

Convener
Rural Affairs and Islands Committee, The
Scottish Parliament,
Edinburgh,
EH99 1SP

Email: rural.committee@parliament.scot

Our ref: CORR/9014
27/09/2024

Dear Mr Carson,

Queries following the Rural Affairs and Islands Committee visit to Dunstaffnage fish farm

Thank you for your queries regarding aquaculture operations at the Scottish Sea Farms Ltd (FB0125) site known as Dunstaffnage (FS0299) following your site visit on 23rd September 2024. Charles Allan (Head of the Fish Health Inspectorate), is currently unavailable and unable to respond directly before 01st October 2024. In the interests of expediting your request the Fish Health Inspectorate (FHI) have provided the information detailed below, on Charles' behalf.

The visual impact of mortalities being removed from an aquaculture facility can understandably cause some concern. Whilst any mortality is regrettable and should be minimised, where possible, it is a recognised aspect of animal husbandry. The mortality removal should also be considered within the context of the overall population of stock held and husbandry practices in operation at the farm.

To assist your understanding the FHI have discussed the current operation of the farm with the business on 26th September 2024. The site is currently stocked with 447,563 Atlantic salmon at an average weight of 2.6 Kg and has been taking actions to manage the gill health of stocks held at the site. The majority of the stocks had been treated with freshwater in week 36, between 03/09/2024 and 09/09/2024. Pen 1, the main focus of the video footage, received a freshwater treatment three days before the video footage was taken. The mortality levels have not been above the voluntary reporting levels, with 1,082 Kg of biomass overall having been removed from the site on the date the video footage was taken. Recent site mortality levels have been:

- Week 35: 0.1%
- Week 36: 0.24%
- Week 37: 0.55%
- Week 38: 0.35%
- Week 39: Mon – 0.1%, Tues – 0.04%, Weds – 0.07%

- **Does the video footage raise any concerns for FHI regarding the quantity of dead fish being removed?**

The FHI, on behalf of the competent authority, has not received any reports of increased unexplained mortality at the Dunstaffnage site, from Scottish Sea Farms Ltd, in accordance with regulation 23 of The Aquatic Animal Health (Scotland) Regulations 2009 (the 2009 Regs). There have been no reports received of mortality above the voluntary reporting levels set out in Chapter 4, point 3.5 of A Code of Good Practice for Scottish Finfish Aquaculture [[chapter-4-seawater-lochs.pdf \(thecodeofgoodpractice.co.uk\)](#)]. The FHI do not have concerns with the routine mortality removal procedure being undertaken in the video footage.

- **Does FHI consider the video footage to be consistent with daily standard operating procedure?**

There is no requirement for the FHI to routinely have open access to the standard operating procedures currently being followed by farm staff to enable comment on whether these are being followed. The FHI would consider that this procedure would be consistent with the mortality removal procedures on Scottish aquaculture farm sites, although procedures may differ between sites.

- **Would the quantity of fish being removed meet voluntary mortality reporting thresholds requiring a report to be submitted to FHI?**

It is very difficult to consider whether the quantity of fish being removed from the pen(s) in the video footage would meet the voluntary reporting requirements. Information on the total number of fish removed from all pens during a particular calendar week, total number of fish held on the site and the timing of removal operations would be required to make this consideration. The FHI have not received any reports of mortality above the voluntary reporting levels during this production cycle at the Dunstaffnage site. Mortality reports received by the FHI are published at [Fish Health Inspectorate: mortality information - gov.scot \(www.gov.scot\)](#). Mortality records inspected during animal health surveillance in April and July 2024 indicated that mortality levels would not require reporting to FHI.

- **Is the quantity of fish being removed from the pen in the video footage consistent with monthly mortality reports submitted to FHI for the Dunstaffnage site in the current production cycle? To that end, the Committee would also welcome a record of monthly mortality reported to FHI for the current production cycle for Dunstaffnage.**

There is no requirement for monthly mortality reporting on aquaculture sites to be provided to the FHI. The FHI have not received any reports of monthly mortality for this current production cycle at the Dunstaffnage site.

- **How many visits has FHI made to Dunstaffnage during the current production cycle and in total since 2017 for regulatory inspections and how many of these visits were unannounced?**

The FHI have attended the Dunstaffnage site on 6 occasions since 2017, with two of these visits being conducted in the current production cycle. None of the visits to the Dunstaffnage site were unannounced for the period in question.

- **Did any of these inspections identify any cause for concern or further regulatory action?**

The inspection in April 2024 identified that to ensure compliance with the Aquaculture and Fisheries (Scotland) Act 2007, as amended, the farm management statement required to contain provision for the review of the document and the arrangements for sensitivity testing in relation to treatments for parasite management. Advice was provided and a deadline of 21st June 2024 was issued to demonstrate compliance. Information to demonstrate that these requirements had been addressed was provided to the FHI on 12th June 2024.

- **Has the FHI been notified of any disease outbreak at the Dunstaffnage site in the current production cycle, as required under the Code of Good Practice for finfish aquaculture?**

The FHI are not aware of a requirement under the Code of Good Practice for Scottish Finfish Aquaculture for an aquaculture production business to provide it with notification of any disease outbreak. The FHI have not received a notification of a disease outbreak at the Dunstaffnage site during the current production cycle.

If you have any further queries please let the Fish Health Inspectorate know.

Regards

Charles Allan, Mr
Head of the Fish Health Inspectorate

Ronald Smith, Mr
Fish Health Inspectorate Technical Manager