

Hello

Please can you pass this onto the relevant team as I could not find an open consultation on this License for a **'Nearshore seaweed cultivation of native species application by Aqua Botanika Ltd off Combe Martin' in North Devon.**

Obviously I am inputting information about seals and marine conservation in general.

This area is close to important wild seal habitat used throughout the year (at Morte Point and Lundy).

Both native seal species have been recorded in this area of N Devon (although harbour seals as single individuals)

Dolphins and harbour porpoises are also recorded in this area – harbour porpoise being reliably sighted regularly.

As these are all highly mobile marine mammals, increased human activity or increased prey availability will likely increase wild marine mammal activity in this specific area.

This potentially increases current risk levels, so the project needs to anticipate, future proof and agree to honest, open reporting of any issues with marine life for example live entanglement or dead bycatch and avoid and agree to never blaming or persecuting these species if they become an issue for the company. This is their home.

Combe Martin is also a regular release site for moulted ex rehabilitated seal pups from RSPCA West Hatch Wildlife Hospital.

This is an important release site, given the limited suitable alternative options and the welfare issues associated with unnecessary transport.

Potential positives

This will likely create a blue carbon sink (although very small scale and so not very impactful)

Potential habitat creation to increase local biodiversity (although this may encourage more commercial fishing in the area)

Neutral thought

5m distance between strings seems reasonable (depending on how prolific the sugar kelp growth will be reducing the width of these corridors)

Risks to consider and future proofing

Pollution during construction, particularly noise affecting hearing of fish, seals and other marine creatures. Small vessels have higher pitched sound signatures that can have a greater effect on marine life hearing. Seals can hear higher pitched sounds underwater than on land (as they pump blood into their inner ear on diving to match the sound medium). Noise of vessel traffic during operation needs to be minimised, ideally with electronic vessels. There could be a displacement (or attraction) effect for species. There is also a potential for chemical pollution arising from any leaked diesel or rubbish thrown or lost overboard from vessels – packaging, cut ropes, other detritus etc. Nothing must enter the water column from the vessels or from farm activity.

There is a medium to high risk for potential entanglement, so the quality of the infrastructure ropes, buoys, tension and their ongoing maintenance checks are vital. An emergency plan is needed for when/if a seal or other creature becomes entangled....contacting BDMLR 01825 7665545 if alive and reporting it to CSIP 0800 652 0333 if dead. It is vital that the strings are tensioned properly at all times to avoid seals interacting and playing with them (like they do with kelp). Moulted pups in particular learn through play so are at particular risk. Any floaty rope (for example at low tide) will

present a high entanglement risk, so the infrastructure design and set up is vital! Depending on the size of the buoys, seals may well haul out to rest here (this is recorded in other areas of aquaculture around the SW). This could be a positive provided the seals are allowed to rest rather than being disturbed away.

Given observations of seals interacting with floaty pot buoy ropes at low tide, there is a high potential for interaction, and this can ultimately be fatal. It is vital all staff discourage any interaction between themselves and seals in the vicinity of the farm and staff must commit to NEVER consider feeding or touching seals, as this will change the seal behaviour for life and create considerable issues (as previously experienced in this area with habituated seals – these stories never end well for the seals). If seals do start interacting, then maybe underwater and surface remote cameras should be deployed to assess this, but there should never be any deterrents employed of any description to keep seals away and certainly no persecution of seals as the farm is being set up in their home.

Lost gear. There is considerable potential for farm gear to be lost, given the currents in the area. All buoys/ropes must be marked with farm name and if lost it should be the responsibility of the company to search for these and retrieve them all to avoid adding to ghost gear entanglement and marine plastic pollution. Alternatively local clean up charities should be given a donation for each retrieved item of lost gear from the farm by the company.

Monitoring. What baselining of the existing habitat has been done by the company prior to set up and what ongoing long term monitoring will the company be required to do during the construction and operation phases (for example of the water chemistry, currents, substrates and biota)? The MMO will ideally impose a license requirement for the company to monitor, identify and mitigate future impacts when they arise. The cost of this monitoring should be built into the company's business plan. The costs of this could be minimised by funding local citizen scientists (from Coastwise for example) to undertake this work (which also helps with the credibility of the science produced and this needs to be subsequently published!) It is not enough to give permission and a licence and just assume everything will be OK as a result within the marine habitat.

The company need to be aware that under Defra's 'Polluter Pays' Principle that they will be liable to rectify any ecosystem changes arising from their activities. A key concern might be changes to the benthic habitat below the farm through sedimentation or biological debris.

In addition, we assume that this developer will need to demonstrate Environmental Net gain from their project before being issued a licence? If so, how are they achieving this?

Please can you confirm receipt of this consultation response.
Many thanks and good luck with your deliberations