FHI 059, Version 12		Issued by: FHI	Date of issue: 08/10/2018
Case No: 2019-0575			Date of visit: 15/10/2019
Time spent on site:	6hrs	Main I	nspector:
Site No: FS1310 Business No: FB0134	Site Name: Business Name:	Loch Pooltiel Kames Fish Farming L	td
Case Types: 1 ESC	2 CNA 3	4 5	6
Water Temp (°C):	Thermometer No:		FHI 045 completed
Observations:	Region: HI	Water type: S	CoGP MA M-25
Dead/weak/abnormally behavir Clinical signs of disease observ Gross pathology observed? Diagnostic samples taken?	-	N If yes, see addition	nal information/clinical score sheet. nal information/clinical score sheet. nal information/clinical score sheet.
UNI/REG only - if unable to car	ry out intended visit deta	ail reason below:	

Additional Case Information:

Fish graded and poorer doing fish in one cage, which has the majority of the mortality on site.

Discovery of escaped fish on the 7 September 2019. RTR observed at the jetty and divers were on site the same day and repaired holes. Two pens with holes but pen 2 only had small holes (1x1 mesh - so unlikely for fish to have escaped from that pen), pen 3 had one hole of approximately 40x60cm approximately 2-3 meters from the surface and several smaller holes (2x2 meshes along the waterline). Since it was a Saturday it was thought to be difficult to contact to ask for permission to deploy gill nets. DSFB and Marine Scotland notified on Monday 9 September 2019.

Seals regularly observed in the vicinity of the site. Large numbers of spurdogs in the area. All pens on site had a double mesh at the bottom of the net, except for the two pens with holes (pen 2 and pen 3). In the last cycle only two pens were used and they had double netting at the bottom the cage. As there had been no issues in the previous cycle with seals it was thought to not be an issue. Nets had been strength tested. Pen 3 and Pen 2 repaired on the 7 September 2019 by divers, pen 3 net changed to net bought second-hand from local fish farm on the 20 September 2019. Cage 2 net changed 26 September 2019 for band new net from Boris net services.

Net number 8106 pen 3: made 26/01/2014, washed and strength tested 30/8/2015 and stored until 2019 at Knox. 26/04/2019 net put on cage 3 at Pooltiel.

Net number 8110 pen 2 came in at the same time from Knox as for pen 3.

Overall fish look very well. A few poor doing smaller fish observed that seem not to be feeding. The majority of these are actively swimming. A few of these poor doers were removed from pen 4 (lower grade fish) and opened up but no clinical signs of disease were observed so no samples collected. Poor doers removed from pens were remarkably clear of lice. Only one Caligus observed on approximately 15 fish removed from pen 4.

Net numbers correspond with records, no containment issues observed on site. However strong current flows were observed on the site.

Wellboat availability is a problem. Initially the site was supposed to be stocked in the autumn but then was stocked in May due to a well boat only being available then.

Not a lot of paperwork was available for inspection on site due to the site not having an office/shorebase. Additional paperwork reviewed via e-mail.

Recommendations and requirements addressed. Documents received 11/10/20 &13/11/20.

FHI 059, Version 12		_	Issu	ed by: FHI	_		Date of issu	e: 08/10/2018
Case No:	2019-0575		Site No:	FS1310				
Date of Visit:		15/10/2019]		Inspector(s):]
Registration/Autho	risation Deta	ails						
1. Business/site deta	ails summary	checked by s	ite representa	itive?			Υ	1
2. Changes made to	details?						Υ	1
Site Details								
Total No facilities		5	Facilities sto	cked	5	No facilitie	s inspected	5
Species	RTR	RTR					Τ .	
Age group	2019 Q2	2019 Q3						
No Fish	164,189	51,047						
Mean Fish Wt	982.5g	427g						
Next Fallow Date (S	ite)	December 2	020	Next Input Da	ite (Site)	March/Apr	il 2021	
					1.	,		v
Recent (last 4 wks)				N	Any escapes	(since last	visit)?	Υ
If yes, detail:	see addition	al info						
Movement Records	S							
1. Movement record	s available fo	r inspection?						Y
2. Date of last inspec		•					20/03/2018	•
3. Are records comp	lete and corre	ectly entered?	•					Y
4. Are movement red	cords availab	le for dead fis	h and waste?					Y
5. Are records comp	lete and corre	ectly entered?	?					Y
6. Are health certification	ates for introd	ductions (outw	ith GB) availa	able?				N/A
Transport Records								
1. Are any movemen	nts carried ou	t by (or on be	half) of the bu	siness (not us	ing a STB)?			
If yes, is there a syst	tem in place f	or maintenan	ce of transpor	tation records	?			
Mortality Records								
1. Mortality records a	available for i	nspection?						Y
2. How are mortalitie	es disposed o	f?			Other (detail)		
	whole fish co	ollected by Ha	isco (to Binn F	Farm, Perth) o	r Billy Bowie (to Dalkeith)	collected fron	n Grieg
If other detail:								
3. Mortality records of	complete and	correctly ente						Y
4. Recent mortality (lact 4 wke).		2019 wk38 - 0.17%	0.21%; 2019 v	wk39 - 0.07%;	; 2019 wk40	- 0.31%; 201	9 wk41 -
5. Evidence of recen		typical mortal						Y
If yes, facility nos/no		••		reason.				
pen 4 and pen 5 slig		•						
6. Any other peaks in								Y
If yes, detail:				eks post input	(does not fall	within repo	rting criteria)	
7. Have increased (u							. J	N/A
If yes, detail action:								
8 Have 'mortality ev	ents' heen re	norted to FHI	2 If no ladd M	RT case and e	enter on morta	ality events s	sheet	N/A

FHI 059, Version 12	Issued by: FHI	Date of issue: 08/10/2018
1. Recent treatments (last 4 volume last 4 v	le for inspection? correctly entered?	
6. Are medicines stored appr	opriately?	
3. Has the manner and period increased (unexplained) model. 4. Has the action that will be is detected been included and	d in which the APB will notify Scottish Ministers or veterality at the site been included? taken in the event that the presence or suspicion of the downward when that will be notified to Scottish Ministers animals being stocked on the farm site been the discount of the stocked on the farm site been the site of the same animals.	erinary professional of any le presence of a listed disease ters?
transmission of disease beer 7. Is documentation available aquaculture animals held on	piosecurity measures implemented between each epiden covered (movement of staff, visitors, equipment, live e regarding the measures in place to maintain the physisite? edures been adequately implemented on site?	or dead fish etc.)?
Results of Surveillance		
1. Has any animal health sur	veillance been carried out by, or on behalf of, the busi	ness?

20/03/2018 - 15/10/2019

2. If yes, are results available for inspection?

If yes, detail (if not detailed under recent disease problems).

Records checked between:

3. Any significant results?

SSI, 2,9

Hiah

1.9. Is there a site specific contingency plan in response to failures

n containment, aimed at preventing escapes and recovering

escaped fish?

Point of compliance	Risk level	Satisfactory?	Requirement C		Comments and advice given or action taken if necessary
b(i). Inspection of records relating to equipment, facilities and t	he site				
General records			CoGP: 4.4.9,	4.4.14,	
2.1 With regard to each facility, net, screen and mooring at each site, a record should be maintained of:-			SSI 2,1		
site, a record should be maintained of:-		Facilities	Moorings	Nets	-
a) The name of the manufacturer	Low	Y	Y	Y	-
b) Any special adaptations	Low	N/A	Y	Y	-
c) The name of the supplier	Low	Y	Y	Y	-
d) The date of purchase	Low	Y	Y	Υ	-
e) Each inspection including					
i) the name of the person conducting the inspection	Low	Υ	Υ	Υ	
ii) the date of each inspection	Medium	Υ	Υ	Υ	
iii) the place of each inspection	Low	Υ	Υ	Υ	
iv) the outcome of each inspection	High	Υ	Υ	Υ	
f) the date and result of each repair, equipment test and antifouling	High	N/A	Υ	Υ	Facilities no repairs required so far.
treatment carried out					_
2.2. In relation to each net a record of:					
i) The mesh size	Medium	Υ	SSI, 2,2		
ii) The code which appears on the identification tag	Medium	Υ			
iii) The place of use, storage and disposal	Medium	Υ			
iv) The depth of water between the bottom of the net and the	Low	Υ			
seabed as measured at the mean low water spring					
2.3. In relation to each facility a record of:					
i) The date of construction	Low	Y	SSI, 2,3		
ii) The material used in construction	Low	Y			
iii) Its dimensions	Low	Υ			
2.4. In relation to each mooring a record of-			SSI, 2,4		
i) The date of installation	Low	Υ			
ii) The design and weight of the anchors	Low	Υ			
iii) The length of the mooring ropes or chains	Low	Y			
2.5. A record of any navigation markers deployed at each site at which fish are farmed	Low	Υ	SSI, 2,5		
2.6 In respect of sites at which fish are farmed in inland waters ³			SSI, 2,6		
a) The type, method of and date of construction of any flood prevention or flood defence measures in place	Low				
b) The date of and results of any tests conducted on any such measures	Low				

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
c) The date of any incident where the site was flood	Low			
d) The water course height during any such flood incident	Low		1	
2.6 A record of-			SSI, 2,7	
a) The date of any severe weather event which caused damage	Medium	N/A	SSI, 2,11 (a)	Harsh weather experienced and records of weather kept in site diary
to any facility, net or mooring				but no damage experienced so far.
b) Any action taken to rectify any such damage	High	N/A	SSI, 2,11 (b)	
Pen and mooring systems				
2.7 Are there documented procedures maintained regarding the selection and installation of pens and moorings?	High	Υ	CoGP 4.4.8, 4.4.13	
2.8 Can the site demonstrate evidence that the design specification of pens and moorings are suitable for purpose and correctly installed?	High	Υ	CoGP 4.4.9, 4.4.14	
2.9 Do pen systems meet the manufacturers guidelines?	High	Υ	CoGP 4.4.10	
2.10 Are pen systems inspected and approved by suitably qualified / experienced person(s)?	High	Y	CoGP 4.4.11	Site staff and manager do both, site manager has been fish farming for 30 years. In house training record complete for daily site inspections and containment control.
2.11 Is there evidence of the competence of personnel involved in the design, installation and maintenance of pen and mooring systems?	High	Y	CoGP 4.4.12, 4.4.15	Majority of this work undertaken by Kames (with evidence available), however some mooring components installed in October 2017 by Seahorse Marine with no evidence available. Seahorse Marine was bought over by another business and have been unable to obtain any certification subsequently.
2.12 Are pen and mooring components inspected with a) a documented SOP b) a documented inspection plan based on a risk assessment	High	Υ	CoGP 4.4.16	
2.13 Do all nets used on site meet industry standards?	High	Υ	CoGP 4.4.17	
2.14 Can the site demonstrate an awareness of the minimum fish size in relation to net size	High	Y	CoGP 4.4.19	
2.15 Does the net design, quality and standard of manufacture take into account the conditions that are likely to be experienced on site and include adequate safety margins?	High	Y	CoGP 4.4.20	
2.16 Are nets treated with a UV inhibitor?	Low	Υ	CoGP 4.4.21	
2.17 Are nets tested at a pre-determined frequency?	High	Υ	CoGP 4.4.22	After every cycle.
2.18 Is the method of test procedure based upon the manufacturers advice?	High	Υ	CoGP 4.4.22	all nets tested by KNOX
2.19 Are frequent net inspections conducted to look for damage?	High	Υ	CoGP 4.4.23	daily surface inspections, one a month divers check the nets and nets are always checked before any work on the pen is done i.e. handling, grading, stocking etc.
2.20 Are net inspection records maintained?	High	Υ	CoGP 4.4.23	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
2.21 Is the system by which nets are attached to the pen and	High	Υ	CoGP 4.4.24	inspected daily
weighted inspected frequently?	_			
2.22 Where damage to nets and/or associated fittings has occurred,	High	Υ	CoGP 4.4.25	
or the potential for damage exists, has remedial action been taken?				
b(ii). Inspection of records relating to training				
3.1 Are training programmes and plans relevant to the various onsite activities documented?	High	Υ	CoGP 7.1.8	Fish welfare course from FVG has been completed by all staff on site, this covers containment as well. In-house training for procedures for handling, grading harvesting etc. For all staff available.
3.2 Is there a satisfactory record of all training and qualifications for each person working at the site in relation to any boat operations? (This excludes well boat operations)	High	Y	SSI 2,6,a	
3.5 With respect to any transfer of or handling of fish is there a record of all training of each person working on site in relation to containment and prevention of escape of fish, and recovery of escaped fish?	High	Y	SSI 2,7,a	
b(iii). Inspection of records relating to procedures and risk asset 4.1 Are procedures which could increase the risk of fish escaping considered to be carefully planned and supervised to minimise risk?	essments	Y	CoGP 4.4.29, 5.4.12	
considered to be carefully planned and supervised to minimise risk?				
4.2 Before procedures are conducted on site, are the following in place:			CoGP 4.4.30, 5.4.13 SSI 2,7, b , SSI 2, 8, c	
a) a documented risk assessments	High	Υ		
b) standard operating procedures	High	Υ	1	
c) contingency plan	High	Υ	1	Escapes contingency plan in place.
4.3 In relation to any boat operations at each site at which fish are farmed is there a record of				
4.3 In relation to any boat operations at each site at which fish are	Low	Y	SSI 2,6,b	
4.3 In relation to any boat operations at each site at which fish are farmed is there a record of -The type and size of each boat used for operations on the site - The type and size of any propeller guard fitted to each boat used	Low	Y N/A	SSI 2,6,b SSI 2,6,c	No propeller guard fitted.
4.3 In relation to any boat operations at each site at which fish are farmed is there a record of -The type and size of each boat used for operations on the site		Y N/A		No propeller guard fitted. Until the escape no issues with predators on site.

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
4.6 Are there risk assessments undertaken on a pre-determined frequency?	Low	Υ	CoGP 4.4.26	
4.7 A record of any anti-predator measures undertaken at each site at which fish are farmed including:			SSI, 2,8,a	
The type and location of each net, fence and scarcer deployed	Medium	Υ	1	
- The use of lethal means by any person involved in operations on the site	Low	N/A	SSI, 2,8,b	
4.8 Where predator nets are deployed is the advice of Annex 7 considered?	Low	N/A	CoGP 4.4.27	top nets on all pens
c. Inspection of site and site equipment				
5.1 Are there any obvious containment issues on the site?	High	N		
5.2 Is the net mesh size considered to be capable of containing all fish sizes present on site?	High	Υ	CoGP 4.4.18	

1 1 1 2 2 3 7 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2			· · · ·	
Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
5.3 Do nets carry numbered ID tags?	Low	Υ	SSI 2,2 ii	
Look at a percentage of nets on site - Does the net location meet the inventory?	Low	Υ		
5.4 Are nets stored away from direct sunlight?	Low	N/A	CoGP 4.4.21	
5.6 Are appropriate measures in place to mitigate predation on site? (Provide detail if necessary)		Υ		top nets, ADD, tension nets, double mesh around the waterline and the mort sock
5.7 Are boat operations conducted in such a manner which prevents damage to nets and pens?	High	Υ	CoGP 4.4.28	
5.8 Is there a requirement for navigation markers to be deployed?	Low	Y	MSA ⁵ 2010 P4, S21	2 required to be on site for the 12 cage site with the feed barge, however currently only 5 cages on site and no feed barge. 1 marker observed on site.
5.9 If yes, has this been done in accordance with the necessary requirements?	Low	Υ	MS Marine licence	second marker supposed to be on the northern most grid which is not installed yet
5.10 If Yes to 5.8 is there a record of any navigation markers deployed?	Low	Υ	SSI 2,5	
d. Inspection of site specific procedures				
6.1 Are pen nets examined for holes, tears or damage prior to and during the stocking, moving or crowding of fish?	High	N/A	CoGP 4.4.31	No site specific procedures observed.
6.2 If helicopter transfer of fish is conducted are receiving pen(s) properly prepared:-			CoGP 4.4.32	
a) nets should be secure	High	N/A	1	
b) pens should be marked with buoys clearly visible from the air	High	N/A		
c) radio contact between farm staff and helicopter crew should be maintained or where this is not possible, pens receiving fish should be manned	High	N/A	CoGP 4.4.33	
Consideration should be given to all other site procedures being undertaken during the visit with respect to containment and the risk of fish farm escapes				

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
Additional actions	Powers			Comments and advice given or action taken if necessary
e) Collection of samples If necessary collect samples. Indicate if samples have been taken and detail what those samples are and the purpose of their collection	Power grante	ed under the Act	- section 5 (3) (a)	
h) Enforcement Notice. If an enforcement notice has been issued then maintain a copy / duplicate and record detail Guidance on completing the Enforcement Notice	Power grante	ed under the Act	- Section 6 (2)	

1 An 'escape event' can be defined as any circumstances on or in the vicinity of a fish farm which are believed to have caused an escape, or which may have given rise to a significant risk of an escape of fish.

2 FHI interpretation – Informing the SSPO is only a requirement where the site belongs to an Authorised Production Business which is signed up to the CoGP.

- 3 being waters which do not form part of the sea or any creek, bay or estuary or of any river as far as far as the tide flows
- 4 The Aquatic Animal Health (Scotland) Regulations 2009 (as amended)
- 5 The Marine Scotland Act 2010

Case No:	2019-0575	Date of visit: 15/10/2019									
Site No:	FS1310	l	Inspector:								
Results Summary	ary Freq. Date of Notification										
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Case Type	Date	Insp	2 nd Insp								
ESC	04/06/2020		2 11130								
CNA	16/07/2020										
case closed	01/12/2020										
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Kames Fish Farming Ltd Kilmelford Oban Argyll PA34 4XA

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS NO FB0134
SITE NO FS1310
INSPECTOR

DATE OF VISIT 15/10/2019
SITE NAME Loch Pooltiel
CASE NO 20190575

ENHANCED CONTAINMENT INSPECTION

An enhanced inspection to ascertain the risk of escape from the fish farm was conducted in accordance with the Aquaculture and Fisheries (Scotland) Act 2007.

The visit consisted of an inspection of facilities, records and the provision of advice.

a) Inspection of i) escape incidents and ii) contingency procedures

The following recommendations are made for improvement.

It is recommended that to meet the requirements of part 4A, section 31D (1) of The Aquatic Animal Health (Scotland) Regulation 2009 (as amended) that circumstances on, or in the vicinity of the fish farm which are believed by that person to have caused an escape or gave rise to a significant risk of an escape are immediately reported to Scottish Ministers. A documented review of the site-specific contingency plans that describe actions to be taken in the event of any escapes in accordance with chapter 4, point 4.34 of a Code of Good Practice for Scottish Finfish Aquaculture (CoGP) should be undertaken to ensure the regulatory requirement is met.

It is also recommended that this documented review should consider the availability of any necessary equipment as required by the recapture strategy, in consultation with local wild fishery interests, to ensure equipment is available should it be required for deployment.

b)i) Inspection of records relating to equipment, facilities and the site

Although the site meets the requirement of current Scottish industry best practice. The following recommendation is made for improvement.

It is recommended that a documented review be undertaken of the design, quality and standard of manufacture of nets to ensure that they can withstand the conditions experienced on the site in accordance with CoGP Chapter 4, point 4.20. This should implement improvements to ensure that predator interactions do not result in breaches in stock containment.

b)ii) Inspection of records relating to training

The site meets the requirement of current Scottish industry best practice. No recommendations made or further action required.

b)iii) Inspection of records relating to procedures and risk assessments

Although the site meets the requirement of current Scottish industry best practice. The following recommendation is made for improvement.

It is recommended that a documented review be undertaken of the site specific risk assessment ascertaining the risk of predator attack in accordance with CoGP Chapter 4, point 4.26. This should ensure that appropriate predator mitigations are deployed at the site for the prevention of predator interaction.

c) Inspection of site and site equipment

The site meets the requirement of current Scottish industry best practice. No recommendations made or further action required.

d) Inspection of site specific procedures

No site specific procedures were observed during the inspection.

Further Action

The recommendations in this report should be implemented by 16 October 2020. Documentation should be provided as evidence that the recommendations have been implemented. Enforcement action may result if the recommendations are not implemented in the necessary time frame. Records should be sent to Marine Scotland Science's Fish Health Inspectorate (FHI) (contact details are provided below).

Please contact myself or the duty inspector should you require any further information or have any queries regarding this report.



Fish Health Inspector

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Marine Scotland website at www.gov.scot/Topics/marine/Fish-Shellfish/FHI/charter

Date: 16/07/2020

R10





Kames Fish Farming Ltd Kilmelford Oban Argyll PA34 4XA

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

Business No FB0134
Site No FS1310
Inspector

DATE OF VISIT 15/10/2019
SITE NAME Loch Pooltiel
CASE NO 20190575

Date: 01/12/2020

Case completion report

Recommendations in relation to the above case were made for implementation by 16 October 2020. Following submission of the required documentation, evidence has now been provided to Marine Scotland to demonstrate that the recommendations have been implemented.

This case will now be closed. This site may be subject to further audit and recommendations in the future.

Please contact myself or the duty inspector should you require any further information or have any queries regarding this report.

Signed:

Fish Health Inspector

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Marine Scotland website at https://www.gov.scot/publications/fish-health-inspectorate-service-charter/





Kames Fish Farming Ltd Kilmelford Oban Argyll PA34 4XA

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

 Business No
 FB0134
 Date of Visit
 15/10/2019

 Site No
 FS1310
 Site Name
 Loch Pooltiel

 Inspector
 Case No
 20190575

The site was inspected following notification of an escape of an 1,300 Rainbow trout on 7th September 2019.

An enhanced containment inspection was conducted and a report will be issued separately.

All epidemiological units were inspected.

On this occasion no samples were taken for disease analysis. The Inspector did not observe any clinical signs associated with the listed diseases as described in the Aquatic Animal Health (Scotland) Regulations 2009.

The information required for the public record of aquaculture production businesses regarding this site was verified and where necessary updated. The following records were also inspected to ensure that the conditions of authorisation for your Aquaculture Production Business (APB) are being met:

Aquaculture animal and aquaculture animal product movement records were inspected and appeared to be adequately maintained.

Mortality records were inspected and found to be adequately maintained.

Please contact myself or the duty inspector should you require any further information or have any queries regarding this report.

Signed:
Fish Health Inspector

Date: 04/06/2020

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Marine Scotland website at www.gov.scot/Topics/marine/Fish-Shellfish/FHI/charter

R27