

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

Policies 5 and 6 should be amended to reflect the coastal nature of these developments. All near-shore activities will have an impact on the amenity of the coastal zone and this should be considered. We would suggest:

Policy 5 - Other marine and coastal users and activities should be considered in the siting of farms.

Policy 6 – Shellfish scale farming is not spatially limited, and may be located anywhere in Scotland with appropriate local conditions and with due regard to the marine and coastal environment.

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

Yes. We consider that the maintenance of the genetic integrity of areas to be important consideration.

3. Do you agree with policy 7? NO

The current text states that mitigation measures must be considered to prevent adverse impacts. Mitigation is the reduction in harm, not its prevention. The term “safeguards” would be more appropriate.

4. Do you agree with policies 8 and 9?

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

Yes.

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

We would favour option 2 as this would offer a consistent regime, would be best placed to assess marine and coastal impacts together, and would allow for the greatest community input into decision-making.

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

Yes. The research needed to underpin the guidance should also take into account other stressors on the local environment, including climate change and other relevant land (e.g. agricultural run-off), coast and marine usages.

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

Yes, though this should be done on a case-by-case basis after an evidence-based assessment has been carried out. As with the choice of seaweed species, the genetic integrity of local environments should be respected.

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