

Case No:	2021-0257	Date of visit:	14/07/2021			
Time spent on site:	3 hours	Main Inspector:				
Site No:	FS0335	Site Name:	South Drumachro			
Business No:	FB0012	Business Name:	Otter Ferry Seafish Ltd			
Case Types:	1 ECI	2 CNI	3 SLI	4	5	6
Water Temp (°C):	14.5	Thermometer No:	T155	FHI 045 completed		
Observations:	Region:	ST	Water type:	S	CoGP MA:	M-46
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:

Recent Mortality

wb 6th July - 752 fish

wb 22nd of June 412 fish

wb 15th June 450 fish

wb 8th June - 314 fish

Mortality has been very low throughout June but picked up at start of July amongst smaller fish once water temperature rose. Primary source of mortality has been sunburn in the larger tanks where shade netting cannot be deployed. Some fish were observed with sun burn lesions on their backs, most appeared to be minor injury's and healing over.

Movement records are kept at Otterferry and will be collected next time an inspector visits. Scan's of the records were submitted electronically for inspection.

Site does not experience issues with sea lice, despite no filtration of water intake. Halibut are not parasitized by Leps. No sea lice have ever been observed on halibut on site so no sea lice counts are conducted. There is not a maintained sea lice strategy due to the nature of the site not ever having had sea lice issues. In the unlikely event of a sea lice infestation, one would be produced.

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Inspector(s):

Registration/Authorisation Details

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

Y
N

Site Details (include cleaner fish for all sections)

Total No facilities	16	Facilities stocked	16	No facilities inspected	16
Species	HAL	HAL	HAL	HAL	
Age group	2015	2016	2017	2018	2019
No Fish	13,687	24,277	10,386	20,223	11,549
Mean Fish Wt	4.5 kilos	3.5 kilos	2.5kilos	1.5 kilos	1.5kilos
Next Fallow Date (Site)	not planned		Next Input Date (Site)	not known	
Recent (last 4 wks) disease problems?			N	Any escapes (since last visit)?	N
If yes, detail:					

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?

Y
25/04/2017
Y
Y
Y
N/A

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?

N

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:

Whole fish - Dundas Chemicals

High temperature causing stress and morts in smaller fish - Sunburn in larger fish.

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.

Y
Whole fish - Dundas Chemicals
Y
see additional info
Y
N
N/A
N/A

Treatments and Medicines Records

1. Recent treatments (see comment)?	N
If yes, detail:	
If other, detail:	
2. Medicines records available for inspection?	N/A
3. Are records complete and correctly entered?	
4. Are fish in a withdrawal period?	N/A
5. If yes, what treatment(s)?	
If other, detail:	
6. Are medicines stored appropriately?	Y

Biosecurity Records

1. Biosecurity records available for inspection?	Y
2. Has the manner and frequency of mortality removal, recording and safe disposal been considered?	Y
3. Has the manner and period in which the APB will notify Scottish Ministers or veterinary professional of any <i>increased (unexplained)</i> mortality at the site been included?	N
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?	N
5. Has the health status of aquaculture animals being stocked on the farm site been covered (equal or higher health status, certification if required)?	Y
6. Have the husbandry and biosecurity measures implemented between each epidemiological unit to minimise transmission of disease been covered (movement of staff, visitors, equipment, live or dead fish etc.)?	Y
7. Is documentation available regarding the measures in place to maintain the physical containment of aquaculture animals held on site?	Y
8. Have the biosecurity procedures been adequately implemented on site?	Y
If no, detail:	

Results of Surveillance

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

Records checked between: 25/04/2017-14/07/2021

Case Number:	2021-0257	Site No:	FS0335	Insp:		
Date of Visit	14/07/2021	No of movements/supp./dest.			Score	
Live fish movements		0	1-5	6-10	>10	
Movements on (from out with GB) of susceptible species	Frequency of movements on from equivalent MS	0	5	10	14	0
	Frequency of movements on from equivalent zone or compartment including third country	0	9	18	26	0
	Number of suppliers	0	5	10	14	0
Movements off	Frequency of movements off	0	3	6	10	3
	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		0
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				0
	Common processes with other farms	3				
	Collection point for waste from other farms	5				
Use of unpasteurised feeds	No feeding of unpasteurised feed	0				0
	Feeding unpasteurised feed	5				
Biosecurity	Number of sites	1	2 or 3	≥ 4		
Contacts with other sites	Sites operating from single shorebase	0	1	2		0
	Sites sharing staff and equipment	0	1	2		0
Disinfection of equipment between sites, use of footbaths etc	Yes	0				0
	No	1				
CoGP/Regulator						
Practices in accordance with regulator or industry code of practice	Yes	0				0
	No	3				
Platform access to cages	Yes	0				0
	No	2				
Total Rank					9	LOW

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Site No: FS0335

Sea Lice Inspection (Seawater Sites Only)

1. Has the site experienced sea lice problems in the previous 4 years?
2. Is the CoGP Farm Management Area (or equivalent) fallowed synchronously on a single year class basis?
3. Does the site have access to a range of licenced in-feed and bath sea lice medications (including deltamethrin, azamethiphos and emamectin benzoate) as well as access to suitable biological and/or mechanical control measures, and can these be deployed in a reasonable period of time?
4. Is there a signed documented farm management agreement or statement relevant to the site and CoGP Farm Management Area (or equivalent)?
5. Are sea lice count records available for inspection? (Legal SSI, CoGP Annex 6)
6. Do records adequately reflect the required standard specified in the SSI and the CoGP? (Legal SSI, CoGP Annex 6)
7. Are sea lice (*L. salmonis*) record levels below the suggested criteria for treatment in the CoGP during the period that records are inspected? (CoGP Annex 6)
8. Have average adult female sea lice (*L. salmonis*) numbers per fish been at a level of 3 or above (prior to w/b 10/6/19) or 2 or above (from w/b 10/6/19) during the period that records are inspected?
- If yes, have these been reported to the Fish Health Inspectorate? If no, FHI see comment.
9. Is *C. elongatus* infestation at a level which is considered to cause significant welfare problems? (CoGP 4.3.81, 5.3.50)
10. Have therapeutic treatments been administered or other actions taken when *L. salmonis* levels have exceeded the suggested criteria for treatment or where *C. elongatus* is considered to have welfare implications? (CoGP 4.3.82, 5.3.51)
11. Has any other action been taken (where applicable)?
12. Have therapeutic treatments or the actions taken had a significant impact upon the lice levels recorded?
13. Are treatments, where conducted, carried out in cooperation between participating farms?
14. Is there a harvesting strategy for the site, where fewer populations or part populations are held without treatment for sea lice?
15. Is there a site specific written lice management procedure with waypoints describing set actions to deal with recognised scenarios during the escalation of a sea lice infestation?
16. Do the sea lice levels observed on stocks reflect sea lice count data? If no please detail reasons.

Containment Inspection

1. Has the site experienced equipment damage due to predators in the current or previous production cycles?
 2. Are measures in place to mitigate against the predation experienced on site? (Detail below)
- Top nets**
- If other, detail below:
3. Have escape incidents or events been experienced on or in the vicinity of the site since the last FHI inspection?
 - If Yes proceed with questions 4 – 9. If No skip to question 10
 4. Have these been reported to Scottish Ministers?
 5. Have these been reported to local DSFB forthwith (where they exist)? (CoGP – 4.4.37, 5.4.17)
 6. Have these been reported to the SSPO and local fisheries trusts forthwith (where they exist)? (CoGP – 4.4.37, 5.4.17)
 7. Were methods (if any) used to recover escapees? If yes give detail
 8. If gill nets were deployed was this action agreed with local wild fish interests and was permission given by Scottish Ministers? (Legal, CoGP – 4.4.38, 5.4.18)
 9. What action was taken to prevent and minimise the risk of further escapes? (Not covered in code but could be considered under satisfactory measures of the Act)
 10. Is the site inspected as satisfactory with regards to containment? If no, please detail reason(s)

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Site No: FS0335

Date of Visit: 14/07/2021

Inspector: [REDACTED]

Point of Compliance

1. Is the farm under inspection located within a farm management area?

If N, no further questions require completion.

Points of Compliance for Both Farm Management Agreements and Statements

2. Has a current farm management agreement or statement (FMAg/S) been prepared?

3. Is the current FMAg/S available for inspection?

4. Does the FMAg/S identify the relevant farm management area?

5. Does the FMAg/S identify the fish farm site(s) to which it applies?

6. Does the FMAg/S identify the date of commencement of the agreement or statement?

7. Does the FMAg/S identify the date of review?

Arrangements for Fish Health Management

8. Does the FMAg/S identify the minimum health standards for the stocks to be introduced to the area or farm?

9. Does the FMAg/S identify the vaccination requirements for stocks held in the area or farm?

10. Does the FMAg/S identify the species of fish which may be stocked into the area or farm?

11. Does the FMAg/S identify the maximum stocking density of any pen on any farm in the area or the individual farm?

12. Does the FMAg/S identify the arrangements for the storage and disposal of any dead fish from any fish farm in the area or the individual farm?

Arrangements for The Management of Sea Lice

13. Does the FMAg/S identify arrangements for the sharing of data on sea lice numbers and treatments?

14. Does the FMAg/S identify the availability and the use of medicines on farms covered by the agreement or statement?

15. Does the FMAg/S identify any requirements for the sensitivity testing of available treatments for sea lice on farms in the area or individual farms?

16. Does the FMAg/S identify the circumstances under which biological controls and cleaner fish are to be used on farms in the area or individual farms?

17. Does the FMAg/S identify the arrangements for synchronous treatments on farms within the area?

Live Fish Movements

18. Does the FMAg/S identify the circumstances when live fish may be introduced or removed from the area or farm?

19. Does the FMAg/S identify the arrangements for the movement of live fish on and off sites in the area or individual farms?

Harvesting

20. Does the FMAg/S identify acceptable harvest practices on farms in the area or individual farms?

Fallowing

21. Does the FMAg/S identify the dates by which the area or individual farm will be fallow and the earliest date when a farm or area may be restocked?

22. Does the FMAg/S identify whether one or more year classes may be stocked onto sites covered by the agreement or statement?

23. Does the FMAg/S identify whether broodstock or potential broodstock are to be kept on any site covered by the agreement or statement?

Point of Compliance for Farm Management Agreements Only

24. Does the farm management agreement include arrangements for persons to become, or cease to be, parties to the agreement?

Management and operation

25. Is the fish farm being managed and operated in accordance with the agreement or statement?

26. What is the version no/date of issue of the FMAg/S?

Inspector: [REDACTED]

[illegible]

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

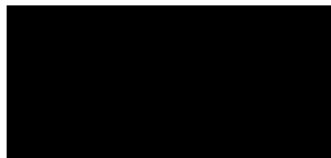
BUSINESS No	FB0012	DATE OF VISIT	14/07/2021
SITE No	FS0335	SITE NAME	South Drumachro
CASE No	20210257	INSPECTOR	[REDACTED]

Case completion report

Recommendations in relation to the above case were made for implementation by 31/08/2022. 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.

Signed:



Fish Health Inspector

Date: 31/08/2022

The Fish Health Inspectorate Service Charter detailing standards of service is available on the Marine Scotland website at <https://www.gov.scot/publications/fish-health-inspectorate-service-charter/>

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0012	DATE OF VISIT	14/07/2021
SITE No	FS0335	SITE NAME	South Drumachro
CASE No	20210257	INSPECTOR	

Inspection under the Aquatic Animal Health (Scotland) Regulations 2009

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

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

Records

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

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

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

Mortality records were inspected and found to be adequately maintained.

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

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

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

The Biosecurity measures plan provided for inspection by the company did not include two key points:

-The manner and period in which the APB will notify Scottish ministers or veterinary professionals of any increased (unexplained) mortality at the site.

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-The action that will be taken in the event that the presence or suspicion of the presence of a listed disease is detected, including how and when that will be notified to Scottish ministers.

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

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

Medicine records were inspected and found to be adequately maintained.

Inspection under the Aquaculture and Fisheries (Scotland) Act 2007

The site was also inspected in accordance with the Aquaculture and Fisheries (Scotland) Act 2007, as amended, with respect to section 3 regarding parasites (sea lice), section 4A regarding fish farm management agreements and statements and section 5 regarding containment and escapes.

On this occasion the site was found to be satisfactory with regards to parasites, and containment and escapes.

The farm management agreement/statement was inspected and found to be inadequately maintained. Please see the attached annex detailing the points that must be addressed.

Please ensure that these points have been addressed by 06/09/2021. Records or documentation demonstrating that these points have been addressed should be sent to the Fish Health Inspectorate (contact details below). The site may be subject to further inspection or enforcement action should the appropriate action regarding the above points not be taken within the time period stipulated.

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

Signed:



Date: 04/08/2021

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/>

Annex - The Aquaculture and Fisheries (Scotland) Act 2007

Section 4A of the Aquaculture and Fisheries (Scotland) Act 2007, as amended, introduces the requirement for a person carrying out the business of fish farming within a farm management area⁽¹⁾ to;

- (a) be party to a farm management agreement, or prepare and maintain a farm management statement, in relation to the fish farm, and
- (b) ensure that the fish farm is managed and operated in accordance with the agreement or statement.

To ensure compliance with the Aquaculture and Fisheries (Scotland) Act 2007, as amended, the following points must be addressed in the farm management agreement/statement

The statement or agreement must include arrangements for;

- **The management of parasites⁽²⁾**
This must include arrangements for the synchronisation of treatments; the availability of and use of medicines; requirements for sensitivity testing; the sharing of data and information on sea lice numbers and treatments and the use of biological controls and cleaner fish.

⁽¹⁾ Farm management area means an area specified as such in the Code of Good Practice for Scottish Finfish Aquaculture

⁽²⁾ Parasites as defined in The Aquaculture and Fisheries (Scotland) Act 2007 which means *Caligus elongatus* and *Lepeophtheirus salmonis*