

RESPONSE FORM

NOT
NAME +
ADDRESS

DRAFT SEAWEED POLICY STATEMENT 2013

1. Do you agree with policies 1-6?

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

In principle, yes. There are however a few points that are ambiguous:

1. Policy 3: What would be defined as 'away'? This could be interpreted in many different ways when considering distance from source, oceanographic currents, prevailing winds, etc.
2. Policy 6: If small-scale seaweed farms are high in number within a defined area this could have similar, or even elevated, impacts as a large-scale farm. What considerations will be put in place for permitting small farms to develop? What will be deemed a 'high-density' of small seaweed farms?

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:

This question is impossible to answer without providing your definition of a water body. A single sea loch? Defined geographic regions around Scotland? UK waters?

I certainly support the development of seaweed farms that cultivate seaweed species from the local area, but 'local' also depends on the specific seaweed – some seaweeds have a small spatial distribution, others have global distributions.

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

State your reasons:

In principle, yes. However, very little research has been conducted on the environmental impact of seaweed cultivation, particularly relating to less obvious impacts such as changes to biogeochemical cycles. At present, it would be impossible for a planning application to present an effective impact-mitigation strategy for all potential impacts, as they simply are not yet understood.

4. Do you agree with policies 8 and 9?

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

Yes, these seem reasonable. An integrated approach to marine cultivation certainly seems to me to be an efficient use of resources. I would potentially like to see the inclusion of mandatory seaweed cultivation alongside farming.

Some questions over this which come to mind include:

What extra infrastructure would be required? Could existing infrastructure be retro-fitted? What is the expected growth of other types of farms (e.g. shellfish), which would then be paired with seaweed cultivation?

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

Give your reasons

The upper limit of 'medium' sized farms (80 x 200 m lines) still seems rather small for an economically-viable venture. This also really depends on what the Scottish Government envisages getting out of seaweed cultivation. Small scale farms may be beneficial to local island communities for example, but will not provide the biomass needed for commercial seaweed use. I wonder if this choice of size scales is also simply a reflection of the size of current seaweed farms? If seaweed cultivation is predicted to continue to expand in Scotland, what size farms are expected to emerge? Scotland has the potential to become world leaders in seaweed cultivation; their use as a 3rd generation biofuel is promising and should be seriously considered by the Scottish Government. A recent report for the Algal Bioenergy Special Interest Group identified that seaweed cultivation in the UK will begin to develop in earnest in the next 2 – 10 years, so this is a topic that will be upon us in the near future.

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

Give your reasons

I would suggest a combination of option 3 and 4. Small-scale farms will almost always be near to the shore, thus it would make sense for them to be regulated with other aquaculture. However, larger farms need more space, thus will be more likely to be located further offshore, making it more sensible for them to be regulated under the Marine Licensing regime; being offshore may also help to mitigate their environmental impact. However, if these farms were working within an IMTA site, it *may* be sensible to consider them under the 1997 Act (although this should also depend on the scale of the seaweed farm vs the IMTA development).

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

Yes, guidance should be developed. I expect to see a growth in the amount of wild harvesting over the next few years as the popularity of seaweed in the UK grows, e.g. health benefits etc.

What factors do the Crown Estate consider when granting harvesting rights? Are these criteria suitable for extrapolation if the extent of harvesting significantly increases?

From the policy statement: 'There is currently no evidence that any adverse environmental effects are taking place.' Is this based on studies of Scottish seaweed harvests? Or is this simply because there is a lack of data? More information should be provided before an informed decision can be made

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.

Whilst I cannot comment on named species, I certainly believe farmers should be able to diversify – this allows farmers to follow current trends and fashions, maximising their income. However, there should also be regulations in place that ensure the diversification adheres to appropriate guidelines.

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

This is a summary of the policy statement, thus my above comments hold for the BRIA also.