

**11<sup>th</sup> March 2019**

**Devon and Severn IFCA's Response to MMO Licence Application  
MLA/2018/00506**



Devon and Severn Inshore Fisheries and Conservation Authority (D&S IFCA) has reviewed the application MLA/2018/00506. D&S IFCA wishes to object to the current proposal to locate a trial seaweed research farm within Start Bay.

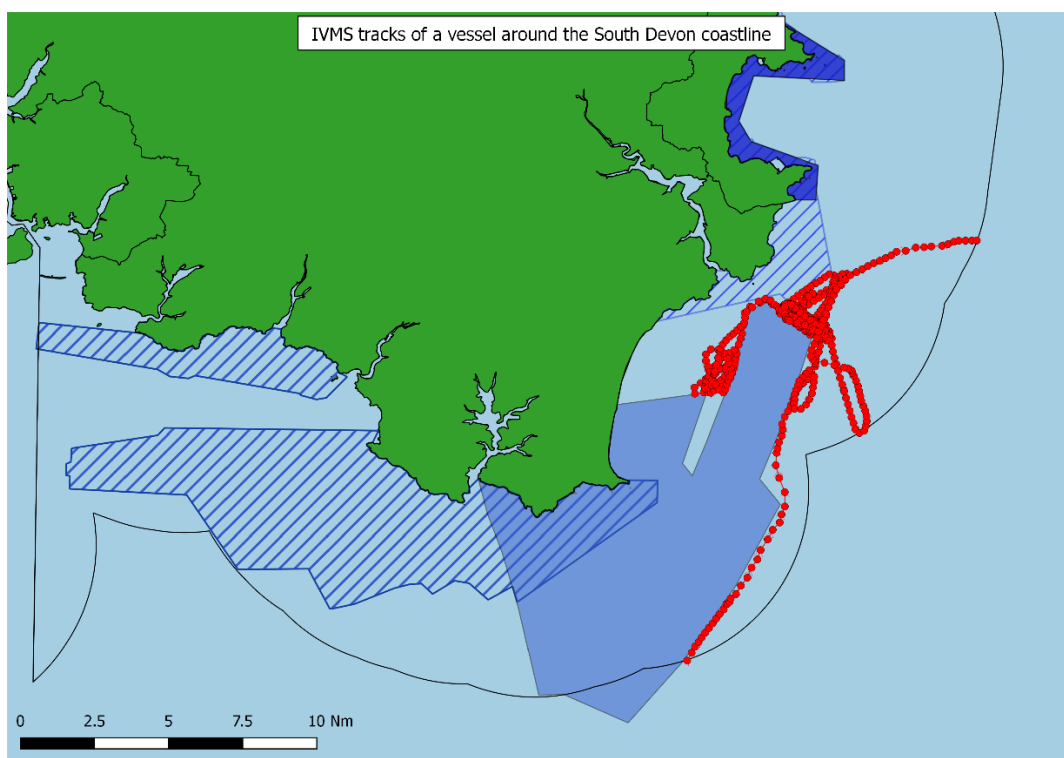
There are several areas of concerns that D&S IFCA wishes to highlight. There are no exact GPS or latitude/longitude co-ordinates of the proposed farm site detailed in the application, and therefore it makes it very difficult to give a detailed response to the siting of the site. However, the generic map provided in the consultation shows the site located well within an area used throughout the year by demersal fishing vessels. The inshore area along the South Devon coast has large sites that are already closed to demersal fishing gear. Approx. 40% of the IFCA's District in the south is closed to Mobile fishing vessels. Therefore, the siting of the farm, as indicated, will impact this fleet and cause displacement. Whilst the applicant consulted with some of the fishing sectors at meeting in Beesands, the conclusions outlined in the application do not concur with what was expressed at the meeting, especially relating to the lack of the use of the area outside the closed areas by demersal fishing vessels and their inability to turn close to the MCZ boundary. The site is in an area where there is a lot of vessel traffic including commercial fishing vessels, recreation fishing, recreational sailors and boatmen, and is a thoroughfare for traversing vessels. D&S IFCA would recommend that other sites are considered.

The applicant has provided supporting evidence relating to her discussions with relevant bodies and licensing authorities. Within these documents there is mention that D&S IFCA and the South Devon and Channel Shellfishermen's Association (SD&SCA) members were consulted with. From initial correspondence with the applicant it became clear that there was no intention of the applicant to talk to fishermen about the proposal and siting of the project. D&S IFCA encouraged the applicant to talk to the SD&SCA and persisted with this until the applicant did talk to its Executive Officer. It was the SD&SCA's Executive Officer who organised a meeting with those fishermen who might be impacted by the proposed siting of the farm within the closed area of Start Bay.

The meeting that was held was a very lively one. Fishermen from Beesands, Hallsands and Dartmouth attended together with the SD&SCA's Executive Officer and a D&S IFCA Officer. The fishermen were not happy with the proposal, not only because it would displace them, but they considered that if the trial was successful the farm would likely grow and become a larger permanent structure position and displace them further. Whilst the applicant pointed out this proposal is for a trial farm and would be dismantled, she could not reassure the fishermen that a larger, viable farm within Start Bay would not be considered in the future. The fishermen highlighted the heritage value of the fishing industry there, the generations of families that have fished in the area and the rationale behind it being closed to trawling many years ago. The fishermen understood that aquaculture interests are likely to increase but that other areas should be considered. They also raised huge concerns about the viability of the farm due to the winter storms experienced in Start Bay. Evidence of their destructive nature can be seen in the damage to the coast, villages and road along Start Bay. The applicant told

the group that she would be using anchors to keep the farm in place, but the fishermen described the mobility of the sediment in the bay, the prevailing winds and winter conditions and that they believed the farm would end up on the beach. The applicant considered this and said she would use concrete blocks as anchors but still the industry did not feel that this would hold that structure through bad weather. The outcome was that the members of the fishing industry were not happy nor convinced that the trial would remain only a trial and would not eventually grow in size. An option to potentially place the farm further north in the Bay was discussed, where the farm might straddle both the closed area and the area open to demersal gear. It was felt that if it was located here it might have a limited impact on both the static and mobile fishing fleets.

After the meeting the applicant e-mailed D&S IFCA and SD&CSA to say she was considering a third site slightly outside the MCZ but failed to provide a chart showing the third area under consideration. This third site was not proposed at the meeting and there was no discussion to move the seaweed farm site to the area within Start Bay, that is open to demersal gear. D&S IFCA did not say that there would be no conflict between the farm and the mobile fishing sector in this area. The chart (figure 1) below shows how close a mobile gear vessel can operate in relation to a closed area within the IPA and MCZ.



*Figure 1 IVMS tracks of a demersal gear vessel*

The applicant has mistakenly indicated in the proposal that, according to the potters at the meeting, the demersal gear vessels do not come that far south due to their inability to physically turn without impacting the IPA/MCZ. D&S IFCA was never asked to comment on the new location and if had it would have clearly explained that this area is used by demersal trawlers on a regular basis. This area is one of the few areas open to the demersal fleet in the South Devon and D&S IFCA would have clearly stated this to the applicant. D&S IFCA and SD&CSA's Executive Officer asked the applicant to provide a revised chart to show the three

proposed locations, but this was not submitted to either organisations. In November 2018, D&S IFCA raised the proposal with the IPA committee, whose members included several demersal fishermen and their representatives, but was not able to show a definitive chart as the applicant had not provided one. The applicant did not approach D&S IFCA to consult more widely once she had decided to relocate the proposed site within the area in Start Bay open to demersal gear. However, D&S IFCA took it upon itself to contact all the D&S IFCA Mobile Fishing Permit holders working in the district when the licence application went out to consultation, to make them aware of the proposal and its new location. D&S IFCA also e-mailed out to its Commercial Potting and Commercial Netting Permits holders to make them aware of the MMO licence application consultation. As the whole of Start Bay is used by many different fishing sectors and gears, it was important to ensure engagement with as many of the permit holders as possible who might be impacted by the proposal.

The Licence Application includes a Crown Estate Conflict Plan and a Licence Plan. These both show the location of the site with the closed area of the MCZ within Start Bay. No co-ordinates have been provided. These two documents show a location that would conflict with the static gear fishermen who work in the area. This area is different from the site outlined in the Start Bay admiralty chart that has been submitted as part of the application.

A Project Milestone document has been submitted as part of the application. Within this document there is reference to invasive Non-Native Species (INNS) and states 'to prevent the spread of invasive and non-native species (INNS) a review of best practice will be undertaken into biosecurity protocols for sustainable farms using peer-reviewed scientific publications. This information will be synthesised with the current INNS protocols used at SAMS to form a 'best-practice' protocol for the southwest of England by June 2019. This will avoid the spread of INNS'. However, there is no mention of the monitoring of the site for INNS, only a review and development of best practice protocol. D&S IFCA believes that monitoring of the site for INNS is paramount as there could be impacts to the adjoining MPAs in the area and to the habitat, species and fisheries in Start Bay. INNS are also raised as a concern in the Project Assessment in Relation to Marine Planning Documents. On p.13 it highlights these concerns and mention that monitoring of the Biosecurity protocol. There is no mention of how INNS will be recorded and how this information will be shared with relevant agencies and what remedial actions will be take.

Within the Project Milestone document there is also the mention that 'trophic analyses to quantify how much farmed seaweed is entering the natural food webs will be conducted and regular nutrient analysis of the water will be conducted.' D&S IFCA would like clarity as to what considerations, mitigation or actions would be to be taken if the detritus load is found to be high. The proposed site is close to an MCZ and SAC and could potentially impact these sites.

The Applicant has provided a document entitled 'Project Assessment in Relation to Marine Planning Documents'. Within this document there is a section on 'Living within Limits' and it states that promoting seaweed cultivation in the region will reduce reliance on less sustainable forms of harvesting such as destructive mechanical harvesting of natural kelp. It should be highlighted that within the D&S IFCA district there is no commercial harvesting of wild kelp. The document also outlines how the seaweed farm and potters could co-exists together side by side within the site. However, it is very unlikely that potters could use the fringes of the site and what of the other commercial fishermen that use the area such as trawlers, netters, longliners. There is no mention here of displacement or how that has been assessed. D&S

IFCA understands the policy drivers and the aims of Marine Spatial Plans but it has concerns with the location of this site not only due to conflict with other users, displacement, and INNS but also due to hydrographical features of the site. Other sites may be considered such as Torbay, where aquaculture sites are already located. This was suggested to the applicant but was rejected because it was too far from her home base. Within this document there is no reference to the use of the near coast in Start Bay by commercial and recreational vessels traversing the Bay. Whilst it is not a shipping lane this is a well-used route by boats leaving port from Dartmouth and Salcombe.

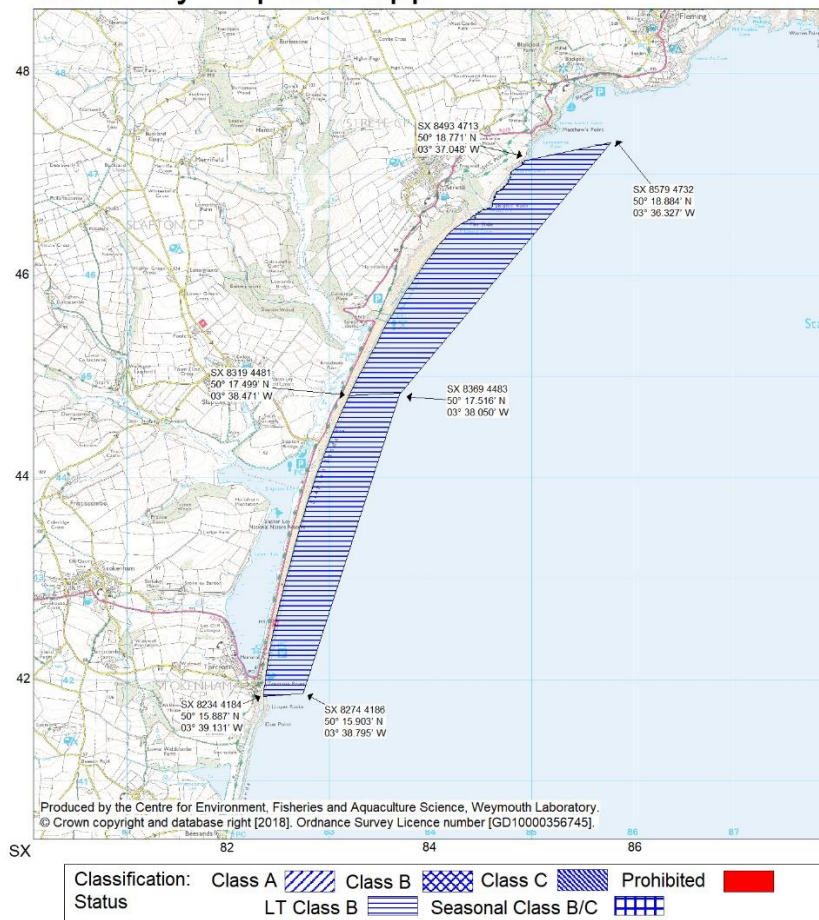
The admiralty chart provided by the applicant clearly shows the proposed location within the trawled area of Start Bay some distance north of the closed area. D&S IFCA was only made aware of this location through the licence application consultation. There are no co-ordinates with this proposal and therefore this area could not be mapped and further evidence of the use of the site could not be obtained.

The application fails to recognise the Lyme Bay to Torbay SAC, the Torbay part stretches into Start Bay and the boundary ends south of Blackpool Sands. The newly proposed site is located close to the SAC and is not separated by a headland, which is used as mitigation to any likely impacts on the Start Point to Plymouth Sound and Eddystone SAC. The Potential Impacts and Proposed Mitigation paper does not list the factors that will be monitored to assess environmental impacts. The paper once again mentions the fact fishermen, at the meeting, stated that demersal gear fishing occurs in Start Bay, but vessels do not use the areas where the site has now been proposed because the turning circle required for dragging demersal gear is too large and would cross the MCZ border. The IFCA has no recollection that this was said at the meeting and certainly would not endorse this. There was no map produced at this meeting showing a third site which would have encouraged this discussion. The new proposed site lies, as indicated in the application, some distance from the MCZ boundary and would certainly be used by demersal fishing vessels.

Within the many documents supporting this application, D&S IFCA cannot find any detail of the shellfish classified harvesting area within Start Bay – see figure 2. The area is classified for the harvesting of the surf clam *Spisula solida*. As no GPS position or co-ordinates have been provided it is difficult to locate the exact position of the proposed farm and whether it has potential to impact the shellfish areas within the Bay.

## Start Bay - Spisula spp.

Scale 1 : 44000



Classification of Bivalve Mollusc Production Areas: Effective from 1 September 2018

Figure 2 Classified Shellfish Harvesting Area Start Bay.

Various supporting documents to the application detail the size of the farm to be 300m by 50m. Figure 3 shows the anchors to be located some distance further out from the farm structure. It is essential to know the exact size of the area, which will be cordoned off for the farm, and the exact location in Start Bay.

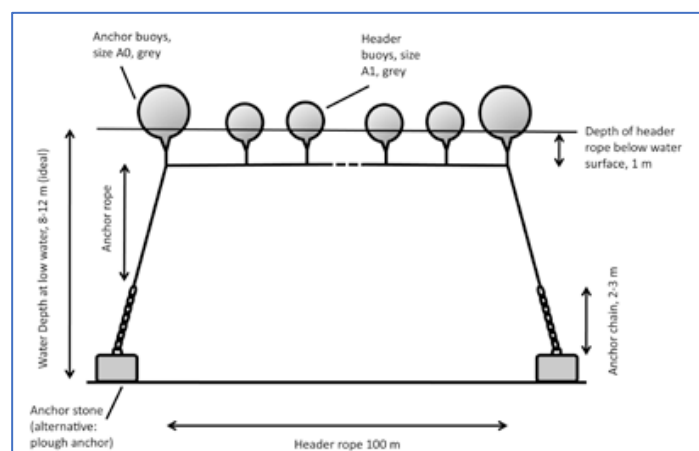


Figure 3 Example of farm structure provided by Biome (Algae) Ltd.