

Case No:	2022-0474	Date of visit:	16/11/2022
Time spent on site:	5.5 hours	Main Inspector:	
Site No:	FS0434	Site Name:	Loch Ness
Business No:	FB0119	Business Name:	Mowi Scotland Ltd
Case Types:	1 <input type="checkbox"/> ECI	2 <input type="checkbox"/> VMD	3 <input type="checkbox"/> CNA
	4 <input type="checkbox"/> ESC	5 <input type="checkbox"/>	6 <input type="checkbox"/>
Water Temp (°C):	10.9	Thermometer No:	T155
		FHI 045 completed	<input type="checkbox"/> N/A
Observations:	Region: HI	Water type: F	CoGP MA
Dead/weak/abnormally behaving fish present?	<input type="checkbox"/> Y	If yes, see additional information/clinical score sheet.	
Clinical signs of disease observed?	<input type="checkbox"/> N	If yes, see additional information/clinical score sheet.	
Gross pathology observed?	<input type="checkbox"/> N	If yes, see additional information/clinical score sheet.	
Diagnostic samples taken?	<input type="checkbox"/> N		

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

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Additional Case Information:

Since inspection last September fish moved off in December then restocked in July until Mid August then restocked again until end of September. Current stock moved on 24th October.

Mortalities for previous stocks - a couple of peaks in Nov/Dec 2021 due to fungus - reported, site to confirm numbers for w/c 15/11/21 and 06/12/21 as discrepancy between figures provided for inspection and those reported at time.

Morts were removed whole to Barkip by Billy Bowie. 2022 Q3/Q4 stocks from July-September were mostly <10/cage/day with no peaks. Morts for current stocks in Site Records sheet.

Formalin and Cress used in previous cycles.

Main mortality in current stock is due to cormorants. Pens 1, 2 and 10 slightly higher morts as closest to nesting area.

Started treating 14/11 for fungus - formalin and cress.

The FHI have received reports of farmed smolts being captured in Loch Ness. An escape investigation was conducted with the aim of determining the source. Some of the captures smolts have been genetically tested which showed them to be of Aquagen origin. The genetic origin and size (134g and 247mm, 89g and 215mm) match the stock held on site between 04/07/2022 and 14/08/2022.

Movement records showed a difference between the number moved onto site and the number moved off site which was greater than the recorded mortality. The site manager explained that the number moved off includes a 3% 'overage' for the receiving site which accounts for most of the difference. This is company policy - to raise with business correspondent.

The site manager suggested further reasons for the difference between counts. The counts onto site were provided by the hatchery, whereas the counts off site were conducted at Loch Ness using a counter which had been recently serviced. The site manager explained that if the loch is at all rough during counts that the counter can be overloaded and miss fish going through for a few seconds as too many fish going up the pipe at once. The fish are not counted at unloading, the receiving site goes by the counts provided into the wells and tops up as needed with the next load.

During the period 04/07/2022 to 14/08/2022 fish were moved onto site (8 movements), treated on site (8 cages treated over 28 & 29 July - bath treatment) and moved off site (7 movements). Sample weights were also conducted. No other high risk activities were conducted - no vaccination or grading. There is no requirement to drop the sides of the nets during treatments, the net is shallowed and the tarpaulin drawn across. Each cage has it's own tarpaulin which is left in place raised, then dropped as required.

When moving fish off site the procedure is to tow the cages into the pontoon and pump ashore from there. The nets are shallowed and the side of the net dropped to about a foot above the water when pumping. The highest risk part of the procedure is the towing of cages, but no snags occurred during the relevant movements and no holes were found in nets when inspected between stocks.

Standard operating procedures and equipment was inspected during the on-site visit. No transfers were carried out during the visit so the site manager talked through the process and equipment was checked. All equipment was in a good state of repair and the described process did not identify any weaknesses in the procedures.

Unable to locate all documented risk assessments for transfers during on-site inspection -the health and safety risk assessment was available but not the containment one. A signed copy of the risk assessment for using a mobile pen was provided after the visit.

One lethargic fish seen across site - this was immediately after the net had been dropped again after collecting samples so likely caught in net. One dead fish seen across site.

Awaiting confirmation of site number for East Loch Tarbert site supplied.

Site paperwork, inspection and sampling carried out by ■■■■, witnessed by ■■■■ as competency audit.

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 Date of Visit: **16/11/2022** Inspector(s): **[REDACTED]**

Registration/Authorisation Details

- 1. Business/site details summary checked by site representative? Y
- 2. Changes made to details? Y

Site Details (include cleaner fish for all sections)

Total No facilities	18	Facilities stocked	10	No facilities inspected	18
Species	SAL				
Age group	2022 Q4				
No Fish	1,018,293				
Mean Fish Wt	67g				
Next Fallow Date (Site)	Mid Dec 2022	Next Input Date (Site)	June 2023		
Recent (last 4 wks) disease problems?			N	Any escapes (since last visit)?	N
If yes, detail:	[REDACTED]				

Movement Records

- 1. Movement records available for inspection? Y
- 2. Date of last inspection: **08/09/2021**
- 3. Are records complete and correctly entered? N
- 4. Are movement records available for dead fish and waste? Y
- 5. Are records complete and correctly entered? Y
- 6. Are health certificates for introductions (outwith GB) available? N/A

Transport Records

- 1. Are any movements carried out by (or on behalf) of the business (not using a STB)? N
- If yes, is there a system in place for maintenance of transportation records?

Mortality Records

- 1. Mortality records available for inspection? Y
- 2. How are mortalities disposed of? **Incinerated - on site**
- If other detail: **[REDACTED]**
- 3. Mortality records complete and correctly entered? N
- 4. Recent mortality (last 4 wks): **Site total 1478 since input on 24/10. Mostly single figures per day, but 3 cages slightly higher - 0-42/c/day.**
- 5. Evidence of recent increased/atypical mortalities? N
- If yes, facility nos/no mortality per facility/no stock per facility/reason: **[REDACTED]**
- 6. Any other peaks in mortality during period checked? Y
- If yes, detail: **Nov/Dec 2021 - fungus - reported to FHI**
- 7. Have increased (unexplained) mortalities been reported to vet or FHI? N/A
- If yes, detail action: **[REDACTED]**
- 8. Have 'mortality events' been reported to FHI? If no, enter details on mortality events sheet. Y

Treatments and Medicines Records

1. Recent treatments (see comment)?	<input type="checkbox"/>	Y
If yes, detail:	Formalin, Cress	
If other, detail:		
2. Medicines records available for inspection?	<input type="checkbox"/>	Y
3. Are records complete and correctly entered?	<input type="checkbox"/>	Y
4. Are fish in a withdrawal period?	<input type="checkbox"/>	Y
5. If yes, what treatment(s)?	Cress	
If other, detail:		
6. Are medicines stored appropriately?	<input type="checkbox"/>	Y

Biosecurity Records

1. Biosecurity records available for inspection?	<input type="checkbox"/>	Y
2. Has the manner and frequency of mortality removal, recording and safe disposal been considered?	<input type="checkbox"/>	Y
3. Has the manner and period in which the APB will notify Scottish Ministers or veterinary professional of any <i>increased (unexplained)</i> mortality at the site been included?	<input type="checkbox"/>	Y
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 <i>how</i> and <i>when</i> that will be notified to Scottish Ministers?	<input type="checkbox"/>	Y
5. Has the health status of aquaculture animals being stocked on the farm site been covered (equal or higher health status, certification if required)?	<input type="checkbox"/>	Y
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.)?	<input type="checkbox"/>	Y
7. Is documentation available regarding the measures in place to maintain the physical containment of aquaculture animals held on site?	<input type="checkbox"/>	Y
8. Have the biosecurity procedures been adequately implemented on site?	<input type="checkbox"/>	Y
If no, detail:		

Results of Surveillance

1. Has any animal health surveillance been carried out by, or on behalf of, the business?	<input type="checkbox"/>	Y
2. If yes, are results available for inspection?	<input type="checkbox"/>	Y
3. Any significant results?	<input type="checkbox"/>	N
If yes, detail (if not detailed under recent disease problems).		

Records checked between:	08/09/2021-16/11/2022
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Case no: Site No: Date of visit/
Sampling:

Priority samples: VI BA PA MG HI

Time sampling starts/ends: Inspector: VMD No.

Environmental conditions: 1 2 3 4 5

Summary samples HIST BA MG VI PA Total Samples

Add Fish/Pools - click

Pool/Fish No												
Fish nos	1-20	21-40	41-60	61-80	81-100							
Pool Group												
Species	SAL	SAL	SAL	SAL	SAL							
Average weight	0.0650	0.0650	0.0650	0.0650	0.0650							
Sex	N/A	N/A	N/A	N/A	N/A							
Water Type	FW	FW	FW	FW	FW							
Stock Details		Inchmore	Inchmore	Inchmore	Inchmore	Inchmore						
	Stock Origin											
Facility No	10	13	16	11	14							

Case Number:	2022-0474	Site No:	FS0434	Insp:		
Date of Visit	16/11/2022	No of movements/supp./dest.			Score	
Live fish movements		0	1-5	6-10	>10	
Movements on (from out with GB) of susceptible species	Frequency of movements on from equivalent MS	0	5	10	14	0
	Frequency of movements on from equivalent zone or compartment including third country	0	9	18	26	0
	Number of suppliers	0	5	10	14	0
Movements off	Frequency of movements off	0	3	6	10	10
	Number of destinations	0	3	6	10	6
Exposure via water	Site contacts	0	1-5	6-10		
Water contacts with other farms (holding species susceptible to same diseases)	Farm is protected (secure water supply through disinfection or borehole)	0				
	Farm is on-line or in a coastal zone with category I farms upstream or within 1 tidal excursion	1	2	4		2
	Farm is on-line or in a coastal zone with category III farms upstream or within 1 tidal excursion	1	3	6		
	Farm is on-line or in a coastal zone with category V farms upstream or within 1 tidal excursion	1	4	8		
Management practices		None	Secure	Unsecure		
Water contacts with processors	Any processing plant discharging into adjacent waters	0	1	2		0
On farm processing within the rules of the directive	No on farm processing	0				0
	Processing own fish (re-cycling risk)	1				
	Processing fish from MS of equivalent status	2				
	Processing fish from zone or compartment of equivalent status	4				
	Processing fish from Category III farm	8				
	Processing fish from Category V farm	10				
Disposal of fish and fish by-products	Site's own waste only processed.	0				0
	Common processes with other farms	3				
	Collection point for waste from other farms	5				
Use of unpasteurised feeds	No feeding of unpasteurised feed	0				0
	Feeding unpasteurised feed	5				
Biosecurity	Number of sites	1	2 or 3	≥ 4		
Contacts with other sites	Sites operating from single shorebase	0	1	2		0
	Sites sharing staff and equipment	0	1	2		0
Disinfection of equipment between sites, use of footbaths etc	Yes	0				0
	No	1				
CoGP/Regulator						
Practices in accordance with regulator or industry code of practice	Yes	0				0
	No	3				
Platform access to cages	Yes	0				0
	No	2				
Total Rank					18	MEDIUM

Case No: Site No:

Date of visit: 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 (FRESHWATER)

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? If yes answer 1.2-1.8:		N		Site staff not aware of any escape incidents, however reports of feral farmed salmon in the loch.
1.2. Have appropriate reports been made to Scottish Government within 24 hours of discovery?	High		AAAH 31D,E	
1.3. Have these been reported to the SSPO[2] and, where in existence, the local DSFB and fisheries trust?	Medium		CoGP 2.4.31, 3.4.39	
1.4. Were methods (if any) used to recover escapees? 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		CoGP 2.4.32, 3.4.40	
1.6. Was permission sought from Marine Scotland prior to recapture?	Medium		CoGP 2.4.32, 3.4.40	
1.7 Were the gill nets deployed of appropriate mesh size with regard the size of the escaped fish?	Low		CoGP 2.4.32, 3.4.40	
1.8. In light of the escape event, has appropriate action been taken to prevent and minimise the risk of further escapes?	High			
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	CoGP 2.4.28, 3.4.36 SSI, 2,9	

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

General records			SSI 2,1			Cages originally 40m circumference but extended to 48m - in 2015. Certificate supplied by manufacturer in 2015. No net adaptations.
2.1 With regard to each facility, net, screen and mooring at each 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	Y	N/A	N/A		
c) The name of the supplier	Low	Y	Y	Y		

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary		
d) The date of purchase	Low	Y	Y	Y	Cages purchased by previous operators. Site purchased in 2014 and pens modified and re-installed in 2015.	
e) Each inspection including						
i) the name of the person conducting the inspection	Low	Y	Y	Y		Daily visual inspection doesn't include name, but other inspections do.
ii) the date of each inspection	Medium	Y	Y	Y		
iii) the place of each inspection	Low	Y	Y	Y		Net on pen inspection record checked as well as net certificate and daily site check sheet. Pen mooring check form covers above surface facilities. Mallaig Marine report covers moorings below surface.
iv) the outcome of each inspection	High	Y	Y	Y		
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	Y	Y	Y	Net certificate includes appropriate detail. Report from Mallaig Marine and Pen Mooring check sheet covers facilities and moorings.	
2.2. In relation to each net a record of:					Freshwater site.	
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	N/A				
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	Y				
2.4. In relation to each mooring a record of-			SSI, 2,4			
i) The date of installation	Low	Y				
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		Lights at each end of group on yellow pole. Location detailed on updated pen mooring plan.	
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			

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
a) The date of any severe weather event which caused damage to any facility, net or mooring	Medium	Y	SSI, 2,11 (a)	Site diary, routine daily checklist.
b) Any action taken to rectify any such damage	High	N/A	SSI, 2,11 (b)	No damage caused by storms.
Pen and mooring systems				
2.8 Can the site demonstrate evidence that pens and moorings are designed, manufactured and installed suitable for purpose at the location of the site?	High	Y	CoGP 3.4.11	Pen attestation from manufacturer. Pen, net and mooring attestation from pens and moorings manager.
2.9 Are pen systems inspected and approved by suitably qualified / experienced person(s)?	High	Y	CoGP 3.4.12	Policy states inspection carried out once per cycle for sheltered sites by Mallaig Marine.
2.10 Can the site demonstrate evidence that all nets have been designed and manufactured under the control of a Quality Management System to ensure they provide containment for the whole of their working life?	High	Y	CoGP 3.4.13	Nets on site are all Hvalspund nets which are part of Morenot. Morenot production process is s monitored according to ISO 9001:2008. All Morenot net solutions follow the NS 9415 (Norwegian Standard).
2.11 Are all screens inspected daily and relevant action taken? Are records maintained of inspection frequency and the outcomes?	High	N/A	CoGP 2.4.17, 2.4.18	
2.12 Are screens constructed from a suitably strong and robust material, and therefore fit for purpose?	High	N/A	CoGP 2.4.19	
2.13 Can the site demonstrate awareness of the minimum net strengths to be used at all times?	High	Y	CoGP 3.4.14	Detailed in Mowi Net and Moorings Policy 2022.
2.14 Does the site have a documented net replacement policy based on meeting the minimum strength requirements?	High	Y	CoGP 3.4.15	Detailed in Mowi Net and Moorings Policy 2022.
2.15 Does the site use nylon nets older than 5 years?	High	N	CoGP 3.4.16	
2.16 Can site managers demonstrate awareness of the minimum fish size supplied where new stock is introduced?	High	Y	CoGP 3.4.18	Detailed in Mowi Net and Moorings Policy 2022.
2.17 Have nets been treated with UV inhibitor?	Low	Y	CoGP 3.4.19	Detailed in Mowi Net and Moorings Policy 2022.
2.18 Are nets stored away from direct sunlight and vermin when not in use?	Low	Y	CoGP 3.4.20, 3.4.21	Policy states they will be stored out of direct sunlight. When not in use nets are stored in tote bags within IBCs.
2.19 Can the site demonstrate evidence of nets being inspected and strength tested after each cycle by a competent person?	High	Y	CoGP 3.4.22	Net servicing and testing carried out by Highland Aqua Team. Certificate for net 4009 checked.
2.20 Is in accordance with a detailed procedure based on manufacturer's advise and using a documented quality control system?	High	Y	CoGP 3.4.22	Highland Aqua Team SOP checked. Calibration certificate for Chatillon Ametek Strength testing gauge checked.
2.21 Do the net inspections include representative sections from:			CoGP 3.4.23	
a) net base	High	Y		
b) side wall	High	Y		
c) above the waterline	High	Y		
2.22 Are nets visually inspected on a daily basis?	High	Y	CoGP 3.4.24	Recorded on site daily check sheet

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
2.23 Are additional inspections undertaken following adverse weather where required?	High	N/A	CoGP 3.4.25	Not as yet. Would get divers in if required e.g. if grid moved.
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	No helicopter transfers. Staff training records on site checked and confirmed appropriate work boat training certificates present. Online training system checked and staff on site have completed training in containment.
3.2 Are all staff fully aware of the importance of containment and best practice?	High	Y	CoGP 7.4.7	
3.3 Is there a satisfactory record of all training and qualifications for each person working in the site in relation to any helicopter operations?	High	N/A	CoGP 2.4.27, 3.4.33	
3.4 Is there a satisfactory record of all training and qualifications for each person working at the site in relation to any boat operations?	High	Y	CoGP 3.4.35 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 ; CoGP 2.4.29, 3.4.37	
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 2.4.6, 3.4.8, 2.4.7, 3.4.9	Not clear during inspection who is responsible for completing risk assessments. Although some documented risk assessments exist for moving cages and net changing, some parts of the procedures are not covered e.g. pumping fish onto lorries. If weather not appropriate, transfers and other high risk activities cancelled. Risk assessment for using a holding cage includes control measure to take weather into account.
4.2 Before procedures are conducted on site, are the following in place:	High		CoGP 2.4.23, 3.4.27 SSI 2,7, b SSI 2, 8, c	
a) a documented risk assessments		N		
b) standard operating procedures		Y		
c) contingency plan	High	Y	CoGP 2.4.24, 3.4.28	
4.3 Is the integrity of all handling equipment checked, including pipelines, pumps, transport tanks, graders, counters and vaccination stations, before fish are handled?	High	Y		
4.4 Do these checks include the suitability of the above equipment for use during adverse weather conditions where appropriate?	High	Y	CoGP 2.4.25, 3.4.29	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
4.5 Are mitigation measures such as safety nets, security devices, or bunding used at potential risk points, such as pipe connections?	High	Y	CoGP 2.4.26, 3.4.30	Shade netting used under pipe across pontoon and into cage. No prop guards fitted (this is recorded). Cormorants around at the moment and causing mortality but not generally considered regular or heavy predation. Site specific predator control plan available which contained detailed risk assessments and mitigations for predators. Predator control plan details measures available - updated following inspection to be more explicit as to which are used on site. No predator nets used on site.
4.6 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	Y	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	
4.7 Does the site suffer from regular or heavy predation?		N		
4.8 Are there records of site specific risk assessments ascertaining the risk and impact of predator attack?	Medium	Y	2.4.7, 3.4.9	
4.10 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	Y		
- The use of lethal means by any person involved in operations on the site	Low	N/A	SSI, 2,8,b	
4.11 Where predator nets are deployed is this done in such a manner as to reduce the likelihood of access by predators? For example, see requirements of Annex 7.	Low	N/A	3.5.34-37 2.5.34-37	
c. Inspection of site and site equipment				
5.1 Are there any obvious containment issues on the site?	High	N		Top of nets is doubled over to provide a slight overhang. Height of nets above water would prevent freshwater stages jumping out.
5.2 Can the site demonstrate evidence that the site is not located within an area likely to be affected by flood, or suitable flood defences in place?	High	N/A	CoGP 2.4.9, 2.4.10, 2.4.11	
5.3 Does the site have effective measures in place to prevent fish from jumping out of holding facilities into surface waters or natural water courses?	High	Y	CoGP 2.4.12	
5.4 Is the site inflow system designed to prevent any upstream escape of farm stock?	High	N/A	CoGP 2.4.14	
5.5 Are the screen sizes capable of containing the entire range of fish sizes within the unit in every instance?	High	N/A	CoGP 2.4.15	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
5.6 In the case of a land-based aquaculture system, are there two screens incorporated into the outflow system of a suitable size to prevent the passage of fish in all potential water conditions?	High	N/A	CoGP 2.4.20	
5.7 Does the net mesh size contain the entire range of fish sizes in every instance of the species involved?	High	Y	CoGP 3.4.17	10mm mesh used (6mm mesh also available but not required this year) - fish moved on at approximately 60g.
5.8 Are boat operations conducted in a manner which avoids damage to nets and pens?	High	Y	CoGP 3.4.34	
d. Inspection of site specific procedures				
6.1 Are nets visually inspected on a daily basis including prior to and during the stocking, moving or crowding of fish?	High	Y	CoGP 3.4.24	Recorded on daily site check sheet.
6.2 If helicopter transfer of fish is conducted are receiving pen(s) properly prepared:-				
a) pens should be marked with buoys clearly visible from the air	High	N/A	CoGP 3.4.31	
b) 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 3.4.32	

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

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0119	DATE OF VISIT	16/11/2022
SITE No	FS0434	SITE NAME	Loch Ness
CASE No	20220474	INSPECTOR	██████████

Inspection under the Aquatic Animal Health (Scotland) Regulations 2009

The above site was inspected, in accordance with the Aquatic Animal Health (Scotland) Regulations 2009.

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.

Records

The surveillance frequency category of the site was assessed as medium. An inspection under the Aquatic Animal Health (Scotland) Regulations 2009 will be conducted every second year. The category of the site will be reassessed on a routine basis and updated as required.

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 found to be inadequately maintained. A discrepancy was noted between the number of fish moved onto site and the number of fish moved off site which was not accounted for by the number of recorded mortalities. This was partly attributed to the movement off site excluding a 3% 'overage' which was reported to be standard practice for the company.

Mortality records were inspected and found to be inadequately maintained. Mortality levels had exceeded the reporting criteria since the last inspection and had been reported to the Fish Health Inspectorate as required. However, there was a discrepancy noted between mortality figures reported at the time of mortality events for weeks 15/11/21 and 6/12/21 and figures provided during inspection on 16/11/22. This was explained as being due to mortalities which occurred at the sea site post transfer being re-allocated to the site of origin.

Reports detailing the results of animal health surveillance carried out by or on behalf of the business and/or Marine Scotland were available for inspection.

The biosecurity measures plan for the site was inspected and found to be adequately maintained and implemented.

R04

The following points were raised with the site representative following the inspection:

Mortality figures must be recorded against the farm and epidemiological unit where they were observed.

Movement records must be recorded accurately as the total number of fish which moved.

These must be addressed to ensure the conditions of authorisation for your Aquaculture Production Business (APB) are being met. Records or documentation demonstrating that these points have been addressed should be sent to the Fish Health Inspectorate (contact details below) within 30 days of the date this report was issued.

Inspection under the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) (England and Scotland) Regulations 2015

Medicine records were inspected and found to be adequately maintained.

Samples were taken to be analysed for veterinary residues.

Inspection under the Aquaculture and Fisheries (Scotland) Act 2007

The site was also inspected in accordance with the Aquaculture and Fisheries (Scotland) Act 2007 with respect to section 5 regarding containment and escapes.

An enhanced containment inspection was conducted. A separate report will be issued in due course.

Please contact myself or the duty inspector should you require any assistance or clarification in implementing any requirement or recommendation detailed in this report.

Signed:



Date: 08/12/2022

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/>

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0119	DATE OF VISIT	16/11/2022
SITE No	FS0434	SITE NAME	Loch Ness
CASE No	20220474	INSPECTOR	██████████

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 and A Technical Standard for Scottish Finfish Aquaculture.

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

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

Although the site meets the requirement of current Scottish industry best practice, feral farmed fish have been reported being caught in Loch Ness. No escape or suspected escape incidents have been reported by the company as site staff are currently not aware of any incidents which they believe have caused an escape or have given rise to a significant risk of an escape of fish.

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

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

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 recommendations are made for improvement.

It is recommended that a documented review is undertaken of the standard operating procedures and risk assessments associated with fish transfer and handling in accordance with the Code of Good practice for Scottish Finfish Aquaculture (CoGP) (Chapter 3, points 4.8, 4.9 and 4.27) to ensure that all processes with potential risks to the containment of fish are included.

It is also recommended that a record is maintained of any updated assessment of the escape of fish from transfer or handling procedures as required by The Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 (Schedule 2, point 7(b)).

As feral farmed fish have been reported in Loch Ness, it is recommended that a documented review is undertaken of all standard operating procedures and risk assessments which include fish transfer or handling in accordance with the CoGP (Chapter 3, points 4.9 and 4.27) to ensure satisfactory measures remain in place for the containment of fish. This review should consider:

- any improvements which are required to site security to prevent intruder access;
- any improvements to supervision of fish transfer and handling procedures to ensure any breaches in containment can be observed and minimised; and,
- any improvements which are required to fish transfer and handling procedures to either remove or minimise any risk of breaches in containment.

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

Although the site meets the requirement of current Scottish industry best practice, due to the reports of feral farmed fish in Loch Ness further inspections will be carried out to witness fish handling procedures. A separate report will be issued for this.

Further Action

Please ensure that these points have been addressed by 20 June 2023. Records or documentation demonstrating that these points have been addressed should be sent to the Fish Health Inspectorate (contact details below). The site may be subject to further inspection or enforcement action should the appropriate action regarding the above points not be taken within the time period stipulated.

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: 20/12/2022

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	FB0119	DATE OF VISIT	16/11/2022
SITE No	FS0434	SITE NAME	Loch Ness
CASE No	20220474	INSPECTOR	[REDACTED]

Case completion report

Recommendations in relation to the above case were made for implementation by 20 June 2023. Following discussion and sharing of the required documentation, evidence has now been provided to the Fish Health Inspectorate 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:

[REDACTED]

Date: 01/05/2024

Fish Health Inspector

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Scottish Government website at [Fish Health Inspectorate Service Charter - gov.scot \(www.gov.scot\)](https://www.gov.scot/policies/fish-health-inspectorate/)



FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0119	DATE OF VISIT	16/11/2022
SITE No	FS0434	SITE NAME	Loch Ness
CASE No	20220474	INSPECTOR	[REDACTED]

Escape Investigation

The site was inspected following third party reports of feral farmed Atlantic salmon smolts being caught in Loch Ness.

An enhanced containment inspection and a risk based surveillance inspection (in accordance with the Aquatic Animal Health (Scotland) Regulations 2009) were also conducted and reports issued separately.

Please see the reports issued on 8 December 2022 and 20 December 2022 for further information on record checks carried out.

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

Signed: [REDACTED]

Date: 01/05/2024

Fish Health Inspector

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Scottish Government website at [Fish Health Inspectorate Service Charter - gov.scot \(www.gov.scot\)](https://www.gov.scot/policies/fish-health-inspectorate/)