

**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.**

Seafood Shetland agrees with policies 1 – 6.

**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:**

Seafood Shetland holds the view that policy 2 should prevail, this in an effort to minimise the risk of importing invasive non-native species and as a future safeguard.

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

**State your reasons:**

Seafood Shetland is in agreement with policy 7.

**4. Do you agree with policies 8 and 9?**

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

While it is appreciated that the principle of Integrated-Multi Trophic Aquaculture (IMTA) is reasonably sound when carried out in a considerate manner, Seafood Shetland has concerns. These projects are being initiated by large-scale finfish farms, primarily as a means to retain current production capacity at over-stocked locations; the conversion of dormant finfish farming sites to IMTA enables companies to retain control of sites and areas. It is considered that finfish farms have no real interest in, or respect for, the IMTA species, their principal aim being to continue production of finfish. It is very likely that ancillary sites will become neglected and burdensome. It is also considered that the likely impact on the healthy and developing shellfish farming sector is likely to be negative:

1. Ancillary sites are fed by large-scale, artificial, industrial nutrient input and consequently consumers will be confused when making purchasing choices, consequently diminishing the kudos of the hard-won Marine Stewardship Council award granted to shellfish production in Shetland and the Scottish Shellfish Marketing Group's Scottish mainland sites.

2. There is no real means of containing nutrients; the 'integrated' tag is inappropriate.

3. In order to maximise nutrient absorption or particulate ingestion, separation distances would require to be small, with likely problems particularly with other waste materials, including pesticides.
4. The effects of introducing new IMTA production on existing shellfish producers are unknown.
5. It is very likely that farms will be unkempt and possibly derelict, giving the wider industry a bad reputation.
6. Product is likely to be 'dumped' on the market, with no consideration given to long-term outlook on customer relations, quality or price.
7. Access to sites - which should have been made available to the expanding shellfish farming sector - will still be denied. This is the responsibility of the Crown Estate and of Shetland Islands Council in Shetland.

If the concept of IMTA is to be promoted by the Scottish Government, every step should be taken to ensure that any permissions granted for production are awarded to concerns with serious intent and those with a genuine desire to succeed in this particular area of activity.

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

**Give your reasons**

Seafood Shetland considers that the scales of shellfish (small) scale and medium scale are reasonable. Promotion of Extensive scale seaweed production requires further, greater consideration and consultation.

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

**Give your reasons**

Seafood Shetland considers that all seaweed cultivation should be regulated by the terrestrial planning regime, bearing in mind that other aquaculture developments are regulated in this manner. While the costs are significant, they would serve to deter any spurious applications.

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

Seafood Shetland has no particular view on the development of guidance for harvesting wild seaweed.

**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.**

Seafood Shetland considers that the 1997 Act should be amended to provide flexibility for operators to farm other species, rather than naming species individually. While this may be considered rather general, it should allow for any likely eventualities and avoid costly and unnecessary future amendments.

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

Seafood Shetland has no comments.