



NZDA

New Zealand Deerstalkers Association

REVIEW OF THE RULES FOR HOMEKILL AND RECREATIONAL CATCH

Submission to New Zealand Food Safety, MPI

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To: New Zealand Food Safety, Ministry for Primary Industries

By Email: 28dayruleconsultation@mpi.govt.nz

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The New Zealand Deerstalkers Association Incorporated (NZDA) welcomes the opportunity to submit on the review of the rules for homekill and recreational catch.

NZDA represents approximately 14,000 members across 50 clubs, 35,000 supporters, and the interests of approximately 85,000 recreational big-game hunters throughout New Zealand.

Since 1937, NZDA has represented recreational hunters and shooters, promoted ethical and safe hunting, protected public access to New Zealand's mountains, bush and wild places, supported game animal management, and undertaken conservation, hut, track, training and volunteer work throughout the country.

Introduction

The NZDA supports the direction of this review, particularly the proposal to clarify the rules applying to the use, sharing and donation of recreationally hunted wild game meat.

NZDA represents recreational hunters throughout New Zealand. For our members, hunting is not only a recreational activity, but it is also an important source of food, part of New Zealand's rural and outdoor culture, and an increasingly important contribution to the management of wild animal populations.

Our starting position is simple:

where a wild animal is lawfully and humanely harvested and the meat is safe and suitable for consumption, the objective should be to utilise as close to 100 percent of that edible meat as practicable.

Hunters routinely provide meat to their families, friends and communities. NZDA branches and hunters also support charitable initiatives and food banks by supplying excess hunted wild harvested venison. There is considerable opportunity to expand this contribution where hunters have more meat than they can personally consume.

Accordingly, NZDA strongly supports a clear legal pathway that enables excess recreationally harvested venison and other wild game meat to be gifted and donated, including to food banks, charities, marae and other community organisations, provided appropriate food-safety precautions are followed.

General support for the review

NZDA agrees with MPI that the existing provisions have become unnecessarily unclear.

The current statutory settings are more than 20 years old. MPI itself acknowledges that the way New Zealanders live and share food has changed, that food affordability has become a greater concern, and that recreationally harvested game has the potential both to provide food and assist in managing deer populations.

The practical reality has already moved ahead of the legislation because the NZDA is aware that hunters already share meat, community organisations want and accept meat, and food banks need protein. As a result, programmes have developed to connect hunters with people who can use surplus wild venison. MPI's own material acknowledges that charitable donation can occur through an agreed and well-managed arrangement with a recognised food bank or charity.

The law should recognise and facilitate the current reality rather than leave hunters, charities and recipients uncertain about whether a sensible and socially beneficial activity is lawful.

NZDA therefore supports the review's objectives of making the rules clearer, fairer and more practical, while continuing to distinguish donated recreational catch from commercially traded meat.

Recreational catch should be treated differently from commercial

NZDA supports Option Two B - removal of the restrictions on who may use and consume recreational catch.

The existing restrictions are too narrow. They limit lawful consumption essentially to the hunter, members of the hunting party and their respective families or households.

A hunter may recover substantially more meat than their household needs. It makes little sense from a food-utilisation, conservation, hunter-led management, or community perspective for otherwise usable venison to be discarded simply because the hunter has reached the limits of what their immediate household can consume.

MPI itself identifies the benefits of Option Two B as broader access to homekill and recreational catch, improved food security, keeping pace with current practices and removing a regulatory restriction that is difficult to verify.

NZDA considers that the policy objective should be the maximum utilisation of safely recoverable meat from harvested animals.

Recreational hunters expend considerable time, money and effort harvesting wild animals. Ethical hunting practice already strongly encourages recovery and use of edible meat.

That approach also complements the Government's wider objective of managing wild deer numbers. MPI's discussion document expressly recognises that wild deer, goats, and pigs place pressure on farming and natural environments and that recreational hunters contribute to managing those populations.

There is an obvious public benefit in linking those two objectives: harvest animals that require management, recover the meat, and feed people with it.

MPI records that meat is particularly sought after by food-bank users and recognises existing initiatives designed to facilitate the donation of wild game meat.

Food safety

NZDA recognises that recreationally harvested meat sits outside the regulated commercial meat system. Removing unnecessary restrictions should not mean removing personal responsibility or sensible food-safety practices.

Hunters donating meat should be expected to take reasonable steps to ensure that meat supplied for consumption is safe and suitable when donated. This is consistent with the principles already applying to donated food under the Food Act 2014, which MPI notes provides protection to donors where food was safe and suitable when it left their control and appropriate information was provided to the recipient.

For recreational hunters, practical guidance should focus on matters such as:

- harvesting an apparently healthy animal and excluding meat where there is reason to suspect disease, contamination or toxin exposure:
- hygienic field dressing and handling:
- prompt cooling and maintenance of an appropriate cold chain:
- clean processing and packaging:
- sufficient identification of the meat as recreationally harvested wild game: and
- ensuring recipients understand that the meat has not passed through the regulated commercial meat-processing system.

These are practical risk-management measures.

The system should not attempt to replicate the commercial meat-processing regime for privately donated meat. Doing so would defeat the purpose of the reform and would discourage perfectly responsible donations.

Labelling and information

Consumers/donees should know what they are receiving and NZDA supports simple identification requirements, particularly where meat has passed through a listed service provider.

MPI proposes that recreational catch processed by a listed service provider could be labelled with its source and a statement that it has not been processed under the regulated food-safety system.

NZDA supports that principle, provided the requirement remains straightforward and inexpensive. For example:

"Recreationally harvested wild game - [venison/pork/goat] on [date]"

There is no need for elaborate warnings, complex packaging requirements or compliance documentation.

Where hunters personally process and directly donate meat, the same information could be provided verbally or by a simple tag, label or accompanying information sheet rather than imposing a formal labelling regime designed for commercial products.

Food banks and organised donation schemes

NZDA particularly supports making the position of food banks and charitable organisations explicit. MPI acknowledges that uncertainty surrounding the interaction between consumption restrictions and donations may currently discourage people from donating meat. It proposes clearer guidance distinguishing donation from trade and NZDA agrees with this proposal.

A food bank or charity should be able to receive suitable wild venison from recreational hunters and distribute it to people who wish to consume it.

The framework should facilitate both:

1. direct gifting between hunters and recipients; and
2. organised donation programmes, through which hunters supply meat to food banks, charities or other community organisations.

Organised programmes can offer additional advantages around processing, cold storage, traceability, education and consistency. They should be encouraged rather than inadvertently regulated out of existence.

NZDA and its branches are well placed to assist with education and the development of sound hunting, meat-handling and donation practices.

Avoid creating unnecessary barriers

NZDA cautions against solving an issue of legislative ambiguity by creating an overly complicated new compliance regime. The people donating this meat are not generally commercial suppliers. In most cases they are recreational hunters voluntarily giving away a valuable food resource. Every additional mandatory form, certification, processing requirement or fee creates a disincentive to donate.

The regulatory response should therefore be proportionate to the activity and risk.

The basic framework should be readily understandable:

1. lawfully harvest it:
2. handle it safely:
3. do not sell or barter it:
4. tell the recipient what it is: and
5. allow people to make their own informed decision whether to consume it.

That provides substantially greater clarity than the existing arrangements.

Recreational catch and homekill need not have identical settings

NZDA's principal interest in this review is recreational catch.

We consider there is a reasonable basis for MPI to address recreational catch separately from homekill if issues associated with livestock ownership, veterinary medicines, animal movements or the 28-day rule require different treatment.

Wild deer, pork and goat meat cannot sensibly be treated as though they were farmed livestock.

Recreationally harvested deer are being removed from the wild and put into the system for human consumption every day. Once a game animal has been lawfully harvested, the sensible policy question is how much of that animal can safely be put to beneficial use.

Accordingly, even if MPI ultimately decides to retain some existing restrictions applying to homekill, that should not prevent removal of the consumption restrictions applying to recreational catch.

For NZDA, the desired outcome is straightforward: surplus venison should be able to feed New Zealand families and communities rather than go to waste.

NZDA therefore supports legislative clarification and, in particular, the removal of the current restrictions on the use and consumption of recreational catch.