

Case No: 2019-0252 Date of visit: 29/05/2019

Time spent on site: 6h Main Inspector:

Site No: FS1277 Site Name: Reibinish

Business No: FB0169 Business Name: The Scottish Salmon Company

Case Types: 1 ESC 2 CNA 3 4 5 6

Water Temp (°C): 9.8 Thermometer No: T173 FHI 045 completed

Observations: Region: WI Water type: S CoGP MA W-8

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:

Morning of the 24th April a pre treatment inspection by the divers (standard operating procedure prior to crowding) reported a hole in pen three, on the lead line, extending approximately four meters horizontally two metres either side of the vertical rope. The net (net i.d. tag 7864) was reported to have no damaged but the stitching had come undone. Divers cable tied the hole immediately, then the hole was properly repaired with twine to secure containment.

The fish from the pen were transferred and counted to Plockropol (27760) on the 4/5/2019 as a precaution and the net was removed from the site and returned to the manufacturer Knox nets.

Full net records are maintained on Knox nets database. The net 15mm 100m circle net and was recorded as being hung on the pen 16/10/17. The net was manufactured 11/7/13 and has been used on two other sites prior to deployment at Reibinish. Records show that the pen had been serviced three times in the years 2014, 2015 and 2017. Break testing was completed at each service show that the net was well within safe working limits of between 70% to 80% of original strength.

Fish talk recorded the number of fish in the pen on the 23/4/2019 as being 27843 with 27760 being transferred 4/5/2019 (83 discrepancy).

Investigation is underway with the manufacturer as to why this happened and a report will be sent to the company.

20/5/19 dive report stated that a 1m hole repaired (pen9) with cable ties and then stitched (thought to above waterline but manager to confirm)

Numerous instances of damage to nets recorded on the dive reports, copies have been taken. Following discussions with site contact on return to the lab it was determined that the holes were either above the waterline or single stranded breaks therefore no suspicion that escapes may have occurred.

Sea lice records were inspected to confirm the numbers reported through the sea lice reporting, two discrepancies were noted where the numbers were higher than reported, following discussion with company this was due to two counts being conducted in the same week.

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 Date of Visit: **29/05/2019** 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	16	Facilities stocked	6	No facilities inspected	1
Species	SAL LUM				
Age group	2017 S0's	2018			
No Fish	185,600	19,000			
Mean Fish Wt	3.8	N/A			
Next Fallow Date (Site)	July 2019		Next Input Date (Site)	September 2019	

Recent (last 4 wks) disease problems? **N** Any escapes (since last visit)? **Y**
 If yes, detail: **Hole in net no fish suspected to be lost**

Movement Records

- 1. Movement records available for inspection? **Y**
- 2. Date of last inspection: **20/11/2018**
- 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? **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? **[redacted]**

Mortality Records

- 1. Mortality records available for inspection? **Y**
- 2. How are mortalities disposed of? **Other (detail)**
- If other detail: **White shore cockles**
- 3. Mortality records complete and correctly entered? **Y**
- 4. Recent mortality (last 4 wks): **0.96% 3427/last four weeks (post treatment/production mortalities)**
- 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**
- 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)?	<input type="checkbox"/>	Y
If yes, detail:	T.M.S.	
If other, detail:	Hydrolicer 30/4/19	
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)?	T.M.S.	
If other, detail:		
6. Are medicines stored appropriately?	<input type="checkbox"/>	Y

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:	

Results of Surveillance

1. Has any animal health surveillance been carried out by, or on behalf of, the business?	<input type="checkbox"/>	N/A
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).		

Records checked between: 20/11/18 - 29/5/19

Case No: 2019-0252 Site No: FS1277

Date of visit: 29/05/2019 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	By the Biological Director Hole immediately repaired and net removed from site
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	
1.4. Were methods (if any) used to recover escapees? If yes give detail		N/A		
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		
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	N/A	N/A	Y
c) The name of the supplier	Low	Y	Y	Y
d) The date of purchase	Low	Y	Y	Y
				Seal blinds
				No date of purchase available

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
e) Each inspection including				Dive reports some have damage recorded but not remedial action taken.
i) the name of the person conducting the inspection	Low	Y	Y	
ii) the date of each inspection	Medium	Y	Y	
iii) the place of each inspection	Low	Y	Y	
iv) the outcome of each inspection	High	Y	Y	
iv) the outcome of each inspection	High	Y	N	
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	Y	Y	
2.2. In relation to each net a record of:				
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		
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	
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	
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				
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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	Some records do not have remedial action taken recorded. Records also lack clarity on size and location of holes.
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	Y	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	
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	
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	
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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	
4.4 Does the site suffer from regular or heavy predation?		no		
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		
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	
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	
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	Not used
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)	Copies of 2019 dive reports have been taken and will be used to determine if additional possible escapes should have been reported.
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

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██

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0169	DATE OF VISIT	29/05/2019
SITE No	FS1277	SITE NAME	Reibinish
INSPECTOR	██████████	CASE No	20190252

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

During the inspection of records the actions taken to repair nets, following the identification of damage, was not recorded. The following recommendation is made for improvement.

To meet the requirements of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, Schedule 2, point 1(e)(iv), in relation to each net, a record should be maintained of;

- the outcome of each inspection.

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.

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c) Inspection of site and site equipment

The potential breach in containment was reported to be the result of a manufacturing defect. The following recommendation is made for improvement;

It is recommended that a documented review of the design, quality and standard of manufacture of nets is undertaken to ensure that the nets in use meet the requirements of chapter 4, point 4.20 of A Code of Good Practice for Scottish Finfish Aquaculture which states that;

- the design, quality and standard of manufacture of nets should take account of the conditions likely to be experienced on the site and include an adequate safety margin.

The recommendations in this report should be implemented by 31 March 2020. 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:



Fish Health Inspector

Date: 11/12/2019

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

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FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0169	DATE OF VISIT	29/05/2019
SITE No	FS1277	SITE NAME	Reibinish
INSPECTOR	[REDACTED]	CASE No	20190252

Case completion report

Recommendations in relation to the above case were made for implementation by the 30/06/2020.

One recommendation was not fully implemented however, the information and the reasons provided are deemed acceptable in this instance.

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: 26/1/2021

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/>

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FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0169	DATE OF VISIT	29/05/2019
SITE No	FS1277	SITE NAME	Reibinish
INSPECTOR	[REDACTED]	CASE No	20190252

The site was inspected following notification of circumstances which gave rise to a significant risk of escape of Atlantic salmon on 24/4/2019 (Marine Scotland escape incident number MSe240419SAL1).

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:

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.

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: 11/12/2019

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

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