

RESPONSE FORM

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

SEPA considers that the approaches outlined in Policies 1-6 will provide an adequately robust framework to support the development of a seaweed farming industry while ensuring the protection of consumers, the environment and other marine users.

During discussions around the issue covered in Policy 3, SEPA highlighted that although the risks posed to consumers of harvested seaweed by faecal bacteria and other sewage contaminants were likely to be low, producers should provide assurance by not producing seaweed products in proximity to areas contaminated by sewage. In this regard, Policy 3 should more explicitly state that cultivators *should* rather than "could" site their farms away from sources of pollution.

The commitment in the document that the establishment of seaweed production would not be used as the sole driver for improvements to water quality or to impose additional requirements on existing operators of authorised activities is welcomed by SEPA.

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

There are two risks posed by the use of stock of non-local provenance. While the importance of location in terms of the genetics of marine algae is not fully understood, the risk that farmed seaweed of a non-local provenance may have detrimental impacts on local wild populations at a genetic level exists and should be avoided.

The use of non-local stock may also increase the risk of non-native species being introduced either as a deliberate result of developing a farm or accidentally through being introduced along with the species to be cultivated when the farm is stocked.

For these reasons stock of as local a provenance as possible, and ideally from within the same waterbody should be used in the development of seaweed farms.

3. Do you agree with policy 7? YES

SEPA is supportive of the development of medium scale seaweed farms provided these are appropriately sited and the authorisation of such sites takes account of local issues and the possible environmental impacts of such developments.

4. Do you agree with policies 8 and 9?

IMTA has a long and international history with the first aquaculture systems being based on these principles. The use of marine algae and potentially shellfish to absorb some proportion of the nutrients arising from finfish production is logical and will provide benefits for the environment. SEPA is supportive of this approach. The onward use of the algae arising from IMTA is also important, clearly to ensure the sustainability of the approach it should not merely be seen as a sink for finfish farming nutrients but should be directed towards a useful purpose after harvesting. In the authorisation process, preference could be given to proposals which include a beneficial and sustainable use for the seaweed arising.

Clearly, while there is a presumption against further finfish development on the East and North Coast IMTA involving finfish and algae culture is not feasible there.

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

Yes. Large scale cultivation and harvesting would raise additional issues requiring further consideration, whereas smaller scale production is likely to be more benign requiring a less exacting approach in licensing and regulation.

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

SEPA retains the view that for developments in the inshore, authorisation by Local Authorities under the Town and Country Planning regime is the most appropriate certainly for small and medium scale developments. Extensive scale sites may require to be handled differently, not least because these would normally be developed further offshore but also because there are potentially a different suite or scale of issues to be considered during the determination process, however where these were developed within the seaward extent of the planning regime, these should also be handled within the terrestrial planning system. Option 2 would therefore be the favoured approach with a slight adaptation based on location, ie where seaweed farms were proposed beyond the seaward extent of the planning regime, Marine Licensing would be the appropriate means of authorisation.

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

While harvesting of wild seaweed remains an activity undertaken on a small scale using hand tools or small boat-based dredges or rakes, then there appears to be little requirement for regulation, but there should be industry guidance on best practice. However a move towards greater mechanisation may require control. This is because the prospect of larger scale harvesting of wild seaweed over larger areas could have implications for biodiversity and the viability of certain commercially important crustaceans. Rather than direct regulatory control over wild harvesting activity, the use of an approach such as General Binding Rules and accompanying best practice guidance to allow smaller scale activity without the need for regulation may be a useful way forward. Some definitions of scale are required however to ensure that potentially damaging large scale mechanised harvesting can be adequately controlled because the implications of such harvesting in the absence of regulation may be significant.

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

The Act need not specify the species permitted to be farmed though any planning application and subsequent planning consent should detail the species to be involved in any development.

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

No comment.