

## Policy for the Use of the Scrubbing Off Grid in Afon Seiont, Caernarfon Harbour

### Purpose

This policy outlines procedures for using the scrubbing off grid in the Afon Seiont, within the Caernarfon Harbour Trust (CHT) jurisdiction, for hull cleaning of small pleasure boats (under 15 metres LOA). It aims to manage marine growth and prevent the spread of invasive species, ensuring compliance with the **Marine and Coastal Access Act 2009, Natural Resources Wales (NRW)** marine licensing requirements, and CHT bylaws. The policy is designed to qualify as a low-risk activity, likely exempt from a marine licence, by minimising environmental impact in the marine environment below the Mean High Water Springs (MHWS) mark.

### Scope

This policy applies to vessel owners or operators using the designated scrubbing off grid in the Afon Seiont for hull cleaning to remove marine growth.

### Definitions

- **Scrubbing Off Grid:** A designated intertidal structure in the Afon Seiont, managed by CHT, where vessels can dry out at low tide for hull cleaning.
- **Mean High Water Springs (MHWS):** The average high water level during spring tides, defining the upper boundary of the marine environment subject to NRW licensing.
- **Marine Environment:** Areas below MHWS or within tidal influence, where deposits require a marine licence unless exempt.
- **Low-Risk Activity:** Activities classified by NRW as Band One, which may be exempt from licensing if environmental impacts are minimised.
- **Invasive Species:** Non-native marine species (e.g., zebra mussels, carpet sea squirts) that can harm local ecosystems if spread during hull cleaning.

### Policy Requirements

#### 1. Booking and Registration

- **Booking:** Users must book the scrubbing grid in advance through the CHT Harbour Office (email: [admin@caernarfonharbour.org.uk](mailto:admin@caernarfonharbour.org.uk); VHF channels 12/14, initial contact on 16). Priority is given to vessels registered with CHT and compliant with Harbour Dues (£38.10 per metre per annum, as of 2024/25).
- **Vessel Eligibility:** Only small pleasure boats (under 15 metres LOA) are permitted. Commercial vessels are not covered by this policy.

#### 2. Environmental Mitigation Measures

To ensure the activity is low-risk and likely exempt from NRW marine licensing, while preventing the spread of invasive species, the following measures must be followed:

- **Invasive Species Awareness and Reporting:**
  - When booking the scrubbing grid, CHT will ask for details of where the vessel has come from and when it was last cleaned.
  - Users must inspect the hull for invasive species (e.g., gelatinous or encrusting organisms like *Didemnum vexillum* or *Dreissena polymorpha*) before cleaning.
  - If invasive species are suspected, users must cease cleaning and report immediately to CHT (email: [admin@caernarfonharbour.org.uk](mailto:admin@caernarfonharbour.org.uk); VHF channels 12/14). CHT will advise on next steps, which may include contacting NRW for guidance.
- **Informative Signage:** CHT will maintain a visible sign at the scrubbing grid with the following information:
  - Identification guide for common invasive species in Welsh waters (e.g., carpet sea squirt, zebra mussel).
  - Requirement to inspect hulls before cleaning.
  - Instruction to stop cleaning and report suspected invasive species to CHT.
  - Contact details for CHT (email and VHF) and a reminder of environmental responsibilities.
- **Cleaning Methods:** Use manual scraping or low-pressure water cleaning to remove marine growth. High-pressure washing is prohibited to avoid dispersing invasive species fragments into the water. The sanding or removal of paint shall not be permitted on the scrub grid.
- **Eco-Friendly Cleaning Agents:** Only biodegradable, non-toxic cleaning agents approved by the UK Environment Agency (e.g., phosphate-free detergents) may be used. A list of approved agents is available from CHT.

### 3. Operational Procedures

- **Tidal Planning:** Users must consult tide tables (e.g., Liverpool tides) and coordinate with CHT for safe access and egress, considering strong tidal currents (up to 3.5 knots) and Caernarfon Bar conditions.
- **Grid Use:**
  - Vessels must be positioned on the grid at high tide and secured as per CHT instructions.

- Cleaning is permitted only during low tide when the vessel is fully dried out.
- Maximum duration on the grid is one tidal cycle (approximately 12 hours) unless authorised by CHT.
- **Safety:**
  - Users must wear appropriate personal protective equipment (PPE), including gloves and eye protection, when handling marine growth.
  - A basic risk assessment must be completed before starting work.
- **Supervision:** Users must remain present during cleaning to ensure compliance with this policy.

#### 4. Environmental Monitoring

- **Inspections:** CHT may inspect the grid during or after use to verify compliance with environmental measures.
- **Reporting:** Any suspected invasive species or accidental release of wastewater must be reported to CHT immediately.
- **Records:** Users must keep records of cleaning agents used for six months, available for CHT inspection.

#### 5. Compliance and Enforcement

- **CHT Bylaws:** Users must comply with CHT bylaws, including payment of grid usage fees.
- **NRW Regulations:** Activities must align with NRW's low-risk activity criteria to avoid the need for a marine licence. If invasive species are detected, users must follow CHT and NRW guidance.
- **Penalties:** Non-compliance (e.g., failing to report invasive species, discharging wastewater) may result in fines or suspension of grid access by CHT.
- **Appeals:** Disputes can be addressed to the CHT Harbour Master.

#### 6. Alternative Options

- **Professional Services:** Users are encouraged to use local providers like Above The Brine or Menai Marine at Victoria Dock for professional hull cleaning, which are equipped to manage invasive species risks.
- **Alternative Sites:** If the Afon Seiont grid is unavailable, consider the Port Penrhyn maintenance grid or Conwy scrubbing grid, subject to their policies.

#### Responsibilities

- **Users:** Must follow this policy, inspect for invasive species, and report as required.
- **CHT:** Maintains the grid, provides signage, approves bookings, and monitors compliance.

### **Contact Information**

- **Caernarfon Harbour Trust:** Email: [admin@caernarfonharbour.org.uk](mailto:admin@caernarfonharbour.org.uk); VHF: Channels 12/14 (initial contact on 16).
- **Natural Resources Wales:** Website: [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk) (for guidance on invasive species and licensing).

### **Review**

This policy will be reviewed annually by CHT to ensure alignment with environmental regulations and best practices for invasive species management.