.pdf](https://www.foodstandards.gov.scot/downloads/FSS_Wild_Game_Guide-December_2021.pdf)
- <https://register.food.gov.uk/new>
- [Policy statement \(hse.gov.uk\)](http://www.hse.gov.uk)
- <https://magic.defra.gov.uk/MagicMap.aspx>.
- <https://www.gov.uk/guidance/disease-prevention-for-livestock-farmers#biosecurity-measures>
- [Defra, UK – Disinfectants](http://www.defra.gov.uk)
- <http://www.thinkwildlife.org/crru-code>.
- [National Gamebag Census - Game and Wildlife Conservation Trust \(gwct.org.uk\)](http://www.gwct.org.uk)
- <http://www.bvpa.org.uk>
- <https://basc.org.uk/wildfowling/advice/flight-ponds-code-of-practice/>
- [Fallen stock and other animal carcasses – Animal by-products: disposal guidance – gov.scot \(www.gov.scot\)](http://www.gov.scot)
- [Fallen stock and safe disposal of dead animals – GOV.UK \(www.gov.uk\)](http://www.gov.uk)