

Case No:	2023-0030	Date of visit:	08/02/2023			
Time spent on site:	5 Hours	Main Inspector:				
Site No:	FS1121	Site Name:	Bight of Bellister, Dury Voe			
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd			
Case Types:	1 REP	2 CNA	3	4	5	6
Water Temp (°C):		Thermometer No:		FHI 045 completed		
Observations:	Region:	SH	Water type:	S	CoGP MA	S-5
Dead/weak/abnormally behaving fish present?	☐ Y	If yes, see additional information/clinical score sheet.				
Clinical signs of disease observed?	☐ Y	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:

Paper work conducted on 08/02/2023 by [REDACTED], physical inspection of the site was not conducted at this time due to bad weather.

Site inspected on 27/02/2023 by [REDACTED].

On the date of site inspection fish were observed onsite and on camera. Fish were observed shoaling well and responding positively to routine feeding regimes. The site have been experiencing some heavy seal predation in recent weeks, during the onsite inspection, some fish were observed suffering with wounds from recent seal attacks.

The site is currently harvesting, only two cages were stocked at the time of the site inspection.

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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	12	Facilities stocked	2	No facilities inspected	12
Species	SAL				
Age group	2021 S0				
No Fish	65,404				
Mean Fish Wt	5kg				
Next Fallow Date (Site)	07/03/2023	Next Input Date (Site)	10/2023		
Recent (last 4 wks) disease problems?		Y	Any escapes (since last visit)?		N
If yes, detail:	CMS				

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
02/02/2023
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?

Mortality Records

1. Mortality records available for inspection?
2. How are mortalities disposed of?
3. Mortality records complete and correctly entered?
4. Recent mortality (last 4 wks):
5. Evidence of recent increased/atypical mortalities?
6. Any other peaks in mortality during period checked?
7. Have increased (unexplained) mortalities been reported to vet or FHI?
8. Have 'mortality events' been reported to FHI? If no, enter details on mortality events sheet.

If other detail: Whole fish removed - Palagia

Other (detail)

Week 7 (863, 1.35%), Week 6 (792, 1.22%), Week 5 (2801 3.28%) Week 4 (2738, 1.73%)

If yes, facility nos/no mortality per facility/no stock per facility/reason:

If yes, detail:

If yes, detail action:

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:

02/02/2023 - 27/02/2023

Case No: 2023-0030 Site No: FS1121

Date of visit: 08/02/2023 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?		Y		On 25/01/2023, during harvest cage preparations site staff noticed there were 4 seals in cage 12. There appeared to be a possible entry point through the top net. Divers were called and carried out a full Net inspection and mort removal. During the inspection there were 5 small holes found, but nowhere big enough, that seals could gain access to the pen. No fish are thought to have been lost as the holes found and repaired by divers were too small. The incident was reported to MSS on the date of the potential escape.
If yes answer 1.2-1.8:				
1.2. Have appropriate reports been made to Scottish Government within 24 hours of discovery?	High	Y	AAAH Regs ⁴ 31D,E	Contact made by phone on 25/01/2023. Initial and final notification received.
1.3. Have these been reported to the SSPO ² and, where in existence, the local DSFB and fisheries trust?	Medium	N/A	CoGP 4.4.37, 5.4.17	
1.4. Were methods (if any) used to recover escapees?		N/A		
If yes give detail				
1.5 Was the decision to attempt to recapture and the method employed agreed with the local DSFB and FT	Low	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	Double net system will be reintroduced next production cycle. Following the incident, the site have doubled up on down ropes which secure the top net to the Pen railing, further securing any potential access points for seals.
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
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:-				
a) The name of the manufacturer	Low	Y	Facilities Moorings Nets	PENS : Gael Force fusion, tritons 450's 100m, pens come as standard, no special adaptations. Deployed to sea September 2021, purchased 07/20. Gael force fusion marine manufacture. MOORINGS: Shore pins on south side of site installed as a back up as the site is very tidal. Date of purchase for moorings, 14/08/19. NETS: WJ Knox nets ltd., manufactured 16/04/2020.
b) Any special adaptations	Low	Y		
c) The name of the supplier	Low	Y		
d) The date of purchase	Low	Y		
e) Each inspection including				
i) the name of the person conducting the inspection	Low	Y		ROV survey conducted by Ocean connectics, September 10th 2022 - Mark Simmons for pens and moorings. Inspection of pens carried out daily by site staff as highlighted in their daily check sheets. Nets last serviced on 18/11/2020. Nets are typically serviced every cycle by Morenot Aquaculture ().
ii) the date of each inspection	Medium	Y		
iii) the place of each inspection	Low	Y		
iv) the outcome of each inspection	High	Y		
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	Y		Nets are sent to Scalloway servicing following the competition of each production cycle. Antifouling treatment carried out during servicing by Net Wax E4 greenline. Minor remedial work to moorings summarised in ROV survey report. Documentation highlighting the date of these repairs inspected and found and found to be adequate.
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		20mm Net tags match's the site inventory. Shipped immediately to scalloway following removal from site.
2.3. In relation to each facility a record of:				
i) The date of construction	Low	Y	SSI, 2,3	February to July 2020
ii) The material used in construction	Low	Y		SDR21, Polyethylene Structured plastic

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
iii) Its dimensions	Low	Y	SSI, 2,4	100m circumference, 31.8m diameter. 14/08/2021 750/30 SeaQureHold anchors, 500/30 SeaQureHold anchors. Stored in manufactures manual (Grid spec) for Gael Force fusion.
2.4. In relation to each mooring a record of-				
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	N/A		
b) The date of and results of any tests conducted on any such measures	Low	N/A		
c) The date of any incident where the site was flood	Low	N/A		
d) The water course height during any such flood incident	Low	N/A		
2.7 A record of-			SSI, 2,7	
a) The date of any severe weather event which caused damage to any facility, net or mooring	Medium	Y	SSI, 2,11 (a)	Recorded on aquacom.
b) Any action taken to rectify any such damage	High	Y	SSI, 2,11 (b)	28/11/22, [REDACTED] - Feed pipe clamps snapped off barge. Recorded in FIX .
Pen and mooring systems				
2.8 Are there documented procedures maintained regarding the selection and installation of pens and moorings?	High	Y	CoGP 4.4.8, 4.4.13	Environmental apparmeters surveyed by company's own environmental officer. Results are sent to gael force and moorings and pens are selected based on these parameters.
2.9 Can the site demonstrate evidence that the design specification of pens and moorings are suitable for purpose and correctly installed?	High	Y	CoGP 4.4.9, 4.4.14	
2.10 Do pen systems meet the manufacturers guidelines?	High	Y	CoGP 4.4.10	
2.11 Are pen systems inspected and approved by suitably qualified / experienced person(s)?	High	Y	CoGP 4.4.11	
2.12 Is there evidence of the competence of personnel involved in the design, installation and maintenance of pen and mooring systems?	High	Y	CoGP 4.4.12, 4.4.15	
2.13 Are pen and mooring components inspected with	High	Y	CoGP 4.4.16	Malakoff divers operate in accordance to SOP and risk assessment for each site specific role. Documentation inspected.
a) a documented SOP				
b) a documented inspection plan based on a risk assessment				
2.14 Do all nets used on site meet industry standards?	High	Y	CoGP 4.4.17	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
2.15 Can the site demonstrate an awareness of the minimum fish size in relation to net size	High	Y	CoGP 4.4.19	Minimum fish size 270g. Nets tested every production cycle. Net inspections conducted by divers monthly (routine). Nets also inspected for damage pre and post net washing. Site staff, completed during daily site checks. Diver reports inspected. Remedial action for any damage found is recorded here, dated and signed by the person responsible for the repair. Examples of incidents of minor net repairs were available for inspection and found to be adequate.
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	Y	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	Y	CoGP 7.1.8	Training matrix and SOPS up to date and signed by qualified staff. All training and qualifications for each member of staff inspected - stored in the sites specific training matrix.
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	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
a) a documented risk assessments	High	Y	SSI 2,6,b SSI 2,6,c CoGP 4.4.26 CoGP 4.4.26 SSI, 2,8,a SSI, 2,8,b CoGP 4.4.27	2 work boats, one a catamaran and one a landing craft. Voe boat (Orkney) Polar boat for daily site work in calm weather. Large colony of seals reside on an island within close proximity to the site. During the site inspection, approximately 30 seals were observed within the area of the site during the inspection. There are plans in place for the nets provider to change to Knox nets for the next production cycle – continuing to be Seal Pro nets. In addition, the double net system will be reintroduced. Ropes securing the current nets to the handle of the pens have been doubled up to prevent any slack in the net positions from occurring.
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		
- The type and size of any propeller guard fitted to each boat used on the site	Low	Y		
4.4 Does the site suffer from regular or heavy predation?		Y		
4.5 Are there records of site specific risk assessments ascertaining the risk of predator attack?	Medium	Y		
4.6 Are there risk assessments undertaken on a pre-determined frequency?	Low	Y		
4.7 A record of any anti-predator measures undertaken at each site at which fish are farmed including:				
The type and location of each net, fence and scarcer deployed	Medium	Y		
- The use of lethal means by any person involved in operations on the site	Low	N/A		
4.8 Where predator nets are deployed is the advice of Annex 7 considered?	Low	N/A		
c. Inspection of site and site equipment				
5.1 Are there any obvious containment issues on the site?	High	N	CoGP 4.4.18	The site was found to be satisfactory in regards to containment.
5.2 Is the net mesh size considered to be capable of containing all fish sizes present on site?	High	Y		

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	Double net system will be reintroduced in the next production cycle. Ropes securing the current nets to the handle of the pens have been doubled up to prevent any slack in the net positions from occurring. Feed pipes entering each pen are secured in place by a metal bracket, preventing and tension or abrasion to the net wall or top nets. Further equipment is being reviewed and changes may be implemented in the next production cycle
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	Navigation markers present on site and clearly visible.
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	Yes - documentation inspected and found to be adequate.
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

Inspector: [REDACTED]

[illegible]

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0125	DATE OF VISIT	27/02/2023
SITE No	FS1121	SITE NAME	Bight of Bellister, Dury Voe
CASE No	20230030	INSPECTOR	

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

d) Inspection of site specific procedures

The site meets the requirement of current Scottish industry best practice. No recommendations 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:

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

Date: 07/03/2023

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