

A consultation on an application to register the name “Scottish Wild Venison” as a protected geographical indication under the EU quality schemes for agricultural products and foodstuffs

March 2018



Scottish Government
Riaghaltas na h-Alba
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INTRODUCTION

EU regulation 1151/2012 on quality schemes for agricultural products and foodstuffs provides a system for the protection of products on a geographical or traditional recipe basis. This system is similar to the familiar 'appellation controlee' system used for wine.

If you are a producer of agricultural products or foodstuffs, you can apply to protect the name of your product under EU law.

This means that another producer cannot market their product using that name unless they:

- produce it in the area that has been agreed with the EU; and
- use the methods you have agreed with the EU.

Producers who are not part of the original group applying for protection, but who can show to the satisfaction of a nominated inspection body that their product conforms fully with the registered product specification, may use the registered name.

Protection designations:

There are three protected designations that can be applied for which highlights regional and traditional products whose authenticity and origin can be guaranteed through an independent inspection system.

- Protected Geographical Indication (PGI) – products must be produced, processed or prepared in the geographical area you want to associate with it. The product must have a reputation, characteristics or qualities that are a result of the area you want to associate with it.
- Protected Designation of Origin (PDO) – product must be produced, processed and prepared in one area and have distinct characteristics from this area. PDO differs from PGI in that all production stages must take place in the area you want associated with the product.
- Traditional Speciality Guaranteed (TSG) – products must have a traditional name and characteristics that distinguish it from other similar products. These characteristics can't be due to the area the product is made in or based purely on technical advances used in production. Once protected, a TSG product can be produced in any country within the EU.

Products:

Most foods such as meat, dairy, fish products, fruits, vegetables, beer, beverages made from plant extracts, bread, pastries, cakes, biscuits, confectionery and pasta can apply for PFN status. Examples of other products which can also be registered under particular designations include:

- PGI / PDO – natural gums and resins, hay, essential oils, mustard paste, salt, cork, cochineal, flowers and ornamental plants, wool, cotton, wicker and scutched flax; and
- TSG – pre-cooked meals, prepared condiment sauces, soups and broths, ice-cream and sorbets, chocolate (and other food preparations containing cocoa).

Who can apply:

You can apply as an individual producer or you can form a group with other interested parties, e.g. someone who supplies you raw materials or sells your product.

You can include as many people as you want in your group.

Benefits:

As well as providing a way of helping to preserve our national and regional food heritage there are also good economic reasons to register products under the scheme, including:

- Legal protection against imitation throughout the EU;
- Increased awareness of the product both locally and throughout the EU;
- Opportunities to take advantage of consumers' increased interest in regional products by positioning the product firmly at the quality end of the market;
- The opportunity to get a premium on the product. The results of European wide research has shown that Geographical Indication (GI) products are sold (on average) 2.23 times as high as comparable non-GI products.
- Greater potential ability, under EU state aids rules, to attract public funding for promotional initiatives and activities.

ABOUT THIS CONSULTATION

The purpose of this consultation is to seek views on an application the Scottish Government has received to register the name “Scottish Wild Venison” as a protected geographical indication.

Before a decision can be made by the Member State, the Department of Environment, Food and Rural Affairs, on whether to forward the application to the European Commission for the next stage of the process, the Scottish Government is required to consult on applications seeking registration of Scottish product names to give interested parties within the UK an opportunity to comment on or object to the proposal.

Responding to this consultation:

We are inviting responses to this consultation by **midnight 29 May 2018**.

Please respond to this consultation using the Scottish Government online consultation platform, Citizen Space. You can view and respond to this consultation online at <https://consult.gov.scot/food-and-drink/scottish-wild-venison>. You can save and return to your response while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 29 May 2018.

If you are unable to respond online, please complete the Respondent Information Form (see ‘Handling your response’ below), and send this along with your response to:

Email: Protected_Food_Names@gov.scot

Or write to us at: Food and Drink Industry Growth
 Scottish Government
 B1 Spur
 Saughton House
 Broomhouse Drive
 Edinburgh
 EH11 3XD

Please note that objections must include your legitimate interest in the proposal and specify the grounds on which it is based with reasons and justification for the opposition, giving evidence where necessary.

For guidance on what constitutes as an admissible objection as laid down in Article 10 of the Council Regulation (EU) No 1151/2012 please visit:
(<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32012R1151>)

Handling your response:

If you respond using Citizen Space (<http://consult.scotland.gov.uk/>), you will be directed to the Respondent Information Form. Please indicate how you wish your response to be handled and, in particular, whether you are happy for your response to be published.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

Please note that responses will not be accepted without a Respondent Information Form.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

Next steps in the process:

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at (http://consult.scotland.gov.uk). If you use Citizen Space to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us reach a decision on the final product specification seeking registration or assist in determining the applications suitability for the scheme and whether it can be forwarded to the European Commission (EC) for the next stage of the application process.

Comments and complaints:

If you have any comments about how this consultation exercise has been conducted, please write to us using the contact details above.

CONSULTATION DOCUMENT

PRODUCT SPECIFICATION

“Scottish Wild Venison”

PDO () PGI (X)

1. RESPONSIBLE DEPARTMENT IN THE MEMBER STATE

Department for Environment and Rural Affairs
Great British Food Unit – Protected Food Names Team
Area 1a Nobel House
17 Smith Square
London
SW1P 3JR
United Kingdom
Email: protectedfoodnames@defra.gsi.gov.uk

2. GROUP

Name: Scottish Venison Partnership
Address: c/o Playfair Walker, Winton Loan, Edinburgh EH10 7AN
Tel: +44 (0) 131 445 5570
E mail: mail@scottish-venison.info
Composition: Producers/processors (X) Other ()

3. TYPE OF PRODUCT

Class 1.1 Fresh meat (and offal)

4. SPECIFICATION

4.1 Name

“Scottish Wild Venison”

4.2. Description

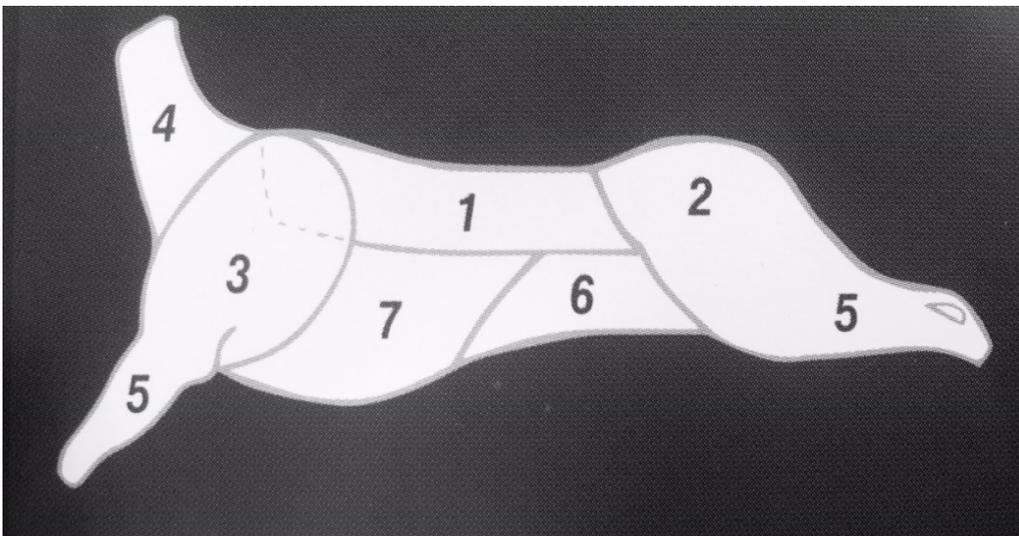
Scottish Wild Venison is the name given to the meat derived from all free-roaming deer species in Scotland. Currently these are red deer *Cervus elaphus*, sika deer (*Cervus nippon*), fallow deer (*Dama dama*) and roe deer (*Capreolus capreolus*).

Venison is acknowledged as being one of the most nutritious of all red meats, is low in fat and is not marbled in the same way as beef and lamb, the exception being venison from sika deer which can produce significant marbling in well fed mature animals. Coupled with the fact it contains no salt or sugar, venison is an excellent source of healthy protein. Deer older than three years can carry fat in the autumn but this is easily trimmed.

Venison is also a good source of iron, delivering more than any meat from conventional livestock, and much more than vegetables. It is high in vitamins B6, B12, potassium, phosphorus, riboflavin, niacin, and is also a source of zinc.

Whilst important that it is lower in both fat and saturated fat than other red meats, venison is higher in polyunsaturated fats, highly favourable saturated to polyunsaturated (P:S) and omega n-3 to omega n-6 ratios . This is largely because deer feed on grass and other vegetation rather than high-energy cereals.

The main cuts of venison from a deer carcass are shown here:



1. Saddle (back) – breaks into rack, loin, fillet

Traditionally caterers buy whole saddles cut between the 11th and 12th ribs, but they also buy boned out loins and/or fillets. To avoid confusion, venison loins are usually referred to as loin or loin fillet and the true fillet as filet mignon, undercut or tenderloin. A carvery saddle is slit between the 6th and 7th ribs. The saddle yields the most tender cuts for steaks or roasting.

2. Haunch (back leg)

The haunch can be cut into bone-in joints if young or from roe deer haunches, or boned and seamed out to form rolled joints, or sliced into steaks and stewing meat. It is desirable to remove all sinew, especially from older venison.

3. Shoulder

The shoulder is most commonly diced for stews or casseroles. It can also be boned and rolled (and stuffed for added value) for braising. Shoulder joints from young deer are also suitable for roasts and frying steaks. Old venison shoulder is often minced for processing.

4. Neck

The neck is good for mince, making venison stock, or diced neck from young deer can be used to make stew.

5. Shank

Shank can be minced for processing, or diced for a slow-cook stew. It can also be cut into neat shanks, or sliced into osso buco.

6. Flank

Flank is normally used for processing. From older deer in the autumn it can either be used for processing or discarded if over-fat because venison fat has a high melting point, making it unsuitable for processing.

7. Rib/breast/brisket

This is mainly used for processing but can also be made into mince, or rolled as a stewing joint.

Eating quality – information sourced from Nichola Fletcher

Tenderness:

Tenderness varies according to the age of the animal and the way it was killed. Any deer under three years old should be as tender as any domestic meat. When older than three years then the sinews that run through and around the meat start to thicken and the grain of the meat becomes coarser. Venison from hinds will remain tender up until around six years old as long as skin and sinew is completely removed. Careful butchery and trimming of sinew is essential with older animals.

Tenderising can be achieved by dry-ageing (hanging the whole carcass), and in the right conditions a red deer carcass can 'mature' for three weeks or more, either in-skin or skinned, whereas a smaller roe carcass may require just a few

days. Cuts of meat can also be tenderised by marinating in oil and wine, by completely covering them in oil, or maturing in vacuum pack or shrink-wrap. Some cuts are more tender than others, and employing the correct method of cooking for a particular cut will determine the final degree of tenderness of the meat when served.

Flavour and smell:

These can be affected by a number of factors such as hanging, marinating, bruising, stress at slaughter etc. Hanging enhances the flavour although it will not improve that of a bruised or damaged carcass. Venison matured in the right conditions, (i.e. a whole red deer carcass hung in a dry atmosphere of - 2 to 0 degrees C, 28 – 32 degrees F), will mature slowly over three weeks or more.

This gives the meat an attractive, rich, but bright smell and flavour, and the venison a deep rich, mahogany colour.

Flavours from an animal's diet can pass into the fat in meat but the leanness of most venison means that diet has very little effect and makes very little difference to how its meat will taste. Venison from roe deer living on a varied diet is rarely more complex in flavour than that of red deer that has been eating grass. It is the processes described above that will alter the flavour more dramatically. However, where the fat is retained, or if the meat is marbled, the diet can affect the flavour.

Succulence and 'juiciness':

Succulence in meat generally comes from fat, and juiciness, or moisture content. It can only be retained if the meat is cooked rare or medium-rare. Venison from older animals can lose its moisture very suddenly during cooking or serving. If there is still pinkness in the meat when cooked it will not be dry and remains juicy. Venison immersed in liquid and cooked long and slowly stays moist, but once removed from the liquid will quickly dry out.

4.3. Geographical area

The geographical area of Scotland including those Scottish islands with deer populations.

4.4. Proof of Origin

Records at the time of culling and at the larder/chill - Wild Deer Best Practice Guidance

Cull records must be kept by all who take or kill deer. These records are required as the data they contain is required to comply with legal requirements,

or to assist in informing deer management, or to meet standards required through quality assurance schemes or venison dealers.

Scottish Natural Heritage (SNH) may require owners/occupiers to submit records of deer taken or killed, including species, sex, whether in or out of season, and on what type of land. Hygiene legislation requires that the health, condition and behaviour of deer destined for the food chain are checked and recorded, and that the carcass can be traced back from the processor to where it was shot.

Separate quality assurance schemes or the terms of individual game dealers/processors may also require extra records to be kept.

Essential data to be recorded includes:

- Carcass tag number
- Date shot
- Species
- Sex
- Location shot and six figure grid reference
- Time culled to the nearest hour
- Any abnormalities to organs on inspection including mouth, tongue, lungs, bladder, kidneys, lymph nodes, adhesion between viscera and the abdominal wall, and any other parts of the carcass
- Any abnormal behaviour observed prior to shooting
- Carcass contamination
- Name of individual signing the inspection declaration
- Larder weight

Additional data that may be provided:

- Name of the individual who culled the deer (if not as above)
- Name of individual who gralloched (eviscerated) the deer (if not as above)
- Age class
- Whether pregnant
- Whether with milk in udder
- Level of kidney fat cover
- Bullet entry point
- Bullet exit point
- Hill weight (gralloched but with head, legs and pluck attached)
- Time taken to chiller or larder
- Air temperature of chiller or larder.

Records at the primary processor - Scottish Quality Wild Venison processor standards

Where the primary processor is a member of the sector's quality assurance scheme the following records are required. These records must be available for examination when inspections are carried out and include:

- A valid Certificate of Registration
- Any correspondence with or from the Certifying Authority including copies of any non-compliance reports
- Details of suppliers of carcasses including confirmation that they have been culled in Scotland
- Records of stock received and all relevant identification paperwork sent with them
- Pest Control – details of pest control arrangements and servicing report, using an accredited pest control agent
- Any relevant correspondence from the Local Authority including registration details and Environmental Health Inspection reports.

Records must be kept of Trained Hunters from QA scheme approved members that are qualified in accordance with the SQWV producer standards to sign a Trained Hunter Declaration (THD).

The declarations must be verified, procedures in place and checked against the approved names list. A record must be kept where a declaration has been signed by someone who is not on the qualified persons list. It is recommended that processors request copies of Deer Stalking Certificates (DSC) 1 and (DSC) 2 certificates.

4.5. Method of Production

Deer are culled by specialist, skilled stalkers. Hunting varies depending on the quarry deer species and its habitat. Deer are free ranging and are culled in a variety of habitats, often extreme. The animals to be culled are carefully selected by the stalker on the basis of age, sex, condition, and other factors including the management objectives of landholdings and respective deer management groups. Deer may be culled under license out of season where there is damage to crops, trees, or for public safety (such as risk of

deer/vehicle collisions). The use of a high-powered rifle ensures a quick, humane death.

Red hind stalking, as part of a managed cull to protect environment, biodiversity, or to meet other management objectives, can be undertaken in especially arduous conditions given that during the hind season (October to February) there is likely to be snow and ice on the ground and very low temperatures.

The deer sector has invested in the production and implementation of Wild Deer Best Practice. These guidelines and codes seek to assure voluntarily the highest standards in food safety, public safety and deer welfare. Personal competence is encouraged and deer managers and stalkers will have attained Trained Hunter status in compliance with regulations and with the Code of Practice on Deer Management.

For red deer, after the kill, the removal of the animal's stomach and intestines (the gralloch) is done *in situ* of the kill and a preliminary *post mortem* inspection made of the culled animal's health. Records are kept of date, time, place, deer health etc. and any abnormalities noted (see Proof of Origin 4.2). The carcass is taken from the hill by ATV or, where the terrain is particularly difficult, by specially trained pony, to be transported to the larder.

This process varies on low ground where the main quarry, roe deer, is smaller and the terrain less arduous. Stalking is usually undertaken at dawn across farmland or woodland, with the deer culled by high velocity rifle. Once killed, the carcass is then discretely removed.

A deer larder is a dedicated, self-contained clean space equipped to allow the thorough preparation and storage of carcasses before uplift by a game dealer. Once in the larder, the stalker will prepare the carcass and remove its internal organs, head and feet.

Under hygiene regulations, it is required that the internal temperature of the deer carcass is brought down to and maintained at below 7 degrees C as quickly as possible, with a suggested temperature for hanging of between 1 – 3 degrees C. Active chilling may be required unless the air temperature and flow can ensure the carcass temperature is maintained at 7 degrees C or below. Carcasses should be hung to allow the free flow of air between them (i.e. they should not be touching) and should not be frozen.

Carcasses will then be uplifted with the skin kept on and taken for further processing by a game dealer in line with current food hygiene legislation.

Contracts are usually agreed between estates or groups of estates and individual game dealers before the start of each season. Game dealers and producers can be assured under the SQWV scheme.

For direct sales from the estate, venison must be sold only to a licensed venison dealer. Licences are obtained from the relevant Local Authority Department of Environmental Health. Thereafter, butchers, shops, supermarkets, restaurants and food service companies are able to sell onwards to the consumer.

4.6. Link

Scotland has its own legal statute and framework for the protection, regulation and management of wild deer, giving greater relevance to the distinct attributes of Scottish Wild Venison. The right to take or kill wild deer derives from Scots law, under which deer are regarded as a common resource belonging to no-one '*res nullius*' until they are killed or captured. The right to shoot deer cannot be divested from the land. This is different from many other European countries and reflects the wider structure of rights over land and natural resources in Scotland. Deer management is carried out by land managers on estates, farms, crofts and in woodland and forests, and through recreational stalking.

The UK market for venison has been expanding for the last 10 years, and currently by an estimated 10 -15 per cent per annum. Scottish wild venison is the single biggest component of supply into this market at around 2500 tonnes per annum.

As meat, man has hunted deer and eaten wild venison since Neolithic times – long before lamb, beef and the concept of domestic livestock. Deer meat was the product of the hunt. Through history, royalty and nobility embraced deer hunting, and stalking as we know it today developed from these traditions through the Highland deer drives of the late 19th century to the modern practice of today– a test of skill, fitness, field craft and an accurate shot. Deer stalking in the Highlands of Scotland is undertaken for conservation, environmental and deer welfare objectives as well as the income derived from letting stalking. Wild venison production is an important part and bi-product of the sustainable management of Scotland's wild deer populations in the uplands, and equally so across low ground areas where roe deer populations are increasing.

Deer are a valuable resource, not just for their 'social' value, but are also a 'keystone species' in Scotland's biodiversity requiring active management.

The red deer has previously been voted by the public as Scotland's most iconic species.

"Scottish Wild Venison" would apply to venison from all four wild deer species found in Scotland: roe deer, red deer, sika deer and fallow deer, and to their joints, cuts, and processed products (pies, sausages etc.)

Roe deer and red deer are native species; they colonised Scotland naturally after the end of the last glaciation around 10,000 years ago, and wild populations have survived in Scotland since then. Sika and fallow deer have both become established following introduction.

The red deer is the largest native land mammal in the UK and is found predominantly in the open hill range, characteristic of much of upland Scotland, also using woodlands and plantations, particularly for shelter.

Although red deer may be the most recognisable species, roe deer increased in numbers hugely during the 20th century to become the most widely distributed species across Scotland - mainly woodland dwelling and found throughout mainland Scotland including around urban centres.

Sika and fallow deer have become established as a result of deliberate releases and escapes from deer parks. Fallow deer were introduced from the Mediterranean to England possibly during the 11th and certainly by the 12th centuries, and to Scotland by the 13th. They occur in Scotland mostly around areas where they were originally kept in captivity. Sika deer were introduced from Japan and East Asia into UK deer parks in the 19th century and the earliest records of their escape from captivity date from the 1920s. They are more widespread than fallow, with populations spreading in the south, west and north of Scotland.

With no natural predators in Scotland (since the extinction of the wolf), wild deer populations will increase to the carrying capacity of the ground over which they range. Deer therefore require to be managed because of their impact on other land uses and land management objectives. They can cause damage by grazing, browsing and trampling, or impact on the public (such as road traffic accidents).

At a national scale the Scottish red deer population is broadly 'in balance'. Indications suggest however that numbers and distribution of roe deer are expanding, and sika deer also continue to expand their range. Fallow deer numbers remain steady in isolated populations.

Wild deer also need to be managed to maintain a healthy population in balance with their habitat and the land use of the area where they live. The

voluntary Deer Management Group system is established across much of the red deer range to promote and undertake collaborative management. 'Taking' of wild deer is governed by open and close seasons that are different for each species and each sex. However, because of these differences, and also because deer that damage crops and forestry can legally be shot out of season under a General Licence, it is possible for wild venison to be sourced all year round.

A recent study (PACEC 2016) commissioned by the Association of Deer Management Groups into the contribution of deer management found that the deer sector contributes an estimated £140 million each year to the Scottish economy and supports 2500 full time jobs.

Taking into account related goods and services this activity makes a significant contribution to the rural economy, often in areas where employment and economic opportunity is relatively limited.

There is a clear distinction in Scottish law between 'farmed' and 'wild' deer.

Only venison from wild deer populations is eligible for accreditation under the Scottish Quality Wild Venison (SQWV) scheme. It is proposed that only venison certified under this scheme for 'wild', or another legitimate, recognised assurance process, but not 'park' or 'farmed' deer should be eligible for PGI status.

Because deer carry predominantly lean meat, the notion that what they eat may affect how they taste, does not actually apply. Such flavours are passed into the fat rather than the muscle tissue, and as venison is largely un-marbled then any link between diet and flavour is actually almost indiscernible. The link in this case lies with the process, the free ranging nature of the species, and the routes from hill to plate.

Scotland is in many respects regarded as the home of deer stalking, its deer held in high regard, and epitomised in works such as Sir Edwin Landseer's painting *Monarch of the Glen*. Whilst there is exceptional venison produced from other regional areas of the UK, Europe and further afield, Scottish venison holds a special cachet and distinction, not least because of the skill required to procure it, and the exceptional landscape in which deer stalking takes place.

Highland ponies or garrons are used at some locations for extracting carcasses from the hill and stalkers on private estates still wear tweed. Whilst the most modern rifles, scopes and moderators are now used, for efficiency as well as

animal welfare purposes, the field craft involved in deer stalking is a traditional practice stretching back over 150 years.

For Scottish “wild” venison, designation would provide a valuable link between a “wild” meat and an established, traditional process that has been followed, albeit significantly modernised, for more than 100 years.

It would provide an essential link between the provenance of that product, whether from wild red deer culled across Scotland’s spectacular upland deer range, or roe deer from the country’s low ground hills, woodland, forestry and farmland.

- The strategy for the sustainable management of Scotland’s wild deer is laid out in the Scottish Government document *Scotland’s Wild Deer: A National Approach* and accompanying action plan, and the *Code of Practice on Deer Management*.
- Methods of culling are governed by law and by strict voluntary codes, with onward processing to market also undertaken to established quality standards including Best Practice Guidance, the Game Meat Hygiene Regulations, Deer Management Qualification training etc.
- The Scottish Quality Wild Venison (SQWV) scheme is open to all public and private sector producers that meet the required standards, subject to inspection.
- The designation should apply to “wild” Scottish product culled and processed in Scotland.
- All product designated would require to be produced in line with the Codes of Practice, legislation and licensing processes outlined, and subject to verification of these.

4.7. Inspection body

Scottish Quality Wild Venison Ltd
6 Redheughs Rigg
Edinburgh
EH12 9DQ

Tel: 0131 335 6621
www.sqwv.co.uk



RESPONDENT INFORMATION FORM

A consultation on an application to register the name “Scottish Wild Venison” as a protected geographical indication under the EU quality schemes for agricultural products and foodstuffs

This form must be completed and returned with responses by post or email.

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (anonymous)
 Do not publish response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
 No



CONSULTATION QUESTIONS

A consultation on an application to register the name “Scottish Wild Venison” as a protected geographical indication under the EU quality schemes for agricultural products and foodstuffs

1. Do you object to the proposal to register the name Scottish Wild Venison as a protected geographical indication?

Yes

No

2. **On what grounds is your objection based?** *(select all that apply)*

Non-compliance with the conditions as laid down in Article 5 or non-compliance with product specification requirements as laid down in Article 7(1) of Regulation (EU) No 1151/2012

Registration of the name would be contrary to Article 6(2) of Regulation (EU) No 1151/2012 (name conflicts with plant variety or animal breed)

Registration of the name would be contrary to Article 6(3) of Regulation (EU) No 1151/2012 (name wholly or partly homonymous)

Registration of the name would be contrary to Article 6(4) of Regulation (EU) No 1151/2012 (existing trademark)

Registration would jeopardise the existence of names, trademarks or products as specified in point (c) of Article 10(1) of Regulation (EU) No 1151/2012

The name proposed for registration is generic; details to be provided as set down in point (d) of Article 10(1) of Regulation (EU) No 1151/2012

3. **Please outline your answer.**



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