

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.

*We agree in principle with policies 1-6 with the following provisos:
Policy 3 the stronger text 'cultivators should...' be used
Policy 4 should clarify that potential damage could affect natural and built structures along the coastline in addition to boats and other marine structures
Policy 5 should read 'other marine and coastal users and activities'
Policy 6 should read 'with due regard to the marine and coastal environment'*

Rationale: in the West of Scotland most communities and crofts are located directly on the coast line and many local people already utilise intertidal seaweeds (to improve soil conditions for example)

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:

*There is evidence from research that indicates that there is considerable variation in the chemical and physical properties (nutrient content and growth habit) within individual seaweed species; beyond seasonal variation [Pavia, H., Toth, GB., Lindgren, A. and Åberg, P. (2003) Intraspecific variation in the phlorotannin content of the brown alga *Ascophyllum nodosum*. *Phycologia* 42(4):378-383 and other references].*

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

State your reasons:

Medium-scale seaweed cultivation could (and should) benefit local communities in those areas identified where there is limited income and employment beyond subsistence crofting/farming. It is, however, imperative that appropriate regulation is in place and enforced and that provision for long-term monitoring of sites is also made to prevent overexploitation.

4. Do you agree with policies 8 and 9?

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

*We do not agree with policies 8 and 9 for two main reasons.
1] IMTA increases the likelihood of pathogens and diseases developing and spreading into natural populations of marine organisms generally. In particular increased nutrients (especially nitrogen) from farmed fish would have an*

unknown (and probably adverse) effect on seaweed quality; similar to growing in sewage effluent.

2] The Western Isles, especially the east coast of the Outer Hebrides, is renowned for quality 'wild' marine products (not only finned fish) and the health and quality of these would be put at risk by increased feeding, intensification of farming and the resulting increase in nutrients and effluent.

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

Give your reasons

Yes

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

Give your reasons

We believe that option 2 is the most appropriate consenting option for seaweed cultivation of inshore species because of the impact that farming would impact on the intertidal zone and coastline which is currently used for small-scale collection of 'wild' seaweeds.

Consent for cultivation of offshore and deep marine species would be best considered under option 1.

Division by scale of cultivation and harvesting would not be appropriate because of the different requirements different seaweed species and their uses.

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

YES. Guidance must be developed to prevent over-exploitation of wild stocks, to avoid negative impacts on the seaweeds reproductive cycle and, in some cases, to ensure important fish breeding habitats are not significantly disturbed by industry and to protect the continued, sustainable, availability of seaweed 'for personal use'.

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.

This response is based on the ecological importance and fragility of the sites identified. There is a danger that if farming of additional, currently wild,

marine organisms is permitted that this will have a detrimental effect on both natural communities and currently farmed species.

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

The potential problems indicated in the SEA must be investigated fully so that more informed decisions and recommendations can be made. 'The SEA Environmental Report identifies some potential negative impacts from overharvesting of wild seaweeds, including temporary loss of habitats and damage to the seabed. In addition, there may be an impact on coastal processes such as loss of storm resistance.'