

Mara Seaweed Ltd

St Andrews Bay Seaweed Farm Pre-Application Consultation Report



Details

Version	Date	Description	Author(s)	Revised by
V1.3	11/07/2022	Final version	Stevie Jarron	DB-C, FH

Updates

Section	Description	Page

Index

01 Introduction.....	2
02 Pre-Application process.....	2
03 Statutory Consultees	3
04 Stakeholders	4
05 Previous work explained.....	5
06 Pre-Application Consultation Event.....	6
07 Follow up consultations.....	6
08 Annex 1 - email and meetings list.....	7
09 Annex 2 – advert for PAC event.....	8
10 Annex 3 – PAC event attendees in person and online Zoom.....	9
11 Annex 4 - copy of the presentation given at PAC event.....	9
12 Annex 5 - Questions asked and answers at PAC event.....	10

Pre-Application Consultation Report

01 Introduction

Mara Seaweed Ltd (Mara) is an established seaweed harvesting and processing company with a workforce in place to sustainably hand harvest seaweed species from the Fife coast and process in their Edinburgh factory. Founded in 2011, Mara have been pioneering developments in harvesting, sourcing and processing seaweed. Today, Mara enjoys international success as one of the UK's most innovative seaweed brand.

Mara have applied to Crown Estate Scotland (CES) and gained a Lease Option Agreement for a seaweed (algal) cultivation farm off the Fife coast.

Mara have now begun the Marine Scotland Pre-Application Process (PAC) to license this new, purpose-built Seaweed Farm. The proposed site identified as suitable for Seaweed Cultivation is 6nm from the Fife coast in St Andrews Bay. Mara's intention is to have the necessary consent in place to put the first equipment in the water by late Autumn 2022. Seeding lines in Nov 2022 to Feb 2023 will produce a harvestable crop in late spring and early summer 2023.

The boundaries of the proposed Algal Farm site are:

56 ° 23.025 ' N 002 ° 37.256 ' W
56 ° 23.433 ' N 002 ° 35.873 ' W
56 ° 22.587 ' N 002 ° 34.890 ' W
56 ° 22.147 ' N 002 ° 36.315 ' W

02 Pre-Application process

The Pre-Application Consultation (PAC) is a 10-week process. On the 14th of April 2022, Mara began the PAC process by contacting the appropriate Government Bodies (Statutory Consultees), representative bodies of marine users and individuals (Stakeholders). A list of those contacted can be seen in Annex 1 – email and meetings list.

The PAC process also includes a Pre-Application Consultation event (PAC event). This must be no sooner than 6 weeks from notification of the PAC process and allow 4 further weeks for consultation and comments from Statutory Consultees and Stakeholders.

From 14th April 2022, Mara sent dozens of emails, put out posters and put adverts into the local newspaper (Fife Courier, print and online versions 18th April), with details of their proposed farm site and links to the Zoom event (Annex 2 – advert for PAC event). The event was set for between 17:30 – 19:00 on 31st May 2022.

This 6 weeks' notice of a Pre-Application Consultation Zoom event was sent in emails that also included links to Mara's website which contained further information and booking details for the event.



Pre-Application Consultation Report

03 Statutory Consultees

On 14th April 2022, well on advance of the PAC meeting, the Statutory Consultees, Crown Estate Scotland, Marine Scotland, Nature Scot, NLB, SEPA and MCGA were contacted directly. RYA Scotland and Fife Council were also brought into direct discussions as well.

Information provided to the Statutory Consultees and responses included information about the Zoom webinar, buoyage at the site, wild bird disturbance and Phases of development. The responses of the statutory consultees will be highlighted below and have been taken into account and will be addressed in the marine licence application process during which these Statutory Consultees and other groups will be presented with the full application documentation for formal response.

Crown Estate Scotland – have been involved in the site selection and given a Lease Option Agreement for the site by the point of PAC initiation. Mara have discussed their chosen site, the development of the site in phases and the onshore business model that supports the need for this development.

Marine Scotland – acknowledged the PAC process commencing and gave advice on some stakeholders to contact in the Fife area. Mara duly contacted all those and more.

Nature Scot – Mara contacted Nature Scot as the site of the proposed seaweed farm falls within a SPA for feeding wild birds. Multiple emails and Teams meetings with Nature Scot led to recommendations from Nature Scot on what information they deem necessary to be able to fully scrutinise the farm site and operation in the SPA. Further information will be seen in the Application in attachment "Mara - St Andrews Bay Environmental Responsibilities"

NLB and RYAS – a question was raised at the PAC event by RYAS Planning and Environment Officer, Graham Russell, about the lighting regime at the proposed site. Aquaculture and other marine structures are marked at seaward corners by yellow buoys called Special Marks. RYAS was concerned that as the site was offshore, rather than tight to a coast as is more conventional for an aquaculture site, the Special Marks may be confusing to hobby sailors who may not have updated charts showing the farm installation or may ignore the hazard warning the buoys represent and attempt to sail between them as they are often observed doing on the west of Scotland where there are over 300 aquaculture sites marked in this way. RYAS requested that a different system of marking be used at the site. Cardinal Buoys give a chart position, a day visual pattern and a night lighting pattern that indicate where safe passage is in relation to the buoy. Mara discussed this with NLB who have final say over lighting systems. NLB indicated that they saw merit in the Cardinal Mark system and Mara have agreed to include this in their Application process. Further information will be seen in the Application in attachment "Mara - Navigational Risk Assessment and MEAC".

SEPA – acknowledged the PAC process notification. SEPA rarely if ever comment on seaweed cultivation sites as the farm and operations do not use chemical additives, or discharge pollutants into the environment. They will still be consulted again during the Application phase of this process.



Pre-Application Consultation Report

MCGA - acknowledged the PAC process notification. MCGA rarely comment at this stage of an application but will require a Navigational Risk Assessment is done and a Marine Emergency Action Card is produced for the site. This has been done now and will be seen in the Application in attachment "Mara - Navigational Risk Assessment and MEAC".

04 Stakeholders

Mara chose to go beyond their statutory obligations by making a significant effort to meet with as many of the fishing individuals and representative bodies, as well as other stakeholders as possible.

On 14th April 2022, Mara emailed dozens of local and regional fishing representatives and individuals, with details of their site choice and date of PAC event. The email also included links to Mara website which offered further information on the proposed farm and a means to register for the Zoom PAC event.

With covid still rampant at the start of this process, Mara had decided on the option of Zoom PAC event, accessible to the vast majority of people and used throughout Covid for these licensing events as well as most other business and personal contact for the last 2 years. Mara saw this as preferable to a single meeting in a single venue, which could be in jeopardy if there was a local outbreak or travel restrictions returned. In addition, due to the proximity of the proposed site in relation to fishing harbours and communities, no single venue would have encompassed all the Statutory Consultees or Stakeholders.

Mara also made many attempts to contact directly with fishermen who may directly affected by the proposed location of the farm ahead of the PAC event. This was to discuss and even revise potential locations; this is because Mara's stated ambition to work cooperatively alongside other marine users is sincere.

During the preparations for the PAC event, a number of fishing industry representatives asked if it were possible to hold a face-to-face PAC event rather than just the Zoom online event. Mara agreed to the request and hired a room in St Andrews Lecture Theatre, Arts Building, St. Andrews University, which boasted good tech support for such events. Both the face-to-face and the Zoom events could be held together this way.

Pre-Application Consultation Report

05 Previous work explained and reception

Mara looked at 2 potential sites for farms in 2021. These sites were dropped by Mara as a direct consequence of discussions with local fishermen and their representatives. Recorded meetings with these fishing representatives at that time show that the new proposed site is in line with recommendations made on where a suitable farm site would be. Mara took these recommendations onboard and reassessed their location of choice.

Many fishing representatives have been spoken to since the start of this Pre-Application Consultation process. Most of the people spoken to have listened with interest, can see the benefits to the coastal communities of Fife and see no objection in the proposed location.

There is a historical distrust of marine development amongst the fishing community from their perception of dealing with windfarm development. It is claimed that many promises were made of local recruitment and investment and nothing has come of it. But the local fishermen have lost huge areas of potential fishing grounds to the wind farms and associated cabling.

It is with this backdrop of both the windfarm experience and Mara's earlier attempts at site selection that this new proposed seaweed farm is undertaken. Mara's perception is that this has caused one or two fishing representatives to confuse or disrupt Mara's honest efforts to deal transparently with the whole fishing community. Mara have responded, and continue to do so, by making good faith representations to the individual fishermen and crews as well as representative bodies at every opportunity through email, phone calls and face-to-face meetings.

The majority of the concerns raised by the fishing representatives at the PAC event were around the process of notification and questions of who was told what when rather than objections with the site itself. As documented above, Mara have gone well beyond the statutory requirement in engaging with the fishing representatives and believe that whilst many members of the fishing community see the benefit and opportunity in this proposal some retain a general reservation towards activity other than fishing in the seas around Scotland. Mara do not consider this a direct concern with the proposed site and hope that, through developing a successful business using a part of the East Coast water that is fished extremely lightly, if at all, some of these concerns will be allayed when the benefits of the project become apparent.

From all the conversations Mara has had with the fishing community there are only two fishing vessels that claim, anecdotally, to fish the area (there is no evidence to support this and was not raised when Mara was directed to the area). Mara is taking these claims seriously and are actively seeking to find an accommodation with the vessel owners and captains acceptable to all; despite some cordial email traffic the vessel owners / captains have not yet been able to commit to a date for a face-to-face discussion about viable options.

Pre-Application Consultation Report

06 Pre-Application Consultation Event

At St Andrews Lecture Theatre, Arts Building, St. Andrews University between 17:30 – 19:00 on 31st May 2022, Mara gave a presentation to both a hall audience and an online audience via Zoom. After the presentation a Q&A session was opened up to both hall and online attendees.

The event attracted 8 people face to face at the venue and 16 online through the Zoom portal.

A list of attendees at the event can be found in Annex 3.

A copy of the presentation can be found in Annex 4.

Questions asked and answers given can be found in Annex 5.

Some follow up discussions were organised from questions raised at the event.

07 Follow up consultations

From questions raised at the PAC event, further discussions were undertaken with several SCs and Stakeholders.

RYAS raised a question about buoyage and lighting at the site. This was discussed further with them and with NLB. A solution was agreed and the outcome of this will be seen in the Application in attachment "Mara - Navigational Risk Assessment and MEAC".

A skipper and the owner from the vessels Vanguard and Celtic Pride attended the meeting and raised their concerns that the site of the proposed seaweed farm would impact them in that it took up some of their seasonal fishing area. Mara had further discussions with them in the hall after the meeting ended and attempted to continue discussions beyond the event.

Mara have considered a number of possible mitigation efforts that they will propose to the owners/skippers, but to date multiple emails have not managed to secure a meeting with them. These include the possibilities of;

- Negotiation of mutually beneficial resighting of farm
- charter of the vessels affected in visual checks (weekly) of the site
- charter of the vessels for growing line deployment
- charter of the vessels for harvesting
- charter of the vessels for maintenance of the site

The efforts will continue beyond the PAC process and into the Application phase. Mara had hoped to find an accommodation before continuing with the application but, without being able to secure a meeting, have progressed the application. Concurrently Mara will continue to liaise with these fishermen to find a mutually satisfactory accommodation.

Pre-Application Consultation Report

08 Annex 1 - email and meetings list

Organisation	Name(s)	Position	Email address	Tel	Date(s) met	Date(s) contacted	PAC Venue	Comments
Statutory Consultees – ALL DONE 14/04/2022								
Marine Scotland – MS-LOT	MS-LOT	n/a				emailed 14/04/2022	12/05/2022	
Marine Scotland – MS-LOT	Judith Horrill	Marine Licensing Casework Officer				emailed 14/04/2022	12/05/2022	
Marine Scotland – MS-LOT	Neil MacLeod	Marine Licensing Casework Officer				emailed 14/04/2022	12/05/2022	
Crown Estate Scotland	Alex Adrian					emailed 14/04/2022	12/05/2022	
Crown Estate Scotland	Emma Riach					emailed 14/04/2022	12/05/2022	
Crown Estate Scotland	Anneli Hill					emailed 14/04/2022	12/05/2022	
Northern Lighthouse Board	Peter Douglas	Navigation Manager				emailed 14/04/2023	12/05/2022	emails/Teams
Northern Lighthouse Board	Karl Davies	Coastal Inspector				emailed 14/04/2024	12/05/2022	emails/Teams
Marine & Coastguard Authority	Sam Chudley	Maritime Licence Advisor				emailed 14/04/2025	12/05/2022	May join Zoom
Nature Scot (best local area email forth@nature.scot)	Tracey Begg					emailed 14/04/2022	12/05/2022	to Liam Wright
Nature Scot	Liam Wright	Marine Sustainability Advisor				emailed 15/04/2023	12/05/2022	
Nature Scot	Helen Wade	Ornithologist				emailed 21/04/2024	12/05/2022	
Nature Scot	n/a	local NatureScot office				emailed 14/04/2021	12/05/2022	
Scottish Environment Protection Agency						emailed 14/04/2022	12/05/2022	
Other Official Bodies								
RYA Scotland	Admin					emailed 14/04/2022	12/05/2022	
RYA Scotland	Pauline McGrow					emailed 14/04/2022	12/05/2022	
RYA Scotland	Graham Russell	Planning and Environment Officer				online 31/05/2022		email/Teams
Fife Council	Pamela Stephenson	Development Officer				emailed 14/04/2022	12/05/2022	Supportive emails
Fife Council						emailed 14/04/2024	12/05/2022	
Fife Council						emailed 14/04/2025	12/05/2022	
Marine Scotland - Pitenweem Fishery Office	Carl Jones	Senior Fishery Officer				met 21/04/2022	emailed 22/04/2022	12/05/2022
Marine Scotland - Pitenweem Fishery Office						met 21/04/2022	emailed 22/04/2022	12/05/2022
Fishing Community Groups and Representatives								
Fishermen's Mutual Association Pitenweem	Billy wood					met 21/04/2022	emailed 14/04/2022	12/05/2022 emails on site and fishing
Regional Inshore Fisheries Group	Jennifer Mouat					online PAC	emailed 27/04/2022	12/05/2022 no reply/passed emails
Fife Creel Fisherman's Association	John Hoggan	Secretary				emailed 15/04/2022	12/05/2022	asked for face to face
Inshore Fishermen's Alliance	Andrew Whiston					met 26/04/2022	emailed 22/04/2022	12/05/2022
Scottish Whitefish Producer's Association	Raymond Hall					met 31/05/2022	emailed 22/04/2022	12/05/2022 to Arbroath fishermen and SFF
Scottish Fishermen's Federation	Malcolm Morrison					met 31/05/2023	emailed 22/04/2022	12/05/2022
Scottish Creel Fishermen's Federation								
Arbroath and Montrose Static Gear Association	Bob Teviotdale	Chairman						members.htm
Arbroath and Montrose Static Gear Association	Bryan Beckett							
Individuals in the Fishing Industry								
St Andrews Fisherman	John Chater					met 21/04/2022	emailed 22/04/2022	12/05/2022 Generally interested
St Andrews Fisherman	Gordon Cation					met 21/04/2022	emailed 22/04/2022	12/05/2022 Generally interested
St Andrews Fisherman	Lee Gardner					met 21/04/2022	emailed 22/04/2022	12/05/2022 Generally interested
Celtic Pride ULS74	Danny Walker	Skipper				met 31/05/2022	emailed 04/05/2022	12/05/2022 Fishing in proposed area
Vanguard KY18 and Celtic Pride ULS74	Graham Irvine	Owner				met 31/05/2023	emailed 04/05/2022	12/05/2022 Fishing in proposed area
Vanguard KY18	Nick Irvine	Skipper					emailed 04/05/2022	12/05/2022 Fishing in proposed area
Harbour groups and shore facilities								
St Andrews Harbour Trust	Andrew Whiston	Chair				met 26/04/2022	emailed 28/04/2022	12/05/2022
Pitenweem Harbour Master	Allan Anderson	Local Harbour Master				met 21/04/2022	emailed 22/04/2022	12/05/2022
SSE wind farm	Nick Brockie						emailed 27/04/2022	12/05/2022
David Anderson Marine	Liz Anderson					met 21/04/2022	emailed 14/04/2022	12/05/2022 replied - may attend

Pre-Application Consultation Report

09 Annex 2 – advert for PAC event

Email, poster and newspaper detail as below.

Dear Consultee/MS-LOT

Notice is hereby given that **Mara Seaweed Ltd**, Company number **SC390829 - Wynd House Rankeillor Street, Elie, Leven, Scotland, KY9 1DJ**, intends to apply for an Algal Farm license for a new Algal Farm site, in St Andrews Bay off Fife east coast. The activity consists of Seaweed Cultivation.

As per the Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013, Mara Seaweed Ltd plans to hold a Pre-Application Consultation event regarding the proposed Marine Licence application.

Mara Seaweed Ltd have allowed for more than the prescribed 6 weeks and will this week place an advert the Fife Courier for publication in Monday's edition and will place posters of the event around relevant Fife locations as well as contact relevant Statutory Consultees and prominent Stakeholders in the Fife area.

Mara Seaweeds Ltd have already held discussions with many of the aforementioned bodies and individuals and the new chosen site is a compromise that is viable for algal farming purposes and unobtrusive to environmental and other marine users concerns.

The boundaries of the Algal Farm site are:

56 ° 23.025 ' N 002 ° 37.256 ' W
56 ° 23.433 ' N 002 ° 35.873 ' W
56 ° 22.587 ' N 002 ° 34.890 ' W
56 ° 22.147 ' N 002 ° 36.315 ' W

On **Tuesday 31st May 2022 at 17:30 – 19:00** Mara Seaweed Ltd, will host an online Pre-Application Consultation Zoom event offering discussion, charts and plans of their proposed Seaweed Farm. The event will include a Q&A session with the audience on the details of the venture.

In all adverts for the event (local newspaper, posters and emails) the address of Mara Seaweed Ltd website will link to the Zoom event:

Topic: Pre-application Marine Licence Public Consultation Event

Time: Tuesday 31st May 2022 at 17:30 BST

All information on this event, as well as the link to join the Zoom meeting and all associated information for the application, can be viewed online at www.maraseaweed.com/pages/mara-farming.

Representations in respect of the application should be made by email to seaweedfarm@maraseaweed.com. Representations should be received no later than 27th May 2022.

Please note that comments made to these procedures are to the applicant Mara Seaweed Ltd and not to MS-LOT. There will be an opportunity for representations to be made to MS-LOT on the application.



Pre-Application Consultation Report

10 Annex 3 – PAC event attendees in person and online Zoom

	Online /Inperson	Name	Means Attended	Email Address	Additional Info
1	Online	Jennifer Mouat			Inshore Fisheries Group
2	Online	Iain Matheson			Kaly Group
3	Online	John Hamilton			Lochnell Oysters
4	Online	Sandra Turnbull			Accountant
5	Online	Andy Barlow			Aquamoor
6	Online	Graham Russell			RYA Scotland
	Online	John Lecyn			
7	Online	Rita Henderson			Aquamoor
8	Online	Niall Reid			Fletcher
9	Online	Owen Stevens			Fishwise
10	Online	Anna Wright			Anna Wright Art
11	Online	Lawrie Stove			Aquamoor
12	Online	Bruce Hare			Kaly Group
	Online	Alycia Hayes			Fife Council
	Online	Cllr Fiona Corps			Fife Council
13	Online	Daniel Pendrey			Marine Scotland
14	Online	Inga Marchetti			Mara Seaweed
15	Online	David More			
	Online	Jip Gravenberch			Agora Solutions
	Online	Anneli Hill			Crown Esatates Scotland
	Online	Alex Adrian			Crown Esatates Scotland
16	Online	Billy Wood			Pittenweem FMA
17	In person	John Lambert			St Andrews Harbour Trust
	Registered	Corallie Hunt			Nature Scot
18	In person	Bob Teviotdale			Arbroath and Montrose Static Gear Association
19	In person	Malcolm Morrison			Scottish Fishermens' Federation
20	In person	Raymond Hall			SWFPA
21	In person	Graham Irvine			Vanguard/Celtic Pride
22	In person	Daniel Walker			Celtic Pride (fishing vessel)
23	In person	John Floersheimer			Marivate Seaweed
24	In person	Hanna Zaimovic			Student

11 Annex 4 - copy of the presentation given at PAC event



Copy of PAC Presentation.pdf

Pre-Application Consultation Report

12 Annex 5 - Questions asked and answers at PAC event

PAC Questions

- Graham Russell, RYAS –
 - The proposed farm site will likely be marked and lighted by 4 Special Marks (large yellow buoys at each corner, with flashing yellow lights at night. RYA members may not know what to do when faced with these. Can we discuss this as I (Graham) would always like to say “no objection” to an application by remediation at an early stage (such as at the PAC stage).
 - Yes, we are happy to discuss this with RYA (along with NLB/MCGA). Stevie to contact.
- Billy Wood – Pitenweem FMA –
 - Cetacean Entanglement, Have Mara contacted (SCEA – Scottish Cetacean Entanglement Association) on Dolphin and mammal entanglement?
 - Yes, via email 20th April 2022, no reply.
- Jennifer Moat – IFG –
 - Creel pot entanglement with farm. Is there compensation for lost fishing gear?
 - I don't know.
 - Will Mara compensate fishermen for lost fishing gear?
 - No.
- Bob Teviotdale - Arbroath and Montrose Static Gear Association;
 - Would fishermen get their creels back?
 - There is the possibility that a creel line could be lifted if an end was still free but given the weight of the anchors and strength of the risers to the surface, it is likely that is entangled with the farm structure, creels ropes would likely break away.
- Malcolm Morrison - Scottish Fishermens' Federation
 - When and how did you start communicating with the representative bodies and with the fishermen your plans originally; as well as your change of location to St Andrews. Within the 6 miles limit, this IFG must be informed. What communications did you have with the IFG? Why did no one contact me? This is within the 6-mile limit which is within the IFG realm. No one contacted me.
 - Answer from an online IFG representative – you were emailed twice with the details.
- St Andrews Harbour – John Lambert - St Andrews Harbour Trust;
 - Would we work out of St Andrews harbour? For how long? What sort of vessels?
 - Yes, we have looked at St Andrews harbour and despite the tidal nature and issues with the encroaching sandbank, we see the harbour as useful for us for our operation for some time to come. The vessels we are looking at using are local creel vessels. In time, larger vessels will be needed, probably working out of Dundee, but for the foreseeable future, the local creel boats will do the bulk of the farm work, deploying, maintaining, sampling and harvesting.
- Bob Teviotdale - Arbroath and Montrose Static Gear Association;
 - What is the max weather state you can work in when harvesting?
 - Sea state 3 possibly 4.



Pre-Application Consultation Report

- Raymond Hall – SWFPA;
 - Have you considered the transit lanes for the sea farms?
 - Yes, we have been in touch with various individuals and have charts showing the routes that windfarm boats are to take, and they are well to the east of the site.
- Malcolm Morrison - Scottish Fishermens' Federation;
 - What is the maximum footprint you intend to expand to? How large does this grow? Is it the thin edge of the wedge?
 - Response – we are candidly showing you the full plot for a maximumly successful 8-year project building up 4 farm units; we are showing max footprint after 8 years with no plan to expand beyond.
- Raymond Hall – SWFPA;
 - Would you close off full area with nav buoys or would you mark farm footprint only?
 - Yes, we can work with NLB/MCGA to this end. To only mark out are actively being used, therefore use the smallest footprint possible.
- Malcolm Morrison - Scottish Fishermens' Federation;
 - Are any parts of the farm (e.g. anchor lines) outside the footprint?
 - No, the farm will be within the consented area.
- Bob Teviotdale - Arbroath and Montrose Static Gear Association;
 - Will any fishing vessels to be used at the farm be coded under the new coding for weight; suitability of boat coding for seaweed farming.
 - We will seek answers to this through the MCGA and other sources about whether the existing coding held by fishing vessels that we may use for the farm harvesting is suitable. We will also be using local vessels for visits to the lines to visually check the structure and for taking seaweed samples for quality checks. They will not require recoding for that.
- Malcolm Morrison - Scottish Fishermens' Federation;
 - Are the claims valid regarding the carbon sequestration properties of seaweed?
 - The science is still unclear of the part seaweed cultivation will play in carbon sequestration, but there is a well-documented role for seaweed aquaculture to provide food that does not use more land habitat, that does not use more fresh water and does not require feed or chemicals for growth.
- Malcolm Morrison - Scottish Fishermens' Federation
 - Of the two-farm design-types that you have shown, are you clear on which you would deploy?
 - As mentioned in the presentation, Mara have modelled the farm using the longline system. This is most likely the design that will be employed. But at this early stage in the planning, there is still a full material and services bidding process to be completed before the final farm is deployed.