

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

Policy 1: Agree- This is evident through the development of this statement which will hopefully fill an increasingly evident gap in legislation surrounding the seaweed industry in Scotland in all its forms. Further support would be welcomed through financial support for small businesses trying, not only to exist in this industry but grow the seaweed industry in Scotland, this would be greatly beneficial. In addition to this the funding of research into the area would again fill a large gap in the knowledge of seaweeds, their lifecycle, nutritional benefits and seasonal variability.

Policy 2: Agree- protection of the native population should be of high priority. This is in the interest of those using a combination of cultivation and wild harvest where the native wild population is key. Protection of Scottish species is also important where brand principles are concerned e.g. standards of excellence, Scottish premium product.

However, due to shifting climate and the highly temperature sensitive nature of seaweeds, this policy may need to remain flexible and be reviewed if non-native species become invasive.

It is also important to define 'native to the area' e.g. is the 'area' the coastline of Scotland or a smaller scale? We harvest/grow, seaweed of the same species, on the East and the West coast of Scotland.

Policy 3: Agree- As a business producing seaweed seasonings for human consumption, the quality of our product is of utmost importance and any potential contamination is avoided at all costs.

The filtration ability of seaweed is however of interest and it's cultivation at sources of pollution could benefit the quality of water and thus of seaweed in close proximity.

Our seaweed is batch tested for its microbiological profile. However more research is needed into the testing criteria for seaweed for human consumption, in order to keep it to a minimum (to prevent excessive testing constraints which could potentially cripple SMEs).

Policy 4: Agree- A standard must be set to make sure this happens and that cultivation infrastructure is safe yet effective. But without becoming too much of a burden on the industry, cost and regulation-wise, preventing SME's from entering the market.

Policy 5: Disagree- There is very low impact on other marine users anticipated on our scale, and could have positive impacts on the environment e.g. water quality improvement, carbon capture.

Policy 6: Agree- This is important while the industry is in it's infancy, and areas should not be limited to shellfish growing areas as long as other criteria are met.

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

Disagree- Need evidence to prove that there would be any issue with movement of species within Scotland (same species present on both coastlines of Scotland). And as mentioned previously a clear definition of the 'area' and 'water body' is needed to fully review this point.

Genetics should be considered in answering this question and the conservation of the seaweed gene pool should be of high priority. Cultivated seaweeds could also release spores (depending on when in their lifecycle they are harvested) and thus could be part of the reproductive population. This potentially could shrink the gene pool within the population, and hence reduce the resilience of the species-putting the species at risk in the face of climate change.

The stock used should therefore pose no threat to the wild genome, but further research is needed into the effects of this, giving evidence for legislation. Again it is important not to constrain the industry with legislative barriers, especially with little evidence of species movement being negative.

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

Policy 7: Agree- I feel that there should be provided in the SPS (Seaweed Policy Statement) mitigation measures, backed by evidence (peer reviewed) this would ensure that the mitigation measures are effective and a baseline of quality is in place.

4. Do you agree with policies 8 and 9?

Agree

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

Separating by production scale seems to be a logical approach to the SPS. It is important however that the infrastructure and regulations are in line with the ability of the business to provide them. As a small business, too many regulations can have a huge implication on our profit margins.

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

None of the options given seem to provide a holistic and consistent approach. A move away from the Marine Licensing regime does not seem logical as this by name seems to me the most obvious umbrella title for any marine development.

7. Should guidance be developed for the harvesting of wild seaweed?

If not, what (if any) alternative arrangements would you suggest?

Mara Seaweed has developed its own guidance that has SNH approval. It is part of our "brand" and company ethics to create a sustainable wild harvest model. We harvest wild seaweed in accordance with our own guidelines. These guidelines were created due to the application for a harvesting licence from Crown Estate, the lack of governmental legislation and a desire to protect seaweed as a sustainable natural resource. Although Mara Seaweed follows a sustainable harvest plan there is a danger that other wild harvesters will not and will thus put the stock of seaweed which we depend on, at risk.

Guidelines should, therefore be developed which offer a sustainable method for harvesting wild seaweed: this information would also be a very useful reference when applying for a wild harvest licence.

Legislation should allow companies like Mara to have a harvesting licence that allows commercially and environmentally sustainable harvest. This is only possible if enough stretch of coastline for harvesting rights below mean low water (MLW) and outwith the MLW line to 500 metres is granted, allowing seaweed to be harvested on a rotational basis. This allows seaweed businesses to create sustainable business plan.

Crown Estate, at this time, grants harvesting licences for only 3 years. As an SME this does not allow enough security as we are investing considerable sums in infrastructure to support our harvest - only 3 years of guaranteed harvest rights is not enough. This short-term harvest right is also a limiting factor to many potential investors who require a longer-term outlook. Mara Seaweed has a business plan of 5 years which therefore relies on extended tenancy rights.

Moreover, the Crown Estate has taken a policy position of requiring from prospective wild harvest tenants no evidence of aptitude, qualifications or regulatory compliance with Food Standards Agency strictures. Once a licence is signed off, the terms do not deliver any territorial exclusivity.

Mara Seaweed has undertaken a SWOT analysis of its mission. Whilst a Strength is the increasing demand for high quality seaweed product for international food markets, a Threat is the licensing. There is no guarantee that the CE will NOT licence a competitor for the same coastline who is able to reduce overhead by not having the same commitment to ecological surveying, training and general regulatory compliance.

Seaweed harvesting is distinguished from, say, winkle collection by the necessity for vertical integration of the business. Shellfish harvesters can simply sell to merchants. There are no seaweed merchants, so any organisation seeing the potential of seaweed for the human food chain is obliged to set up costly systems of collection, processing and distribution. This can only take place with a little more support from landowners and regulators than is currently in evidence.

We emphasise that Scottish seaweed has, in our analysis, huge potential. Marine algae grows best in cold, unpolluted waters with strong tidal currents. The export

potential is significant, and considerable thought needs to be applied to supporting the Scottish wild harvest effort.

8. Should the 1997 Act should be amended to provide the flexibility to farm other species or specifically named species? YES/NO

Yes there should be flexibility in the 1997 Act to allow the diversification and therefore stability of the industry. If species are named, this should not limit farmers but provide a useful reference, which can be built upon.

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

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