



Community of Arran Seabed Trust

Old Pavilion

Lamlash

Isle of Arran

KA27 8LS

23 August 2018

Marine Scotland Licensing
MS.MarineLicensing@gov.scot

Dear Marine Scotland Licensing

Re: Comments on Wild Seaweed Harvesting, West Coast of Scotland, Scoping Report by Marine Biopolymers Ltd (MBL)

Kelp forests are among the most biologically diverse and valuable marine habitats on the planet, are important blue carbon sinks and are recognised and protected as a Priority Marine Feature. Scottish inshore waters are home to a significant proportion of the UK records of kelp beds and therefore the habitat is considered to be nationally important. 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.

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. 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.

The benefits that kelp beds bring to the marine ecosystem are many and diverse:

- 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 snails graze on the seaweeds, and fish find shelter from predators.
- The beds are 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 known diversity in this habitat. Industrial, mechanical removal of kelp will impact upon many different species which rely on this habitat, including other Priority Marine Features.

Kelp bed are also known to:

- Be important carbon storage sinks, and protecting blue carbon features is essential for healthy seas and for action against climate change.
- Act as vital buffers against coastal erosion and the impacts of storm damage through their absorption of wave action.

The targeted removal of kelp beds together with their holdfasts will substantially reduce the ability of the beds to provide these vital, free ecosystem services. The mechanical removal of stems and holdfasts will prevent fast short term regrowth and recovery of this vital habitat and damage the provision of their valuable ecosystem services with unknown consequences. The scoping report does not adequately take into account these ecosystem services and the risk posed to coastal areas by the reduction of these due to mechanical kelp removal.

There are a large number number of Marine Protected Areas (MPAs) and other statutory protected areas within this area covered by the scoping report. 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 protected areas included in the scoping report have management measures in place which prohibit bottom-contacting mobile fishing gear. The mechanical harvesting vessels shown in the scoping report have the potential to cause an equivalent level of harm to priority marine features as that caused by scallop dredging. This equipment is not appropriate for use within Marine Protected Areas and in locations where there are known to be valuable and sensitive habitats.

COAST call for a ban on this method of damaging, mechanical kelp harvesting and for investment to be directed into the development of environmentally sustainable seaweed farming methods, which will bring jobs and economic benefits to our coastal communities. We call for Marine Scotland to protect our marine environment to the benefit of all and to listen to the concerns and wishes of Scottish coastal communities.

Yours sincerely,



Paul Chandler; **Director COAST**