Submission on the South Coast Offshore Renewable Energy Designated Maritime Area Plan Proposal by BioAtlantis Ltd.

Ref: Draft South Coast DMAP for Offshore Renewable Energy.

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1. Introduction:

This document is a submission by BioAtlantis Ltd. on the '**Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy, 3 May 2024'.** BioAtlantis is an Irish biotechnology company, specialising in the development and production of bioactives from renewable marine and terrestrial resources for the plant, animal and human health markets. The company utilizes renewable and commercially important intertidal species of seaweed such as *Ascophyllum nodosum,* and subtidal species such as *Laminaria* (kelp). In this submission, BioAtlantis makes a number of key recommendations regarding the draft SC-DMAP and its associated documentation.

2. Document: *"Draft South Coast DMAP for Offshore Renewable Energy, 3rd of May 2024":*

Section 7: Co-existence

The draft SC-DMAP does not address the need for coexistence between Offshore Renewable Energy and wild seaweed harvesting activities. This is despite the significant economic and social contribution that wild seaweed harvesting makes to the Irish seaweed industry, coastal communities and the Bioeconomy. Notably, the National Marine Planning Framework (NMPF) recognises the important role of sustainable seaweed harvesting, given it's important economic and social contribution. The NMPF also supports the development and maintenance of a regulatory framework that supports sustainable seaweed harvesting and respect for existing rights to harvest seaweed. The NMPF also cites the importance of wild seaweed harvesting to companies in Ireland who develop innovative technologies from this renewable resource.

Recommendations:

(a) A new section called **"7.5. Co-existence with wild seaweed harvesting"** should be added to Section 7 of the SC-DMAP. This should include the following key points:

- Seaweed harvesting has been undertaken in Ireland for over 50 years and is a well-established human activity in Irish marine and coastal areas.
- Commercially relevant species of seaweed in Ireland include *Ascophyllum nodosum, Laminaria digitata* and *L. hyperborea,* which are important to the Irish seaweed industry.
- The NMPF recognises the important role of sustainable seaweed harvesting given its important economic and social contribution.
- The SC-DMAP is compatible with wild seaweed harvesting activities, and will not preclude existing seaweed harvesting activities or future license applications to harvest seaweed.
- Policy Objectives: Developers of ORE projects and transmission infrastructure within the SC-DMAP should be cognisant that wild seaweed harvesting is a well-established existing human activity in Ireland and can take place in the intertidal zone and in subtidal areas up to 30m in depth. Wild seaweed harvesting is typically undertaken by those with existing appurtenant rights and profit à prendre rights to harvest wild seaweed, and those who secure licenses to undertake this activity.

(b) Alternatively, Section 7.1 in the SC-DMAP should be renamed ***"Co-existence with Aquaculture, Seafood, Fisheries and Seaweed Harvesting".*** In this case, the points in 2(a) above should be added to ensure that coexistence with seaweed harvesting is adequately covered.

3. Document: *"Public consultation findings report":*

The following statement in the *'Public consultation findings report'*, was submitted by BioAtlantis during public consultation on the 6th October, 2023: *"That the SC-DMAP should not preclude maritime usages and human activities which are common along all Irish coasts, including existing seaweed harvesting; future license applications for seaweed harvesting; aquaculture; inshore fisheries; fishing and seafood production; sport; recreation; and tourism".*

Recommendations: Based on the above text, a new section called **"7.5. Co-existence with wild seaweed harvesting"** should be added to Section 7 of the SC-DMAP (see point 2 above).

4. Document: *"Draft environmental data log":*

Wild seaweed harvesting has not been included as a "Consent/Theme topic", despite it being a well-established human activity in marine and coastal areas of Ireland.

Recommendations: A new "Consent/Theme topic" called **"Wild seaweed harvesting"** should be added to 'Workbook 1 - Draft Environmental Data Log'. Locations for wild seaweed harvesting include the intertidal zone and subtidal areas up to 30m in depth, i.e. areas which are incompatible with offshore wind farm developments. Windfarm developments would not be considered in these areas. Therefore, there will be no spatial overlap between wind farm developments and wild seaweed harvesting. While no spatial datasets are available, further information regarding seaweed harvesting is provided in the NMPF.

5.* Document: *"SEA Environmental Report":

Recommendations:

- Page 81 of the SEA report states *"There are also two sites that harvest seaweed",* which implies that wild seaweed is harvested in these areas. However, it is unclear whether these licensed sites relate to 'seaweed farming' or 'wild seaweed harvesting', which are two different activities. This should be clarified and the text amended if necessary.
- The SEA should acknowledge the fact that wild seaweed harvesting is a well-established existing human activity in Irish marine and coastal areas. Locations for wild seaweed harvesting include the intertidal zone and subtidal areas up to 30m in depth, i.e. areas which are incompatible with offshore wind farm developments.