

Case No: 2021-0067 Date of visit: 14/04/2021

Time spent on site: n/a Main Inspector: [Redacted]

Site No: FS0427 Site Name: Fishnish (A)
Business No: FB0125 Business Name: Scottish Sea Farms Ltd

Case Types: 1 CNA 2 3 4 5 6

Water Temp (°C): Thermometer No: FHI 045 completed

Observations: Region: ST Water type: S CoGP MA: M-35

Dead/weak/abnormally behaving fish present? N/A If yes, see additional information/clinical score sheet.
Clinical signs of disease observed? N/A If yes, see additional information/clinical score sheet.
Gross pathology observed? N/A If yes, see additional information/clinical score sheet.
Diagnostic samples taken? N/A

UNI/REG only - if unable to carry out intended visit detail reason below:

Additional Case Information:

Peaks in mortality -

week 39 (1.19% 375) - End of cycle.

week 19 (2019) - 2.68% - post input mortality

CNA conducted after Escape event notification. Seal in pen, 2 medium sized holes @ 2.5m depth were quickly repaired by divers. Not fish are believed to have escaped. Seal was observed leaving the pen prior to divers repair.

movement records not checked as remote inspection conducted with business correspondent who did not have access to movement records.

Inspection was conducted remotely due to covid distancing guidelines, so certain elements of the inspection could not be completed as usual.

Recommendations for improvement were made by 01/12/2022.

Case No: Site No:

Date of Visit: Inspector(s):

Registration/Authorisation Details

1. Business/site details summary checked by site representative?

2. Changes made to details?

Site Details (include cleaner fish for all sections)

Total No facilities	<input type="text" value="10"/>	Facilities stocked	<input type="text" value="10"/>	No facilities inspected	<input type="text" value="0"/>
Species	<input type="text" value="SAL"/>				
Age group	<input type="text" value="20 Q4's"/>				
No Fish	<input type="text" value="723,543"/>				
Mean Fish Wt	<input type="text" value="450g"/>				
Next Fallow Date (Site)	<input type="text" value="May 22"/>	Next Input Date (Site)	<input type="text" value="October 22"/>		
Recent (last 4 wks) disease problems?	<input type="text" value="N"/>		Any escapes (since last visit)?	<input type="text" value="Y"/>	
If yes, detail:	<input type="text" value="Recent escape notification (MSe040221SAL1)"/>				

Movement Records

1. Movement records available for inspection?

2. Date of last inspection:

3. Are records complete and correctly entered?

4. Are movement records available for dead fish and waste?

5. Are records complete and correctly entered?

6. Are health certificates for introductions (outwith GB) available?

Transport Records

1. Are any movements carried out by (or on behalf) of the business (not using a STB)?

If yes, is there a system in place for maintenance of transportation records?

Mortality Records

1. Mortality records available for inspection?

2. How are mortalities disposed of?

If other detail:

3. Mortality records complete and correctly entered?

4. Recent mortality (last 4 wks):

5. Evidence of recent increased/atypical mortalities?

If yes, facility nos/no mortality per facility/no stock per facility/reason:

6. Any other peaks in mortality during period checked?

If yes, detail:

7. Have increased (unexplained) mortalities been reported to vet or FHI?

If yes, detail action:

8. Have 'mortality events' been reported to FHI? If no, enter details on mortality events sheet.

Treatments and Medicines Records

1. Recent treatments (see comment)?

If yes, detail:

If other, detail:

2. Medicines records available for inspection?

3. Are records complete and correctly entered?

4. Are fish in a withdrawal period?

5. If yes, what treatment(s)?

If other, detail:

6. Are medicines stored appropriately?

Biosecurity Records

1. Biosecurity records available for inspection?

2. Has the manner and frequency of mortality removal, recording and safe disposal been considered?

3. Has the manner and period in which the APB will notify Scottish Ministers or veterinary professional of any *increased (unexplained)* mortality at the site been included?

4. Has the action that will be taken in the event that the presence or suspicion of the presence of a listed disease is detected been included and *how* and *when* that will be notified to Scottish Ministers?

5. Has the health status of aquaculture animals being stocked on the farm site been covered (equal or higher health status, certification if required)?

6. Have the husbandry and biosecurity measures implemented between each epidemiological unit to minimise transmission of disease been covered (movement of staff, visitors, equipment, live or dead fish etc.)?

7. Is documentation available regarding the measures in place to maintain the physical containment of aquaculture animals held on site?

8. Have the biosecurity procedures been adequately implemented on site?

If no, detail:

Results of Surveillance

1. Has any animal health surveillance been carried out by, or on behalf of, the business?

2. If yes, are results available for inspection?

3. Any significant results?

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

Records checked between:

Case No: 2021-0067 Site No: FS0427

Date of visit: 14/04/2021 Inspector(s):

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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ENHANCED CONTAINMENT INSPECTION (SEAWATER)

a. Enquiry relating to i) escape incidents and ii) contingency procedures

1.1. Have escape incidents or events ¹ been experienced on or in the vicinity of the site since the last MSS inspection?		Y		No fish considered to have escaped so not reported.
If yes answer 1.2-1.8:				
1.2. Have appropriate reports been made to Scottish Government within 24 hours of discovery?	High	Y	AAAH Regs ⁴ 31D,E	
1.3. Have these been reported to the SSPO ² and, where in existence, the local DSFB and fisheries trust?	Medium	N/A	CoGP 4.4.37, 5.4.17	
1.4. Were methods (if any) used to recover escapees?		N/A		
If yes give detail				
1.5 Was the decision to attempt to recapture and the method employed agreed with the local DSFB and FT	Low	N/A	CoGP 4.4.38, 5.4.18	
1.6. Was permission sought from Marine Scotland prior to recapture?	Medium	N/A	CoGP 4.4.38, 5.4.18	
1.7 Were the gill nets deployed in accordance with the permission issued by Marine Scotland?	Low	N/A	CoGP 4.4.38, 5.4.18	
1.8. In light of the escape event, has appropriate action been taken to prevent and minimise the risk of further escapes?	High	Y		Increased observation, and following existing predator control plan contingency and predator control plan two documents.
1.9. Is there a site specific contingency plan in response to failures in containment, aimed at preventing escapes and recovering escaped fish?	High	Y	SSI, 2,9	

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

General records			CoGP: 4.4.9, 4.4.14, SSI 2,1	Facility records were not available at time of inspection.
2.1 With regard to each facility, net, screen and mooring at each site, a record should be maintained of:-				
a) The name of the manufacturer	Low	N	Y Y	
b) Any special adaptations	Low	N	Y Y	
c) The name of the supplier	Low	N	Y Y	
d) The date of purchase	Low	N	N Y	
e) Each inspection including				

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
i) the name of the person conducting the inspection	Low	N	N	Mooring inspection record- not available at time of inspection.
ii) the date of each inspection	Medium	N	N	
iii) the place of each inspection	Low	N	N	
iv) the outcome of each inspection	High	N	N	
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	N	N	
2.2. In relation to each net a record of:				Net codes recorded, could not verify tags as no physical inspection has occurred.
i) The mesh size	Medium	Y	SSI, 2,2	
ii) The code which appears on the identification tag	Medium	Y		
iii) The place of use, storage and disposal	Medium	Y		
iv) The depth of water between the bottom of the net and the seabed as measured at the mean low water spring	Low	Y		
2.3. In relation to each facility a record of:				
i) The date of construction	Low	N	SSI, 2,3	
ii) The material used in construction	Low	N		
iii) Its dimensions	Low	N		
2.4. In relation to each mooring a record of-			SSI, 2,4	
i) The date of installation	Low	N		
ii) The design and weight of the anchors	Low	Y		
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	Y	SSI, 2,5	Facility records were not available at time of inspection. not present on records.
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	N/A		
b) The date of and results of any tests conducted on any such measures	Low	N/A		
c) The date of any incident where the site was flood	Low	N/A		
d) The water course height during any such flood incident	Low	N/A		
2.7 A record of-			SSI, 2,7	
a) The date of any severe weather event which caused damage to any facility, net or mooring	Medium	Y	SSI, 2,11 (a)	
b) Any action taken to rectify any such damage	High	N/A	SSI, 2,11 (b)	
Pen and mooring systems				
2.8 Are there documented procedures maintained regarding the selection and installation of pens and moorings?	High	Y	CoGP 4.4.8, 4.4.13	
2.9 Can the site demonstrate evidence that the design specification of pens and moorings are suitable for purpose and correctly installed?	High	Y	CoGP 4.4.9, 4.4.14	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
2.10 Do pen systems meet the manufacturers guidelines?	High	N	CoGP 4.4.10	not available at time of inspection.
2.11 Are pen systems inspected and approved by suitably qualified / experienced person(s)?	High	Y	CoGP 4.4.11	
2.12 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	
2.13 Are pen and mooring components inspected with a) a documented SOP b) a documented inspection plan based on a risk assessment	High	N	CoGP 4.4.16	
2.14 Do all nets used on site meet industry standards?	High	Y	CoGP 4.4.17	Tested by the manufacturer during service. Top side of nets checked daily, and underneath checked by feeders daily, more in depth carried out during net cleaning.
2.15 Can the site demonstrate an awareness of the minimum fish size in relation to net size	High	Y	CoGP 4.4.19	
2.16 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	
2.17 Are nets treated with a UV inhibitor?	Low	Y	CoGP 4.4.21	
2.18 Are nets tested at a pre-determined frequency?	High	Y	CoGP 4.4.22	
2.19 Is the method of test procedure based upon the manufacturers advice?	High	Y	CoGP 4.4.22	
2.20 Are frequent net inspections conducted to look for damage?	High	Y	CoGP 4.4.23	
2.21 Are net inspection records maintained?	High	Y	CoGP 4.4.23	
2.22 Is the system by which nets are attached to the pen and weighted inspected frequently?	High	Y	CoGP 4.4.24	
2.23 Where damage to nets and/or associated fittings has occurred, or the potential for damage exists, has remedial action been taken?	High	Y	CoGP 4.4.25	
b(ii). Inspection of records relating to training				
3.1 Are training programmes and plans relevant to the various onsite activities documented?	High	Y	CoGP 7.1.8	
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
b(iii). Inspection of records relating to procedures and risk assessments				
4.1 Are procedures which could increase the risk of fish escaping considered to be carefully planned and supervised to minimise risk?	High	Y	CoGP 4.4.29, 5.4.12	not available at time of inspection. No propeller guards used RA is completed at the end of each cycle. not available at time of inspection. Seals not currently controlled by lethal means
4.2 Before procedures are conducted on site, are the following in place:	High		CoGP 4.4.30, 5.4.13 SSI 2,7, b , SSI 2, 8, c	
a) a documented risk assessments		Y		
b) standard operating procedures		Y		
c) contingency plan	High	Y		
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	Low	N	SSI 2,6,b	
- The type and size of any propeller guard fitted to each boat used on the site	Low	N/A	SSI 2,6,c	
4.4 Does the site suffer from regular or heavy predation?		N		
4.5 Are there records of site specific risk assessments ascertaining the risk of predator attack?	Medium	Y	CoGP 4.4.26	
4.6 Are there risk assessments undertaken on a pre-determined frequency?	Low	Y	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 scarer deployed	Medium	N		
- 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	
c. Inspection of site and site equipment				
5.1 Are there any obvious containment issues on the site?	High	N/A		Remote inspection.
5.2 Is the net mesh size considered to be capable of containing all fish sizes present on site?	High	Y	CoGP 4.4.18	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
5.3 Do nets carry numbered ID tags? Look at a percentage of nets on site - Does the net location meet the inventory?	Low	Y	SSI 2,2 ii	ID tags for nets were not recorded due to remote inspection.
5.4 Are nets stored away from direct sunlight?	Low	N/A		
5.6 Are appropriate measures in place to mitigate predation on site? (Provide detail if necessary)	Low	Y	CoGP 4.4.21	
5.7 Are boat operations conducted in such a manner which prevents damage to nets and pens?	High	Y	CoGP 4.4.28	
5.8 Is there a requirement for navigation markers to be deployed?	Low	Y	MSA ⁵ 2010 P4, S21	
5.9 If yes, has this been done in accordance with the necessary requirements?	Low	Y	MS Marine licence	
5.10 If Yes to 5.8 is there a record of any navigation markers deployed?	Low	Y	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	Y	CoGP 4.4.31	
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	Y		
b) pens should be marked with buoys clearly visible from the air	High	Y		
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	Y	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 granted 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 granted 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

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0125	DATE OF VISIT	14/04/2021
SITE No	FS0427	SITE NAME	Fishnish (A)
CASE No	20210067	INSPECTOR	██████████

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 remote inspection of records available at the time of inspection. Due to Covid-19 social distancing requirements, a physical inspection of the site and facilities was not undertaken.

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

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

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

The following recommendations are made for improvement.

To meet the requirements of schedule 2, section 1 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 and to ensure compliance with A Code of Good Practice for Scottish Finfish Aquaculture Edition (CoGP) (Chapter 4, points 4.9, & 4.14) farmers should hold on record the design specifications of pens and moorings, along with evidence that they are suitable for the purpose and are correctly installed, paying particular attention to:

- a) The name of the manufacturer
- b) Any special adaptations
- c) The name of the supplier
- d) The date of Purchase
- e) Each inspection including;
 - i) the date of each inspection.
 - ii) the outcome of each inspection.
 - iii) the date and result of each repair, equipment test and antifouling treatment.

To meet the requirements of schedule 2, section 3 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 in relation to each facility, a record must be kept of:

- i) the date of construction
- ii) the material used in construction

R10

iii) its dimensions

It is recommended that in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 4, point 4.10) pen systems deployed at all finfish aquaculture sites should meet the manufacturers' guidelines.

It is recommended that in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 4, point 4.16) Pen and mooring components should be inspected in accordance with a documented standard operating procedure and a documented inspection plan which is based on risk assessment.

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

The following recommendation was made for improvement.

To meet the requirements of schedule 2, section 8(a) of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 a record must be kept of any anti-predator measures undertaken, including details of the type and location of each net, fence and scarer deployed.

c) Inspection of site and site equipment

The inspection was conducted in accordance with Covid-19 distancing guidelines and was completed remotely without a physical inspection of the site. Requirements of schedule 2, section 2 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 and the Code of Good Practice for Scottish Finfish Aquaculture (CoGP) Chapter 4 were checked where possible.

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

d) Inspection of site specific procedures

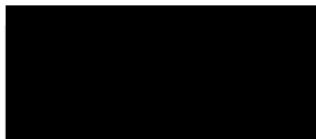
The site meets the requirement of current Scottish industry best practice. No recommendations made or further action required.

Further Action

The recommendations in this report should be implemented by 01/12/22 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.

Signed:



Date: 30/08/2022

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

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0125	DATE OF VISIT	14/04/2021
SITE No	FS0427	SITE NAME	Fishnish (A)
CASE No	20210067	INSPECTOR	[REDACTED]

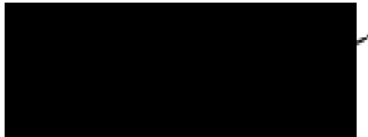
Case completion report

Recommendations in relation to the above case were made for implementation by 01/12/2022. 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:



Date: 05/12/2022

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/>