



SITE MANAGEMENT MANUAL – LOCH TAY

Technical
KAMES FISH FARMING



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1. Revision

This document shall be reviewed annually or whenever changes occur that may impact the safety of food production and/or the product integrity.

Document Revision			
Date	Name	Signature	Details of Changes
31/12/2025			Technical review and new issue
18/03/2026			Changes to the Containment Database and Record Keeping System
13/04/2026			Section 10.6.2 Fish Talk

2. Introduction

The Site Management Manual provides a framework for the systematic management of the production site operating within the structure of the company's Integrated Management System and compliance requirements, with the objective of consistently achieving good outcomes.

The site shall be operated in compliance with all customer, legal and quality assurance scheme requirements.

- GLOBALG.A.P. Standard
- RSPCA Welfare Standard for Farmed Rainbow Trout 2025
- Code of Good Practice for Scottish Finfish Aquaculture

3. Normative References

The references and documents listed below underpin this manual, however they are not an exhaustive list and additional references may apply.

Document	Issued by
1. GLOBALG.A.P. Standard	GLOBALG.A.P.
2. RSPCA Farmed Rainbow Trout 2020	RSPCA
3. Code of Good Practice Scottish Finfish Aquaculture	Salmon Scotland
4. Technical Standard for Scottish Finfish Aquaculture	Marine Directorate
5. Customer Standards	Customers
6. Legal Requirements	Regulating Bodies
7. Manual – Quality Management System	Kames Fish Farming
8. Manual – Health and Safety Management System	Kames Fish Farming
9. Manual – Environmental Management System	Kames Fish Farming
10. Company Handbook	Kames Fish Farming

4. Terminology and Definitions

Industry standard terminology and definitions apply to this manual.



5. Legality and Administration

5.1 Company Overview

The company, known as Kames Fish Farming, is registered in the United Kingdom as a legal entity and operates as a multi-site producer. The production sites are in various locations across Scotland, with each site specialising in different stages of the rainbow trout lifecycle.

The company maintains direct control over the production sites operating within the scope of the Quality Management System and where production sites are leased, site owners shall not be permitted to have any responsibility and input or decision-making capacity for the production operations at the rented-out site.

5.2 Site Overview

The Production Management Unit, known as Loch Tay, was established as a trout farm in 1994 and acts as an on-growing unit. It has a shorebase and one production site with the purpose of finishing the stock to meet the product specifications and harvesting on achieving the specified size.





5.3 Site Management System Scope

This document covers the freshwater ongrowing stage of the production cycle and is applicable to the production unit Loch Tay, operating as part of Kames Fish Farming.

5.4 Site Particulars

Production Management Unit	
Site Name	Loch Tay
Site Manager	Mobile: Email: tay@kames.co.uk
Ownership Structure	Leased from Remony Estate
Site Address	Loch Tay Fish Farm Remony, Aberfeldy Perthshire PH15 2HP
SEPA License	CAR/L/1001403 <i>Controlled Activities Regulations (CAR) have been replaced by the Environmental Authorisations (Scotland) Regulations 2018 (EASR). These changes have not reflected yet at time of the manual review and license reference number is due to change at an undetermined time.</i>
Marine Directorate Authorisation	Site Authorisation Number: FS0432 Company Authorisation Number: FB0134
National Grid Reference	Latitude = 56.5735 Longitude = -4.0164
GPS Coordinates	56°34.455 N 004° 1.020 W
Fallow Period	The site does not require a fallow period and is perpetually stocked.
Production System	Open water pens with suspended nets
Stocking Density (max allowed)	RSPCA Trout Standard
Annual Production Volume (PMU)	License for 250 tonnes per year.
Site water depth	-15m



5.5 Site Reference System

The site management shall have a reference system for identifying sites used in production, operational areas and facilities.

The site entrance shall have a physical entrance sign, and each production unit e.g. pen or tank, shall be identified by a physical sign that can be cross-referenced to the site map and Fish Talk.

The site map shall include, but not be limited to the following information:

- Overview of the operating area
- Details on production units, buildings and facilities
- Entry and exit points to the site
- Water sources and isolation valves
- Electrical isolation points
- Biosecurity controls
- Emergency and First Aid Equipment
- Storage/handling facilities
- Danger Zones and Safe Zones (where applicable)
- Muster Stations

The map shall be reviewed and updated annually.

5.6 Key Contacts

The site shall maintain an up-to-date register of key contacts.

5.7 Regulators

The site must operate in compliance with the relevant regulations and may be subject to routine inspections by the following regulating bodies.

- SEPA – Scottish Environmental Protection Agency
- MD - Marine Directorate
- HSE – Health and Safety Executive
- MCA – Maritime and Coastguard Agency
- VMD – Veterinary Medicines Directorate



5.8 Quality Assurance Schemes

The site is required to be certified to the following standards:

- GLOBALG.A.P.
- RSPCA Assured
- Code of Good Practice for Scottish Finfish Aquaculture
- Customer Standards

As part of the ongoing certification process, the site is subject to an auditing programme that includes a combination of internal and third-party audits.

Chain of Custody

The site manager shall check that all certified inputs and outputs from the production site are in compliance with chain of custody requirements to maintain certified product status.

Full and transparent lifecycle traceability shall be maintained from ova to point of sale for the harvested product.



6. Leadership

6.1 Policies

Company policies are held in the designated management folder and must be prominently displayed in a suitable location on site. Policies are also made available to everyone via the SAGE HR App and all members of the team shall be fully briefed on the policy, with managers/supervisors being responsible for maintaining compliance with the policies.

6.2 Organisational Structure

A company organisational diagram is detailed in the Quality Management System Manual.

6.3 Roles, Responsibilities and Authorities

Site Team	
The site is managed and operated by a multi-disciplinary team who all share a duty and responsibility for the implementation of compliance standards that ensure food safety.	
1.	Site Manager
2.	Senior Husbandry Operator (Assistant Manager)
3.	Senior Husbandry Operator
4.	Husbandry Operator



7. Planning

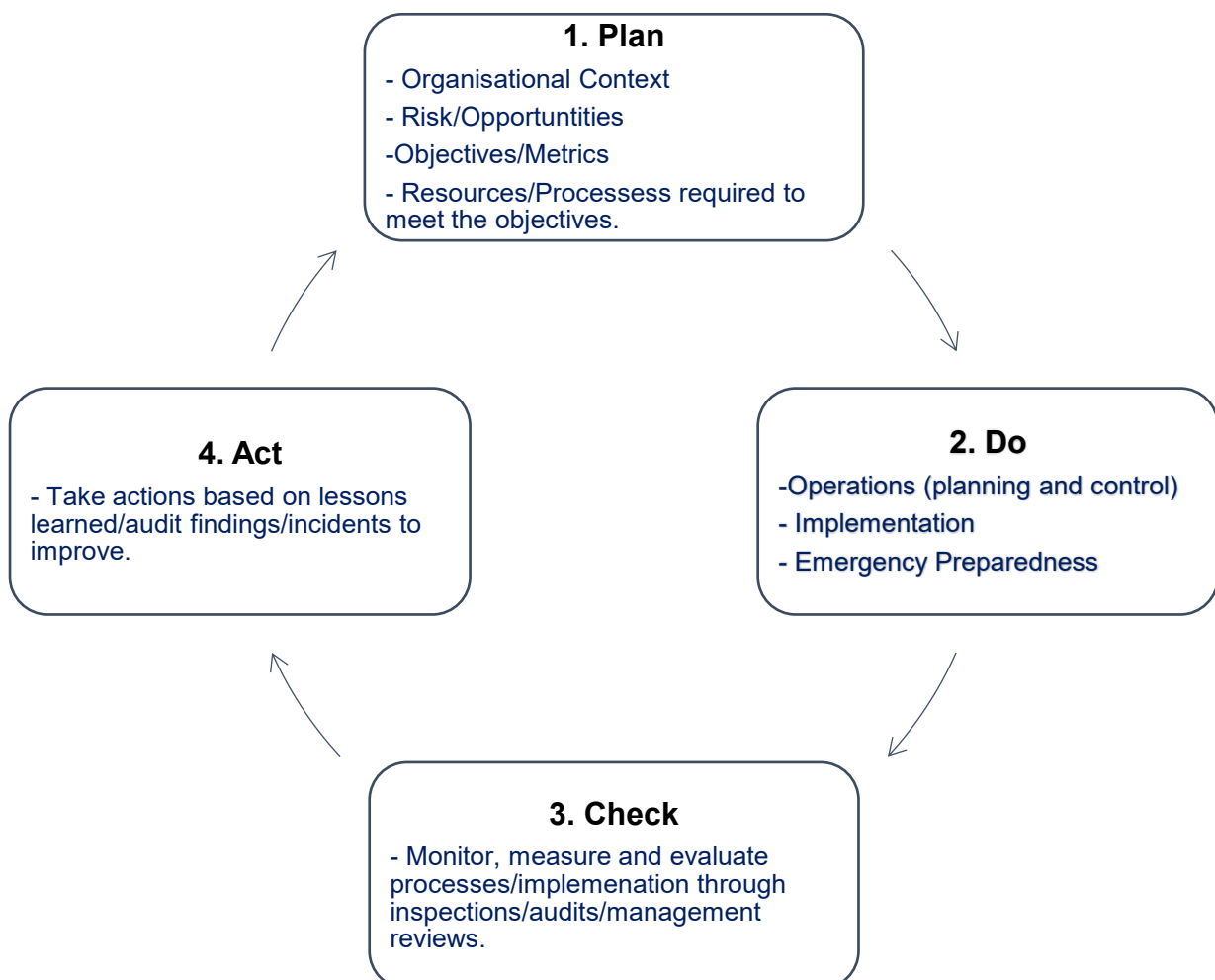
7.1 Management Cycle

The site management system is based on the Plan-Do-Check-Act (PDCA) continuous improvement model to implement a systematic approach to consistently achieve the specified management objectives as measured by Key Performance Indicators and underpin continuous improvement plans in all aspects of the sites activities.

Information on appropriate action following reviews and/or corrective actions in the event of non-compliances or non-conformances raised during inspections/audits are detailed in the company QMS Manual.

Material improvements, such as new equipment or infrastructure upgrades, requiring financial approval above specified limits are subject to the annual CAPEX approval process.

All improvements must be evaluated as part of the sites annual management review and recorded on the review report – refer to the Performance Evaluation Section in this document.





7.2 Operating Environment

The site operates on a freshwater loch based inland Scotland, United Kingdom.

7.3 Objectives

The primary objective of the site is to grow the juvenile trout to the specified harvest size, while consistently meeting all customer and compliance requirements.

In addition to the above, the following objectives are fundamental to the company:

- Consistently achieving product quality standard.
- Maintain a high standard of food safety and zero incidents.
- Maintain a high health and safety standard and zero accidents.
- Minimise the environmental impact and zero incidents.
- Protecting the brand integrity of the company and its customers.
- Consistently meet all specified compliance requirements.

7.4 Planned Changes

It is encouraged to engage with research, development and innovation as part of the continuous improvement process.

Any planned changes to processes/procedures or those that will result in a significant change from compliance standards shall be thoroughly assessed and must be discussed with the relevant customers before being approved and implemented.



7.5 Risk Management

7.5.1 Risk Management Process

Risk management is a core part of the site management system and should be practiced by all member of the team to pro-actively prevent incidents.

The company uses a standardised 5-step risk management process that can be applied to any risk category:

- Quality
- Health and Safety
- Environmental
- Food Safety
- Fish Health and Welfare

Risk assessments must be reviewed annually and/or following any incident or change.





7.5.2 Site Suitability and Water Quality Risk Assessment

Refer to the GLOBALG.A.P. Standard IFA GFS Checklist P&C's section

- AQ-GFS 01.02.01
- AQ-GFS 20.02.16
- AQ-GFS 20.02.18

The farm is required to risk assess the suitability of the sites (including rented land, structures, equipment) for continuing farming operations, considering aspects of food safety, the environment and animal health and welfare. A list of all activities potentially affecting the farm shall be available with regard to the following hazards:

- Physical
- Chemical
- Allergenic
- Biological

In addition to the above, the farm shall assess all potential water pollution sources affecting food safety and stock health and welfare. Where risks have been identified, these must be appropriately controlled (water treatment, filtration, disinfection etc). Any water sources not suitable for the production process shall be clearly identified by marking it.

A water quality monitoring programme, based on the risk assessment, must be implemented and the risk assessment must provide details on the water quality parameters.

The following water quality indicators may be monitored:

- Temperature
- Dissolved Oxygen
- Carbon Dioxide
- Dissolved Nitrogen
- pH
- Ammonia
- Nitrate
- Nitrite
- Suspended Solids
- Microbiological parameters

7.5.3 Routine and Non-Routine Risk Assessment

The site is required to carry out risk assessments for both routine and non-routine tasks/operations/activities to cover all potential risk categories.



8. Specified Management Plans

In support of implementing specified requirements, there are a number of site-specific management plans detailed within or as part of this manual.

8.1 Production Plan

A documented production cycle plan shall be developed prior to the start of each production cycle. A copy of this plan shall be held on file for management and compliance purposes.

The production plan for the production cycle shall map out the cycle along with key events.

8.1.1 Farm Management Statement

As part of the Production Cycle Plan a Farm Management Statement (FMS) shall be prepared by the Site Management Team. The FMS provides key information pertaining to the management of the site that is communicated to stakeholders that are directly impacted by the farm activities on the surrounding area.

Form – Farm Management Statement (KFF-QS-FOR-012)

8.1.2 Production Monitoring

Production must be monitored on an ongoing basis for management and compliance purposes.

The site manager is responsible for generating and reviewing the following reports:

1. Weekly Stock Sheets
2. Monthly Production Reports
3. Production Cycle Reports

Records of the cycle that are relevant for production management and compliance purposes must be kept.

Production monitoring also acts as a Mass Balance exercise to determine inputs, losses, stock carried over and outputs.



8.1.3 Livestock Input

Live Fish Transfers

The Operating Procedure – Live Fish Transfers provides details on the actions to be taken to move livestock between sites.

Lifecycle Traceability

The System Procedure – Lifecycle Traceability provides information for assigning a batch code and implementation of the lifecycle traceability system.

Stocking records shall be maintained in the site management folder for the production cycle and recorded on Fish Talk.

To provide an overview of the stocking, the site shall maintain a Stock Input Log with the following details:

- Input Date
- Origin Site
- Origin Batch Code
- New Batch Code
- Number of Fish Stocked
- Transport Mortality
- Site Stocked
- Pen Stocked
- Verification check that all transport documents have been completed

Site Specific Considerations

No site-specific considerations noted.



8.1.4 Feed Management Plan

Company Policy and Procedure	Refer to Operating Procedure – Ongrowing Feed Management
Feed Supplier	EWOS (Cargill)
Feed Delivery Method	Feed is delivered to the fish farm on either a flatbed truck, covered with a waterproof tarpaulin, or a curtain sided truck. All the feed pallets are tied down using ratchet straps. The feed is then offloaded using a telehandler and stored in the shed.
Feed Storage Arrangements	Feed is stored in the shed.
Diet and Feed Table	Company approved Trout diet
Guidance on feed pellet size in relation to fish.	See EWOS guidelines
Guidance on quantity of feed to be fed in relation to population size.	Aquasim Production Planner may be used to model the feed requirements for the production cycle based on site specific feeding factors. Site feeding regime detailed below Ewos Micro LR 80P – 3.3mm pellet size = 80g – 150g Ewos Kames Silva 150 – 5mm pellet size = 150g – 600g Ewos Kames Silva 600 – 8mm pellet size = 600g – 1500g Ewos Kames Silva 1500 – 10mm pellet size = 1500g – Final Harvest weight. Dermic functional feed is used for 2 weeks pre and post fish handling work to minimise the effects of fish handling. Feed Guideline charts are used to calculate daily feed rates and will be reviewed on a weekly basis to factor in any changes to fish health, welfare and growth. Charts used are as follows; Ewos Trout feed table – Base Growth Performance Ewos Trout feed table – Mid Growth Performance Ewos Trout feed table – High Growth Performance Skretting Rmax Feed & Growth table. Skretting 20% below Rmax Feed & Growth table. The site only uses these feed tables as guidelines for calculating feed rations but, will adjust feed rates according to Environmental & fish health factors.
Guidance on dietary pigment inclusion rates.	Standardised pigment inclusion rate specified in the approved diet.
Feeding and monitoring system.	Feeding is carried out by hand or by water cannon and surface feed response assessed by the operator.



Review of feeding against stock health and welfare indicators.	Weekly stock sheets
Ongoing review of performance against targets (SFR, eFCR, bFCR).	Production monitoring e.g. annual management review report.

8.1.5 Growth Monitoring

As a minimum sample weighing must be carried out on a monthly basis and can be combine with activities like fish health checks.

New technologies, such as digital Biomass Scanners, should be used where feasible.

8.1.6 Grading

Grading is determined as part of the cycle production plan.

[Refer to the Operating Procedure - Grading](#)

8.1.7 Mortality Management

[Refer to the Operating Procedure – Mortality Management](#)

8.1.8 Livestock Output

A site may transfer live fish to another site.

The transfer log (stock output) should be completed by the sending site and acts as a master overview of the stock transfers and captures the following details on an Excel spreadsheet:

- Transfer Date
- Origin Site
- Origin Pen
- Origin Batch Code
- Number of Fish Transferred Off-Site
- Destination Site



8.1.9 Quality Control

Quality control is carried out at specified times within the production phase to ensure that the harvest fish meet the specified requirements and do not pose a food safety risk to consumers.

[Refer to the Operating Procedure – Flesh Quality Monitoring](#)

8.1.10 Harvesting

Harvesting is planned and coordinated with the sales team.

[Refer to the Operating Procedure - Harvesting](#)

Harvesting records must be recorded in the following location in the Site Management Folder on public:

The following records shall be maintained in the designated folder:

Site Management Folder 02 Production Cycles: all site harvest records shall be maintained in this folder	
Harvesting	
01 Flesh Quality	• Veterinary Medicines Directorate Reports • Heavy Metals Test Reports • Flesh Quality Analysis (Oils, colour etc) • Organoleptic Assessments
02 HAS	Harvest Advice Sheets
03 Processing Reports	Processing document pack that is emailed for every harvest • Harvest Breakdown • Kames Downgrade Summary
04 Micros	Micro sampling reports checking harvest hygiene
05 Ice	Ice water test reports
06 Bin Cleaning	Provided by processing
07 Equipment Derogations	RSPCAA Electro Stunning Derogation

8.1.11 Following Plan

The SEPA license conditions stipulate the mandatory following compliance.



8.2 Cleaning and Hygiene Plan

Maintaining a high standard of cleaning and hygiene in the work environment is critical for fish health & welfare, biosecurity, food safety and health & safety.

The site is subject to a routine cleaning and hygiene programme that is implemented in accordance with the following procedures.

- Refer to the VHWP for details on biosecurity measures.

8.2.1 Annual Health and Hygiene Training

All members of the team must undergo cleaning and hygiene training and refresh this training annually.

[Form – Induction/Annual Refresher Training Checklist \(KFF-QS-FOR-006\)](#)

10.2.2 Hygiene Risk Assessment

Inherent risks associated with cleaning/hygiene must be assessed and appropriately mitigated.

The site is required to carry out and document a hygiene risk assessment – the below table provides an overview of potential risk factors to consider when carrying out the hygiene risk assessment.

Risk Factor	Additional Information
Staff illness	Contamination of fish/product with human pathogens
Equipment	Dirty and/or contaminated equipment
Feed Withdrawal pre-harvest/transport	Fish that have not been fasted will contain faeces that could contaminate the processing facility or the water in transport units.
Other contamination (external pollution event & natural conditions)	Fish being supplied after experiencing a pollution event or adverse natural conditions e.g. slurry spill



8.2.3 Approved Products

<u>Approved Cleaning/Disinfection Products</u>	
Note products may be subject to SEPA license conditions and must be verified prior to use.	
Product	Application Procedure
Domestic Cleaning Products (various) for general housekeeping	Refer to product instructions.
Virkon Aquatic Multi-purpose disinfection (biosecurity)	Refer to the manufacturer's instructions and the appendix in this manual for further details on the correct application of Virkon Aquatic. *Virkon is very corrosive to metal and must be rinsed off with water. For routine disinfection of equipment, PPE and footwear Virkon is used at a concentration of 1:100 (1% - 10 grams per 1 litre of water). <u>Surface Disinfection</u> 1. Rinsing with clean water. 2. Thoroughly cleaning using a brush or pressure washer. 3. Applying disinfectant. a. Virkon (STIM – distributor)* – 1:100 (10g per litre) solution for a minimum of 10 minutes 4. Further rinsing with clean water. 5. Drying. 6. Storage (if applicable). <u>Foot Dips</u> Fill a suitable container with water and stir until dissolved. Replenish solution once it has either become soiled or after a period of 4 days.
Caustic Soda Detergent	• Caustic Soda is used at a concentration of 0.3:100 W/V (0.3%) • The ideal contact time for effective cleaning is 24 hours.
Hypofoam Detergent (food safe) – harvest equipment	Refer to the Operating Procedure - Harvesting
Divosan Sanisigma Terminal Disinfectant (food safe) – harvest equipment	Refer to the Operating Procedure - Harvesting



8.2.4 Cleaning and Hygiene Program

Cleaning and Hygiene Program	
Tasks	Frequency
1. Pens, Buildings & Equipment - Fish pens, buildings and equipment are constructed so as to enable them to be effectively cleaned. - Once emptied of fish: pen nets are hung up and dried out, walkways are pressure washed (if required) and feeders are cleaned. - Buildings, equipment, tools, work surfaces and containers are kept clean and in good condition. - Cleaning takes place on a regular basis using the correct cleaning apparatus (pressure washer, brush and shovel).	As required/ongoing
2. Fish Handling Equipment (including nets, pumps and graders etc.) - Fish handling equipment is maintained in good condition and kept clean. - Cleaning takes place on a regular basis using the correct cleaning apparatus (pressure wash / rinse). - Wherever possible clean equipment is dry stored. - Disinfection post use.	Ongoing/Post Use
3. Facilities - The canteen, office, training room, drying room and toilet are kept clean and in good condition. - Cleaning takes place on a regular basis using the correct cleaning apparatus (brush, dustpan, mop and bucket).	Ongoing/Daily/Weekly Clean as you go
4. Vehicles - Vehicles are maintained in good condition and kept clean. - Cleaning takes place on a regular basis using the correct cleaning apparatus (Vacuum cleaner, pressure washer and brush).	Ongoing/Daily/Weekly
5. Vessels - Kept clean and tidy. - Disinfection post use and prior to transit to other sites/farming areas.	Ongoing/Daily/Weekly Clean as you go
6. Personal Hygiene Team is required to maintain high standard of personal hygiene - Showers - Handwashing - Oral hygiene - Clean clothes	Ongoing/Daily



7. Lunch Breaks • Lunch breaks to taken in designated eating areas. • Smoking in designated areas	Ongoing
8. Sick member of team • Sick member of team to notify site manager and either stay at home until fit for work or abstain from activities like harvesting where there is a risk of contaminating food products.	As required
9. Visitors/Contractors • Visitors/Contractors to complete Visitor Questionnaire and if risk of breaching hygiene standards they will not be allowed on site • Use footbaths • Handwashing Facilities • Visitors PPE	As required
10. Personal Protective Equipment • Stored in designated locker room • Kept clean by routine washing • Site Specific • Follow disinfection procedure when moving between sites	Ongoing
11. Harvesting Harvesting and ice production cleaning/hygiene requirements are specified in the Operating Procedure – Harvesting	Every Harvest

8.2.5 Hygiene Signage and Instructions

Appropriate signage and instructions must be displayed at facilities and may include, but not be limited to the following:

- Handwashing
- No smoking, eating/drinking, spitting
- Mandatory PPE

8.2.6 Pest Control

Land-based facilities shall operate a suitable pest monitoring system. A third-party contractor should be appointed, and a minimum of eight documented site inspections shall be conducted annually.

The Pest Control Contractor is: Strathhearn.

Pest control reports shall be saved and be available for audit purposes.





8.3 Health & Safety Plan

The company leadership recognises that a healthy, safe and productive team is fundamental to achieving the company objectives, in addition to honouring its moral and legal duties to protect its team from accidents and ill health.

The company aims to achieve its H&S objectives through the implementation of a fully integrated H&S Management System that is based on the ISO 45001 Standard and as a minimum complies with all statutory requirements.

The objective of this plan is to assist the team in the effective elimination of injuries and losses in their area of responsibility and to develop an overall accident prevention program of the highest standard. However, we will not be satisfied, until we reach our long-term goal of ZERO ACCIDENTS.

It has been proven that an excellent health & safety record is achieved by taking a systematic approach, having standardized processes, team engagement and following a continuous process of careful operational planning and thoughtful risk assessment.

The appointed Managers and Skippers have overarching responsibility for the implementation of H&S standards; however, every member of the team shares a responsibility for implementing and maintaining health & safety standards within their scope of operations to achieve an excellent health & safety record.

An internal H&S Committee, with representatives from all areas of the company, meets every month to discuss any H&S matters and initiate appropriate actions.

A safe environment is not created by publishing regulations and procedures but rather results from attitude and commitment to safety. Regulations and procedures are necessary tools used to inform and remind all members of the team how to perform each job in a safe manner.

Every member of the team has the obligation and authority to stop unsafe work and with reasonable justification, any member of our team shall remove themselves from unsafe work without fear of facing retaliation.

'Stop Work Authority'

A 'Stop Work Authority' may be exercised by any member of our team subject to a dynamic risk assessment, which is the last line of defence to prevent an accident.

'Be A Pro Mindset'

Everyone should have a 'be a pro mindset' by acting with integrity and professionalism no matter what their role or job title is to do their part in maintaining and championing a healthy, safe and productive work environment.



8.4 Veterinary Health and Welfare Plan

The site's Veterinary Health and Welfare Plan (VHWP) is detailed on a separate document.

The Veterinary Health and Welfare Plan (VHWP) is an extension of the company Policy – Animal Welfare, that focuses on the implementation aspects of the policy.

As stated in the policy, our objective is to provide every trout with a high standard of welfare throughout the farming life cycle by adhering to the principles of 'Living a good life' and the 'Five Freedoms' as defined by the Farm Animal Welfare Committee (FAWC).

- **Freedom from hunger and thirst** by ready access to fresh water and a diet to maintain full health and vigour.
- **Freedom from discomfort** by providing an appropriate environment including shelter and a comfortable resting area.
- **Freedom from pain, injury or disease** by prevention or rapid diagnosis and treatment.
- **Freedom to express normal behaviour** by providing sufficient space, proper facilities and company of the animal's own kind.
- **Freedom from fear and distress** by ensuring conditions and care which avoid mental suffering.

These freedoms will be better provided for if those who have care of livestock practice/provide:

- Caring and responsible planning and management.
- Skilled, knowledgeable and conscientious stockmanship.
- Appropriate environmental design.
- Considerate handling and transport.
- Humane slaughter.

Fish health and Welfare is also a key factor in minimising the environmental impact from disease outbreaks and producing a high-quality product.

This VHWP has been developed to ensure that fish health, welfare and biosecurity requirements are met at all times and that there is a documented fish health management system being implemented.

The VHWP shall be treated as a 'live' document that is subject to regular reviews and therefore is structured to integrate a controlled and live section to meet this requirement.

Definition: Veterinarian/Aquatic Animal Health Professional

A certified veterinarian/aquatic animal health professional is the professional responsible for health management on the farm who has the legal authority to diagnose disease and prescribe medication.



VHWP Technical Requirements

The site shall have a site-specific biosecurity inclusive Veterinary Health and Welfare Plan, that has been approved by a qualified veterinarian and updated either:

1. Annually.
2. For each production cycle, if farmed aquatic species are on the farm for a period shorter than one year.
3. Whenever any of the content requires updating.

The VHWP shall be treated as a live document and shall as a minimum include the following information:

1. Animal Welfare Policy
2. Site Particulars
 - Name of Farm(s)
 - Location of farm(s)
 - Compliance Details e.g. Marine Directorate license
3. Designated Veterinarian/Aquatic Animal Health Professional
4. Veterinary and Stock Keepers Declaration
5. Competence Standards
6. Record Keeping Requirements
7. Key Contacts
8. Animal Health Risk Assessment, including biosecurity controls
9. Animal Welfare Risk Assessment
10. Health and Welfare Monitoring Programme

A fish health and welfare monitoring programme is managed by the Fish Health Manager in collaboration with the Site Manager and is implemented by means of:

- Observations
- Inspections
- Audits
- Reviews
- Technical Analysis
- Sampling and Measuring

Monitoring Activity

- Daily, weekly and monthly checks
- Welfare Outcome Assessments
- Routine and Non-Routine Monitoring Activities
- Monitoring Activity Type, Frequency and Record Keeping
- Where applicable, records of routine assigned veterinarian/aquatic animal health professional visits.



11. Biosecurity Management

11.1 Approved Disinfectants

11.2 Biosecurity Procedures

- Site cleaning and disinfection
- Footbaths
- Stock Handling Equipment Controls
- Pen and Net Disinfection
- Vehicle Controls and Disinfection
- Vessel Controls and Disinfection
- Stock Inputs (health status verification)
- Stock Outputs (health status verification)
- Visitor Controls

11.3 Fallowing

- Fallowing periods and procedure instructions, where applicable.

11.4 Area Management Plan

- Farm Partnership Agreements as detailed in the sites Environmental Management Plan.

11.5 Biosecurity Signs

- Prohibition and warning signage around the farm perimeter and entry/exit points.

11.6 Disease Outbreak

- Internal procedures for disease breakout notification, including who will be notified and livestock quarantine procedure.
- The site infrastructure shall support the quarantine procedures in the event of a disease outbreak.
- Coordinated disease responses and preventative measures with neighbouring farms (Farm Partnership Agreements).
- Notifiable Disease Reporting Procedure

12. Disease and Parasite Management

Potential diseases and parasites, including corresponding preventative measures of disease/parasite spread and mitigation measures.

12.1 Disease Monitoring

- Screening programme for relevant pathogens
- Frequency and methods of mortality inspection.
- Recording of mortality and its causes, which shall be done daily or as often as possible. Where disease outbreak is suspected or mortalities are higher than expected, the veterinarian/aquatic animal health professional and relevant government official shall be notified.

12.2 Parasite Monitoring

- Parasite records and controls, including monitoring frequency.



12.3 Vaccination Programme

- Vaccination protocols, which shall include available vaccines suitable for preventing or reducing possible diseases which could occur in this region, where applicable. If effective vaccines are available for a recurring disease, vaccination shall be preferred over therapeutic treatments. All fish shall be anesthetized prior to vaccination by injection, unless there are well justified health and welfare reasons not to do so. Sedation should be used when vaccinating by dip or bath if there is a risk of injury during handling.

12.4 Treatments

- Medicines and treatments that may be used on the farm, including medicine name, active substance, indication, supplier, administration method, dosage, and preharvest withdrawal period.
- Risk assessment of medicinal residues in relation to food safety issues and potential impact on wild stocks around the farm.
- Action plan for harvestable farmed aquatic species if the maximum residue limit (MRL) in the country of production and/or destination has been exceeded or is likely to be exceeded.
- Preharvest withdrawal period, beginning when medicated feed is flushed from the farm feeding system; use of flushed feeds (feed intended to clear residues from the feed system).
- Frequency of monitoring of sensitivity/resistance and rotation of medicines to avoid antimicrobial resistance (AMR), where applicable.
- Any trials or testing of non-licensed medical treatments.
- Antibiotics shall be used if and only if specific diseases are diagnosed and there is no alternative and farmed aquatic species welfare and health may be compromised.

a) Critically important antimicrobials as per the World Health Organisation (WHO, www.who.int) recommendations shall be used if and only if it is the only last resort. Critical important antimicrobials (highest priority and high priority) listed for human medicine can be used only in exceptional circumstances under the judgement, prescription, and supervision of veterinarian/aquatic animal health professional and if microbial sensitivity results (history antibiogram) demonstrate that the selected antimicrobial is the only efficient treatment option.

The veterinarian/aquatic animal health professional shall give justification in writing for each occasion of this use. If there is such use, there shall be evidence of communication from the producer's certified veterinarian/aquatic animal health professional instructing the feed suppliers to mix prescribed antimicrobials into compound feed. It is the responsibility of the farmer to inform an external prescribing veterinarian or aquatic animal health professional of this requirement.

b) Consideration of the World Organisation for Animal Health (WOAH, www.woah.org) recommendations on the "WOAH List of Antimicrobial Agents of Veterinary Importance":

"Among the VCIA – Veterinary Critically Important Antimicrobial Agents in the WOAH List, some are considered to be critically important both for human and animal health; this is currently the case for Fluoroquinolones and for the third and fourth generation of Cephalosporins. Colistin has been moved in 2016 to the WHO category of Highest Priority Critically Important Antimicrobials. Therefore, these two classes and Colistin should be used according to the following recommendations.

- Not be used as preventative treatment.
- Not be used as a first line treatment unless justified, when used as a second line treatment, it should ideally be based on the results of bacteriological tests; and
- Extra-label/off-label use should be limited and reserved for instances where no alternatives are available. Such use should be in agreement with the national legislation in force."



- Medicines and treatments that are not allowed to be used, which shall include those compounds that are banned under the United Nations Food and Agriculture Organisation (FAO)/WHO Codex Alimentarius: nitrofurans (as well as its derivatives), triarylmethane dyes (including, but not limited to malachite green, crystal violet, and brilliant green), stilbenes (including, but not limited to stilbene, dienestrol, diethylstilbestrol, hexestrol), chloramphenicol, nitroimidazoles) including, but not limited to dimetridazole, ipronidazole, metronidazole) or β -agonists (including, but not limited to clenbuterol).
- Severe Adverse Reaction (SAR): monitoring for SAR and internal reporting procedure.

12.5 Sea Lice Control Strategy

- The site's Sea Lice Control Strategy shall be underpinned by the 'National Treatment Strategy for the Control of Sea Lice on Scottish Salmon Farms (NTS)'. The objective is to ensure the welfare and protection of both farmed and wild fish stocks by controlling the sea lice population on the site.

13 Stock Management and Husbandry Practices

This is not an exhaustive list and additional practices and procedures may need to be included.

- 13.1 Appropriate Handling Techniques
- 13.2 Stocking Densities
- 13.3 Site Inspections
- 13.4 Anaesthetisation
- 13.5 Stunning and killing procedures, including those for brood stock.
- 13.6 Culling
 - Frequency and methods of culling, removal of sick and disposal of dead animals.
- 13.7 Water Quality Monitoring
- 13.8 Vaccinating
- 13.9 Crowding Operations
- 13.10 Grading Operations
- 13.11 Harvesting Operations
- 13.12 Feeding
- 13.13 Mortality Removal and Classification
- 13.14 Mutilations
- 13.15 Egg Transport
- 13.16 Live Fish Transport
- 13.17 Protection from other animals
- 13.18 Future Husbandry Plans
- 13.19 Genetic Selection and Modification
- 13.20 Equipment Selection and Modification
- 13.21 CCTV



14 Emergency Response System

The site shall implement a risk appropriate emergency response system that allows for an effective emergency response for the most likely events that may occur and impact fish health and welfare.

15 Live Section

- A live section must be maintained and updated after a fish health and welfare event, with a programme of remedial action if appropriate.
- Monthly update and review
- Annual VHWP review
- Production cycle review



8.5 Environmental Management Plan

Sustainability is a core value of Kames Fish Farming and this management plan plays a key part in Kames' Environmental Management System (EMS). The objective of this plan is to provide a framework for minimising the environmental impact of the farming operations and protecting the surrounding eco system. Farming has a symbiotic relationship with the environment, and it is in the interest of the sustainability of the farms to ensure that the farming environment is kept healthy and productive.

This management plan has been developed to address the following topics:

- Risk Management
- Wildlife and Conservation
- Biodiversity
- Waste Management
- Energy Efficiency
- Predator Control
- Containment Control
- Farm Partnership Agreement



8.5.1 Aquaculture Legislation

As part of the EMS the company maintains an Environmental Legislation Register and conducts an annual review against the compliance requirements. The following table provides an overview of the legislation applicable to aquaculture, along with the regulators who actively monitor compliance against the requirements. It shall be noted that this is not an exhaustive register of environmental legislation that may apply to the scope of site operations.

Legislation	Website Link	Regulator
Environmental Authorisation (Scotland Regulations (EASR) 2018 1st Nov 2025 - Replaced Water Controlled Activities) (Scotland) Regulations 2011 (CAR) and Pollution Prevention and Control (Scotland) Regulations 2012	https://www.legislation.gov.uk/sdsi/2018/9780111039014/contents	SEPA
The Aquaculture and Fisheries (Scotland) Act 2007 and 2013 Aquaculture Production Business Authorisation	https://www.legislation.gov.uk/asp/2007/12/contents https://www.legislation.gov.uk/asp/2013/7/contents	Marine Directorate (FHI)
The Aquatic Animal Health (Scotland) Regulations 2009 Aquaculture Production Business Authorisation	https://www.legislation.gov.uk/ssi/2009/85/contents	Marine Directorate (FHI)
Marine (Scotland) Act 2010 Marine Licensing	https://www.gov.scot/publications/marine-scotland-act/	Scot Gov – Marine Licensing
UK Marine and Coastal Access Act 2009 Planning	https://www.legislation.gov.uk/ukpga/2009/23/contents	Local Authority
The Town and Country Planning (Marine Fish Farming) (Scotland) Order 2007 Planning	https://www.legislation.gov.uk/ssi/2007/268/made	Local Authority



8.5.2 Risk Assessment

The risk of farming activities shall be assessed and reviewed annually or in the event of any changes.

Event	Harm	Controls	Level
Accidental release of production waste into the environment (fish tissues, mortalities, spoiled fish food & blood water)	Disease transfer, eutrophication & endangering native species.	- Active monitoring - Procedures - Right equipment - Training	Low
Accidental release of farm waste into the environment (plastic, metal, cardboard, wood & oil)	Harm to the biodiversity and habitat damage.	Waste removal system	Low
Accidental release of excess chemicals into the environment (disinfectants, fish treatments, fire extinguishers & weed control)	Harm to the biodiversity and habitat damage.	- Safe chemical handling system - Use of approved chemicals - Training - Active monitoring	Low
Accidental release of fossil fuels into the environment (petrol, diesel and oil)	Harm to the biodiversity and habitat damage.	- Approved storage equipment - Safe fossil fuel handling systems - Training	Low
Discharging farm effluents in excess of those permitted	Eutrophication, oxygen degradation of the aquatic environment, changes in benthic composition, sewage fungus.	- Stocking site within SEPA license conditions - Active monitoring to ensure no breaches	Low
Release of pathogens	Disease transfer to native species	Disease screening	Low
Fish escapes	Predation & competition with native species	Containment control plan	Low
Site maintenance	Habitat destruction	All maintenance carried out in compliance with rules and planned before taking action	Low
Over abstraction of water	Habitat destruction.	No abstraction on the farms	Low
Noise from machinery/equipment	Noise pollution	- No permanent farm machinery used - Use of noisy equipment is limited to certain stages of the production cycle	Low
Light from machinery/equipment	Light pollution	- No permanent lights in use - Lights are only used to aid for certain jobs during the production cycle.	Low



8.5.3 Impact Assessment

EIA of Farming Activities and Ecological Consequences.

Aspect	Impact	Controls
1.Disscharge of Effluent	Polluting the loch	- Determined by SEPA license. - In order to control effluent discharges: - The correct type, quantity and size of food is fed to the fish by trained KFF staff, as dictated by the prevailing environmental conditions and the feed charts produced by the fish food suppliers. - Total fish biomass is maintained at levels below the thresholds set out in site specific discharge consents. - In the case of a notification by SEPA of a compliance assessment failure, immediate action will be taken to ensure effluent discharges are minimised. - These actions could include: - Reducing the quantity of food being fed, whilst also taking fish welfare into consideration. - Reducing the biomass on site by harvesting or moving fish.
2.Disposal of production waste	Polluting the loch	- Production waste is processed and stored in an appropriate manner: - Mortalities and fish solids are ensiled and placed into a dedicated IBC Containers. - Spoiled food is ensiled and placed into a dedicated IBC Containers. - Blood water is collected and placed into a dedicated IBC Containers. - Once storage limits have been reached, the production wastes are disposed of as per section 7 of this document. - If production waste is released into the environment, a clean-up operation, using chemical spill kits and/or physical recovery methods, will be commenced immediately, as in accordance with the Chemical Spill emergency procedure.
3.Disposal of farm waste	Polluting the loch and surrounding area	Waste Management Plan
4.Use/disposal of chemicals or medicines	Polluting the loch	Chemicals/medicines are stored, in original containers, inside a designated, lockable chemical store. Powders are stored separately from liquids and only trained staff who have read and understood the applicable chemical safety data sheets are permitted to use chemicals. A chemical spill kit is always available in case of emergency.



		- In the event of an inadvertent release of chemicals into the environment a clean-up operation, using the chemical spill kit, should be initiated immediately, in accordance with the Chemical Spill emergency procedure. - Any expired/ unusable chemicals or medicines are disposed of according to the relevant MSDS. Usually these can be returned to the manufacturer for proper disposal. - Empty 25 litre drums are rinsed three times to remove residue and then disposed of in the farm skip as general waste.
5.Emissions	Air pollution	- Emissions are controlled, where possible, by farm staff. - Control measures include: - Switching off unnecessary equipment, lighting and heating. - Maintaining equipment to a good standard.
6.Fossil fuels	- Air pollution - Polluting the loch - Unsustainable use of natural resources	- The use of fossil fuels is controlled by the farming team. - Fossil fuel powered equipment is maintained to a good standard and only used as required or where no better alternative is available. - In the event of an inadvertent release of fossil fuels into the environment a clean-up operation, using the chemical spill kit, should be initiated immediately, as in accordance with the chemical spill emergency procedure. If necessary, SEPA should be informed.
7.Electricity	- Noise pollution - Unsustainable use of natural resources	Mains electrical power supply to the site specified in this document.
8.Visual Impact	Visual pollution	There is minimal visual impact on the surrounding environment as the infrastructure on the sites is limited to the production pens and shorebase facilities which are integrated into the surrounding natural environment.
9. Release of pathogens	Endangering native species	- The main method of controlling the release of pathogens to the environment is via the maintenance of fish health. The proper VHWP procedures are followed by trained staff. Health screening, proper fish husbandry and the maintenance, as far as is reasonably possible, of environmental conditions are undertaken. - In the event of a disease outbreak, the designated farm veterinarian should be contacted (if required) and a treatment plan created. The administration of any treatments should then commence, as in accordance with the VHWP.

8.5.4 Wildlife and Conservation

Kames' farms aim to operate in harmony with the local wildlife and where possible, wildlife conservation measures are supported.

Common wildlife see in the farming area		
Birds	Foxes	Native Fish
Otters	Beavers	Stoats
Red Deer	Insects	Squirrels
Roe Deer	Frogs	Flora

A wildlife observation log is maintained by the site.

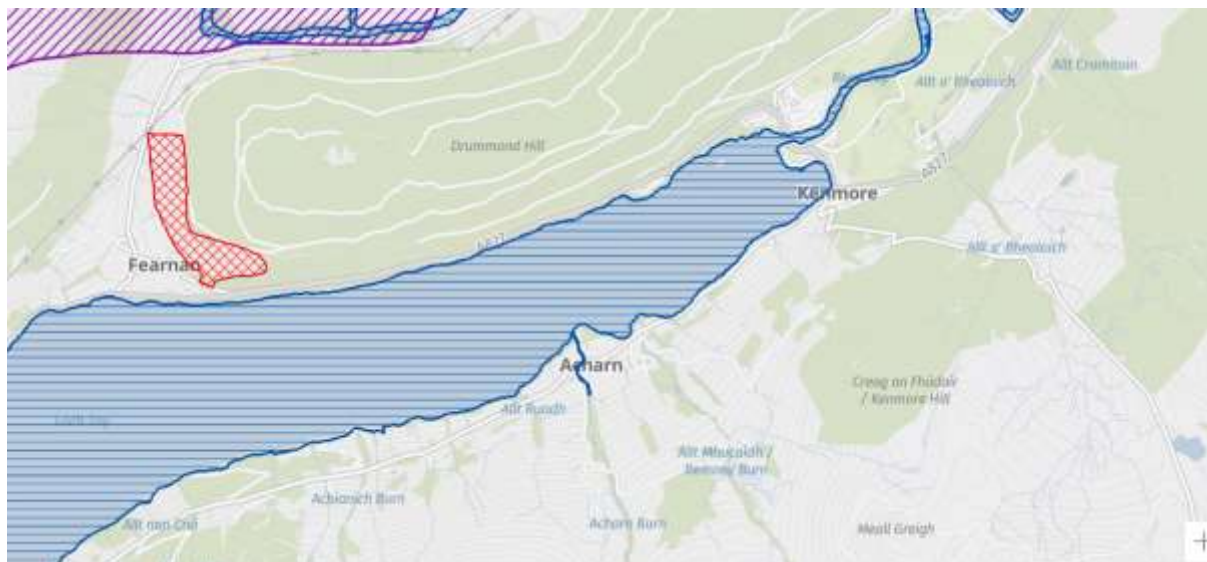
What can be done to enhance and conserve the ecosystem?

The focus is on the protection of existing wildlife and habitats as it is recognised that the opportunity to enhance the wildlife habitat is restricted due to surrounding land use requirements and land ownership status being out with the company.

All farms are operated in compliance with the applicable SEPA license conditions, which have been developed with minimising the environmental impact.

The farm specified in this Environmental Management Plan is located within a special area of conservation – this can be verified via the Nature Scot website. This is in compliance with the farms operating licenses.

[SiteLink \(nature.scot\)](https://www.nature.scot/)





8.5.5 Biodiversity

A healthy ecosystem contains a diverse range of living things and these are defined by the term biodiversity. It is recognised that farming operations have an impact on the surrounding biodiversity and the farming practices and risk management controls are designed to ensure that the impact is kept to a healthy level. It is also recognised that farming requires a healthy ecosystem to be sustainable and productive into the future.

Any new farming developments or changes must be assessed and if required, regulatory approval obtained, prior to implementation to determine their suitability and potential impact on the surrounding ecosystem.

In addition to environmental risk management practices, biodiversity surveys are conducted by regulating authorities and local conservation groups to determine if the biodiversity is within a healthy range. Any findings from these surveys are fed back to the company as part of a cross-collaboration exercise between community stakeholders.



8.5.6 Waste Management Plan

Reducing waste is fundamental to achieving Kames' sustainability targets and minimise its environmental impact. This is achieved by having a waste management system with the objective of:

- Storing waste appropriately on site.
- Disposing waste through approved channels.
- Identifying opportunities to reduce the waste produced.
- Striving for 100 % Recycling and zero disposal to landfill.

Waste Type	Storage	Storage Limit	Disposal	Timescale
Fish tissues	IBC Containers.	16 IBC's	Fergusons Transport.	< 1 month
Mortalities				
Fish Feed				
Blood water				
Plastic	Plastic Liners	10	Solway Recycling	< 1 month
Rinsed chemical containers	Plastic Liners	10	Solway Recycling	< 1 month
Cardboard	Council Bins	1	Perth & Kinross Council	< 1 month
Wood (including pallets)	Farmyard	250	Pallet Services Ltd	< 12 months
Metal	Farmyard	1 truck load	Local Scrap merchant	< 12 months
Redundant fish nets	Kames	2-3 Nets	WJ Knox or land fill	< 3 months
Expired medicines/chemicals	Medical store (labelled)	250 litres	Supplier/Manufacturer	< 3 months
Waste Oil	Kames Oil store (labelled)	250 litres	SafetyKleen	< 12 months
Domestic waste	Council Bins	4 Bins	Perth & Kinross Council	Weekly Collection
Sharps	Container	2 containers	Supplier/Manufactuer	< 6 months
Rope	Plastic Liners	10	Solway Recycling	< 6 months
Portable Toilet – human waste	Toilet Tank	50 litres	Smartloo	Weekly



8.5.7 Sustainability and Energy Efficiency

The company supports the Scottish Salmon 'Sustainability Charter' and is actively managing all aspects and impacts with the objective to reduce the carbon footprint and use energy efficiently.

Farming equipment shall be selected and maintained for optimum energy efficiency. The use of renewable energy sources should be encouraged.

Key Monitoring Metrics

- Feed
- Electricity
- Fuel

The site is required to maintain records such as invoices/delivery notes for feed, fuel and electricity use.

An internal audit of on-farm energy use and waste management should be done annually and may form part of the sites annual Management Review to inform Opportunities for Improvement.

Plan to improve energy efficiency:

The site receives its electricity from a mains supply and no further actions are currently feasible to reduce the reliance of fossil fuels. The installation of mains power has been explored.

The company's annual Sustainability Report for details on actions taken to improve the overall sustainability of the business and sites.



8.5.8 Predator Control Plan

Predator control forms an integral part of the farming process, with the core objectives being:

- Prevent farm stock loss.
- Ensure farm stock welfare.
- Ensure predator welfare.

Predator control links in with the environmental risk management as detailed in this document.

Predator Control Risk Assessment			
Predator	Risk Factor	Controls	Level
Seagulls	Commonly seen around the pens and sitting on top of the pens when feeding – causing stock stress.	• Bird exclusion nets • Net Management • Daily Containment Checks • Monitoring	Low
Hérons	Occasionally seen sitting on the pens using the walkways as a platform to catch wild fish.	• Bird exclusion nets • Net Management • Daily Containment Checks • Monitoring	Low
Cormorants	Commonly seen around the pens targeting wild fish.	• Bird exclusion nets • Net Management • Daily Containment Checks • Monitoring	Low
Otters	Rarely seen and have never been an issue.	• Net Management • Daily Containment Checks • Monitoring	Low

Exclusion net details

- Bird exclusion nets are industry standard designs.
- In-water exclusion nets are 25mm x 25mm (re-cycled pen nets).

In compliance with relevant requirements, only non-lethal predator control measures are permitted. The focus with non-lethal predator control measures is to provide a suitable barrier between the farm stock and predators, thereby reducing the likelihood of an interaction occurring.



8.5.9 Containment Control Plan

The objective is to prevent farmed fish escapes, predator incursions and environmental harm from damaged equipment/infrastructure.

The production system is based on industry standard designs.

Escape Procedure

In the event of a suspected or confirmed farmed fish escape, appropriate containment control actions shall be taken, and the escape shall be notified in compliance with specified requirements.

Operating Procedure – Fish Escape

8.5.9.1 Risk Assessment

Containment Control Risk Assessment			
Scope	Risk Factor	Risk Controls	Level
Containment system breach and/or total failure at Loch Tay	Net Chaffing	Net tensioning, along with the correct pen movement procedure, is employed to prevent net chaffing.	Low
	Poor Net integrity	- Nets are manufactured by competent and reputable companies. Design and materials used follows the 2015 Scottish Technical Standard. Nets are independently tested by Knox on an annual basis, or using the KFF net testing machine which can be brought onto site. - Nets are manufactured by experienced and reputable companies. Design and materials used follows the 2015 Scottish Technical Standard. Nets are independently tested by Knox on an annual basis, or using the KFF net testing machine which can be brought onto site.	Low
	Net dropping from pen framework	Double net-to-stanchion attachment and some net-to-handrail ropes are used to reduce the risk of nets dropping into the water. I.e. tying the net to the top and bottom of the stanchion.	Low
	Pen structure	Pens are designed, built and installed by Kames Fish Farming, an expert in the design and installation of aquaculture moorings, taking into consideration the environmental conditions likely to be experienced at the specific site.	Low
	Mooring system failure	Moorings are designed, constructed and installed by Kames Fish Farming, an expert in the design and installation of aquaculture moorings, taking into consideration the environmental conditions likely to be experienced at the specific site.	Low



	Floating debris	Any floating debris that is identified in the site vicinity is removed	Low
	Pen towing/pushing	Trained and competent personal, adhering to the fish movement procedure undertake all fish pen movements.	Low
	Fish Husbandry and Handling	Trained and competent personal, adhering to fish handling operations procedures, undertake all fish handling.	Low
	Vandalism and Environmental Activism	Restricting site access, ensuring boats/buildings are secure, and good community relations reduce the risk of fish escapes due to vandalism or environmental activists engaging in activist activities on site	Low

8.5.9.2 Monitoring Programme

Containment Monitoring Programme	
Tasks	Frequency
Daily Containment Checks Team must conduct a daily (every 24 hours) surface visual inspection of the pen systems to verify integrity and identify potential containment breach points.	Daily
Net Inspections In-water net inspections are carried out on a monthly basis as part of routine containment checks and pre/post handling operations such as grading, treatments etc where net integrity is critical to prevent an escape.	Monthly and pre/post handling operations
Husbandry and Handling Operations The team must dynamically assess containment controls during any husbandry or handling operations. In the event of a suspected or actual breach, operations shall be aborted and immediate containment control actions taken.	Every Operation
Pen and Mooring Systems Pen and mooring systems must be subject to a thorough IIR (inspection, repair, maintenance) programme to assess and replace all critical mooring components. A third-party contractor should be appointed to conduct the inspection and where required repairs/maintenance of the Pen and Mooring System.	Minimum 24-month period e.g. every fallow



8.5.9.3 Containment Database

The Containment Database is a collection of key information and records related to the farming sites mooring system, nets and pens.

Further details on the management system are provided under Section 9.1 Site Assets in this manual and Section 9.4 Documented Information.



8.6 Food Safety, Fraud and Defence System

The company operates a Food Safety, Fraud and Defence System, with individual farming sites responsible for the implementation of site specific controls.

8.6.1 HACCP

The company implements a food safety system that is based on HACCP principles.

Management Plan – HACCP (KFF-QS-MP-004)

8.6.2 Food Fraud Mitigation Plan

Food fraud is defined by Europol and Interpol as "the deliberate placing on the market, for financial gain, foods which are falsely described or otherwise intended to deceive the consumer."

The main types of food fraud include adulteration, counterfeiting, diversion, over-running, simulation, tampering and theft.

The company HACCP team also acts as the food fraud and defence team to reduce the likelihood of an intentional food safety breach and ensure the implementation of risk controls throughout the production process.

The risk of food fraud for the production of rainbow trout is low.

Risk Assessment		
Risk Factor	Controls	Level
Counterfeiting Fraudulent use of GGN misleading consumers about the product quality and safety standards.	Quality Management System	Low
Counterfeiting Fraudulent sale of a trout product that is not produced by Kames.	No controls feasible	Low
Adulteration Certified inputs that do not meet the assured standards. E.g. fish feed and medicine	Quality Management System	Low
Adulteration Non-approved medicines/chemicals used as part of the production process.	- Quality Management System - Regulatory Monitoring	Low
Diversion Sale of product in unauthorised market	Kames sells its product in compliance with domestic and international export requirements.	Low
Over-running Production limits are in breach of site license biomass consents.	- Quality Management System - Environmental Management System - Regulatory monitoring of production sites to ensure that license biomass consents are not breached.	Low



Tampering Product tampering could occur at the processing facility i.e. false packaging labels.	Processing facility is accredited to GLOBALG.A.P. and BRC.	Low
Theft Theft of live fish from non-designated harvest pens that may be in breach of medicine withdrawal period that could be sold illegally to consumers.	- Site Security - Stock Monitoring	Low

8.6.3 Food Defence Plan

Food defence is the protection of food products from intentional contamination or adulteration by biological, chemical, physical or radiological agents introduced for the purpose of causing harm.

The objective of the Food Defence Plan is to identify potential threats to food safety in all phases of the operation and ensure that the risks are appropriately controlled.

Information of all employees and contractors shall be held on record by the company.

Risk Assessment		
Scope	Malicious attacks or contamination that may impact the live trout held at the site.	
Intentional Threats	Controls	Level
Farm site water pollution	Water Quality Monitoring Programme	Low
Fish Feed Contamination	- Purchased from verified source. - Stored in a locked shed. - The site is checked daily for signs of tampering.	Low
Site Access	- Visitor sign in process - Monitor suspicious activity around the site.	Low
Illegal Therapeutants	- Veterinary authorised therapeutants permitted - Flesh Quality Monitoring Programme (Internal and Marine Directorate)	Low



9. Support

9.1 Site Assets

The site is responsible for maintaining and protecting site specific assets that are critical to the farming operation and implement suitable risk controls to minimise the likelihood of harmful environmental and safety incidents.

All assets should be managed by following a process of inspection, repair and maintenance (IRM).

9.1.1 Pen and Mooring System

Selection and Installation

The Pen and Mooring System must be selected based on various factors to ensure that it is robust enough to withstand environmental conditions that it is exposed to.

Technically competent people must be involved in the design and installation of the Pen and Mooring System and there should be environmental modelling to support the selection decision.

Technical specifications for the Pen and Mooring System must be held on site.

The installation of the Pen and Mooring System must be carried out by a competent team, based on manufacturer's instructions and mooring system diagrams.

Risk Assessment

A documented risk assessment must be completed to determine the ongoing suitability of the Pen and Mooring System design for the site and identify potential failure points along with suitable risk controls.

The risk assessment must be reviewed annually, if there have been any changes or after an incident.

Inspection, Repair and Maintenance Programme

Component	Inspection Scope/Frequency	Repair/Maintenance
Pens	Daily surface visual inspection of the pens to identify damaged parts or potential for damage.	As determined by inspection findings.
Grid to Pen Moorings	Daily surface visual surface inspection (water visibility dependent)	As determined by inspection findings.
Damper Buoys	Daily surface visual surface inspection.	As determined by inspection findings.
Damper buoy risers, node rings (monkey plates) and other components	Surface visual inspection every 24 months i.e. every fallow period or more frequently based on risk.	As determined by inspection findings
Mooring grid ropes	Diver or ROV visual inspection every 24 months i.e. every fallow period or more frequently based on risk.	Replacement plan as determined by inspection findings. Cleaned every fallow period.



Anchors	Diver or ROV visual inspection every 24 months i.e. every fallow period or more frequently based on risk.	Replacement plan as determined by inspection findings.
Shore Pins	Surface visual inspection every 24 months i.e. every fallow period or more frequently based on risk.	As determined by inspection findings.

Record Keeping

Records related to the IRM programme must be kept in the designated management folder and recorded on the Containment Database.

Mooring IRM Log	General Information • Date • Mooring System Part Inspection Details • Inspection Reason • Inspection Team • Type • Findings Repairs and Maintenance • Team • Repair Details • Maintenance Details Risk Control Action Plan Record any action plans to control identified issues that may result in mooring system failure.
Pen IRM Log	General Information • Date • Pen ID Inspection Details • Inspection Reason • Inspection Team • Type • Findings Repairs and Maintenance • Team • Repair Details • Maintenance Details Risk Control Action Plan Record any action plans to control identified issues that may result in pen failure.



9.1.2 Nets

Refer to the Operating Procedure – Net Management

Inspection, Repair and Maintenance Programme

IRM Programme		
IRM Task	Scope	Frequency
1. Pre Stocking Integrity Assessment	Whole net and tensioning system must be visually inspected by the site team after they have been fitted to the pen.	Pre Stocking
2. In-water Net Integrity Assessment	Daily Visual Inspection • Net above waterline • Topnet • Bridles • Cushion Buoys • Grid • Net tensioning	Daily
3. Pre- and Post-crowding Event • Vaccinating • Grading • Treatments • Harvesting	Nets must be visually inspected for holes from the surface by lifting the net by hand to prevent fish escapes during any crowding events and identify potential holes caused during crowding events.	Pre and Post Operations
4. Weather events and operational incidents that may result in a fish escape	• Surface Visual Inspection • In-water inspection by divers (if possible)	Immediately Post Event
5. Out of Water Net Integrity Assessment	At Tay nets are not removed from pens between production cycles nets must be lifted above the surface level of the pen to facilitate: • Visual inspection • Drying and disinfection • In-situ Net Strength Testing	Per Production Cycle
6. Net Replacement Planning	Net integrity assessment results must be reviewed annually to inform a documented net replacement plan.	As determined by net integrity condition for non-nylon nets. Nylon nets must be replaced every 5 years.



Record Keeping

Records related to the IRM programme must be kept in the designated management folder and recorded on the Containment Database.

Net Register	<u>Net Number</u> <u>Tag ID</u> <u>Manufacturing Details</u> - Manufacturer - Date - Material Type - Predator Base <u>Dimensions</u> - Circumference (m) - Mesh Size (mm) - Depth + Freeboard (m) <u>Strength Test</u> - Date - Pass <u>Disinfection (between stocking/cycles)</u> <u>Antifouling</u> <u>Operational Status</u> - In Use/Stored - Location <u>Notes</u> <u>Replacement Plan</u> - Date
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9.1.3 General Equipment

General equipment includes any equipment that is required for the farming operation on the sites.

9.1.4 Vessels

All workboats shall be operated in compliance with Workboat Code 3 (WBC3).

The exception to this is for feed barges tethered to the seabed and freshwater sites where WBC3 has no statutory authority. For these exceptions, WBC3 should still be used as the guiding standard for the safe operation of vessels.

9.1.5 Infrastructure

The sites infrastructure is subject to routine inspection, repair and maintenance (IRM).

9.1.6 Vehicles

The site must ensure that all vehicles are maintained in a good state and that the vehicles are subject to their annual MOT.

[Refer to the Operating Procedure – Vehicles](#)



9.2 Personnel Competence

[Refer to the System Procedure – Training System](#)

9.3 Communication

A communication system is in place to ensure that 360-degree communication takes place in support of the site and overall business operations:

- Toolbox Talks (Briefings)
- Monthly Site Meeting
- Production Meeting
- H&S Committee Meeting
- Debriefings



9.4 Documented Information

Refer to the Manual – Quality Management System for details on the Document Control System.

There are a range of documents that underpin the practical implementation, are required for compliance purposes and act as tools in support of site management. All required documents for site management are located in the following location on the public server:

[Note: For any document requirements contact the Technical & Quality Systems Manager.](#)

Document Hierarchy	
Refer to the Appendix in this document for an overview of documentation organisation.	
01	Policies
02	Management System Manuals
03	Operating Manuals
04	Management Plans
05	Operating Procedures
06	Working Instructions
07	Forms

Record Keeping

The site is required to maintain record keeping standards and all records must be kept for a minimum of 6 years.

The company operates a digital filing system called 'Public' that has arrangements in place for all departments to use for record keeping and management purposes. The designated file for this site on the Kames Public filing system can be accessed as follows:

Company Server		
Step	File Name	File path
1	Site Management	\\192.168.54.237\public\Site Management
2	03 On-Growing	\\192.168.54.237\public\Site Management\03 On-Growing
3	Loch Tay Management	\\192.168.54.237\public\Site Management\03 On-Growing\Loch Tay Management



Site Management Folder Filing Structure		
	File	Designation
Loch Tay Management	01 General	01 Site Licenses 02 Site Map 03 Controlled Documents – copies 04 Inspection and Audits - 'Year' 05 Training Arranged by 'Persons Name' 01 Personal Training Plan 02 Induction-Annual Refresher Training 03 Certificates 06 Accounting 01 PO Requests 02 CAPEX 03 Invoices 04 Fuel Orders 05 Monthly Stock Takes 07 Infrastructure and Equipment List items such as: 01 Shore Base 02 Telehandler 03 Handy Polaris 04 Lice Treatment System 05 Macerator/Incinerator 06 Vessels 08 Containment Database 01 Mooring System - 01 Risk Assessment - 02 Technical Specifications - 03 Mooring Diagram - 04 IRM 02 Nets - 01 Technical Specifications - 02 Purchase Records - 03 Net Register - 04 IRM - Dive Reports - Out of water service Records 03 Pens - 01 Risk Assessment - 02 Technical Specifications - 03 Mooring Diagram - 04 IRM 09 Technical Library 01 QA Normative References 02 Management Resources 03 Health & Safety 04 Environment
	This folder is designated for site management documents and records	



	02 Production Cycles This folder is designated for production cycle specific records. A new folder is created annually for the Production Cycle Sub-Folders. e.g. 2025	01 Production Planning 01 Aquasim 02 Production Plans 03 Production Reports 04 Farm Management Statement 05 Regulator Notifications - Stocking - Fallow 02 Day Sheets 03 Weekly Reports 01 Stock Sheets 02 Lice Reports 04 Fish Health 01 VHWP 02 Treatments 03 Vaccinations 04 Welfare Outcome Assessments 05 Mortality Breach Notifications 05 Stock Inputs 01 Input Log 02 Movement Records (PTE and Workbook) 03 Regulator Stocking Notification 06 Feed 01 Order Log 02 Delivery Notes 07 Sample Weights 08 Grading 09 Harvesting 01 Flesh Quality 02 HAS 03 Processing Reports 04 Micros 05 Ice 06 Bin Cleaning 07 Equipment Derogations 10 Stock Output Live fish transfers to other sites 01 Output Log 02 Movement Records (PTE and Workbook)
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	03 Health & Safety This folder is designated for health & safety specific records	01 Safety Meetings 02 Risk Assessments 03 Incident Tracking System 01 Incident Log 02 Incident Information 04 Emergency Action Plan 01 Site EAP 02 Marine Emergency Action Card 05 Liability Insurance 06 Pest Control 07 Fire 08 COSHH 01 Safety Data Sheets 02 Chemical Store 03 Face Fit Testing 04 Blood Tests SalmoSan 09 Electricity 10 Contractors 11 Defibrillators 12 Lifting Operations 13 Lifejackets 01 Technical Specifications 02 Purchase Records 03 Service Records 04 Completed Checklists 14 Drinking Water Supply
	04 Environment This folder is designated for environmental specific records	01 Risk Assessments 02 Impact Assessment 03 Incident Tracking System 01 Incident Log 02 Incident Information 04 Waste Management 01 Mortality Waste Transfer Notes 02 General Waste Transfer Notes 03 Waste Oil Disposal 04 Septic Tank 05 Fisheries Trust 06 Energy Monitoring 07 Benthics 08 Beach Cleaning 09 Farm Partnership Agreement 01 FPA Agreement 02 Meeting Minutes 03 Risk Assessment
	05 Quality This folder is designated for quality assurance documents and records	01 QA Certificates 01 Internal 02 Contractors 02 Risk Assessments 03 Feed Technical 04 Food Safety 01 Meeting Records 02 Traceability and Recall Exercises 05 Internal Compliance Statements 06 Management Review Reports 01 IMS Review Reports 02 Site Management Review Reports 03 Company Sustainability Reports



9.5 Site Security System

The site shall have a risk appropriate security system in place to ensure Bio, Environmental and Economic security of the farm. The security system shall include, but not be limited to the following controls:

- Preventing unauthorised access to buildings and vessels.
- Visitor sign in system and all visitors shall be accompanied by an appointed member of team.
- Signage shall be in place at all threshold points.
- Keys shall be removed from all vehicles and boats when not in use.
- Feed store and feed barge silos should be locked.
- A CCTV system should be used subject to risk and practicality.
- Training shall be provided to the team in handling anti-farm activism.

The security system shall form part of the annual Management Review site suitability risk assessment.



10. Operation

This section focuses on the implementation stage of the management cycle and the operations that are carried out in support of achieving the objectives and meeting all specified requirements.

10.1 Planning Process

All operations shall be appropriately planned and managed.

Refer to the Manual – Health and Safety System for details on operational planning and risk management.

Refer to approved Operating Procedures for specified operations.

Caution	The contingency plan for most of the routine operations carried out on site, unless an alternative documented contingency plan has been agreed, is to suspend or abort the operation if any changes/incident occurs that may result in a bad outcome (e.g. damage to assets, harm to people or harm to the environment).
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10.2 Operating Process

All operations and associated tasks should be conducted by following a standardised process to achieve the objective. For specified operations, such as Lifting Operations, a company Operating Procedure is provided to support with conducting operations to a required standard.

The following framework should be used where no Operating Procedure is specified.

Steps	Procedure	Responsible Person
Plan	1. <u>Operational Planning and Risk Management</u> The operation shall be appropriately planned before commencing	Management Team and should include Operating Team Leaders
	2. <u>Briefing</u> The plan must be communicated to the team	
Execute	3. <u>Mobilisation</u> - Toolbox Talks - Mobilise team and resources	Operating Team
	4. <u>Operation In-Progress</u> - Open Permit to Work - Toolbox Talks - Carry out the tasks in the planned work scope	
	5. <u>Demobilisation</u> - Toolbox Talks - Demob team and resources	
Review	6. <u>Post Operation Tasks</u> - Equipment maintenance - Record keeping - Closing Permit to Work - Team Debriefing	Management Team and Operating Team Leaders
Improvement	7. <u>Continuous Improvement</u> Take action to make improvements for future operations based on Lessons Learned	Management and Operating Team



10.3 Management of Change

A management of change (MOC) process may need to be initiated by the designated manager/supervisor in the event of deviation from a planned process/action. A deviation from a planned process/action significantly increases the risk of an accident and any changes shall be adequately managed to control that risk.

MOC Process	
1.	Identify the change.
2.	Assess the risk/impact of the change.
3.	Take appropriate action depending on the nature of the change.

The following is a non-exhaustive list of changes that would trigger the MOC process.

- Deviation from operational plans.
- Deviation from approved procedures/working instructions.
- Weather conditions.
- Modifications to equipment/vehicles/vessels.
- Implementation of new equipment/vehicles/vessels/systems.
- Changes to personnel.

10.4 Suspension of Operations

Operations shall be suspended if there are any safety concerns that are deemed an unacceptable risk.

The decision to suspend operations due to safety concerns rests with the designated Manager and/or Supervisor/Skipper who should consult the team and other managers as necessary, and if unable to consult first should confirm suspension of operations with senior management at the earliest opportunity.

Before Suspending Operations

Consider

- Sea State in the operating area
- Wind speed and direction, now and forecast
- Tidal conditions, now and forecast
- Can the task(s) be carried out elsewhere?
- Daylight / Darkness Limitations of the vessel Limitations of the crew

Consult

- Team members
- Management
- Health and Safety Adviser

Confirm

- As soon as possible



- Advise all involved parties

Before Restarting Operations

The designated Manager and/or Skipper must be satisfied that conditions no longer present an unacceptable risk to the site, vessel or personnel. **Consult** and **Confirm** as above.

10.5 Permit to Work

A 'permit to work' system is a formalised process to ensure that high risk operations are appropriately managed and to avoid conflicting activities while the operation is in progress.

All high-risk operations shall be controlled by a Permit to Work System. The following operations are designated high risk:

- Diving Operations
- Confined Space
- Working at Height
- Electrical
- Hot Work
- Asbestos
- Non-Routine Operations/Projects
- Ground Disturbance
- Energy Systems
- Simultaneous Operations



10.6 Site Administration

10.6.1 Daily Activities Record

A record must be maintained of all activities that have taken place on the day. This information shall be recorded on a site-specific day sheet.

10.6.2 Fish Talk

Must be updated daily and following any stock management event.

- Stocking
- Feeding
- Mortality
- Environmental factors – water temperature and oxygen
- Stock Transfers/Grading
- Sample Weights
- Health checks
- Treatments – tricaine, medicines, mechanical

A quarterly Fish Talk data locking procedure is implemented by Head Office to ensure that historical data is not altered because of feed management calibrations or other Fish Talk activities such as sample weights or stock counts. Site Managers are responsible to ensure that all data is checked and recorded within 30 days after each calendar quarter.

The designated Fish Talk administrator can unlock historical data in the event of a record keeping error that needs to be corrected.

10.6.3 Weekly Reports

The weekly report is a summary of the week (Saturday – Friday) and a reporting tool to highlight key points and includes a stock sheet and lice report.

Reporting Points

- Water Temperature
- Feeding
- Mortality
- Fish Health
- Health and Safety
- Transfers
- Other relevant

A reporting template is available – reference document code and location on public.

The report must be emailed to:

- Managing Director
- Finance Director
- Operations Manager
- Fish Health Manager
- Environmental Manager



10.6.4 Stock Take

A stock take must be carried at on the last day of every calendar month and the details sent to the Finance Director

- Feed
- Fuel
- Chemicals
- Medicine

10.6.5 Purchasing Procedure

All purchases must be approved by the accounts team and a PO number issued before the purchase may be actioned.

An approved supplier register is maintained by the company Accounts Department.

The purchase of the following controlled inputs is subject to additional controls as they may introduce a food safety risk or affect quality standards.

Input Specification Plan	
Controlled Input	Standards
1. Ova and live fish	All ova and live fish must have lived their entire life on a GLOBALG.A.P. and RSPCA Assured certified farm. Additional requirements may apply and this must be verified prior to input. Documented records shall be available at farm to verify this. Records include third party and internal documentation.
2. Fish Feed	All fish feed must be purchased from an approved supplier, who as a minimum meets the following standards: • UFAS • GLOBALG.A.P. • ProTerra Deforestation free verified soy Additional requirements may apply and this must be verified prior to input. Documented records shall be available at farm to verify this. Records include third party and internal documentation.
3. Medicines and Therapeutants	Only veterinary authorised medicines and therapeutants are permitted. Documented records shall be available at farm to verify this. Records include third party and internal documentation.

Control of Non-Conforming Inputs

Incoming product is subject to inspection and / or test on arrival and during use. The results of the inspections and / or tests determine whether the product conforms to the required standard. Nonconformity may arise for different reasons and may result in different actions.



10.6.6 Visitors

Visitors may only enter the site premises with permission from appointed site personnel. All visitors must complete a visitors questionnaire form and shall be accompanied at all times.

[Form – Visitor Questionnaire \(KFF-QS-FOR-004\)](#)

10.6.7 Human Resources

All HR records and requirements are managed via the SAGE HR App.

Contact the accounts team for assistance.

The site is required to maintain timesheets and submit all overtime via the SAGE HR app.

10.6.8 Fuel Orders

Fuel must be ordered through the accounts department via email

ap.kames@kames.co.uk

Details to be provided

- Fuel Type
- Quantity
- Delivery location, date and time
- Equipment



10.6.9 Statutory Reporting

It is the site managers responsibility to ensure compliance with all statutory reporting requirements.

- Refer to the appendix for a summary of SEPA and incident reporting requirements.
- Mortality reporting requirements are detailed in the Operating Procedure – Mortality Management.
- Notification records of statutory reporting should be recorded in the site management folder.



10.7 Site Operations and Tasks

The table provides a non-exhaustive overview of the operations and tasks that may be conducted on site with reference to documented risk assessments and procedures.

Any non-routine tasks/operations that may need to be carried out are subject to the Operational Planning and Risk Management Process detailed in the H&S Management System Manual before they are authorised by the designated manager.

Refer to specified Operating Procedures and Working Instructions where required.

On completion of tasks and operations all required record keeping shall be completed.

Operations and Tasks	Risk Assessment	Procedure Reference
<u>Housekeeping and Maintenance</u> - Biosecurity tasks - Personal Protective Equipment - General Equipment - Oxygen Systems - Aeration Systems - Biomass Scanners - Camera Systems - Painting - Landscaping - Pen and Mooring Systems - Emergency equipment	RA - Confined Space RA - COSHH RA - Fire RA - First Aid RA - Hot Work RA - Hygiene RA - Manual Handling RA - Personal Protective Equipment RA - Surface Swimming RA - Working Over Water	Refer to manufacturer instructions for equipment servicing and maintenance instructions. OPR - Confined Space OPR - COSHH OPR - Engineering OPR - Hot Work OPR - Mooring Operations OPR - Vehicles OPR - Working at Height
<u>Husbandry</u> - Mortality Removal - Fish Health Checks - Sample Weights - Environmental Monitoring - Treatments - Netwashing - Feed System Calibration	RA - Fish Husbandry Operations RA - COSHH RA - Fire RA - First Aid RA - Manual Handling RA - Mortality Ensilor Unit RA - Mortality Incinerator RA - Working Over Water	VHWP - details husbandry procedures OPR - Lone Working OPR - Net Management OPR - Sea Lice Control OPR - Contractors
<u>Grading</u>	RA - First Aid RA - Working Over Water RA - Manual Handling RA - Vessel Operations	OPR - Grading OPR - Contractors
<u>Vaccinating</u>	RA - COSHH RA - First Aid RA - Manual Handling RA - Working Over Water	OPR - Vaccinating OPR - Contractors



<u>Live Fish Transfers</u>	RA - Manual Handling RA - Working at Height RA - First Aid RA - Working Over Water RA - Vessel Operations	OPR - Live Fish Transfers OPR - Contractors
<u>Vessel Operations</u> Vessels are used to support with various site operations and tasks	RA - Vessel Operations RA - Capstan and Winches RA - First Aid RA - Working Over Water RA - Fire RA - Lone Working	Workboat specific procedures apply as vessels are used in support of site operations. OPR - Contractors
<u>Lifting Operations</u> • Feed Deliveries • Fitting and removing nets • General lifting tasks	RA - Crane Operations RA - Forklift Trucks RA - First Aid RA - Working Over Water	OPR - Lifting Operations
<u>Diving Operations</u> • In-water net inspections • Vessel surveys • Rope removals • Mooring inspections • Fitting and removing net weights • Object search and recovery	Diving contractor shall provide a diving risk assessment RA - First Aid RA - Working Over Water	OPR - Diving Operations OPR - Contractors
<u>Harvesting Operations</u>	RA - Harvesting RA - Hygiene RA - First Aid RA - Working Over Water RA - Electric Pallet Truck	OPR - Harvesting OPR - Contractors



10.8 Outsourced Services

The site manager shall ensure that all contractors on site are appropriately managed and adequate records maintained.

[Refer to the Operating Procedure - Contractors](#)

10.9 Emergency Response System

The site shall implement a risk appropriate emergency response system that allows for an effective emergency response for the most likely events that may occur and impact:

- Health & Safety (personnel and/or a vessel)
- Environment
- Livestock
- Product Quality
- Food Safety and Security

10.9.1 Classification of Emergencies

Kames Fish Farming uses the following classification system for rating the severity of an emergency

*** Priority 1 - Urgent –Require immediate assistance**

A Priority 1 emergency situation represents imminent danger to personnel and /or the vessel and stock.

*** Priority 2 - Serious – Standby to assist**

A Priority 2 emergency situation represents a serious situation which has potential developing into a priority 1 emergency.

*** Priority 3 - Low – Notification only**

A Priority 3 emergency represents that a minor or low emergency situation has occurred or developed and is well under control at the location.

10.9.2 Emergency Response Flow Chart

Refer to the appendix in this manual.



10.9.3 Emergency Action Plan

The Emergency Action Plan (EAP) provides key information that may be required to facilitate an efficient emergency response in the event of an accident. The site EAP must be printed + laminated and displayed at key locations on the site.

The EAP must provide the following information:

- Emergency response procedure
- Key Contacts
 - General Emergency Services
 - Local Fire Service
 - Maritime and Coastguard Agency
 - Site Contacts
 - Designated Person Ashore (DPA)
- Nearest Hospital
- Safe Havens (workboats)
- First Aid Personnel
- What3Words
- Site GPS Coordinates
- Site Address
- Designated Muster Station
- Emergency Equipment
 - First Aid Kits
 - Defibrillator
 - Chemical Spill Kits
 - Oil Spill Kits
 - Fire Extinguishers
 - Electrical Isolations and redundancy system

The above information is not exhaustive, and additional information may be included on the EAP.

Refer to appendix for EAP template.



10.9.4 Emergency Evacuation

The operating team may be required to conduct an emergency evacuation. Emergency evacuations are authorised by the Site Manager or Senior Husbandry Operator.

Site Evacuation

In the event of a catastrophic failure or high-risk event it may be necessary to evacuate all personnel from the site. This can be achieved by the most appropriate means of transport, which may be:

- Walking off site to a safe zone
- Vehicle
- Boat
- Helicopter

Vessel Evacuation

Refer to the Small Vessel Safety Management System for abandon ship procedure.

Medical Evacuation

In the event of a person becoming seriously ill or injured it may be necessary to conduct a medical evacuation. In most cases this will be coordinated and conducted by the emergency services rescue team e.g. Coastguard or Fire Department.



10.9.5 Emergency Procedures

The following emergency procedure shall be followed to ensure that appropriate action is taken in the event of an emergency. No matter what the emergency, the priority is to firstly ensure the safety of people and then take any further action to control the situation.

The ACE Helix is a proven framework for effectively handling emergency situations.

Step 1 – Assess

Assess the situation and determine the threat to people and the livestock.

Step 2- Choose

Choose the appropriate action to control the situation and minimise the impact.

Step 3 - Execute

Execute the action plan to control the situation.

The following table provides actions for events that may be experienced on the site. It is recommended to conduct scenario-based drills to train for effective emergency preparedness and test safety critical systems.

1. Assess the situation and determine threat to life.

Priority 1 - Urgent –Require immediate assistance: Emergency represents imminent danger/risk to personnel and /or a vessel, livestock, product quality, food safety.

Priority 2 - Serious – Standby to assist: Emergency represents a serious situation which has potential developing into a priority 1 emergency.

Priority 3 - Low – Notification only: Emergency represents that a minor or low emergency has occurred or developed and is well under control at the location.

For serious medical emergencies refer to steps below.

2. Contact Appropriate Emergency Services – Follow advice and give information

- Who –name, no. of casualties,
- What – what is the emergency, state of casualty
- Where – GPS co-ordinates, Post Code

Contact internal team and senior management for additional support.

3. Provide first aid and stabilise the casualty until help arrives

- If suspected head or spinal injury do not move the patient.
- Support emergency services with the medical evacuation.



Emergency Event	Action
1. Fire	Raise the alarm, evacuate the building or vessel and meet at the designated muster station on site. If the fire has been assessed as minor, then action should be taken to extinguish it.
2. Explosion	Evacuate the area and assess the impact on the livestock once the area has been declared safe to enter.
3. Flooding	Monitor containment controls, stop feeding and evacuate the site in the event of risk to human life.
4. Power Failure	Identify the cause of the power failure and activate emergency power supply.
5. Low oxygen impacting fish health and welfare	Water flow must be increased (net washing or net change) and if that is not possible then supplementary oxygen must be activated.
6. Disease Outbreak	Contact the Fish Health Manager and assess the risk to take appropriate action – refer to the VHWP
7. Equipment Failure	Suspend or abort the operation and where equipment is life support critical, activate redundancy systems.
8. Inclement Weather	Assess the severity of the weather and suspend or abort operations if there is a high risk to fish welfare and human life.
9. Sewerage Spill	Take action to contain the sewerage spill and monitor water quality and behavioural indicators.
10. Oil/Chemical Spill	Take action to contain the oil/chemical spill and monitor water quality and behavioural indicators.
11. Vessel/Pen Collision	Take action to contain the stock – refer to the site's Containment Control Plan.

10.9.6 Post Accident Injury Management

Refer to the Manual – Health and Safety Management System



10.10 Incident Tracking System

The company operates an Integrated Incident Tracking System that acts as a risk management tool with the aim of proactively identifying issues, monitor controls and support risk control action plans.

The ITS relies on transparent reporting and reporters shall not be penalised for reporting an incident i.e. No Blame Culture. Reportable events cover all aspects of the farming operation and focus on key areas such as:

- Quality
- Health and Safety
- Environment
- Food Safety, Fraud and Defence
- Fish Health and Welfare
- Reputation and Brand Integrity





Further details on the implementation of the ITS and internal reporting procedure are detailed in the following manuals:

- Manual – Quality Management System
- Manual – Health & Safety Management System
- Manual – Environment Management System

Any complaints received against the farming site or reportable events that have occurred shall be reported by the Site Manager with undue delay (usually within 24 hours) to the designated Manager responsible for the scope of compliance that the incident may impact or has impacted.

If the certificate holder (company) is facing a complaint regarding food safety (i.e. potentially involved in a foodborne outbreak), workers' well-being, environmental protection, or animal welfare, or is involved in a court trial or has been found by a court of law to have infringed a national or international law, and these actions can endanger the reputation and credibility of FoodPLUS GmbH and/or the GLOBALG.A.P. standard, the certificate holder shall inform the CB within 24 hours.



11. Performance Evaluation and Improvement

Performance evaluation is a constructive process aimed to ensure that site and company standards are maintained and where opportunities for improvement are identified that they are systematically actioned.

11.1 Monitoring, measurement, analysis and evaluation

The site management should check, review, inspect and observe its planned activities to ensure they are occurring as intended. The site management must make sure they have determined the appropriate processes, so they can evaluate how well they are performing based on risks and opportunities. Monitoring generally indicates process that can check whether something is occurring as intended or planned.

This is a continuous dynamic process that focuses on all aspects of the day-to-day operations, processes and outcomes and is conducted by means of:

Activity	Description
Monitoring	Visual observations and assessments. Example: Daily visual site inspection to visually assess water quality in pens.
Measurement	Using measuring equipment to assess that something conforms to standards. Example: Measuring dissolved oxygen to check that it is within water quality parameters.
Analysis	Technical analysis of data obtained from processes. Example: Reviewing water quality data for trends and patterns.
Evaluation	Evaluation of data analysis results. Example: Water quality analysis indicates that there is a pattern of oxygen levels dropping below 7 mg/l and this would trigger an action plan to improve the oxygenation system.



11.2 Inspections and Audits

According to the terminology of ISO 17065, the term audit/auditor should be used for evaluation of management systems and term inspection/inspector should be used for process evaluation.

The site is subject to a programme of routine internal/external inspections/audits, as well as unannounced inspections/audits by third parties.

All audit records must be held in the Site Management folder.

The below table provides a high-level overview of the audit programme. The table is not exhaustive, and the site may be subject to additional non-routine inspections/audits.

Type	Internal	Third Party	Standard	Frequency
Audit	✓	✓	GLOBALG.A.P. IFA <i>All third-party audits are unannounced.</i>	Annually
Audit	Non-routine	✓	RSPCA Farmed Rainbow Trout 2025	Annually
Audit	Non-routine	✓	Code of Good Practice	Annually
Audit	✓	Non-routine	M&S Select Farm <i>All select farm audits are unannounced.</i>	Annually
Audit	Non-routine	✓	Waitrose REP <i>Only grow out farms are audited.</i>	1x Per Production Cycle
Inspection	Non-routine	✓	Legal Compliance – Marine Directorate	Annually
Inspection	Non-routine	✓	Legal Compliance - SEPA	Annually
Inspection	Non-routine	✓	Legal Compliance – Northern Lighthouse Board <i>Only applicable to seawater sites.</i>	Annually
Inspection	Non-routine	Non-routine	Legal Compliance – HSE	Non-routine
Inspection	Non-routine	Non-routine	Legal Compliance – MCA <i>Only applicable to seawater sites.</i>	Non-routine
Inspection	Non-routine	Non-routine	Legal Compliance - FSS	Non-routine



11.3 Management Review

The site manager, in collaboration with other members of the team, shall conduct an annual management review, make necessary changes and document the review and results. The management review is presented as a formal report and shall be discussed at a review meeting with the team.

The review report should include the following sections:

1. Executive Summary

This can also be an observation highlighting positive and negative aspects/outcomes for the scope of the review and review period.

2. Production

The section focuses on the sites production performance and review of key areas:

- Stocking
 - Strain, quantity, size, origin, stocking period
 - Performance (mortality, behaviour, feed response) post input
 - < 1 month Post input mortality % (target < 1.7%)
 - 120 Day post input mortality % per year class
- Internal Site Transfers
- Feed Management
- Growth Monitoring and Profiling
- Grading
- Mortality Management
- Net Management
- Harvesting
- Key Performance Indicator (Production Data) Table
 - Comparisons should be made with previous cycles.
 - Acts as mass balance exercise



3. Quality

This section focuses on the site's quality performance and review of key areas:

- Management System
- Compliance Updates
- Incidents
 - Complaints
 - Product contamination
- Flesh Quality Monitoring
- Quality Assurance Schemes
- Food Safety, Fraud and Defence System
- Outsourced Services
- Prohibited Chemicals
- Key Performance Indicator Table

4. Health & Safety

This section focuses on the site's H&S performance and review of key areas:

- Management System
- Compliance Updates
- High Level Risk Assessment
- Incidents.
- Key Performance Indicator Table
 - Near Misses
 - Accidents
 - RIDDOR Incidents
 - Permanent Incapacitation
 - Fatalities
 - Regulatory Compliance Notices



5. Environment

This section focuses on the site's environmental performance and review of key areas:

- Management System
- Compliance Updates
- High Level Risk Assessment
 - Predators
 - Containment Controls
- Incidents
- License Compliance
 - SEPA Monitoring (abstraction, benthic, phosphorous)
- Waste Management System
- Energy Efficiency
- Water Quality
- Copper based anti-foulants
- Quantitative Environmental Performance Indicators
 - Incidents (Chemical Spills, Fuel Spills, Fish Escapes, Third Party Pollution)
 - Water Quality (SEPA Classification)
 - Farming Substances (therapeutant active ingredients)
 - Feed (bFCR, eFCR, FIFO)
 - Energy Use

6. Fish Health and Welfare

This section links in with the VHWP and focuses on Fish Health and Welfare performance and review of key areas:

- Severe Adverse Reactions
- Antibiotics
- Disease and treatments
- Medicine
- Mortality
- Welfare Outcome Assessments (monitoring programme)

7. Inspections and Audits

This section focuses on inspections and audits that were conducted internally and by third parties to assess compliance against statutory and standard requirements.



8. Site Assets and Resources

This section focuses on the operational aspects of the site and the review of key areas:

- Team
 - staffing requirements
 - competence
- Inspection, Repair and Maintenance Programme (IRM)
- Vehicles
- Vessels
- Infrastructure
- General Equipment

9. Site Suitability Risk Assessment

As per the requirements listed in the Risk Management section of this manual using the review information to determine the risk status for the site.

High-level overview of the core risk categories and current controls being implemented to manage the risk.

Operational and Environmental Hazards	High Level Controls	Level
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10. Opportunities For Improvement

Improvements are initiated and actioned based on the findings of incident investigations, audit outcomes and recommendations made by the company team or third parties.

Opportunities for Improvement (OFI) shall be documented on management review reports.

OFI	Date Raised	Target Completion Date	Action Notes	Status
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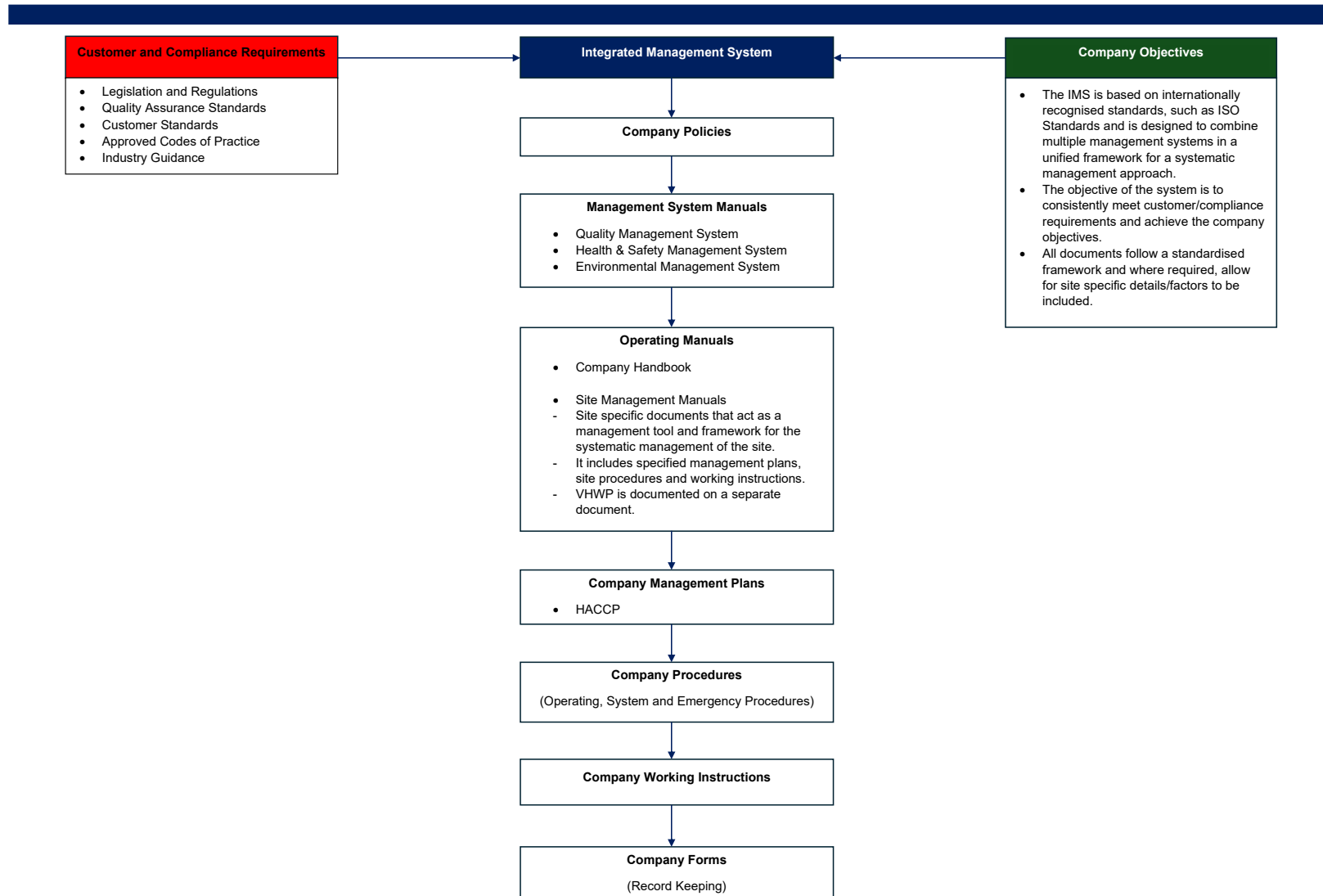
12. Appendix

12.1 Appendix 1 Prohibited Chemicals

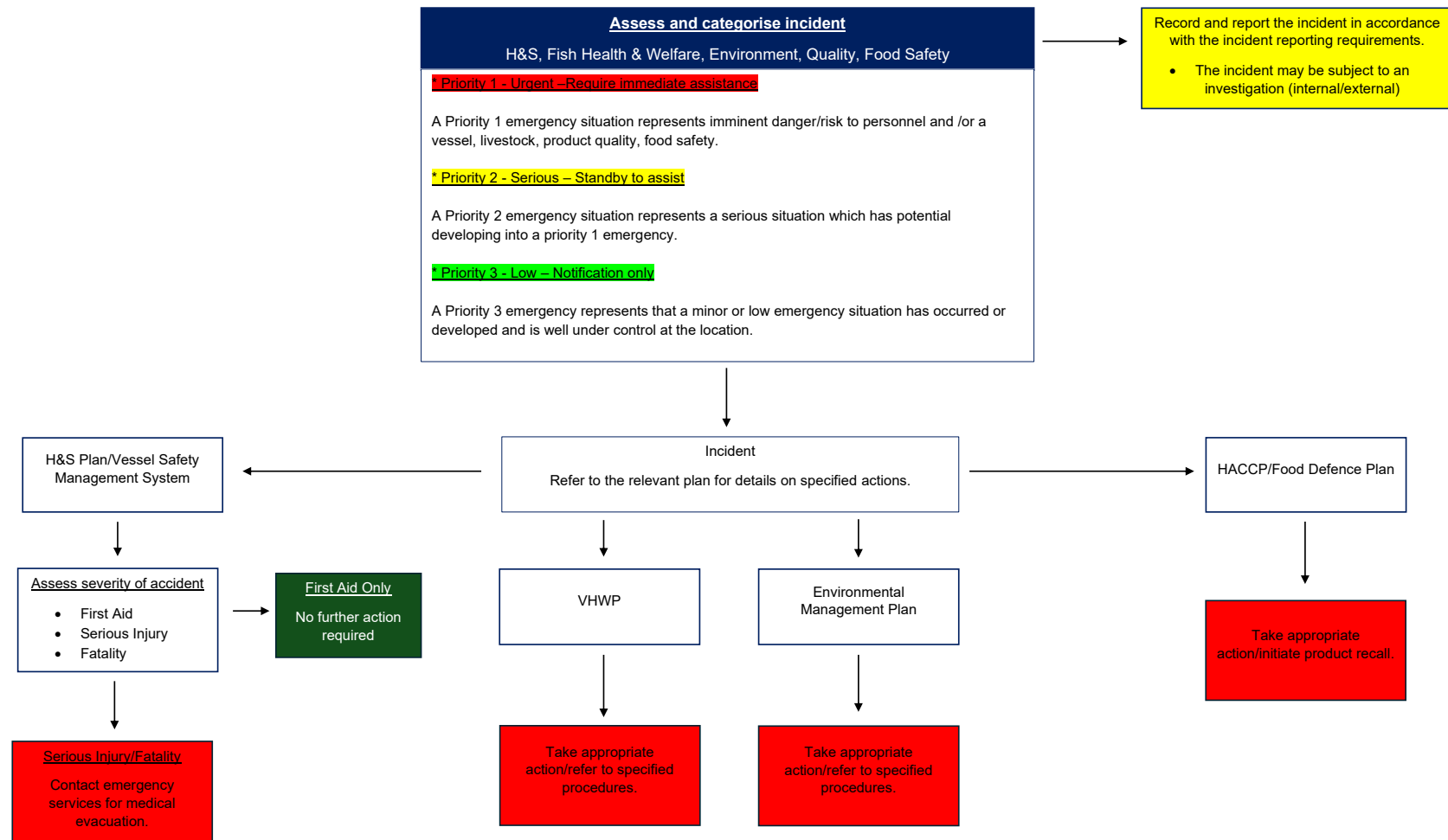
- Aristolochia spp. and preparations thereof
- Chloramphenicol
- Chloroform
- Chlorpromazine
- Colchicine
- Dapsone
- Dimetridazole
- Metronidazole
- Nitrofurans (including furazolidone)
- Ronidazole
- Stilbenes
- Triarylmethane dyes (including malachite green)

Nb. No treatments prohibited by national regulations, guidelines or codes of practice should be used on the farm.

12.2 Appendix 2 IMS Document Organisation



12.3 Appendix 3 Emergency Response Flow Chart



12.4 Appendix 4 Emergency Action Plan

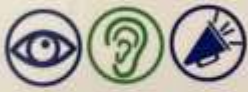
Emergency Action Plan – Loch Tay		
4. Assess the situation and determine threat to life. Priority 1 - Urgent – Require immediate assistance: Emergency represents imminent danger/risk to personnel and /or a vessel, livestock, product quality, food safety. Priority 2 - Serious – Standby to assist: Emergency represents a serious situation which has potential developing into a priority 1 emergency. Priority 3 - Low – Notification only: Emergency represents that a minor or low emergency has occurred or developed and is well under control at the location. For serious medical emergencies refer to steps below. 5. Contact Appropriate Emergency Services – Follow advice and give information - Who – name, no. of casualties, - What – what is the emergency, state of casualty - Where – GPS co-ordinates, Post Code Contact internal team and senior management for additional support. 6. Provide first aid and stabilise the casualty until help arrives - If suspected head or spinal injury do not move the patient. - Support emergency services with the medical evacuation.	Key Contacts	
	Emergency Services	999
	Local Fire Station	Aberfeldy – 01887 820252
	What3Words	///tracking.responds.occur
	First Aid Personnel	All operational personnel are first aid trained
	Site Manager	[REDACTED]
	Designated Person Ashore (Operations Manager)	[REDACTED]
	Nearest Hospital	NHS A&E department is: Perth Royal Infirmary, Taymount Terrace, Perth, PH11NX Telephone: 01738623311 The nearest doctor is: Aberfeldy & Kinloch Rannoch medical Practice, Taybridge Road, Aberfeldy, PH152BH Telephone: 01887820366
	Site GPS Coordinates	56°34.455 N 004° 1.020 W
	Site Address:	Remony Aberfeldy Perthshire PH15 2HS
Muster Station		Emergency Equipment
Sites designated muster station is the shore base yard. 		First Aid Kits
		Defibrillator
		Chemical Spill Kits
		Oil Spill Kits
		Fire Extinguishers
		Site electricity supply isolation and redundancy system
		Located in Site Office and Boats
		1 - Loch Tay Fish Farm (Canteen) 2 - 1 Eddergoll, Acharn, Perthshire, PH152HS
		Located in the Chemical Store
		Located in the Shed
		Located in the Office and Shed

12.5 Appendix 6 Summary of Key Notification Dates for SEPA Consents

SUMMARY OF KEY NOTIFICATION DATES FOR SEPA CONSENTS		
COMMENCEMENT AND CESSATION OF DISCHARGE	notification of commencement or cessation of discharge (2.3)	within 14 days of discharge commencing or ceasing
CHEMICALS AND TREATMENTS	BATH MEDICINE must not be discharged unless (3.6.1)	48hrs notice given (or min 24hrs with veterinary opinion)
	IN-FEED MEDICINE must not be discharged unless (3.6.2)	7 days notice given
SELF MONITORING	benthic sampling notification (5.4)	14 days prior to sampling
	benthic biological sampling (5.2)	biological monitoring must be carried out between 10 days before, and 70 days after, fish biomass is reduced to 75 % of the production cycle peak for the last time.
	in-feed treatment chemical residue sampling (5.3)	during each production cycle samples taken between 80- 169 days after:
	eg SLICE	a) the last use of in-feed medicine in each production cycle or: b) the date on which the authorised place is stocked with fish which have been treated with an in-feed medicine. whichever is later.
	results of surveys and monitoring (7.2.2)	within 26 weeks of survey
INCIDENT/EVENT	notification of event (6.1)	as soon as reasonably practicable and in any case within 24hrs
	report following event if requested (6.3)	within 14 days of the event
MEDICINE MINIMISATION	submission of steps taken to minimise the discharge of medicines in the cycle (7.2.3)	
RECORDS AND PROVISION OF INFORMATION TO SEPA	Quarterly Returns (7.2)	Submission deadline within 28 days for end of each period (31 March, 30 June, 30 Sept, 31 Dec) SEPA MFF Data Return Spreadsheet
KEY NOTIFICATION DATES FROM SEPA CONSENT - PLEASE READ EACH SITE SPECIFIC CONSENT FOR FULL DETAILS (see condition number in brackets)		



SeeHearSpeakUp



**YOU ARE
OUR EYES.**
**DON'T BE BLIND
TO WRONGDOING.**

If you believe someone or something is putting our people or our business at risk, we want to know.
This could include theft, fraud, property damage, serious H&S risks or risks to our reputation or product.

0800 988 6818



Alternatively report to us confidentially by providing information on our website at www.seehearspeakup.co.uk/en/file-a-report or by emailing us at report@seehearspeakup.co.uk

SeeHearSpeakUp is an independent external service that allows you to report your concerns in an anonymous manner. We are available 24/7, 365 days a year

Virkon™ AQUATIC

LANXESS

Complete Aerial, Water System and Surface Disinfectant

Virkon™ AQUATIC – SURFACE DISINFECTION

Dilution chart for surface disinfection

1. Quantity of solution required (litres)	2. Dilution rate	
	1% (1:100)	0.5% (1:200)
	3. Quantity of Virkon™ AQUATIC required	
10	100g	50g
20	200g	100g
50	500g	250g
100	1kg	500g
200	2kg	1kg

1. Select the quantity of solution required and decide the appropriate dilution rate.
2. Measure out the required amount of Virkon™ AQUATIC indicated using measurer provided.
3. Add the disinfectant to the water and stir to dissolve.



Brimful contains approx 200g

INSTRUCTIONS FOR USE

Task	Dilution rate	Application rate
Disinfection of pre-cleaned surfaces and equipment including divesuits	1:100 (1%)	300 mls per square metre
Footdips	1:100 (1%)	Fill with a fresh-water solution of Virkon™ AQUATIC. Replenish ever 4 days or when heavily soiled.
Wellboat & vehicle disinfectant	1:200 (0.5%)	300mls per square metre
Aerial misting	1:200 (0.5%)	Use either a pressure washer or knapsack sprayer on its finest mist setting and apply at 1 litre Virkon™ AQUATIC solution per 10m² of floor space
Reducing pathogen challenge	1:500,000 (2ppm)	In salmon production on a continuous basis

For more information please refer to the "LANXESS Aquaculture Biosecurity Programme" and the Leaflet Virkon™ AQUATIC - reducing pathogen challenge in the aquatic environment.

57788973/Vir/A/Salmon/10kg/UK/09.08.17/C

VirkonTM AQUATIC

Complete Aerial, Water System & Surface Disinfectant

- Complete control - aerial, water and surface disinfectant
- Universal - independently proven effective against major virus families affecting man, animals and fish
- Non flaring
- Effective at low temperatures with proven efficacy against key fish pathogens

IMPORTANT AQUATIC DISEASE ORGANISMS	PROVEN EFFECTIVE DILUTION
Bacteria (disease caused)	
<i>Aeromonas hydrophila</i>	1:200
<i>Aeromonas salmonicida</i> (furunculosis)	1:200
<i>Pseudomonas aeruginosa</i>	1:100
<i>Pseudomonas anguilliseptica</i>	1:100
<i>Yersinia ruckeri</i> (YOJO)	1:100
<i>Morax anguillarum</i> (Moraxella)	1:100
<i>Yersinia ruckeri</i> (ERM)	1:100
Viruses (disease caused)	
<i>Ictaluri</i>	1:100
<i>Infectious Pancreatic Necrosis Virus</i> (IPNV)	1:200
<i>Infectious Salmon Anaemia Virus</i> (ISA)	1:200
<i>Rhabdovirus</i> (RHV)	1:1000
<i>Spring viraemia of carp rhabdovirus</i> (SVC)	1:1000

IMPORTANT FOOD POISONING PATHOGENS	PROVEN EFFECTIVE DILUTION
<i>E. coli</i> O157	1:100
<i>Enterococcus faecalis</i>	1:100
<i>Listeria monocytogenes</i>	1:100
<i>Pseudomonas aeruginosa</i>	1:100
<i>Staphylococcus aureus</i>	1:100
<i>Salmonella typhimurium</i>	1:100
<i>Yersinia enterocolitica</i>	1:100

Manufacture:

Artec International Limited
Windham Road, Chilton Industrial Estate, Sudbury, Suffolk, CO10 2XD, United Kingdom
Tel: +44 (0) 1787 377305
Fax: +44 (0) 1787 310846
Email: info@lanxess.com
www.lanxess.com

Emergency Telephone Number: +45 214 30 95300 (Suez CHEMPARK Levehoe)

LANXESS

CEFAS Approval

Product name	Product physical form	Bacterial diseases of aquaculture relevance (Test Standard EN1556 Modified)	Viral diseases of aquaculture relevance (Test Standard EN14575 Modified)
Virkon TM Aquatic	Powder	1 to 100	1 to 200



DANGER

Contains: pentapotassium bis(peroxymonosulphate) bis(sulphate); benzenesulfonic acid, C10-13 alkyl derivs.; sodium salts; potassium hydrogensulphate; dipotassium disulphate

Hazard statements - Causes serious eye damage. Causes skin irritation. Harmful to aquatic life with long lasting effects.

Precautionary statements - Wash skin thoroughly after handling. Avoid release to the environment. Wear protective gloves/ eye protection/ face protection. IF ON SKIN: Wash with plenty of water. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER/ doctor. If skin irritation occurs: Get medical advice/ attention. Take off contaminated clothing and wash it before reuse. Dispose of contents/ container to an approved waste disposal plant.

Supplemental information - Contains dipotassium peroxodisulphate. May produce an allergic reaction. Bioactive substances: pentapotassium bis(peroxymonosulphate) bis(sulphate) at 49.7% active chlorine generated in-situ from sodium chloride and pentapotassium bis(peroxymonosulphate) bis(sulphate).

PRECAUTIONS

• Use disinfectants safely. Always read the label and product information before use. • Store in a cool dry place with lid tightly closed. • Always replace lid after use, if product is to be stored for a period of time. • Rinse bucket out with water after use and dispose of appropriately (dispose of any powder residue & inner polybag as special waste). • Do not allow the powder to directly enter watercourses. • Do not mix with other chemicals except those recommended by the manufacturer. • When prolonged contact with metal surfaces is expected, rinse with clean water. • Rinse out application equipment after use. • Unprotected persons must not enter areas being treated until spray mists have dispersed. • If in contact with food contact surfaces, rinse thoroughly with potable water.

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Under development

GUIDANCE: UNAUTHORISED FARM VISITS



Unauthorised visits to our farms put the intruder at risk, our farm teams at risk and our trout at risk.

What do we mean by 'unauthorised visitor'

Anyone who goes beyond the farm boundaries into the managed area or onto farm infrastructure and equipment without permission and without following company protocol around Health & Safety and farm biosecurity.

What are the risks associated with such visits

First and foremost, the unauthorised visitor is putting their own safety at risk, given the potential hazards on and under the water of our working farms and shore bases. In the event that they move or dislodge anything, they could also put our farm teams at risk; likewise, the safety and biosecurity of our trout.

What to do in the event of an unauthorised visitor

All Staff

- Alert your Line Manager**
Do not approach or engage the unauthorised visitor. Your line manager will issue instructions so that the situation is handled calmly and sensibly and if deemed appropriate notify Police Scotland explaining the safety risk and requesting an incident number.

Manager

- Approach the unauthorised visitor**
The objective is to protect the unauthorised visitor and defuse the situation and not do anything that could be misinterpreted as threatening or aggressive.
- Be calm and clear, never confrontational**
Explain to the unauthorised visitor that by ignoring the safety instructions and by being within the operational area, that they are putting their safety at risk. Politely request that they leave immediately and inform them that their visit will be recorded and reported to Police Scotland.
- Where safe to do so, film/photograph the unauthorised visitor**
If asked, explain this is to provide evidence for Police Scotland. Please note: the unauthorised visitor does not have the right to film you at work without your permission. If they do film you, clearly state that you do not give your permission and that any such images can not be used. (Data Protection Act 2018).
- In the event that the unauthorised visitor refuses to leave the operational area, keep watch from a safe, non-threatening distance.**
Should they get into difficulty, follow your training and go immediately to their aid. If necessary, dial 999 or use your VHF radio, whichever is most appropriate.

After the incident is safely over

Manager

- Note down the time, date and key details in your site diary**
These may be needed at a later date by Police Scotland.

All Staff

- If the unauthorised visitor has left you feeling threatened or anxious about going to work, please contact the H&S team.**
They can put you in touch with a trained counsellor who you can speak to in complete confidence.

Remember, even though you refuse permission, you may still be filmed. Remain your calm and non-confrontational self at all times and be respectful of others and how they may perceive your words or actions.