

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

S

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

We disagree with 5. Other marine users should be taken account of but the fishing industry should have a higher status compared to other users especially in Orkney as it is fundamental to the sustainable self-sufficiency of the isles. There should be a presumption that no development takes place over a wild fishery or displaces the legitimate activity and legally held right of fishermen to fish.

2. Should policy 2 require local provenance, i.e., stock must originate From the water body the seaweed is to be grown in? YES/

State your reasons: NNS are already prevelant in Orkney waters therefor everything must be done to prevent bringing in species which alter the natural biodiversity through micro-organisms or infected stock.

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

State your reasons: No. Spatial pressure in the marine environment is already at capacity. No consideration is given to fishing displacement or displacement resulting in environmental pressures from cumulative development pressures from MPAs WWT energy, existing aquaculture developments. The Orkney fishery is now highly vulnerable to erosion of the critical mass of harvesting to sustain dependent industries as well as the fishing skill and practitioner base. Evaluation of all the impacts should be undertaken and Orkney should be exempted national from any further threat to its low impact and sustainable fishery.

4. Do you agree with policies 8 and 9?

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

Disagree with 9. There should be a presumption against further finfish and IMTA developments in Orkney due to the exceptionally low unemployment 1.1%, (so jobs are not an issue) and the fact that Orkney is now at full capacity in terms of Aquaculture sites. Additionally Orkney waters are fully exploited by a sustainable and low impact wild inshore fishery, and Orkney is under greater pressure than any other area of the UK to accept large scale renewable developments as it lies within the North region. The inshore Fishery therefor requires special protection

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

Give your reasons

Orkney waters are already fully exploited by a low impact sustainable inshore fishery and cannot withstand further erosion of ground therefor this question is redundant. Any size of spatial exploitation will conflict with the established fishery, causing displacement, gear conflict and fishing pressure in other

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

Give your reasons

No View

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

No seaweed should be harvested close to wild fisheries

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.

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

There needs to be a proper evaluation of the losses to the fishing in particular in relation to the interdependent nature of fishing in Orkney and the socio-economic impacts of the cumulative loss of spatial area to fishing in Orkney.