

Case No: 2021-0005 Date of visit: 19/01/2021

Time spent on site: 0 Main Inspector:

Site No: FS1318 Site Name: Portree Outer
Business No: FB0169 Business Name: The Scottish Salmon Company

Case Types: 1 CNA 2 3 4 5 6

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

Observations: Region: HI Water type: S CoGP MA: M-26

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

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

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="0"/>	No facilities inspected	<input type="text" value="0"/>
Species	<input type="text" value="N/A"/>				
Age group	<input type="text"/>				
No Fish	<input type="text"/>				
Mean Fish Wt	<input type="text"/>				
Next Fallow Date (Site)	<input type="text" value="Currently fallow"/>		Next Input Date (Site)	<input type="text" value="End of March 2021"/>	
Recent (last 4 wks) disease problems?	<input type="text" value="N"/>		Any escapes (since last visit)?	<input type="text" value="N"/>	
If yes, detail:	<input type="text"/>				

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

Biosecurity Records

1. Biosecurity records available for inspection?	<input type="checkbox"/>
2. Has the manner and frequency of mortality removal, recording and safe disposal been considered?	<input type="checkbox"/>
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"/>
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"/>
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"/>
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"/>
7. Is documentation available regarding the measures in place to maintain the physical containment of aquaculture animals held on site?	<input type="checkbox"/>
8. Have the biosecurity procedures been adequately implemented on site?	<input type="checkbox"/>
If no, detail:	<input type="text"/>

Results of Surveillance

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

Records checked between:	11/03/2020 - 21/01/2021
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Additional Case Information:

Stock began moving off site w/b 04/01/21 and site was fallow by w/b 19/01.

Mortalities over the reporting threshold:

08/06/2020 - 1.24% (post treatment losses following mechanical delousing)

15/06/2020 - 1.77% (handling losses while site undergoing reduction in biomass)

22/06/2020 - 2.64% (handling losses while site undergoing reduction in biomass)

29/06/2020 - 1.06% (Handling losses during last movement off of fish. Site now fallow)

Site is currently awaiting the delivery of SealPro nets for all cages on site (expected in March 2021). This site will remain fallow until SealPro nets have been installed.

Due to COVID-19 travel restrictions, this inspection was conducted remotely. A physical inspection of the site was not possible.

CNA documents submitted to FHI for inspection 18/06/2021.

Case No: 2021-0005 Site No: FS1318

Date of visit: 19/01/2021 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? If yes answer 1.2-1.8:		N		No site specific contingency plan was available, but the site manager produced a generic containment and escape contingency plan that is issued to all sites within the business.
1.2. Have appropriate reports been made to Scottish Government within 24 hours of discovery?	High		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		CoGP 4.4.37, 5.4.17	
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 4.4.38, 5.4.18	
1.6. Was permission sought from Marine Scotland prior to recapture?	Medium		CoGP 4.4.38, 5.4.18	
1.7 Were the gill nets deployed in accordance with the permission issued by Marine Scotland?	Low		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			
1.9. Is there a site specific contingency plan in response to failures in containment, aimed at preventing escapes and recovering escaped fish?	High	N	SSI, 2,9	

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

General records 2.1 With regard to each facility, net, screen and mooring at each site, a record should be maintained of:-			CoGP: 4.4.9, 4.4.14, SSI 2,1	Polar circles manufactured and installed by AKVA in 2014. Cages have not been damaged by predators.	
		Facilities	Moorings		Nets
a) The name of the manufacturer	Low	Y	Y		Y

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary		
b) Any special adaptations	Low	N/A	N/A	N/A	Moorings manufactured and installed by Gaelforce. All moorings were new in 2019 and will be replaced after 6 years (as described in SOP).	
c) The name of the supplier	Low	Y	Y	Y		STAR nets were previously used on site prior to fallow. SealPro nets have now been ordered and the site awaits delivery and installation by Knox (estimated in March 2021). STAR nets used previously were manufactured in December 2018 and were sent to Knox in July 2020 for service and repair (this is done prior to each cycle).
d) The date of purchase	Low	Y	Y	Y		
e) Each inspection including						
i) the name of the person conducting the inspection	Low	Y	Y	Y		
ii) the date of each inspection	Medium	Y	Y	Y		
iii) the place of each inspection	Low	Y	Y	Y		
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		
2.2. In relation to each net a record of:						
i) The mesh size	Medium	Y	SSI, 2,2	Accessed via the KNOX online portal.		
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:				All unused nets from site are sent back to Knox for storage. Site survey conducted by Gaelforce states the water is 30m deep. Nets go down 15m leaving 15m between the bottom of the net and the seabed.		
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		Site design plans. Markers are located at the easterly and southerly points of the site (where the term 'site' here refers to both Portree and Outer Portree which are considered to be one site by site staff).	
2.6 In respect of sites at which fish are farmed in inland waters ³			SSI, 2,6			

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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	Y	SSI, 2,11 (b)	
Pen and mooring systems				North West Marine and Gaelforce contracted to select and install equipment suitable for the conditions experienced on site. All equipment exceeds industry standards. Site staff are trained in stock containment including inspection checks on cages, top ties, water ties (not damaged or slack), nets are tight, no holes, main net tensioned. All other inspections are conducted by manufacturers. Pen and morings systems are designed, installed and maintained by manufacturers. Attestations and service reports available.
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	
2.10 Do pen systems meet the manufacturers guidelines?	High	Y	CoGP 4.4.10	
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	Y	CoGP 4.4.16	
2.14 Do all nets used on site meet industry standards?	High	Y	CoGP 4.4.17	The SealPro nets that are soon to be deployed on site, have 18mm mesh. If the site takes on smaller than average smolts, they are able to deploy STAR nets (with 15mm mesh) on the inside of the SealPro nets to act as a double barrier to escape.
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
2.17 Are nets treated with a UV inhibitor?	Low	N	CoGP 4.4.21	No record of nets being treated with UV inhibitor, however nets are never stored on site. If they are removed from the water, they are sent to Knox for servicing/repairs/storage. Tested before every cycle. Manufacturer conducts the testing. Divers in weekly/fortnightly, visual inspections at surface by site staff daily and net cleaners inspections fortnightly. Surface attachments are inspected daily by site staff, sub-surface inspections are conducted by divers and ROV every fortnight and bi-annually, respectively.
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	Extensive staff training record available. Training includes but is not limited to: handling, containment, grading, health and welfare and boat operations. All site staff are qualified to at least level 2 RYA as a minimum. 3 staff members have their level 3 powerboat advanced RYA qualification, enabling the operation of larger boats such as landing crafts and night time operation. All staff trained in stock containment.
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 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	Risk assessment table available identifying the risks associated with site operations and how to minimise those risks. Documentation relating to containment of stock is scheduled to be reviewed by the end of January/beginning of February 2021.
4.2 Before procedures are conducted on site, are the following in place:	High		CoGP 4.4.30, 5.4.13	
a) a documented risk assessments		Y	SSI 2,7, b , SSI 2, 8, c	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
b) standard operating procedures	High	Y		Site has access to a 60m landing craft and two RHIBs, all of which had documentation. None of the work boats are fitted with prop guards. Reviewed every cycle. OTAQ ADD available on site. Service engineer was on site on 17/01/21 to modify the frequency and volume to increase effectiveness. No seals dispatched to date. Licence permits the dispatch of 2 grey and 1 harbour seal every 2 years.
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	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	
4.4 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	Y		
- The use of lethal means by any person involved in operations on the site	Low	Y	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		No on site inspection was carried out due to COVID-19 travel restrictions. As such, no on site operations were observed.
5.2 Is the net mesh size considered to be capable of containing all fish sizes present on site?	High	N/A	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?	Low	N/A	SSI 2,2 ii	
Look at a percentage of nets on site - Does the net location meet the inventory?	Low	N/A		
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)		N/A		
5.7 Are boat operations conducted in such a manner which prevents damage to nets and pens?	High	N/A	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	N/A	CoGP 4.4.31	No on site inspection was carried out due to COVID-19 travel restrictions. As such, no on site operations were 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		
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 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

[REDACTED]
The Scottish Salmon Company
1 Smithy Lane
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Argyll
PA31 8TA
[REDACTED]

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0169	DATE OF VISIT	21/01/2021
SITE No	FS1318	SITE NAME	Portree Outer
INSPECTOR	[REDACTED]	CASE No	20210005

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.

Due to COVID-19 travel restrictions, the inspection was conducted remotely.

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

The following recommendations are made for improvement:

It is recommended that a documented review is undertaken of the contingency plans that describe the actions to be taken in the event of any escape in accordance with CoGP (Chapter 4, point 4.43). This should ensure the contingency plan is site specific, rather than generic for the company, and that recovery plans can be implemented in an effective timeframe.

It is also recommended that a record of any changes made should be recorded to meet the requirements of schedule 2, section 9 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, which requires a record to be kept of any contingency plan for preventing escapes of fish from fish farms and recovering any fish which have escaped.

It is also recommended that staff are trained in any new procedures for reporting breaches in containment or changes to contingency plans in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 7, point 1.8) and a record is maintained in accordance with CoGP (Chapter 7, point 1.9).

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

c) Inspection of site and site equipment

No physical inspection was carried out due to COVID-19 travel restrictions. Due to the remote nature of the inspection, an inspection of the site and site equipment could not be carried out on this occasion.

d) Inspection of site specific procedures

No physical inspection was carried out due to COVID-19 travel restrictions. Due to the remote nature of the inspection, no site specific procedures were observed on this occasion.

The recommendations in this report should be implemented by 1st June 2021. 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: 02/03/2021

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/>

R10

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0169	DATE OF VISIT	21/01/2021
SITE No	FS1318	SITE NAME	Portree Outer
CASE No	20210005	INSPECTOR	

Case completion report

Recommendations in relation to the above case were made for implementation by 01/06/2021. 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: 18/06/2021

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/>