

Marine Scotland Licensing
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Marine Scotland: Wild Seaweed Harvesting, West Coast of Scotland, Scoping opinion request

The Coastal Communities Network, Scotland is a collaboration of locally-focused Scottish coastal community groups, guided by the belief that coastal communities across Scotland are well placed to harness long-term solutions to ensure healthy, well-managed seas. The Network provides the means to build the community voice within marine conservation and management in Scotland and is currently comprised of 12 community groups spanning the Scottish coastline, alongside supporters and associated organisations who share and support the aims of the Network. For more information, see the website: www.communitiesforseas.scot.

Thank you for confirming that the Coastal Communities Network Scotland have been included as a valued stakeholder for the *Wild Seaweed Harvesting, West Coast of Scotland - Scoping opinion request*, which is currently taking place to seek stakeholder's views on the scope of an Environmental Report to accompany an application for one or more 5-year marine licences to harvest wild kelp on the west coast of Scotland. Many of the Coastal Communities Network member groups are deeply concerned with aspects of the scoping report and would like to take this opportunity to provide a response to this consultation, and to MBL's proposed operation.

MBL's operation proposes to mechanically harvest up to 30,000 tonnes of kelp a year over a 20km² area, with the use of specially built or re-purposed vessels. Kelp forests are among the most biologically diverse and valuable marine habitats on the planet, and are recognised as a Priority Marine Feature habitat within Scotland's seas. The Scottish Government have an obligation to ensure that "*Development and use of the marine environment must not result in significant impact on the national status of Priority Marine Features*", under the National Marine Plan, and the Marine (Scotland) Act 2010 requires that decision makers should act in the way best calculated to further the achievement of sustainable development and use, including the protection and, where appropriate, enhancement of the health of the Scottish marine area. We strongly feel that MBL's proposals to mechanically harvest wild kelp on the West Coast of Scotland will result in a significant negative impact to this habitat, and to the wider ecosystems of the West Coast.

Scotland holds a significant proportion of the UK records of kelp beds and therefore the habitat is considered to be nationally important. The benefits that kelp beds bring to the marine ecosystem are multi-fold. Kelp beds provides a canopy under which a wide range of animals and plants thrive. A rich diversity of red seaweeds may grow among the fronds, while the rocks below the kelp are often encrusted with coralline algae or support cushion forming fauna, such as sea anemones, sponges and sea squirts. Small crustaceans and worms live among the kelp holdfasts, while sea urchins and sea

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snails graze on the seaweeds, and fish find shelter from predators. The beds are also known to be vitally important nursery grounds for many species of juvenile fish. The scoping report describes kelp as a “monoculture”, a term usually reserved for agriculture to mean fields of a single crop, and we reject this description based on the evidence above. Industrial, mechanical removal of kelp will impact upon many different species which rely on this habitat, including other Priority Marine Features.

Kelp beds are also known for their important short-term carbon storage abilities, and protecting blue carbon features is essential for healthy seas and for action against climate change. Alongside this, kelp beds act as vital buffers against coastal erosion and the impacts of storm damage through absorption of wave action. The targeted removal of large, old-growth fronds from these kelp beds will substantially reduce the ability of the beds to provide these vital, free ecosystem services. We do not feel that the scoping report adequately takes into account these ecosystem services and the risk posed to coastal areas by the reduction of these due to kelp removal.

We are further concerned by the area of search shown within the scoping report, with particular reference to the number of Marine Protected Areas (MPAs) and other statutory designations within this area. Scotland’s MPAs were put in place for the purpose of protecting and/or recovering Priority Marine features, with the overall aim of protecting and enhancing the marine environment on a national scale, and meeting Scotland’s statutory obligations. Many of the designated areas included in the scoping report area of search have management orders in place which prohibit bottom-contacting mobile fishing gear, for the protection of the vulnerable and sensitive habitats present. We consider the mechanical harvesting vessels shown in the scoping report to be akin to scallop dredgers and with the potential to cause an equivalent level of harm. This equipment is not appropriate for use within Marine Protected Areas and in locations where there are known to be valuable and sensitive habitat features.

The below named members of the Coastal Communities Network, Scotland call for this operation not to be taken forward in its current form, and for investment to instead be directed into the development of sustainable seaweed farming methods as a viable alternative. We call for Scotland’s marine environment to be protected and championed and for Marine Scotland Licensing to fully take on board the concerns of Scottish coastal communities by not allowing this operation to progress.

On behalf of the named Coastal Communities Network members:



Community Association of Lochs
and Sounds (CAOLAS)



Friends of the Sound of Jura



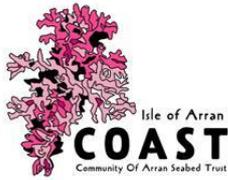
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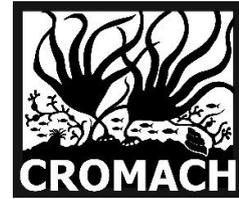
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Community of Arran
Seabed Trust (COAST)



Orkney Skate Trust



Craignish Restoration of
Marine and Coastal
Habitat (CROMACH)



Save Seil Sound



Sea Change Wester Ross



Fairlie Coastal Trust

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