

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.

These policies seem sensible, proportional and adequate.

2. Should policy 2 require local provenance, i.e., stock must originate

State your reasons: Unless there is sufficient evidence of lack of harm (approved screening for other species, authenticated stock, known and approved source) to countermand, we feel that the default position should be that stock must originate from the same body of water to prevent the possible ecological effects of alien species being introduced. However, there may be situations where improvements in seaweed yields are to be gained from introduced species being used and this would be subject to future research and/or case by case assessment.

3. Do you agree with policy 7? YES

State your reasons: We suggest that this is given on the proviso that sufficient knowledge is available to allow proportionate and effective mitigation actions to be put in place to offset potential risks. The caveat is that the respondents are not experts in the nature of the risks of such scale of seaweed, the effectiveness of mitigation. This would also place a burden of regulation on national authorities who should ensure that the resources are available to ensure compliance and appropriate regulatory structures.

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

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

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

Give your reasons YES, in general, but there is a weak definition of extensive cultivation as it is written.

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

Give your reasons No comment

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

We feel that guidance should be developed especially if the scale of wild harvesting was to be increased due to new opportunities/products being identified (perhaps in food or health related products) or novel processing methods (perhaps co-product or multi-use extraction) being developed. This need not be onerous on the largely small-scale enterprises involved and in many cases will probably echo their existing practices to maintain their local stocks with minimal environmental impact.

8. Should the 1997 Act should be amended to provide the flexibility to farm other species or specifically named species? YES

State what named species should be included, and provide your reasons. We feel that the Act should be amended to provide this flexibility. The possible ecological and environmental impacts of farming of new species should be at the heart of any consent process. Obviously the new species would have to be native to the proposed site and any possible impact on existing aquaculture ventures should be investigated.

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

No comment