

3rd October 2019



Further Comments on Marine Licence Application MLA/2018/00506

Devon and Severn IFCA would like to make the following comments relating to the above licence application and the email of 25th September 2019:

1. In the supporting documents there is reference made to the fact that the data and information collected from the trial will be used to locate future farms in MPAs where there is no fishing. All the MPAs in D&S IFCA's District have recreational and commercial fishing activities taking place. If they are closed to mobile gear, they become saturated with static gear. The only place where no fishing takes place is in the No Take Zone at Lundy Island.
2. The key concern, in D&S IFCA's response, is the location of any trial or permanent farm. D&S IFCA is keen to see innovation in aquaculture developments. D&S IFCA is objecting only to the farm's location. It is important in any application to look at the impact of such a development on exiting uses and users of an area. The NFFO has responded showing the level of use of Start Bay by the mobile fleet, some 20 plus vessels are known to operate across the whole area. Several objections by individual fishermen were also submitting at this stage and with the additional two objections following Angela's letter these show the level of concerns of the mobile fleet to the siting of the farm and subsequent impact on their businesses. It appears all the documents produced and received in support of the application have considered that the impact on the fishing industry working in this area will be negligible and that the vessels can go elsewhere. This is not the case. These are traditional grounds used by the mobile fleet. The mobile fleet have been continually moved out of and displaced from fishing grounds in recent years, through the designation of MPAs. This area is one of the few areas in South Devon where they can fish using demersal gear. There appears to be little recognition of the impact of locating the farm in Start Bay on the mobile fleet. D&S IFCA believes that the existing use must be considered as is stated under S 60 (1) of MaCAA 'the appropriate licensing authority must have regard to the need to prevent interference with legitimate uses of the sea'.
3. There does not appear to be any information detailing how the fishing industry can take part in the farm's research. Whilst this may have occurred at other sites, especially with the static gear fishers, it is unlikely that the Mobile fleet would give up days fishing to help, unless there is clearly detailed and costed.
4. D&S IFCA has suggested Torbay as a possible site and the Harbour Master is supportive of Aquaculture here. In the last teleconference call Angela stated that the area of Torbay had been modelled and found not suitable. The document you provided '*MLA_2018_00506_Alternative site & relocation considerations.pdf*') does not give any further information than that provided in the initial application. D&S IFCA was hoping to view the modelled information she discussed. There are already two aquaculture developments in Torbay that survive quite well with the level of activity that takes place there. For a short-term trial, as described in the application, over the winter months, this would be a good location. The document contains reference to numerous possible concerns rather than proven facts. As previously detailed in my initial response, the Magic Map she refers to does not show the waters of Torbay to be poor quality. They show the waters to be good or excellent quality. She has read the legend

wrong as the red areas show seagrass beds not poor bathing quality. D&S IFCA appreciates that Angela wishes the farm to be in Start Bay for numerous reasons, but other sites may be equally as suitable.

To summarise, and as previously stated, D&S IFCA does not support the seaweed farm in the location currently being considered, due to the impacts on the mobile fishing vessels that operate in that area. D&S IFCA is however supportive of the concept of a seaweed farm in a more appropriate site.