

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

State any you agree or disagree with, and your reasons.

Policy 1: Agree

Policy 2: Essential and must be maintained. I do think it should be considered that where non-native species settle naturally within a seaweed farm, there will need to be a procedure in place to ensure that it was clear this was a natural event from an invasive species, and not the intentional action of the farmer, for example.

Policy 3: Being away from sewage outfalls and other pollution is just one of a number of considerations if being grown for human consumption. In response to the needs of our members, standards for human food seaweed need to be implemented, and which the Seaweed Health Foundation is placed to do, based currently on standards that are existing in the industry for wild harvested seaweeds.

Policy 4: Agreed, and equipment must also be suitable for harvesting sustainable, safely and to the appropriate wider standards

Policy 5: Agree

Policy 6: Agree, and depending on what is considered 'appropriate'. The foreseeable future will be small-scale cultivation feeding into larger markets, so this policy seems to be a pragmatic and realistic approach to meeting market demand.

2. Should policy 2 require local provenance, i.e., stock must originate from the water body the seaweed is to be grown in? YES/ NO

State your reasons:

Yes. Otherwise cultivation may speed up any migration of non-native species around Scotland/UK.

Others will be able to comment on this with more authority than me (e.g. Prof Juliet Bordie, Natural History Museum)

3. Do you agree with policy 7? YES/NO

State your reasons:

Yes, agree, depending on the regulatory considerations, and that more than just environment impacts are considered. As with small-scale, other stakeholders must be considered, as well as other aspects of social and economic sustainability

4. Do you agree with policies 8 and 9?

State any you agree or disagree with, and your reasons:

Neither agree nor disagree at this stage. All I would state is that any seaweed produced must be to standard for all aspects those standards incorporate. The concept of IMTA is a good one, in the sense of better utilisation of resources from an environmental and economic perspective, but I believe the practical delivery of seaweed for human food from IMTA to be some way off, and I have limited knowledge of its development

5. Do you think that the size scales (shellfish (small), medium, and extensive), are appropriate?

Give your reasons

Yes, based on the fact that the level of operation, size of companies and resource to address planning would seem reflective of the scales proposed, and thus it seems sensible to address them in this way

6. Which consenting option would be most appropriate for seaweed cultivation?

Give your reasons

As we are not involved in consenting, nor cultivation at this time. I do not feel well placed to answer this. The consultation has been passed to members of the Seaweed Health Foundation to comment on

7. Should guidance be developed for the harvesting of wild seaweed? If not, what (if any) alternative arrangements would you suggest?

Yes, and in response to the need from members, the Seaweed Health Foundation is implementing wider standards around the harvesting of human food seaweed, which will be available to harvesters to take on. We invite Scottish Government and others to be in touch to discuss as the standards being implemented by the Seaweed Health Foundation.

8. Should the 1997 Act should be amended to provide the flexibility to farm other species or specifically named species? YES/NO

State what named species should be included, and provide your reasons.

Yes it should be amended, and the species of seaweed should be kept open, and only limited to the native species. This gives the flexibility to farm seaweeds as the technology and markets develop

9. Do you have any comments to make on the BRIA content?

Wider consultation should have been held with business at the drafting stage. A very supply based approach seems to have been taken, which assumes a market. The market is very small and nascent, and this supply type, quality, quantity and other factors must be undertaken in line with market demand, or it risks the development of the supply side being redundant or inefficient.