

Case No: 2019-0313 Date of visit: 27/06/2019

Time spent on site: 5hours Main Inspector: [redacted]

Site No: FS1067 Site Name: Inverawe (East) Etive 2

Business No: FB0456 Business Name: Dawnfresh Farming Ltd

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

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

Observations: Region: ST Water type: S CoGP MA M-36

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:
[]

Additional Case Information:

Opening count week 22 - 115413 - opening count - 1121 mortality
Post transfer mortality

No net lifting or crowding procedures took place around the time of escape. Site manager had been contacted on Friday the 14th of June by local DSFB, who had been conducting net sampling at the river mouth. They caught 5 medium size rainbow trout and were concerned about a possible escape. This facilitated site manager to go and check all of the nets for signs of containment breach. A 0.3 x 0.5m hole was discovered a few meters below the water line in one of the pens. Due to strong tides the net could not be lifted until Saturday morning in order to repair the damage. Divers had inspected the net on Wednesday before the report of escape. So damage must have occurred between Wednesday afternoon and Friday afternoon.

Mooring grid and bridles have recently been upgraded to higher spec'd equipment. Moving from rope bridles to chain ones. It is believed that during the strong tides at summer solstice that the slack in the net caught and snagged on one of the links in the chain bridle. The chain would have been slack due to the tidal pressure on the opposite side of the pen, the net also affected by the tide would have been pushed into contact with the chain resulting in the snag and tear. The site manager pointed out that the damage was consistent with a tear from extreme force rather than a tear from abrasion.

In response to this event, the site has deployed a high density plastic wrap around all of the chain bridles so that they are now smooth and impossible for the net to snag on the links of the chain. The site manager showed inspectors the material used during the inspection as well as displaying the upgraded chain bridles out on site. This adaptation will be taking place not just on etive 2 but on all sites in the loch managed by dawn fresh to prevent this type of breach of containment from occurring again.

Site manager spoke to local DSFB regarding the possibility of a recapture effort with nets. The local DSFB advised them not to attempt recapture with nets as they believed that it would be a pointless exercise, due to the size of the loch and the shape and features of the river mouth.

A wellboat was called in on the morning of 25/06/19 in order to move the fish from this pen down to Etive 6 from Etive 2. The fish were counted during this movement. It was found that 33 072 fish were missing from the original count of 58464. Over half of the fish from this pen were lost during the breach of containment. It was noted during the inspection that the stocking density of fish within the pens was quite high. the site manager remarked that the pens at etive 2 are right at the high end of there stocking limit as they are due to be thinned out into more pens.

Paperwork and inspection carried out by [REDACTED], supervised by [REDACTED]

Case No: **2019-0313** Site No: **FS1067**
 Date of Visit: **27/06/2019** Inspector(s): **[Redacted]**

Registration/Authorisation Details

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

Site Details

Total No facilities	6	Facilities stocked	2	No facilities inspected	6
Species	Rainbow trout				
Age group	2018				
No Fish	155,223				
Mean Fish Wt	637g				
Next Fallow Date (Site)	09/12/19	Next Input Date (Site)	End of dec 2019		

Recent (last 4 wks) disease problems? **N** Any escapes (since last visit)? **Y**
 If yes, detail: **[Redacted]**

Movement Records

- 1. Movement records available for inspection? **Y**
- 2. Date of last inspection: **13/03/2019**
- 3. Are records complete and correctly entered? **Y**
- 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? **Y**

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? **Whole fish - Dundas Chemicals**
- If other detail: **[Redacted]**
- 3. Mortality records complete and correctly entered? **Y**
- 4. Recent mortality (last 4 wks): **Wk22 - 1.12% 1121 wk23-(0.296% 293) wk24(248-0.25%) wk25(0.046% -45)**
- 5. Evidence of recent increased/atypical mortalities? **Y**
- If yes, facility nos/no mortality per facility/no stock per facility/reason: **[Redacted]**

Post transfer mortality

- 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, add MRT case and enter on mortality events sheet. **N/A**

1. Recent treatments (last 4 wks)?	
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 <i>increased (unexplained)</i> 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 <i>how</i> and <i>when</i> 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: 13/03/19 - 27/6/19

Case Number:	2019-0313	Site No:	FS1067	Insp:		
Date of Visit	27/06/2019	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	14
	Frequency of movements on from equivalent zone or compartment including third country	0	9	18	26	
	Number of suppliers	0	5	10	14	5
Movements off	Frequency of movements off	0	3	6	10	10
	Number of destinations	0	3	6	10	3
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		1
On farm processing within the rules of the directive	No on farm processing	0				
	Processing own fish (re-cycling risk)	1				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				
	Common processes with other farms	3				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		2
	Sites sharing staff and equipment	0	1	2		2
Disinfection of equipment between sites, use of footbaths etc	Yes	0				
	No	1				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					44	HIGH

Case No: 2019-0313 Site No: FS1067

Date of visit: 27/06/2019 Inspector(s):

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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:		Y		
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	Y	CoGP 4.4.37, 5.4.17	DSFB notified.
1.4. Were methods (if any) used to recover escapees? If yes give detail		N		Site manager was advised by DSFB that effort to recapture with nets would not be feasible due to the river shape and size.
1.5 Was the decision to attempt to recapture and the method employed agreed with the local DSFB and FT	Low	Y	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		The staff have gone round the site and wrapped all of the bridal chain in layflat rubber hose. To prevent the nets from any potential damage from snagging/rubbing or catching on the chains during rough weather or strong tides.
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 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	
		Facilities	Moorings	Nets

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary	
a) The name of the manufacturer	Low	Y	y	Y	10359 - E5 net code - 10361 - E6
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					
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:					10359 - E5 net code - 10361 - E6 Nets stored out on site when not in use. Otherwise stored by Knox nets when out of water.
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	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		Installed over January 2019	
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	Location contained in northern lighthouse paperwork.	
2.6 In respect of sites at which fish are farmed in inland waters ³			SSI, 2,6		
a) The type, method of and date of construction of any flood prevention or flood defence measures in place	Low				
b) The date of and results of any tests conducted on any such measures	Low				
c) The date of any incident where the site was flood	Low				
d) The water course height during any such flood incident	Low				
2.6 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)	Would be recorded in site diary and maintenance record.
b) Any action taken to rectify any such damage	High	Y	SSI, 2,11 (b)	Kept in the maintenance record sheet for the site.
Pen and mooring systems				
2.7 Are there documented procedures maintained regarding the selection and installation of pens and moorings?	High	Y	CoGP 4.4.8, 4.4.13	
2.8 Can the site demonstrate evidence that the design specification of pens and moorings are suitable for purpose and correctly installed?	High	Y	CoGP 4.4.9, 4.4.14	
2.9 Do pen systems meet the manufacturers guidelines?	High	Y	CoGP 4.4.10	
2.10 Are pen systems inspected and approved by suitably qualified / experienced person(s)?	High	Y	CoGP 4.4.11	
2.11 Is there evidence of the competence of personnel involved in the design, installation and maintenance of pen and mooring systems?	High	Y	CoGP 4.4.12, 4.4.15	
2.12 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	
2.13 Do all nets used on site meet industry standards?	High	Y	CoGP 4.4.17	
2.14 Can the site demonstrate an awareness of the minimum fish size in relation to net size	High	Y	CoGP 4.4.19	
2.15 Does the net design, quality and standard of manufacture take into account the conditions that are likely to be experienced on site and include adequate safety margins?	High	Y	CoGP 4.4.20	
2.16 Are nets treated with a UV inhibitor?	Low	N	CoGP 4.4.21	
2.17 Are nets tested at a pre-determined frequency?	High	Y	CoGP 4.4.22	
2.18 Is the method of test procedure based upon the manufacturers advice?	High	Y	CoGP 4.4.22	
2.19 Are frequent net inspections conducted to look for damage?	High	Y	CoGP 4.4.23	Daily checks and ROV checks before any lifting, handling procedures.
2.20 Are net inspection records maintained?	High	Y	CoGP 4.4.23	
2.21 Is the system by which nets are attached to the pen and weighted inspected frequently?	High	Y	CoGP 4.4.24	Weekly checks
2.22 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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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	
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	N/A	SSI 2,6,c	No propeller guards used on any of the boats at this site.
4.4 Does the site suffer from regular or heavy predation?		Y		Otters, seals, cormorants.
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	Annually
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	Predator nets not used on site.

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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	Still hung on the cages, when removed from cages, stored by Knox 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	y	SSI 2,5		Kept in navigation records and on site map
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: 2019-0313

Date of visit: 27/06/2019

Site No: FS1067

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	23/12/2019	[Redacted]	[Redacted]
CNA	06/04/2020	[Redacted]	[Redacted]

██████████
Dawnfresh Farming Ltd
Bothwellpark Industrial Estate
Uddingston
Lanarkshire
G71 6LS
████████████████████

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0456	DATE OF VISIT	27/06/2019
SITE No	FS1067	SITE NAME	Inverawe (East) Etive 2
INSPECTOR	████████████████████	CASE No	20190313

The site was inspected following notification of an escape of 33,072 rainbow trout on 14/06/19 (MSe140619RTR1)

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

All epidemiological units were inspected.

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

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

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

Mortality records were inspected and found to be adequately maintained.

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

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

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Signed:

Date: 12/12/2019

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

██████████
Dawnfresh Farming Ltd
Bothwellpark Industrial Estate
Uddingston
Lanarkshire
G71 6LS
████████████████████

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0456	DATE OF VISIT	27/06/2019
SITE No	FS1067	SITE NAME	Inverawe (East) Etive 2
INSPECTOR	██████████	CASE No	20190313

ENHANCED CONTAINMENT INSPECTION

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

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

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

The 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 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

The site experienced an escape of 33,072 rainbow trout on 14/06/19.

Dawnfresh Farming Ltd along with their net manufacturer had conducted an investigation, including modelling of the conditions on site at time of incident, prior to the inspection by the Fish Health Inspectorate. This was available for inspection and identified the likely cause of the net damage was due to the net snagging on the bridal chains.

A recommendation would have been made to conduct a documented review of equipment on site. However, prior to the inspection by the Fish Health Inspectorate, Dawnfresh Farming Ltd had identified and implemented improvements to the site to prevent a re-occurrence of this issue.

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

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



Signed:

Date: 06/04/2020

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