

## RESPONSE FORM

### DRAFT SEAWEED POLICY STATEMENT 2013

**RYA Scotland welcomes the production of a seaweed policy statement at this early stage of the development of the industry. The RYA position paper on aquaculture makes reference to the culture of marine algae as follows:**

#### *Marine algae cultivation*

*Finally there are proposals for the cultivation of marine algae. Such farms will be similar to mussel farms with buoys connected together with ropes hanging beneath them. As these schemes would be likely to cover large areas of sea and may be located further offshore than mussel farms, they are potentially likely to pose significant hazards to recreational sailors.*

**We feel that the policies do not take enough account of the potential adverse effects of inappropriate developments. The Scottish Planning Policy includes useful guidelines for aquaculture and it should be emphasised that these will also apply to seaweed cultivation. There will be real difficulties in effectively marking and lighting seaweed farms and this will have to be discussed with the Northern Lighthouse Board.**

**Paragraph 7.2.25 of the SEA states that 'Seaweed farm developers will need to consider such navigational issues when planning and designing development, including the proximity of sites to known recreational areas and the potential for an increase in collision risk'. We consider that ALL potential seaweed sites are close to areas used for marine recreation. The UK Coastal Atlas of Recreational Boating, which is referred to in the SEA, includes the most important routes and anchorages. It is scheduled for revision to mark routes as corridors based on AIS data update the location of anchorages and take account of increased recreational use of Scottish waters since the 2008 edition was completed.**

**RYA Scotland has no comment to make on policies 1 to 4 and 6. Policy 5 seems too weak. There should be an obligation on developers to consult other marine users rather than just to consider them, which is open to interpretation.**

**1. Do you agree with policies 1-6?**

**RYA Scotland has considerable experience, as a non statutory consultee, of applications for finfish and shellfish consents. In many cases the procedure would have been speeded up had the applicant consulted RYA Scotland in the first instance. Conflicts between aquaculture and recreational boating can be minimised by considering them at the start of the process.**

**2. Should policy 2 require local provenance, i.e., stock must originate from the water body the seaweed is to be grown in? NO COMMENT**

**3. Do you agree with policy 7? YES with reservations**

**State your reasons: It needs to be clarified that adverse environmental impacts include those on other users of the area such as recreational boaters. There is a good example in the Republic of Ireland where the development of a large area for mussel cultivation has effectively deprived all vessels, except those with detailed local knowledge, of using this area. There are situations where mitigation is not possible. Considerable investment has gone into Scottish marine tourism in recent years and inappropriate developments could put that at risk.**

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

**Policy 9 should not assume that IMTA is appropriate for all existing finfish sites. Many sites are already constrained by space due to a requirement to retain access to anchorages and an increase in size would not be possible.**

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

**The size scales are reasonable although there seems rather little difference between the first two. RYA Scotland is very concerned about the extensive scale of seaweed farms needed to justify investment in processing facilities. There are no parts of the coast that are not used by recreational craft and mussel farms can be very difficult to see even if it is possible to manoeuvre round them in adverse weather. We are particularly concerned about any developments on the east coast where night passages are often made to take advantage of the tide and where recreational craft are already squeezed between commercial traffic (and windfarms in the future) on the one side and unlit creel marker buoys on the other.**

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

**RYA Scotland recognises the benefits of a simple consenting regime. We support the view that 'potential significant environmental impacts are best considered and regulated by Marine Scotland', particularly where any adverse impact falls on users from outwith the Local Authority area.**

**here have been cases where a finfish farm has been approved by a Local Authority but where the subsequent application for a Marine Licence showed navigational concerns that had not been considered earlier. Whichever option is chosen, close coordination at an early stage between the Local Authority and Marine Scotland is required.**

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

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

**We agree that the development of guidance could be useful to promote good practice and mitigate against negative impacts. Kelp beds can help protect vessels in exposed anchorages.**

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

**State what named species should be included, and provide your reasons.**

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

**NO**