

Case No: 2023-0520 Date of visit: 04/12/2023

Time spent on site: 7h Main Inspector: [Redacted]

Site No: FS1024 Site Name: Toyness
Business No: FB0125 Business Name: Scottish Sea Farms Ltd

Case Types: 1 CNA 2 ESC 3 [] 4 [] 5 [] 6 []

Water Temp (°C): 8.7 Thermometer No: T173 FHI 045 completed []

Observations: Region: OR Water type: S CoGP MA O-3

Dead/weak/abnormally behaving fish present? [n] If yes, see additional information/clinical score sheet.
Clinical signs of disease observed? [n] If yes, see additional information/clinical score sheet.
Gross pathology observed? [n] 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:
[Redacted]

Additional Case Information:

No fish health issues in the last four weeks. Passive grading just completed some physical damage. Furunc had been identified on site but no issues in the last four weeks.

Last inspection 13/9/2023.

Escapes information: 22/10/2023 a seal was observed in pen 10, divers were on site to conduct a site containment check due to three continuous days of poor weather. Some time given to see if the seal would leave by itself but this did not occur so divers entered the cage and patched the hole which was 5 or 6 meters down and was 40 x 40 cm. It took 1 hour, from the first observation of the seal to the pen being made secure. The fish were shoaling well and no escapees observed so not thought that any escapes would have occurred. No subsequent decrease in appetite noted for the pen.

Newly serviced nets have been ordered and a complete replacement will occur when boats are available. The nets are sapphire nets. The site is to have 120m pens installed at the end of this cycle which is why brand new nets are not being

Movement records were to be inspected in the office following the offshore part of the CNA but issues with a rope snagging the prop of the work boat delayed the return to shore, copies have been requested to be emailed.

Issues raised, movement records were provided 19/1/2024.

Case No: **2023-0520** Site No: **FS1024**
 Date of Visit: **04/12/2023** 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	10	Facilities stocked	10	No facilities inspected	3
Species	SAL				
Age group	2022 s0				
No Fish	258,000				
Mean Fish Wt	4kg				
Next Fallow Date (Site)	May/June 2024		Next Input Date (Site)	September 2024	
Recent (last 4 wks) disease problems?		Y	Any escapes (since last visit)?		N
If yes, detail:	Gill health				

Movement Records

- 1. Movement records available for inspection? **N**
- 2. Date of last inspection: **13/09/2023**
- 3. Are records complete and correctly entered? **N/A**
- 4. Are movement records available for dead fish and waste? **N/A**
- 5. Are records complete and correctly entered? **N/A**
- 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)? **[REDACTED]**
- If yes, is there a system in place for maintenance of transportation records? **[REDACTED]**

Mortality Records

- 1. Mortality records available for inspection? **y**
- 2. How are mortalities disposed of? **Other (detail)**
- If other detail: **Manager not sure but CNA case only so not required.**
- 3. Mortality records complete and correctly entered? **Y**
- 4. Recent mortality (last 4 wks): **2415/site last four week gill health and physical damage**
- 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? **N**
- If yes, detail: **[REDACTED]**
- 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. **N/A**

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: 2023-0520 Site No: FS1024

Date of visit: 04/12/2023 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?		N		
If yes answer 1.2-1.8:				
1.2. Have appropriate reports been made to Scottish Government within 24 hours of discovery?	High	Y	AAAHA 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	CoGP 4.4.37, 5.4.17	Not sure if this has been reported, to be confirmed
1.4. Were methods (if any) used to recover escapees? If yes give detail		N		no escapes thought to have occurred
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		Hole was patched immediately by divers and a full site subsurface containment inspection was conducted.
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		
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	y	y
c) The name of the supplier	Low		y	y	y
d) The date of purchase	Low		Y	Y	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	y	Daily checks are conducted by site staff but issues are reported verbally and deal with adhoc Some bird net issues had been reported.
ii) the date of each inspection	Medium	N	y	
iii) the place of each inspection	Low	N	y	
iv) the outcome of each inspection	High	N/A	y	
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	N/A	y	
2.2. In relation to each net a record of:				Depth to sea bed is known as is the depth of nets but no record of this is maintained.
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		
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	n	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	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	N/A	SSI, 2,11 (a)	None has occurred
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	N	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	N	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	Y	CoGP 4.4.10	Standard pen and grid Moorings inspected by Roving Eye, maintenance is then completed by Inverlussa or Ocean farm services. Moorings are designed by Gael force
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	Dive records Dive records Dive records
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	n	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	N	CoGP 7.1.8	Issues accessing documents
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	N	SSI 2,6,a	Issues accessing documents
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	N	SSI 2,7,a	Issues accessing documents

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	
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	y		
b) standard operating procedures	High	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	Y	SSI 2,6,b	
- The type and size of any propeller guard fitted to each boat used on the site	Low	Y	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		Bird nets on each cage
- 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		
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?	Low	y	SSI 2,2 ii	Froya rings, top nets
Look at a percentage of nets on site - Does the net location meet the inventory?	Low	y		
5.4 Are nets stored away from direct sunlight?	Low	y	CoGP 4.4.21	
5.6 Are appropriate measures in place to mitigate predation on site? (Provide detail if necessary)		y		
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	N	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	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

Case No: 2023-0520

Date of visit: 04/12/2023

Site No: FS1024

Inspector: [Redacted]

Results Summary	Freq.	Date of Notification						
		Database	Insp	Phone	Insp	Writing	Insp	2 nd Insp

Report Summary			
Case Type	Date	Insp	2 nd Insp
ESC	11/01/2024		
CNA	20/02/2024		
Case completion	17/06/2024		



FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0125	DATE OF VISIT	05/12/2023
SITE No	FS1024	SITE NAME	Toyness
CASE No	20230520	INSPECTOR	[REDACTED]

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

There was no evidence to demonstrate that the escape incident reported on the 23rd October 2023 had been reported to Salmon Scotland within 48 hours of discovery.

The following recommendations are made for improvement.

It is recommended that a documented review of the site-specific contingency plan describing actions to be taken in the event of an escape incident should be undertaken to ensure that any incident is reported to Salmon Scotland within 48 hours of occurring, to meet the requirements of A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 4, part 4.37). Evidence of the report to Salmon Scotland should be provided to demonstrate satisfactory measures are in place..

It is recommended that a documented review of the site-specific contingency plan describing actions to be taken in the event of an escape incident should be undertaken to ensure satisfactory measures are in place for the recovery of escaped fish to meet the requirements of Part 1 of the Aquaculture and Fisheries (Scotland) Act 2007.

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

A Minor issue was raised with regard to treatments of nets with a UV inhibitor, these were discussed at the time, no further action is required.

No records were available in relation to the inspection and maintenance of facilities and also the selection and installation of pens and moorings and the suitability for use on site.

The following recommendations are made for improvement.

To meet the requirements of schedule 2, sections 1, 2 and 5 of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008 (RKO) it is recommended that records in relation to inspections of facilities, water depth and navigation markers are maintained and include the following:

- the name of the person conducting the inspection;

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- the date of each inspection;
- the place of each inspection;
- the outcome of each inspection;
- the date and result of each repair;
- the depth of water between the bottom of the net and the seabed as measured at the mean low water spring;
- any navigation markers deployed.

To meet the requirements of the CoGP (chapter 4 part 4.8, 4.9, 4.13 and 4.14) the following records should be maintained:

- documented procedures to be followed in the selection and installation of pens and moorings;
- the design specifications of pens and moorings, along with evidence that they are suitable for the purpose and are correctly installed.

b)ii) Inspection of records relating to training

No records were available in relation to staff training in relation to on-site activities.

The following recommendations are made for improvement.

To meet the requirements of the CoGP (chapter 7 part 1.8) training programmes and plans relevant to the various on site activities should be documented.

To meet the requirements of the RKO (schedule 2, sections 6a and 7a) records should be maintained of:

- all training and qualifications of each person working there in the use of each boat;
- all training of each person working there in relation to containment and prevention of escape of fish, and recovery of escaped fish

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

The following recommendations are made due to the circumstances of the reported escape incident.

It is recommended that the risk assessment, as required in the Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 4, point 4.26) to ascertain the risks of predator attacks, is reviewed and updated to include current circumstances and any additional predator mitigations to be deployed at the site, such as toughened netting materials.

c) Inspection of site and site equipment

A minor issue was raised with regard to records of the deployed navigational markers on site. A recommendation has been made previously in the Fish Health Report regarding the implementation of a record of these, as required by the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008.

d) Inspection of site specific procedures

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

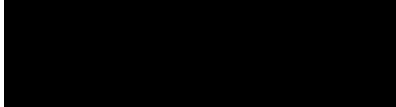
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Further Action

The recommendations in this report should be implemented by 17th July 2024. 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 the Marine Directorate'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:

A black rectangular box redacting the signature of the Fish Health Inspector.

Fish Health Inspector

Date: 20/02/2024

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 \(www.gov.scot\)](http://www.gov.scot/Topics/marine/science)

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0125	DATE OF VISIT	05/12/2023
SITE No	FS1024	SITE NAME	Toyness
CASE No	20230520	INSPECTOR	[REDACTED]

Case completion report

Recommendations in relation to the above case were made for implementation by 17th July 2024. Following submission 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]

Fish Health Inspector

Date: 17/6/2024

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	FB0125	DATE OF VISIT	05/12/2023
SITE No	FS1024	SITE NAME	Toyness
CASE No	20230520	INSPECTOR	[REDACTED]

Escape Investigation

The site was inspected following notification of circumstances which gave rise to a significant risk of escape of Atlantic salmon on 22/10/2023 (MSe221023SAL1)

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

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:

Mortality records were inspected and found to be adequately maintained.

Aquaculture animal and aquaculture animal product movement records were not available for inspection.

The following point was raised with the site representative during the inspection:

- **A copy of the movement records from the last inspection should be provided.**

This 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

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

Signed:

[REDACTED]

Date: 11/01/2024

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/)

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