

# Marine Plants & Algae

## Organic Production and Handling

### Identification of Petitioned Substance

#### Chemical Names:

Fertilizer: kelp meal, kelp powder, liquid kelp, microalgae; Phycocolloids: agar, agarose, alginate, carrageenans, fucoidan, laminarin, furcellaran, ulvan; Edible: *Ascophyllum nodosum*, *Eisenia bicyclis*, *Fucus spp.*, *Himanthalia elongata*, *Undaria pinnatifida*, *Mastocarpus stellatus*, *Pelvetia canaliculata*, *Chlorella spp.*, *Laminaria digitata*, *Saccharina japonica*, *Saccharina latissima*, *Alaria esculaenta*, *Palmaria palmata*, *Porphyra/Pyropia spp.*, *Chondrus crispus*, *Gracilaria spp.*, *Enteromorpha spp.*, *Sargassum spp.*, *Caulerpa spp.* *Gracilaria spp.*, *Cladosiphon okamuranus*, *Hypnea spp.*, *Gelidiella acerosa*, *Ecklonia cava*, *Durovillaea antarctica* and *Ulva spp.*

Molecular Formula: Agar-  $C_{14}H_{24}O_9$ , Alginate-  $C_6H_9O_7$ , Carrageenans- iota-  $C_{24}H_{34}O_{31}S_4^4$ , kappa-  $C_{24}H_{36}O_{25}S_2^2$ ,

**Other Name:** Kelp, Seaweed, Marine algae, Marine Aquatic Plant Extracts, polysaccharides from seaweed and microalgae; agar agar, Japanese gelatin, Japanese isinglass, vegetable gelatin, angel's hair; alginate, alginic acid, algin (sodium, potassium, ammonium, calcium, propylene glycol); carrageenans, iota carrageenans, kappa carrageenans

IUPAC Name: **Agar-** 2-(hydroxymethyl)-6-[(4-hydroxy-3-methyl-2,6-dioxabicyclo[3.2.1]octan-8-yl)oxy]-4-methoxyoxane-3,5-diol; **Alginate-** (3S,4S,5S,6R)-3,4,5,6-tetrahydroxyoxane-2-carboxylate; **iota-Carrageenans-** [(2R,3R,4R,5R,6S)-4,5-dihydroxy-6-[[[(1R,3R,4R,5S,8S)-3-[(2R,3S,4R,5R,6S)-5-hydroxy-2-(hydroxymethyl)-6-[[[(1R,3S,4R,5S,8S)-3-hydroxy-4-sulfonatooxy-2,6-dioxabicyclo[3.2.1]octan-8-yl]oxy]-3-sulfonatooxyoxan-4-yl]oxy]-4-sulfonatooxy-2,6-dioxabicyclo[3.2.1]octan-8-yl]oxy]-2-(hydroxymethyl)oxan-3-yl] sulfate; **kappa-Carrageenans-** [(2R,3S,4R,5R,6S)-6-[[[(1R,3S,4R,5R,8S)-3,4-dihydroxy-2,6-

dioxabicyclo[3.2.1]octan-8-yl]oxy]-4-[[[(1R,3R,4R,5R,8S)-8-[(2S,3R,4R,5R,6R)-3,4-dihydroxy-6-(hydroxymethyl)-5-sulfonatooxyoxan-2-yl]oxy]-4-hydroxy-2,6-dioxabicyclo[3.2.1]octan-3-yl]oxy]-5-hydroxy-2-(hydroxymethyl)oxan-3-yl] sulfate;

#### Trade Names:

Arame, Badderlocks, Bladderwrack, Carola, Carrageen moss, Dulse, Gutweed, Hijiki (Hiziki), Irish moss, Laver, Kombu, Mozuku, Nori, Oarweed, Ogonori, Sea belt, Sea grapes (green caviar), Sea lettuce, Wakame, and Thongweed

#### CAS Numbers:

Agar: 9002-18-0; Alginate: 9005-32-7; iota-carrageenans-9062-07-1; kappa-carrageenans-11114-20-8;

#### Other Codes:

PubChem ID: Agar- 766450141; Alginate: 9166324; iota-carrageenans-11966245, kappa-carrageenans- 11966249  
InChI Key: Agar- GYYDPBCUIJTIBM-UHFFFAOYSA-N; Alginate- AEMOLEFTQBMNLQ-QTWKXLRFS-A-M; iota-carrageenans- QIDSWKFAPCTSKL-RRQHLKGPSA-J; kappa-carrageenans- ZNOZWUKQPJXOIG-XSBHQIPSA-L  
Canonical Smiles: Agar- CC1C(C2C(C(O1)CO2)OC3C(C(C(C(O3)CO)O)O)C)O)O; Alginate- C1(C(C(OC(C1O)O)C(=O)[O-])O)O; iota-carrageenans- C1C2C(C(O1)C(C(O2)O)OS(=O)(=O)[O-])OC3C(C(C(C(O3)CO)OS(=O)(=O)[O-])OC4C(C5C(C(O4)CO5)OC6C(C(C(C(O6)CO)OS(=O)(=O)[O-])O)O)OS(=O)(=O)[O-])O; kappa-carrageenans- C1C2C(C(O1)C(C(O2)O)O)OC3C(C(C(C(O3)CO)OS(=O)(=O)[O-])OC4C(C5C(C(O4)CO5)OC6C(C(C(C(O6)CO)OS(=O)(=O)[O-])O)O)O)O)O

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**Summary of Petitioned Use**

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42 Marine plants (seaweed) and algae are included in the National List in several sections and allowed for use  
43 in organic production and handling:

- 44 1) In §205.601(j)(1), Aquatic plant extracts are synthetic substances allowed in organic crop  
45 production, as plant or soil amendments, from other than hydrolyzed extracts where the  
46 extraction process is limited to the use of potassium hydroxide or sodium hydroxide; the  
47 solvent amount used is limited to that amount necessary for extraction.
- 48 2) In §205.605 (a) and (b), products from marine plants and algae including non-synthetic  
49 substances: alginic acid, agar and carrageenans, and the alginates are nonagricultural  
50 (nonorganic) substances allowed as ingredients in or on processed products labeled as  
51 “organic” or “made with organic (specified ingredients or food group(s))” and may be used as  
52 ingredients in or on processed products labeled as “organic” or “made with organic (specified  
53 ingredients or food group(s)).” In addition, some minerals used for nutrient fortification, such  
54 as calcium, may be derived from marine plants.
- 55 3) In §205.606 (d)(3), (n), (v) and (z), four substances from marine plants and algae are specifically  
56 identified as nonorganically produced agricultural products allowed as ingredients in or on  
57 processed products labeled as “organic” when the specific product is not commercially  
58 available in “organic” form: (d)(3) beta-carotene extract color, derived from algae (CAS #1393-  
59 63-1), not produced using synthetic solvents and carrier systems or any artificial preservative;  
60 (n) Kelp used only as a thickener and dietary supplement; (v) Pacific kombu; and (z) Wakame  
61 seaweed (*Undaria pinnatifida*).
- 62 4) In addition calcium used for fortification may be derived from marine plants

63 Petitions have been received for agar-agar (04/26/95), alginates (4/26/1995), alginic acid (4/26/1995), β-  
64 carotene (10/11/11), calcium from seaweed (3/2/2007), carrageenans (4/1995), color: beta carotene (from  
65 algae) (7/20/2009), kelp (4/1995), laminarin (5/30/13), seaweed extract (10/3/14), seaweed, pacific kombu  
66 (8/17/2007) and seaweed, wakame (1/12/2007). Previously prepared technical reports are available for  
67 agar-agar (USDA National Organic Program, 1995a, 2011a), alginic acid (USDA National Organic Program,  
68 2015a), alginates (USDA National Organic Program, 1995b, 2015b), aquatic plant extracts (USDA National  
69 Organic Program, 1995c, 2006), β-Carotene (USDA National Organic Program, 2012), carrageenans (USDA  
70 National Organic Program, 1995d, 2011b, 2016), colors derived from agricultural products (USDA National  
71 Organic Program, 2015c), color: beta carotene (USDA National Organic Program, 2011c), kelp (USDA  
72 National Organic Program, 1995e) and laminarin (USDA National Organic Program, 2015d). Substances on  
73 the National List lacking a technical review are: seaweed extract (10/3/14), seaweed, Pacific Kombu  
74 (8/17/2007) and seaweed, Wakame (1/12/2007).

75 The National List includes some overlap in species in the various material listings. Public comment  
76 provided to the NOSB has described serious concerns for potential conservation issues for wild marine  
77 algae species and overharvesting of some species in some geographic areas. The public also requested  
78 clarification of the species used, the geographic areas of their origin, their cultivability or lack thereof, the  
79 effects of wild harvesting techniques, feasibility of harvesting by individual species selection as opposed to  
80 multi-species harvesting by littoral or marine zone, extraction methods and the potential for heavy metal  
81 sequestration in some wild species. The NOSB requested that all of these issues be addressed by an up-to-  
82 date technical report covering marine plants and algae on the National List. This is a specialized review  
83 and specific questions were provided by the NOSB. Only these questions are answered.

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**Characterization of Petitioned Substance****Composition of the Substance:**

86 The total value of farmed aquatic algae in 2010 and 2008 was estimated at US\$5.7 billion and US\$4.4 billion,  
87 respectively (FAO, 2014, 2012). In 2012, the seaweed industry continued to produce a variety of products with an  
88 estimated total annual production value of US\$5.5–6 billion (FAO, 2014). Food products from seaweed for human  
89 consumption contributed about US\$5 billion. Substances extracted from seaweeds – hydrocolloids – accounted  
90 for a large part of the remaining billion dollars, with smaller, miscellaneous uses, such as fertilizers and animal

91 feed additives, making up the rest. The industry uses 7.5–8 million metric tons of wet seaweed annually, which is  
92 harvested either from naturally growing (wild) seaweed or from cultivated (farmed) crops. Naturally growing  
93 seaweeds are often referred to as wild seaweeds, in contrast to seaweeds that are cultivated or farmed. Seaweed  
94 farming has expanded rapidly with demand outstripping the supply available from natural resources.  
95 Commercial harvesting occurs in about 35 countries, spread between the northern and southern hemispheres, in  
96 waters ranging from cold, through temperate, to tropical. A few species dominate algal culture, with 98.9 percent  
97 of world production in 2010 coming from Japanese kelp (*Saccharina/Laminaria japonica* – mainly in the coastal  
98 waters of China), *Eucheuma* seaweeds (a mixture of *Kappaphycus alvarezii*, formerly known as *Eucheuma cottonii*,  
99 and *Eucheuma spp.*), *Gracilaria spp.*, nori/laver (*Porphyra spp.*), wakame (*Undaria pinnatifida*) and unidentified  
100 marine macroalgae species (3.1 million metric tons, mostly from China). The remainder consists of marine  
101 macroalgae species farmed in small quantities (such as *Fusiform sargassum* and *Caulerpa spp.*) and microalgae  
102 cultivated in freshwater (mostly *Spirulina spp.*, plus a small fraction of *Haematococcus pluvialis*) (FAO, 2012).

103 Seaweeds are classified into three broad groups based on pigmentation: brown, red and green; respectively,  
104 *Phaeophyceae*, *Rhodophyceae* and *Chlorophyceae* (Gallardo, 2015). Brown seaweeds are usually large, ranging from  
105 the giant kelp that can be as long as 20 m, to thick, leather-like seaweeds from 2 to 4 m long, to smaller species  
106 30–60 cm long. Red seaweeds are usually smaller, generally ranging from a few centimeters to about a meter in  
107 length. Red seaweeds are not always red in color; they are sometimes purple. Green seaweeds are small, with a  
108 similar size range to that of the red seaweeds. Seaweeds are also called macro-algae distinguishing them from  
109 micro-algae (*Cyanophyceae*), which are microscopic in size, often unicellular, and are best known by the blue-  
110 green algae that sometimes bloom and contaminate rivers and streams (FAO, 2004).

111 Despite concern for degradation of threatened marine environments and the sustainability of ocean resources, the  
112 vast and largely unexplored taxonomic genomic and chemical diversity and complexity of marine organisms  
113 including algae is considered an “untapped” resource of valuable products and is currently under investigation  
114 at many levels (Gaspar et al., 2015; Stengel and Connan, 2015). Research and development in marine plants and  
115 algae are focusing on a range of products including some permitted for use in organic agricultural production.  
116 Although these products are shared across many algal species, screening and development for commercial  
117 products in wild and cultured algal species has often been disconnected from environmental and physiological  
118 data and concerns associated with marine habitats and their inhabitants.

#### 119 **Source or Origin of the Substance:**

120 “Algae” is the plural of a 16<sup>th</sup> century Latin word, *alga* for seaweed. It is thought to be etymologically derived  
121 from the Latin word *alliga* for binding or entwining. The term “Algae” does not have a precise taxonomic  
122 meaning. It is generally thought that about 1.6 billion years ago a coccoid cyanobacterium, the earliest  
123 photosynthetic organism, was eaten by heterotrophic eukaryote. Rather than being digested the cyanobacterium  
124 was retained. The incorporation of the cyanobacterium through evolution involved a large reduction in the size  
125 of its genome, transfer of many of its gene functions to and from the host nucleus and the loss of its cell wall  
126 giving rise to a primary alga, i.e., unicellular red or green algae. Subsequent endosymbiotic events are proposed  
127 to have occurred when another eukaryote ate a primary red or green alga giving rise to additional membrane  
128 layers and new plastid based organelles and structures. Land plants eventually evolved from green algae, while  
129 evolving red, green and brown alga continued their development of new plastids, functions and structures  
130 enabling aquatic life (Keeling, 2004; Coelho et al., 2010).

131 Algbase, a database of information including many types of algae, currently lists 144,393 species and  
132 infraspecific names for algae and marine plants (Guiry and Guiry, 2016). Systematically, and based on the DNA  
133 sequence of ribosomal RNA genes, there are two kingdoms: Prokaryota and Eukaryota, eleven phyla: *Cyanophyta*,  
134 *Glaucophyta*, *Rhodophyta*, *Cryptophyta*, *Dinophyta*, *Haptophyte*, *Ochrophyta*, *Euglenophyta*, *Chlorarachniophyta*,  
135 *Chlorophyta* and *Charophyta*; six subphyla and thirty-eight classes of marine algae.

136 A list of products from marine algae and originating species is provided in Table 1. Table 2 provides a list of  
137 common edible marine alga and their scientific names. The following substances and foods from marine algae  
138 have been examined by the National Organic Program: agar-agar, alginates, alginic acid,  $\beta$ -carotene, calcium  
139 from seaweed, carrageenans, color: beta carotene (from algae), kelp, laminarin, seaweed extract, pacific kombu  
140 and wakame.

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Table 1 Examples of Algal Species Uses*				
Compound/Extract	Algal Species	Source	Continent of Production	Applications
<b>Seaweed manure and extract</b>				
Seaweed manure and extract	<i>Ascophyllum nodosum</i> <i>Ecklonia maxima</i> <i>Laminaria/Saccharina spp.</i> <i>Fucus</i> <i>Sargassum spp.</i> Maerl ( <i>Phymatolithon calcareum</i> + <i>Lithothamnion corallioides</i> )	Wild stock	Europe, Asia, Africa, America	Fertilizer
<b>Polysaccharides</b>				
Carbohydrates	<i>Mastocarpus stellatus</i>	Wild stock	Europe	Cosmetics
Polysaccharides	<i>Porphyredium cruentum</i> <i>Rhodella spp.</i> Cyanobacteria	Culture	Europe	Cosmetics
Agar (hydrocolloid)	<i>Geldinium spp.</i> <i>Gracillaria spp.</i>	Wild stock, except <i>Gracillaria</i> , wild stock and culture	Europe, Asia, America, Africa	Biotechnology, bacteriological agar, human food, agar agar, health products, horticulture
Alginates (hydrocolloid)	<i>Ascophyllum nodosum</i> <i>Durvillaea potatorum</i> <i>Ecklonia maxima</i> <i>Laminaria/Saccharina spp.</i> <i>Lesonia nigrescens</i> <i>Macrocystis pyrifera</i>	Wild stock, except cultured	Europe, Asia, Africa America	Pharmaceutical and Medical industry, cosmetics, human food, immobilized biocatalyst, paper industry, animal food
Carrageenan (hydrocolloid)	<i>Eucheuma denticulatum</i> <i>Kappaphycus alvarezii</i> <i>Gigarina skettsbergii</i> <i>Sarcothalia crispata</i> <i>Chondrus crispus</i>	Wild stock, except cultured	Asia, Africa, Europe, America	Human food, pharmaceutical and medical industries
Ulvans	<i>Ulva spp.</i>	Culture and wild stock	Europe	Animal feed
Fucanes (fucoidan)	<i>Ascophyllum nodosum</i>	Wild stock	Europe	Cosmetics, human food, nutraceuticals, animal feed, pharmaceutical
Laminarin	<i>Laminariales</i>			Horticulture
<b>Fatty Acids</b>				
Fatty Acids	<i>Chlorella spp.</i> <i>Syncrocystis spp.</i> <i>Chlamydomonas spp.</i> <i>Isochrysis spp.</i>	Culture	Europe, America, Asia-Pacific	Biofuel
Docosahexaenoic acid (DHA) Eicosapentaenoic acid (EPA)	<i>Cryptocodinium cohnii</i> <i>Schizoclrtrium sp.</i> <i>Nannochloropsis spp.</i> <i>Spirulina/Arthrospira spp.</i> <i>Ulkenia spp.</i>	Culture (heterotrophy mainly), Genetic engineering	Europe, America, Asia-Pacific (Australia)	Nutraceutical, pharmaceutical, animal feed
<b>Pigments</b>				
β-Carotene	<i>Dunaliella salina</i> <i>Hematococcus pluviialis</i>	Culture	Asia, Asia-Pacific, America	Animal feed, human food, pharmaceutical, nutraceutical
Astaxanthin	<i>Hematococcus pluviialis</i> <i>Chlorella spp.</i>	Culture	Asia, Asia-Pacific, America	Animal feed, nutraceutical, pharmaceutical
Canthaxanthin	<i>Hematococcus pluviialis</i> <i>Chlorella spp.</i> Green algae	Culture	Asia, Asia-Pacific, America	Animal feed

Echineone	<i>Botryococcus braunii</i> <i>Cyanobacteria</i>	Culture		Animal feed
Fucoxanthin	<i>Phaeodactylum tricornutum</i>	Culture		Nutraceutical, pharmaceutical
Lutein	<i>Scenedesmus spp.</i> <i>Muriellopsis spp.</i> Green algae	Culture		Nutraceutical, pharmaceutical
Zeaxanthin	<i>Chlorella ellipsoidea</i> <i>Dunaliella salina (mutant)</i>	Culture		Animal feed
Phycobiliprotein	<i>Spirulina/Arthrospira spp.</i> <i>Porphryidium spp.</i> <i>Rhodella spp.</i> <i>Galdieria spp.</i> Cyanobacteria, Rhodophyta, Cryptophyta, Glaucoephyta	Culture	Asia- Pacific, America	Human food, cosmetics, histochemistry, fluorescence microscopy, flow cytometry, nutraceutical, medical
<b>Other compounds</b>				
Mycosporine-like amino acids	<i>Porphyra umbicalis</i> Cyanobacteria	Culture		Cosmetics
Organohalogenated compounds	<i>Asparagopsis armata</i>	Culture	Europe	Cosmetics
Phloropanins (phenolics)	Fucales	Wild stock		Pharmaceutical
Phytotene, phytofluene	<i>Dunaliella spp.</i>	Culture		Cosmetics
Polyhydroxyalkanoates	<i>Syncrocystis spp.</i> Nostoc spp. Cyanobacteria	Culture		Bioplastics
Squalene	<i>Auantiocrytrium spp.</i>	Culture		Cosmetics

\*Adapted from Stengel and Connan, 2015

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Common Name	Scientific Name
Arame	<i>Eisenia bicyclis</i>
Badderlocks	<i>Alaria esculenta</i>
Bladderwrack	<i>Fucus vesiculosus</i>
Carola	<i>Callophylus variegata</i>
Carrageen Moss	<i>Mastocarpus stellatus</i>
Dulse	<i>Eucheuma cottoni</i>
Gutweed	<i>Enteromorpha intestinalis</i>
Hijiki (hiziki)	<i>Sargassum fusiforme</i>
Irish Moss	<i>Chondrus crispus</i>
Laver	<i>Porphyra lacinata/ Porphyra umbilicalis</i>
Limu kala	<i>Sargassum echinocarpum</i>
Kombu	<i>Laminaria spp.</i>
Mozuku	<i>Cladisiphon okamuranus</i>
Nori	<i>Porphyra spp.</i>
Oarweed	<i>Laminaria digitata</i>
Ogonori	<i>Gracilera</i>
Sea belt	<i>Laminaria saccharina</i>
Sea grapes (green caviar)	<i>Caulerpa lentillifera</i>
Sea lettuce	<i>Ulva spp.</i>
Thongweed	<i>Himanthalia elongata</i>
Wakame	<i>Undaria pinnatifida</i>

\*Adapted from Venugopal, 2011

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**145 Properties of the Substance:**

146 Algae are unicellular or multicellular organisms. Algae that produce chlorophyll a and the accessory  
147 pigment  $\beta$ -carotene are called autotrophs. An autotroph is an organism that is able to synthesize its own  
148 food from simple inorganic substances such as carbon dioxide. With the exception of the cyanobacteria,  
149 algae have cellular organelles surrounded by membranes. In general, the cells of eukaryotic algae are  
150 surrounded by a cell wall which is produced by the Golgi apparatus. The cell wall is made up of cellulose  
151 and polysaccharides. As a result it has a fibrillar appearance. Algal cells have numerous organelles, among  
152 which the mitochondria, chloroplast and the nucleus are surrounded by a double membrane (Gallardo,  
153 2015).

154 There is considerable variability in the taxonomic organization of algae, from unicellular organisms only a  
155 few microns in size to complex thalli (leaf-like structures), such as the large brown kelp, *Macrocystis* that  
156 can reach 300 feet in length. Algae show great diversity in their propagation mechanisms. In addition to  
157 sexual reproduction, simple multicellular thalli can vegetatively reproduce by fragmentation. While some  
158 species of brown algae, produce specialized structures of vegetative reproduction (Gallardo, 2015).

159 Sexual reproduction is known in most of the multicellular algal species. For many algae species, their  
160 reproductive cells are flagellate and motile. Sexual reproduction by means of these specialized cells can  
161 involve alternating nuclear phases and a zygote that never develops a multicellular embryo, e.g. a seed.  
162 Fertilization may occur via indistinguishable gametes, and though monoecious or dioecious production of  
163 male or female gametes. There are three basic life cycles in the sexual reproduction of algae – a) the  
164 haplontic reproductive cycle: meiosis takes place in the first division of the zygote, a single generation is  
165 called monogenetic; b) the diplontic and monogenetic reproductive cycle: meiosis occurs during  
166 gametogenesis, gametic meiosis, is as it is in animals and there are only diploid individuals; c) the  
167 haplodiplontic reproductive cycle: alternating generations, two different types of individuals alternate, one  
168 haploid gametophyte that produces gametes and the other diploid sporophyte that produces spores  
169 (Gallardo, 2015).

170 Marine algae produce, secrete and sense a wide variety of chemicals that control important functions such  
171 as reproduction, vegetative colonization, temperature acclimatization, disease resistance and herbivore  
172 defense. Chemicals include a wide array of organic chemical substances such as halogenated compounds,  
173 isoprenoids, monoterpenes, sesquiterpenes, diterpenes, higher terpenes, steroids, acetogenins, oxylipins,  
174 polyketides, alkylated phenyl and quinone derivatives, phlorotannins, bromophenols, peptides, alkaloids  
175 and mycosporine-like amino acids (Young et al., 2015). These chemicals not only influence other algae of  
176 the same species and other species, e.g. determining a location where a plant can grow vegetatively, but  
177 also control the ecology of predators and symbionts. The chemical diversity of algae is linked to evolution,  
178 but phenotypic differences also result from environmental and biological pressures. Local conditions and  
179 sites where algae is collected or farmed, such as light, nutrient and temperature combinations have a  
180 significant impact on metabolic levels, responses and chemical composition. Biological status including life  
181 cycle, developmental stage, thallus structure and other factors also influence biochemical composition and  
182 the eventual value of the harvested material (Stengel and Connan, 2015).

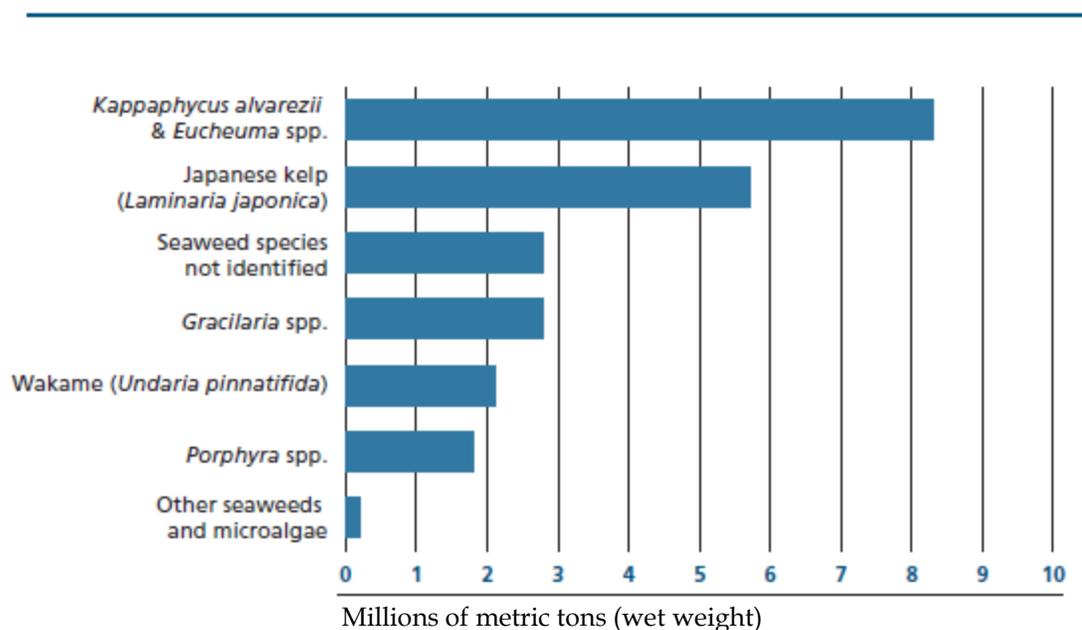
**183 Specific Uses of the Substance:**

184 In 2012, about 23.8 million metric tons worldwide of seaweed and other algae were harvested from  
185 aquaculture. Capture production or wildcrafting produced about 1.1 million metric tons. Seaweed was  
186 used as food, in cosmetics and fertilizers, processed to extract thickening agents, and as an additive to  
187 animal feed (FAO, 2014).

188 The recorded use of seaweed as food dates to the fourth century in Japan and the sixth century in China.  
189 Increasing demand over the last fifty years outstripped the ability to supply the market from natural (wild)  
190 stocks. Cultivation industries now produce more than 90 percent of the markets' demand. In Ireland,  
191 Iceland and Nova Scotia (Canada), a different type of seaweed has traditionally been eaten, and this market  
192 is being developed. Some government and commercial organizations in France have been promoting  
193 seaweeds for restaurant and domestic use, with some success. An informal market exists among coastal  
194 dwellers in some developing countries where there has been a tradition of using fresh seaweeds as  
195 vegetables and in salads (FAO, 2012).

196 China has been the largest producer of edible seaweeds, harvesting about 5.5 million wet metric tons. The  
 197 greater part of this is for Kombu, produced from hundreds of hectares of the brown seaweed, *Laminaria*  
 198 *japonica* that is grown on suspended ropes in the ocean. The Republic of Korea grows about 800,000 wet  
 199 metric tons of three different species, and about 50 percent of this is for Wakame, produced from a different  
 200 brown seaweed, *Undaria pinnatifida*, grown in a similar fashion to *Laminaria* in China. Japanese production  
 201 is around 600,000 wet metric tons and 75 percent of this is for nori, the thin dark seaweed wrapped around  
 202 a rice ball in sushi. Nori is produced from a red seaweed, a species of *Porphyra*. It is a high value product,  
 203 about US\$ 16,000/dry metric ton, compared to Kombu at US\$ 2,800/dry metric ton and wakame at US\$ 6  
 204 900/dry metric ton. A comparison of the marine algae aquaculture species is provided in Fig 1.

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208 Fig. 1 World aquaculture production of farmed aquatic algae grouped by  
 209 nature and intended use (FAO, 2014)

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211 Various red and brown seaweeds are used to produce three hydrocolloids: agar, alginate and carrageenan.  
 212 A hydrocolloid is a non-crystalline substance with very large polymeric molecules that dissolves in water  
 213 producing a thickened (viscous) solution. Alginate, agar and carrageenan are used to thicken aqueous  
 214 solutions, to form gels (jellies) of varying degrees of firmness, to form water soluble films, and to stabilize  
 215 some products, such as ice cream, e.g. they inhibit the formation of large ice crystals so that the ice cream  
 216 can retain a smooth texture (FAO, 2004).

217 Seaweeds as a source of hydrocolloids dates back to 1658, when the gelling properties of agar that is  
 218 extracted with hot water from a red seaweed were first discovered in Japan. Extracts of Irish moss, another  
 219 red seaweed, contain carrageenan and were popular as thickening agents in the nineteenth century. It was  
 220 not until the 1930s that extracts of brown seaweeds, containing alginate, were produced commercially and  
 221 sold as thickening and gelling agents. Industrial uses of seaweed extracts expanded rapidly after the  
 222 Second World War, but were sometimes limited by the availability of raw materials. Once again, research  
 223 into life cycles has led to the development of cultivation industries that now supply a high proportion of  
 224 the raw material for some hydrocolloids. Alginate production (US\$ 213 million) is from brown seaweeds,  
 225 all of which are harvested from the wild; cultivation of brown seaweeds is too expensive to provide raw  
 226 material for industrial uses (FAO, 2004).

227 Agar production (US\$ 132 million) is principally from two types of red seaweed, one of which has been  
 228 cultivated since the 1960–70s, but on a much larger scale since 1990, and this has allowed the expansion of  
 229 the agar industry (FAO, 2004).

230 Carrageenan production (US\$ 240 million) was originally dependent on wild seaweeds, especially Irish  
231 moss, a small seaweed growing in cold waters, with a limited resource base. However, since the early 1970s  
232 the industry has expanded rapidly because of the availability of other carrageenan-containing seaweeds  
233 that have been successfully cultivated in warm-water countries with low labor costs. Today, most of the  
234 seaweed used for carrageenan production comes from cultivation, although there is still some demand for  
235 Irish moss and some other wild species from South America (FAO, 2004).

236 Seaweed meal, used an additive to animal feed, has been produced in Norway, where its production was  
237 pioneered in the 1960s. It is made from brown seaweeds that are collected, dried and milled.  
238 Approximately 50,000 metric tons of wet seaweed are harvested annually to yield 10,000 metric tons of  
239 seaweed meal, which is sold for US\$ 5 million. Fertilizer uses of seaweed date back at least to the  
240 nineteenth century. Early usage was by coastal dwellers, who collected storm-cast seaweed, usually large  
241 brown seaweeds, and dug it into local soils. The high fiber content of the seaweed acts as a soil conditioner  
242 and assists moisture retention, while the mineral content is a useful fertilizer and source of trace elements.  
243 In the early twentieth century, a small industry developed based on the drying and milling of mainly  
244 storm-cast material, but it dwindled with the advent of synthetic chemical fertilizers. Organic farming  
245 produces limited demand for fertilizer from harvested dried algae; however, the combined costs of drying  
246 and transportation have confined usage to sunnier climates where the buyers are not too distant from the  
247 coast. One growth area in seaweed fertilizers is in the production of liquid seaweed extracts that can be  
248 produced in concentrated form for dilution by the user. Seaweed fertilizers can be applied directly onto  
249 plants or watered in around the root areas. Organic farming provides a market for liquid seaweed  
250 fertilizers as a result of wider recognition of the usefulness of the products and their effectiveness in  
251 growing of vegetables and some fruits (FAO, 2004).

252 Cosmetic products, such as creams and lotions, sometimes show on their labels that the contents include  
253 “marine extract”, “extract of alga”, “seaweed extract” or similar. Usually this means that one of the  
254 hydrocolloids extracted from seaweed has been added. Alginate or carrageenan could improve the skin  
255 moisture retention properties of the product. Pastes of seaweed, made by cold grinding or freeze crushing,  
256 are used in thalassotherapy, where they are applied to the person’s body and then warmed under infrared  
257 radiation. This treatment, in conjunction with seawater hydrotherapy, is said to provide relief for  
258 rheumatism and osteoporosis.

#### 259 **Approved Legal Uses of the Substance:**

260 The U.S. Food and Drug Administration (FDA) has determined that agar is a generally recognized as safe  
261 (GRAS) direct food substance (21 CFR 184.1115). It is permitted in foods up to the maximum levels of 0.8%  
262 in baked goods, 2.0% in confections and frostings, 1.2% in soft candy, and 0.25% in all other food  
263 categories. It is also regarded by FDA as GRAS for use as a stabilizer in animal drugs, feeds, and related  
264 products when used in accordance with good manufacturing or feeding practices (21 CFR 582.7115). The  
265 FDA permits the use of agar in over-the-counter (OTC) drug products used as bulk laxative, however, the  
266 data are currently inadequate to establish GRAS and effectiveness of agar for this specific use – 21 CFR  
267 310.545 (NOP, 2011a).

268 Alginic acid is listed at 21 CFR 184.1011 as a GRAS direct food substance with specific limitations for use as  
269 an emulsifier, emulsifier salt, formulation aid, stabilizer and thickener in soups and soup mixes. Alginic  
270 acid is listed by the EPA as both an inert material approved for use in non-food use pesticides and as a  
271 former List 3 inert of unknown toxicity as included on the list of inert ingredients last updated in August of  
272 2004 (NOP, 2015a). Alginates are GRAS in food when produced according to good manufacturing  
273 processes. The FDA provides specific uses and levels of concentration allowed for the different alginate  
274 salts (ammonium, calcium, potassium and sodium) (21 CFR 294– 184.1133, 184.1610, 184.1724, 184.1187).  
275 In addition, sodium and propylene glycol alginate are permitted as ingredients in standardized  
276 pasteurized Neufchatel and processed cheese spreads (21 CFR 133.178 and 133.179). Polypropylene glycol  
277 alginate is also allowed as a coating for fresh citrus fruit per 21 CFR 172.210, as a defoaming agent in  
278 processed foods per 21 CFR 173.240, and as an indirect food additive (components of paper and  
279 paperboard) per 21 CFR 176.170 (NOP, 2015b).

280 Aquatic plant extracts of *Ascophyllum nodosum* (CAS number 84775-78-0) are on EPA’s former List 4B of  
281 inert ingredients in pesticides. EPA exempts cytokinin in aqueous extract of seaweed meal (as opposed to

282 seaweed extract) from the requirement for a tolerance in all food commodities when used as a plant growth  
283 regulator on plants, seeds, or cuttings and on all food commodities after harvest (NOP, 2006). Laminarin is  
284 exempt from tolerance in or on all food commodities when it is applied pre-harvest as a biochemical  
285 pesticide to stimulate natural defense mechanisms in plants—40 CFR 180.1295 (NOP, 2015d). Kombu  
286 (*Laminaria japonica*) and its extract are generally recognized as safe by the FDA ([GRN. 000123](#)—21 CFR  
287 184.1120). The FDA considers fucoidan from *Undaria pinnatifida* generally regarded as safe for use in baked  
288 goods (e.g., bread, cake), noodles, soups, snack foods, imitation dairy products, and seasonings and flavors  
289 at use levels up to 30 milligrams per serving. The edible seaweed wakame is also produced by drying  
290 *Undaria pinnatifida* and is generally regarded as safe ([FDA GRN No. 565](#)—21 CFR 184.1120).

291  $\beta$ -carotene from seaweed is listed as GRAS by the FDA in 21 CFR 184 and exempt from certification in 21  
292 CFR 73.95 (NOP, 2012).

293 Carrageenan may be safely used as a direct food additive for human consumption as follows: a) it is  
294 prepared by aqueous extraction only from eight species of Rhodophyceae (red) seaweeds: *Chondrus crispus*,  
295 *Chondrus ocellatus*, *Kappaphycus alvarezii* (*Eucheuma cottonii*), *Eucheuma spinosum*, *Gigartina acicularis*,  
296 *Gigartina pistillata*, *Gigartina radula*, and *Gigartina stellate*; b) it is a sulfated polysaccharide composed  
297 primarily of galactose and an hydrogalactose with a sulfate content of 20-40% dry weight; c) it is used only  
298 in the amount necessary as an emulsifier, stabilizer, or thickener in foods, except for those standardized  
299 foods that do not provide for such use and d) foods with carrageenan added must be labeled  
300 “carrageenan”—21 CFR 172.620. Salts of carrageenan are also permitted for safe use as a direct food  
301 additive under 21 CFR § 172.626 (NOP, 2011b).

### 302 **Action of the Substance:**

303 Marine plants and algae include a wide variety of organisms that range in complexity from a  
304 picoplanktonic cells to macroalgal kelp (Stengel and Connan, 2015). There are about 20,000 defined species  
305 worldwide belonging to one of three groups: green algae, brown algae and red algae. A number of algae or  
306 seaweed species have played an important role in commerce and providing food and food products for  
307 centuries. These plants possess chlorophyll, but lacking true roots, stems and leaves are distinct from  
308 terrestrial green plants comprising commodities grown in organic or conventional agricultural production.  
309 Unlike an organic agriculture production system where provisions are made to foster soil fertility by  
310 managing the organic content of the soil with proper tillage, crop rotation and manuring, there is no soil to  
311 manage and organic aquaculture does not require manure, tillage or crop rotation. Furthermore, the animal  
312 population within the marine environment, consists mostly of fish and invertebrates that do not produce  
313 manure containing urea. Instead they produce feces containing ammonia that rapidly dissolves in the  
314 surrounding water. Without roots, seaweed may be free floating or attach preferably to a hard surface and  
315 the entire crop self regulates growth based on prevailing water conditions and temperature. Because soil  
316 and humus are not part of the growth medium and not factors in aquaculture generally accepted practices  
317 for sustainability, productivity and profitability affecting terrestrial crop production are not applicable in  
318 organic aquaculture.

319 Much of early algae production required the harvest of wild crops. *Ascophyllum nodosum*, “rockweed” is a  
320 brown algae species that has not been cultivated, but has value as a raw material for fertilizer, animal feed  
321 and alginate. It has been harvested commercially since 1959. Overharvesting of this cold water species has  
322 led to regulatory limitation of the harvest to 17% of harvestable biomass, although practically this ranges  
323 from 15 to 50%. Harvesting methods also evolved from automated suction cutters to simple manual cutter  
324 rakes (Ugarte et al., 2006, 2012). Although much of the cut rockweed grows back before it may be subjected  
325 to reharvest, taking about six years, the effect of the harvest on plant and animal species living in and on  
326 the rockweed forest is still under study. One study addressing the major components of the resident fish  
327 community in the rocky intertidal zone after rockweed harvest found no evidence linking rockweed  
328 harvest to changes in the ichthyoplankton component or the juvenile and adult fish of that community (van  
329 Guelpen and Pohle, 2014). In a summarized review of selected work, a researcher at the University of  
330 Maine also concluded that the effect of 17% rockweed harvest on some species including seabirds was  
331 negligible (Beal, 2015). In Canada, and the north Atlantic United States, both governments and commercial  
332 producers have endeavored to manage resources of *Ascophyllum nodosum* to 1) maintain its economic value  
333 and 2) ensure that their efforts do not interfere with other resources such as marine fisheries (Ugarte and  
334 Sharp, 2012).

335 It is common in this century that natural resources are increasingly under pressure to provide food and  
336 resources for a growing world population (Ginneken and de Vries, 2016). It is apparent that this is the case  
337 with “rockweed,” one of eight brown seaweed species harvested internationally to manufacture alginate,  
338 where increasing capital investment for social responsibility and sustainability is required. Alginates now  
339 provide the basis for many technologies in foods, pharmaceuticals, and medical products and research in  
340 these areas continues. *Laminaria hyperborea* (Northern Europe), *Laminaria digitata* (Mediterranean Atlantic),  
341 *Laminaria japonica* (Japan, China, Korea), *Ascophyllum nodosum* (Northeastern US and Canada), *Ecklonia spp.*  
342 (South Africa, Southern Australia, New Zealand), *Lessonia spp.* (Peru, Chile), *Macrocystis pyrifera*  
343 (California) and *Durvillaea spp.* (Southern Australia) are the eight primary species wild harvested for  
344 alginate production. Because the structure and application of the alginates of brown algae vary depending  
345 upon the species and the water temperature where they grow, quotas of varying amounts of wet product  
346 are determined based on demand for specific products. Companies and organizations involved in the  
347 harvest of brown algae used for alginate production work with international regulators and environmental  
348 advocates to harvest responsibly to sustain regrowth, preserve their resource and provide economic  
349 development for the communities involved in wild crafting and harvest (FMC, 2003; Canadian Science  
350 Advisory Secretariat, 2013; Maine Seaweed Council, 2014).

351 The efficiency of the photosynthetic process of a terrestrial crop or seaweed from the oceans is ultimately a  
352 reflection of the growth that ultimately determines the amount of green biomass harvested. Seaweeds “the  
353 unforeseen crop of the future” and other marine plants are the primary producers in the marine  
354 environment. They form the standing crop and determine the productivity of all communities. Seaweed-  
355 based ecosystems are amongst the most productive on Earth (van Ginnekin and De Vries, 2016).  
356 Notwithstanding, rockweed has an important role as habitat, as food and as a nutrient source supporting a  
357 community of organisms that inhabit its “forests.” Any cutting of rockweed can produce an effect on the  
358 supported eco-communities. Furthermore, many aspects of this ecosystem have not been elucidated,  
359 encouraging more precaution as the brown algae “forestry” industry grows into the future (Seeley and  
360 Schlesinger, 2012).

#### 361 **Combinations of the Substance:**

362 Marine plants and algae are used to produce agar, carrageenan, alginates, and  $\beta$ -carotene as a colorant.  
363 These functional ingredients are used in combination with many foods, food additives, functional products  
364 and health products. Seaweeds used for fertilizers (soil amendments), i.e. aquatic plant extracts, are often  
365 extracted with alkali, e.g. potassium hydroxide or sodium hydroxide (§205.601).

366 <b>Status</b>
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367

#### 368 **Historic Use:**

369 Marine Plants and Algae or seaweeds have been used by people for many centuries as food and as a source  
370 for chemicals. At an archeological site in southern Chile, remains of nine species of marine algae were  
371 recovered from hearths and other features at Monte Verde II, an upper occupational layer, and were  
372 directly dated between 14,220 and 13,980 calendar years before the present (~12,310 and 12,290 carbon-14  
373 years ago). These findings support the archaeological interpretation of the site and indicate that the site’s  
374 inhabitants used seaweed from distant beaches and estuarine environments for food and medicine  
375 (Dillehay et al., 2008). In China, archaeological evidence from as long ago as 3000 BCE describe the use of  
376 seaweed for food. In the twelfth century, seaweed was used in Europe for fertilizer and animal feed.  
377 During the 18<sup>th</sup> century burning kelp became a source for sodium carbonate (ash). Carrageenan from Irish  
378 moss followed in the 19<sup>th</sup> century. Optimism prevailed at this time about an unlimited source of seaweed  
379 and other products such as agar and alginate followed. In addition as the world has internationalized,  
380 seaweed consumption as food, e.g. Kombu, Nori and Wakame, has expanded from China, Japan and Korea  
381 to the entire world. Farming seaweed on lines in the ocean has expanded globally for production of  
382 alginates, carrageenans, other chemicals and the edible seaweed varieties, as management of harvest of  
383 wild seaweed forests continues throughout the world (Hunter, 1975).

#### 384 **Organic Foods Production Act, USDA Final Rule:**

385

386 Aquatic plants and their products may be certified under current USDA organic regulations. Producers  
387 and certifiers are required to comply with USDA organic regulations when producing or certifying  
388 cultured and wild crop harvested plants. Aquatic plant producers must ensure and certifying agents must  
389 verify that production practices maintain or improve the natural resources of the operation including water  
390 quality (McEvoy, 2012).

391 Marine plants (seaweed) and algae are included in the National List in several sections and allowed for use  
392 in organic production and handling:

393 1) In §205.601(j)(1), Aquatic plant extracts are synthetic substances allowed in organic crop  
394 production, as plant or soil amendments, from other than hydrolyzed extracts where the extraction  
395 process is limited to the use of potassium hydroxide or sodium hydroxide; the solvent amount  
396 used is limited to that amount necessary for extraction and the use of aquatic plant extracts does  
397 not contribute to contamination of crops, soil, or water.

398 2) In §205.605 (a) and (b), products from marine plants and algae including non-synthetic  
399 substances: alginic acids, agar and carrageenans, and the synthetic substances: alginates are  
400 nonagricultural (nonorganic) substances allowed as ingredients in or on processed products  
401 labeled as “organic” or “made with organic (specified ingredients or food group(s))” and may be  
402 used as ingredients in or on processed products labeled as “organic” or “made with organic  
403 (specified ingredients or food group(s)).” In addition, some minerals used for nutrient fortification,  
404 such as calcium, may be derived from marine plants.

405 3) In §205.606 (d)(3), (n), (v) and (z), four substances from marine plants and algae are specifically  
406 identified as nonorganically produced agricultural products allowed as ingredients in or on  
407 processed products labeled as “organic” when the specific product is not commercially available in  
408 “organic” form: (d)(3) beta-carotene extract color, derived from algae (CAS #1393-63-1), not  
409 produced using synthetic solvents and carrier systems or any artificial preservative, (n) Kelp used  
410 only as a thickener and dietary supplement, (v) Pacific kombu and (z) Wakame seaweed (*Undaria*  
411 *pinnatifida*).

#### 412 **International**

413 **Canada** - Canadian General Standards Board Permitted Substances List. This list was updated in  
414 November 2015.

415 Although there is a [Canadian organic aquaculture standard](#) and accredited certifying bodies can certify to  
416 it, the standard itself is not referenced in government regulations and organic aquaculture products may  
417 not carry the Canada Organic logo. Aquatic plants and aquatic plant products not containing synthetic  
418 preservatives, such as formaldehyde, either extracted naturally (non-synthetic) or with potassium  
419 hydroxide or sodium hydroxide in approved situations are allowed as soil nutrients and amendments.  
420 Agar is also permitted a medium for spawn production.

#### 421 **CODEX Alimentarius Commission, Guidelines for the Production, Processing, Labelling and Marketing** 422 **of Organically Produced Foods (GL 32-1999) -**

423 A proposal to amend the Codex guidelines to include organic aquaculture, including algae and products of  
424 algae, has been under consideration. Due to consensus issues, it is unclear whether this proposal will be  
425 adopted in the future (CAC, 2016). The Codex guidelines for organic also allow: 1) seaweed and seaweed  
426 products as a soil conditioner, 2) seaweed, seaweed meal, seaweed extracts, sea salts and salty water for  
427 pest control, 3) Carrageenan, 4) Alginic acid/sodium alginate/potassium alginate and 5) agar.

#### 428 **European Economic Community (EEC) Council Regulation, EC No. 834/2007 and 889/2008**

429 Aquaculture is defined by the EEC as the rearing or cultivation of aquatic organisms including marine  
430 plants and algae using techniques designed to increase the production of the organisms in question beyond  
431 the natural capacity of the environment; the organisms remain the property of a natural or legal person  
432 throughout the rearing or culture stage, up to and including harvesting.

433 Algae, including seaweed, can be used in the processing of organic food. Aquaculture production must be  
434 based on the maintenance of the biodiversity of natural aquatic ecosystems, the continuing health of the  
435 aquatic environment and the quality of surrounding aquatic and terrestrial ecosystems.

436 **Japan Agricultural Standard (JAS) for Organic Production** – The Japanese Agricultural Standard for  
 437 Organic Plants (Notification 1065 of the Ministry of Agriculture, Forestry and Fisheries of October 27, 2005)  
 438 allows the use of dried algae as fertilizer for terrestrial plants.

439 **International Federation of Organic Agriculture Movements (IFOAM) -**

440 IFOAM is developing a standard for marine algae in its aquaculture expert forum. Seaweed is allowed as a soil input  
 441 in appendix 2 of the IFOAM norms (IFOAM, 2014). In addition, several hydrocolloids derived from algae such as  
 442 carrageenan and alginates are allowed as additives (IFOAM, 2014).

443

#### 444 NOSB Questions for Marine Plants and Algae

445

446 **NOSB Question #1. Nomenclature: The brief information on each material provided here indicates that**  
 447 **many of the National List listings are generic terms or overlapping terms, lacking specificity, such as**  
 448 **“agar agar”, “carrageenan”, “aquatic plant extracts” or “kelp”. Should each listing include specific Latin**  
 449 **names of approved algae? Should the word “plant” be replaced by the word “algae?”**

450 The term “algae” refers to a complex association of photosynthetic organisms, the taxonomy of which is  
 451 indeterminate and being reexamined based on data from modern molecular genetics. Taxonomically algae  
 452 can be divided into two groups. The multicellular marine algae (macroalgae, seaweed) and unicellular  
 453 algae, which inhabit both the ocean and freshwater lakes, pond, soils, etc. Algae are not lower plants when  
 454 compared to terrestrial plants growing in the soil. They have evolved independently and are “state of the  
 455 art” for their habitats. The terms “algae” and “seaweed” are used interchangeably in the literature. The  
 456 term “marine plant” is not generally used to describe the algae, rather it describes rhizomatous  
 457 angiosperms such as the seagrasses that thrive in a soft substrate. Seagrasses are [phylogenetically](#) more  
 458 closely related to mangroves and terrestrial plants than to the red, green or brown macro algae species.  
 459 They are likely to have adapted to marine environment from a terrestrial environment. However, because  
 460 algae are plants that live in the ocean they are often referred to as marine plants in the technical literature.

461 The chemical composition of algal biomass depends on its taxonomy. The main components are often  
 462 polysaccharides that have structural or storage functions. Table 3 provides some of the seaweeds used to  
 463 produce the industrial polysaccharides. Structural polysaccharides have unique properties that makes  
 464 them valuable. For example the gelling algal polysaccharides, agars, carrageenans and alginic acids have a  
 465 wide range of applications in the health, food and cosmetic industries and are produced on a large scale  
 466 (Usov and Zelinsky, 2013).

467 The main polysaccharides of red algae are the sulfated galactans. These usually have a linear backbone  
 468 built up of alternating 3-linked  $\beta$ -D-galactopyranose and 4-linked- $\alpha$ -galactopyranose residues. The  
 469 configuration of the 4-linked- $\alpha$ -galactopyranose determines whether the sulfated galactan is agar or  
 470 carrageenan. Dextrorotary or D for carrageenan and levorotary or L for agar. Some of the 4-residues may  
 471 also be present as 3,6-anhydro derivatives. This allows for four types of repeating disaccharide units in the  
 472 sulfated galactans and there are further modifications that can take place such as methylation, sulfation or  
 473 substitution by a single saccharide residue. In addition to the sulfated galactans, Floridean starch, cellulose,  
 474 mannans, xylans and sulfated mannans are also produced from the red algae.

475

Polysaccharide	Seaweed
Agar, Agarose	<i>Gracillaria, Gelidium, Pterocladia</i>
Alginic Acid (Alginate)	<i>Macrocystis, Laminaria, Ascophyllum, Sargassum</i>
Carrageenans	<i>Gigartina, Chondrus, Kappaphycus (Euchema)</i>
Fucoidan	<i>Fucus serratus</i>
Laminarin	<i>Laminaria japonica</i> (brown seaweeds)
Furcelleran	<i>Furcellaria lumbricalis, F. fastigiata</i>
Ulvan	<i>Ulva rigida, Enteromorpha compressa</i>

\*Adapted from Venugopal, 2011

476

477 The nomenclature of red algal polysaccharides is arbitrary. For example, agar and carrageenan are names  
478 given to polysaccharides from various alga before elucidation of their chemical structure, thus these  
479 particular substances are subject to wide chemical variation. The first two carrageenan fractions that were  
480 isolated were named kappa and lambda, after that the carrageenans were named by Greek letters without  
481 any system (Usov and Zelinsky, 2013). The principle species used for the commercial production of  
482 carrageenans are *Kappaphycus alvarezii* (*Euchemia cottonii*), *Euchema spinosum*, *Chondrus crispus*, *Furcellaria*  
483 spp and *Gigartina stellata* (Venugopal, 2011).

484 Polysaccharides from the brown algae include laminarans, alginic acids and fucoidans. Of these alginic  
485 acids are the most produced. The alginic acids are linear copolymers of two (1 → 4)-linked uronic acid  
486 residues, β-D-mannuronic and α-L-guluronic acids. In the form of mixed salts (alginates) with several  
487 cations, i.e. Na<sup>+</sup>, K<sup>+</sup>, Mg<sup>2+</sup> and Ca<sup>2+</sup> they are present in the cell walls and intracellular matrices of all known  
488 brown algae (Usov and Zelinsky, 2013). The alginates are produced in large scale mainly from *Laminaria*  
489 *saccharina*, *L. digitata*, *L. japonica*, *Ascophyllum nodosum* and *Macrocystis pyrifera*, but other species are also  
490 used: *Eckloina maxima*, *Eckloina cava*, *Eisenia bicyclis*, *Lessonia nigrecans* and *Sargassum* spp (Venugopal, 2011).  
491 These species are widely distributed occurring throughout the world mostly in temperate to relatively cold  
492 water.

493 β-carotene is a food coloring and nutritional supplement. It is a carotenoid and is found in all  
494 photosynthetic plants. In seaweed, β-carotene is part of the photosynthetic apparatus where it is inserted  
495 into the pigment protein antenna complexes acting as structural stabilizers for protein assembly in the  
496 photosystems and as inhibitors of either photo- or free radical oxidation provoked by excess light exposure.  
497 Macroalgae sources for β-carotene production are *Laminaria digitatus*, *Fucus serratus*, *F. vesiculosus*,  
498 *Ascophyllum nodosum*, *Sargassum* spp., *Ulva* spp., *Chondrus crispus*, *Porphyra* spp., and *Palmaria palmatus*  
499 (Venugopal, 2011). Commercially most naturally produced β-carotene comes from the microalgae *Dunaliella*  
500 *salina* cultivated aquatically in saline ponds or tanks. *Dunaliella salina* is a unicellular green alga belonging  
501 to the *Chlorophyceae* family. It is known to accumulate carotenoids under various conditions of stress, such  
502 as high salinity, high light intensity, and low growth temperature. *Dunaliella salina* can tolerate a variety of  
503 environmental stresses, and is able to accumulate a beta-carotene percentage of up to 10% of its dry weight  
504 (Wu et al., 2016).

505 Whole algae incorporated into food and food additives has been used to develop healthier and more  
506 nutritious foods particularly because there is a technical advantage in the use of algae as natural  
507 ingredients in food reformulation for healthy foods and beverages. Wakame (*Undaria pinnatifida*) a widely  
508 consumed brown algae contains high levels of dietary fiber and minerals. It is used in meats to produce  
509 low fat and low salt products, improving water holding capacity and texture of processed products.  
510 Kombu (*Laminaria* spp.) or sea tangle containing alginic acids, fucoidan and laminaran has also been used in  
511 meat processing to improve water holding capacity and texture, as well as in dairy products, pasta, bread  
512 and many traditional Asian foods (Cofrades and Jimenez, 2013). Red algae (*Macrocystis pyrifera*) a source  
513 for alginate is also chopped and used as a source of Iodine added to food.

514 Aquatic Plant Extracts incorporating *Ascophyllum nodosum*, *Sargassum* spp., and *Laminaria* spp. are used as  
515 fertilizers for organic and non-polluting terrestrial farming. Seaweed extracts are rich in λ-carrageenans  
516 and can elicit an array of plant defense responses (Venugopal, 2011).

517 **NOSB Question #2. Overharvesting: The nine listings include thousands of species of algae from many**  
518 **different geographic locations, marine intertidal zone, deeper ocean areas, and wild harvested beds.**  
519 **Which species, genera, Classes are being overharvested? Which geographic regions indicate**  
520 **overharvesting impact? What is the trend in harvesting marine algae? What is the present status and**  
521 **trends in harvesting and overharvesting of *Ascophyllum nodosum*?**

522 There is one species of red algae and two species of brown algae growing along the coasts of the United  
523 States that have gained attention as ecologically threatened in recent years. They are respectively, Irish  
524 moss (*Chondrus crispus*), rockweed (*Ascophyllum nodosum*) and giant kelp (*Macrocystis pyrifera*). These  
525 plants are economically important and drive several seaweed industries including cosmetic products,  
526 nutraceuticals, fertilizers and hydrocolloids. Fertilizer applications are similar to farmyard manure, but  
527 may also include extracts and foliar applications (Chojnacka, 2012).

528 Kelp and rockweed, are foundational species forming large expansive marine habitats supporting a diverse  
 529 range of wildlife, including other algal species, marine animals and many species of protozoans and  
 530 bacteria (Seeley and Schlesinger, 2012). Without a good accounting of all of the species present it is hard to  
 531 predict the effects of harvesting rockweed and kelp on each ecological niche. Thus, it has been important to  
 532 recognize that sustainable seaweed production perceived as reproducible harvest capacity, may not  
 533 guarantee the sustained subsistence of each resident species. Although not part of any agricultural waste  
 534 stream, extracts from wild-harvested kelp and rockweed are allowed for use in organic production as soil  
 535 amendments (§205.601(j)(1)).

536 To address potential overharvesting, the three marine algae species Irish moss (*Chondrus crispus*), rockweed  
 537 (*Ascophyllum nodosum*) and giant kelp (*Macrocystis pyrifera*) are now harvested primarily using a hand rake,  
 538 rather than powered devices and significant restrictions have been imposed by coastal regulators in North  
 539 America that limit the harvest to approximately one fifth of the available biomass. Observations by  
 540 researchers on regions following this ordinance have been favorable and positively supported by the

541 Table 4 Example of Regulatory Guidance for Sustainable Seaweed Production\*

Maine Seaweed Council 2014 Harvest Guidelines for Maine Seaweeds				
Common Name Scientific Name	Traditional Harvest Season	Traditional Harvest Height	% of biomass removal based on assessment at the beginning of the harvest	Method of Harvest
Dulse <i>Palmaria palmata</i>	5/1-10/31	Should be harvested above the holdfast	75% per harvest as regrowth permits	Although it is recognized that improper hand harvesting can lead to over harvesting, mechanical harvesting has the potential for removal of far more biomass in less time. For this reason, selectivity should be employed regardless of method of harvest and any form of harvesting should undergo careful scrutiny to verify that it is an environmentally concerned, ecological and sustainable method.
Bladderwrack, Fucus <i>F. vesiculosus, F. evanescens</i> [syn <i>Fucus edentatus</i> ]	Year round	Should be harvested above the holdfast	30% per year	
Irish Moss (& false) <i>Chondrus crispus, Mastocarpus stellatus</i>	6/1-11/30	Should be harvested above the holdfast	30% per year	
Kelp, Fingered <i>Laminaria digitata</i> [syn <i>Saccharina digitata</i> ]	Year round	Should be harvested above the holdfast	30% per year	
Kelp, Oarweed <i>Saccharina longicuris</i> [syn <i>Laminaria longicuris</i> ]	3/1-8/31	Should be harvested above the holdfast	30% per year	
Kelp, Sugarwrack <i>Saccharina latissima</i> [syn <i>Laminaria saccharina</i> ]	3/1-8/31	Should be harvested above the holdfast	30% per year	
Kelp, Winged <i>Alaria esculenta</i>	3/1-8/31	Should be harvested above the holdfast and sporophylls (wings)	30% per year	
Nori <i>Porphyra spp.</i>	4/1-10/31	Should be harvested above the holdfast	75% per harvest as regrowth permits	
Rockweed, Knottedwrack <i>Ascophyllum nodosum</i>	Year round	*SEE BELOW	17% per year or 50% per 3 years	
Sea Lettuce <i>Ulva lactuca</i>	4/1-10/30	Should be harvested above the holdfast	75% per harvest as regrowth permits	
Wormweed <i>Ascophyllum nodosum f. scorpioides</i>	Year round	May be harvested in its entirety	75% per harvest as regrowth permits	
* As defined by the Maine Dept. of Marine Resources Regulation 29.05:	(1) "The lowest lateral branches shall remain undisturbed and attached to the main stalk of the rockweed that is attached to the substrate; and (2) a minimum of 16 inches of the rockweed shall remain above the holdfast"			
UPDATE: In 2013, the Department of Marine Resources began the challenging task of developing a framework of recommendations for the long-term management of the rockweed fishery ( <i>Ascophyllum nodosum</i> ). The Planning Development Team included a number of members of the Maine Seaweed Council. As new regulations are developed and approved, these Harvest Guidelines will incorporate the changes.				

542  
543

from Maine Seaweed Council, 2014.

544 resident seaweed harvesters and the associated industries. Table 4 provides information on Maine's  
545 seaweed harvest limits. Fines of up to \$500.00 may be imposed for violations. [Tile 12 Conservation, chapter](#)  
546 [623, subchapter 4, §6803-6803C of the statutes of the state of Maine](#) mandates requirements for permits,  
547 buying regulations and limits for harvesting of seaweed along its coast. These permits do not apply to  
548 seaweed that is detached naturally or dead. In 2014, the Maine legislature enacted H.P. 1318, [an act to](#)  
549 [promote rockweed habitat conservation through the consideration of no-harvest areas](#), permitting the  
550 commissioner of marine resources to regulate seaweed harvest including closing designated areas.

551 The people of China and Japan have included the edible seaweeds in their diets for many centuries.  
552 Japanese national and local seaweed shellfish fisheries cooperative associations promote and develop  
553 seaweed aquaculture management to improve the economic stability of seaweed producers, promote  
554 widespread consumption of seaweed and support the fisheries economy. Historically, these cooperatives  
555 share maritime resources. However, not only the institutions are important. The physical arrangements for  
556 fisher-folk and the ecology of the seaweed are also important considerations in the success of sustainable  
557 seaweed harvesting in Japan. Kombu is a wild resource, the harvest of which dates back to the 18<sup>th</sup> century  
558 in Japan. Kombu harvesting in Japan can serve as an example of a "common rights fishery." In the early  
559 1800s reports of villagers harvesting "as much Kombu as possible" and "paying little attention to its  
560 quality" began appearing. In response the Union for Improvement of Kombu for export was established in  
561 the Hidaka district of Kyoto. Kombu inspectors or "hatamochi" were elected from every village in the  
562 district for Kombu improvement. Their duties included preventing the harvest of Kombu on shady or rainy  
563 days when good quality Kombu could not be produced (Iida, 1998). This practice is now widespread in  
564 Japan but has been supplemented by the inclusion of licensing, assigned fishing zones, penalties for  
565 regulatory violations, permitted boat sizes, permitted harvesting tools, harvesting periods, and no harvest  
566 holiday observance. Because Kombu does not regenerate in the year following its harvest, the amount of  
567 Kombu for harvest decreases over the year. Yield is also influenced by the tide level, wave height, number  
568 of harvesters in each family, transport from the harvest to the shore and to drying areas, the knowledge  
569 and physical strength of the harvesters. In some isolated cases, the hatamochi will allow the families of sick  
570 Kombu harvesters to harvest on foot in shallow intertidal zones, in order to help in the care of the disabled  
571 fisherman. Otherwise this practice would be forbidden. Kombu harvesting regulations voluntarily  
572 observed by the fisher-folk and their enforcement by the "hatamochi" prevents intensive harvesting,  
573 resource depletion and the decline of Kombu quality. The rules support resource sustainability and the  
574 economic protection of the fisher-folk and their villages, ensuring equal access and supporting reserved  
575 competition without being ideally traditional or capitalistic (Iida, 1998).

576 Macroalgae habitats are parametrically defined by a range of environmental variables including  
577 temperature, depth of water, salinity, substrate type and turbidity. If resident conditions aren't within the  
578 range of survivability for a particular species then its range changes and the species declines in that  
579 particular area. Modeling studies on the brown algae, (*Laminaria digitata*), kelp have shown that changes in  
580 the environment, particularly warming seas, have done more to remove this species from the coast of  
581 Europe than overharvesting (Raybaud et al., 2013). This may also be the case for brown algae species, such  
582 as *Ascophyllum nodosum* and *Macrocystis pyrifera*, respectively, along the Northern US Atlantic and Pacific  
583 coasts and locations where the oceans are warming.

584 Irish moss (*Chondrus crispus*) is a red algae used in the production of carrageenan. It is found in the  
585 intertidal to shallow subtidal ocean near Nova Scotia, Canada. Plants can either be tetrasporic or  
586 gametophytic (consisting of male and female). As a whole, Irish moss populations in southwestern Nova  
587 Scotia are not considered to be under immediate threat from overharvesting or environmental factors.  
588 However, there are indications of site specific overharvesting, and harvesting pressure appears to be  
589 increasing. Irish moss is harvested manually with a rake. Canadian regulators have suggested establishing  
590 long term permanently closed control sites for evaluating impacts on standing stocks and ecosystem  
591 effects; re-evaluating *Chondrus* standing stock for evidence of overharvest in specific areas; enforcing the 5  
592 mm minimum rake tine spacing throughout Nova Scotia to prevent over harvesting; re-evaluating the  
593 Marine Plant Harvesting seasonal closure time to adequately protect periods of peak growth and  
594 reproductive effort, as well as seasonal habitat use of associated animals; and scientifically assessing any  
595 new harvest methods against consistent criteria prior to implementation for protecting Irish moss  
596 populations in Nova Scotia (Canadian Science Advisory Secretariat, 2013).

597 Nova Scotia maintains a commercial yield of rockweed. There still isn't sufficient information or analysis  
598 from industry or third party research proving that their harvest rate is not detrimental to the habitat value  
599 that rockweed provides to associated plants and animals. Estimated recovery times based on percentages  
600 removed vary between publications. Regulators have recommended actions for protecting rockweed  
601 populations in Nova Scotia including establishing long term, permanently closed control sites for  
602 evaluating impacts on standing stocks and ecosystem effects; re-evaluating *Ascophyllum* standing stock for  
603 evidence of overharvest in specific areas; replacing the regulated minimum cutting height of 12.7 cm with a  
604 minimum plant cutting height of 1 inch for all parts of Nova Scotia; revisiting the current provincial rule of  
605 15% holdfast content in rockweed landings; scientifically assessing new harvesting methods (e.g.  
606 mechanical harvesters) prior to implementation (i.e. commercial use); and re-evaluating the need for  
607 seasonal closures to adequately protect periods of peak growth and reproductive effort, as well as seasonal  
608 habitat use of associated animals. Shore based walk-on harvesting of *Ascophyllum*, considered a high risk  
609 activity due to trampling damage to the plants themselves and associated biota plus the relative ease of  
610 attaining very high harvest rates, must also be examined for the potential of overharvesting (Canadian  
611 Science Advisory Secretariat, 2013).

612 Distributions of similar algal species can naturally vary geographically and over time. Habitat change  
613 producing conditions not well tolerated by resident species, can often lead to colonization by new species.  
614 Lack of competition or their inability to adjust to environmental changes can lead to the disappearance of  
615 one resident species from a particular region and replacement by another. Sometimes, the algae  
616 themselves cause these changing conditions. Many of the invasive algal species produce alien biomolecules  
617 that control competitive organisms in the new habitat. This is the case with the macroalga *Caulerpa taxifolia*  
618 and *Undaria pinnatifida* (Wakame) which are green and brown macrophytes, respectively. Both species use  
619 chemical invasion to invade and colonize new habitats: inhibiting predation by herbivores; inhibiting  
620 growth of other marine plants and sometimes killing neighboring plants and animals (Mollo et al., 2015). In  
621 addition to chemical ecology, planktonic algal sporophytes and gametes spread by sea animals, currents, or  
622 by ocean-going vessels can competitively colonize new ocean regions where ocean temperatures, raised by  
623 global warming, are no longer suitable for the current resident species (Hoffman, 2014).

624

625 **NOSB Question #3. Selective harvesting: There are about 6,500 species of red algae (Rhodophyta) such**  
626 **as Chondrus species, Palmiria, Delessaria; about 2,000 species of brown algae (Phaeophyta) such as**  
627 **Laminaria species, Ascophyllum species, Sacharina, Fucus, Sargassum muticum; and about 1,500 green**  
628 **algae (Chlorophyta) such as Dunaliella, of which many are not marine. How many species of each class**  
629 **are being wild harvested? Can one species be harvested without impacting other species in the same**  
630 **location?**

631 Taxonomic revision amongst algal species has become commonplace. Morphologically plastic species in  
632 the same geographical area and identical species in different geographical locations are frequently given  
633 different specific names, while morphologically similar species with cryptic diversity are frequently given  
634 the same specific name (Saunders and McDevit, 2013; Pegg et al., 2015; Conklin, 2009; Kucera and  
635 Saunders, 2012). Thus, it is difficult to taxonomically evaluate diversity or species richness in the  
636 wildcrafting and aquaculture settings. Molecular technologies are making sense out of literally hundreds of  
637 years of misidentification; however, seaweed industries themselves provide transparency based on how  
638 specific plants are propagated and harvested.

639 Seaweed is prized in Japan for food and hydrocolloids. The Japanese actively manage and cultivate several  
640 species of seaweed along the coasts of Japan. Wakame (*Undaria pinnatifida*) is distributed in waters where  
641 the annual average surface water temperature is between 10 and 19 degrees centigrade. However, the  
642 greatest harvesting of Wakame in Japan occurs where the temperature is between 12-19 degrees centigrade.  
643 The agar-agar red algal seaweeds, *Gelidium amansii*, *Gelidium japonicum*, and *Acanthopeltis japonica*, are  
644 distributed primarily where the water is respectively, not less than 10, 16 and 17 degrees centigrade,  
645 slightly colder. Laver (*Porphyra tenera*) inhabits water with average temperature between 11 and 21  
646 degrees centigrade (Endo and Matsudaira, 1990). Different species of algae grow best at different  
647 temperatures, lighting and nutrient concentrations (Gallardo, 2015). Aquaculturists in Japan recognized  
648 that macroalgal distribution and growth is species specific and affected critically by seasonal water

649 temperature, lighting and nutrient fluctuations and have applied these as criteria for selecting which  
650 species to propagate and where and when to propagate them.

651 Water movement is a factor in the growth of seaweed. Practically, this applies to both ocean harvesting and  
652 pond or tank cultivation. In studies with the agar producing red algae *Gelidium robustum*, optimum water  
653 movement can contribute to 3.6% growth per day (Friedlander, 2008). Irradiance is critically important to  
654 the growth of seaweed. Marine algae adjust to sun and shade periods depending upon their abilities to  
655 photosynthesize. Some species and varieties of the same species are able to photosynthesize more or less  
656 depending on the particular light and temperature condition. Because photoproducts generate damaging  
657 free radicals, too much photosynthesis could harm the plant, but not having enough would result in  
658 insufficient growth. In addition, particular wavelengths of light are more suited for particular species and  
659 varieties of species. For example, *Gelidium sesquipedale* grows better under blue or red light (shade), than  
660 white light in controlled experiments. *Gelidium crinale* and *Gelidium pulchellum* grow well under ambient  
661 and bright light white light, respectively (Friedlander, 2008). Nitrogen, phosphate, dissolved inorganic  
662 carbon, and pH requirements also vary amongst macroalgal species. For wild harvesting, sea conditions  
663 dictate the species that grow in a particular location. The choice of cultivated seaweed species is important  
664 to ensure adequate performance for a particular set of conditions.

665 In a natural marine setting, ecological succession follows seasonal patterns. The first algae to colonize a  
666 habitat are the ephemeral species. These are followed by perennials. *Macrocystis pyrifera* (Kelp) and  
667 *Laminaria* spp. are perennials that displace ephemeral species. Their growth during ecological succession  
668 fosters growth for additional new algal and animal species. The important factors for recolonization are 1)  
669 availability of substratum for colonization, 2) species composition and abundance of reproductive material  
670 in the water at the time new substratum becomes available (assuming seasonal variation in colonization  
671 reflects a similar variation in reproduction), 3) similar growth rates of the new species that settle, and 4) the  
672 ability of the new species to invade established communities. Established communities, whether early or  
673 later stages in succession, appear to inhibit colonization by new species rather than enhancing it (Foster,  
674 1975).

675 *Dunaliella salina* is a halotolerant green algae cultivated for production of  $\beta$ -carotene. Biologically this  
676 microalgae lacks a rigid cell wall and requires glycerol and  $\beta$ -carotene to maintain its osmotic balance.  
677 Under large scale culture in ponds or tanks this characteristic is easily exploited for a wide variety of  
678 applications (Raja et al., 2007). Grown under high salinity condition *Dunaliella* accumulates glycerol.  
679 Irradiance stress induces the production of large amounts of  $\beta$ -carotene that prevents the accumulation of  
680 reactive oxygen species formed during photosynthesis. Biologically produced  $\beta$ -carotene from *Dunaliella*  
681 *salina* is in demand despite the predominance of commercial  $\beta$ -carotene derived from synthetic sources  
682 (Raja et al., 2007).

683 *Kappaphycus* is mostly farmed in tropical and subtropical oceans. It is the main source of kappa  
684 carrageenan. Cultivation of *Kappaphycus*, which has mostly displaced wild-gathered *Chondrus crispus*, is a  
685 major source of kappa carrageenan in the Philippines and other tropical countries. The cost of labor is  
686 lower in aquaculture. The geographical location of the Philippines, Indonesia, and Malaysia provide the  
687 right climate for *Kappaphycus* and permit profitable production of crops in spite of storms that disturb  
688 growth and harvest (Hurtado et al., 2015).

689 *Kappaphycus* and *Eucheuma* are good examples for the confusing nomenclature of algal species. The earliest  
690 identification of kappa-producing seaweed was called *Eucheuma cottonii*. This name was changed in 1985  
691 when three new varieties of *Eucheuma alvarezii* var. *alvarezii*, *Eucheuma alvarezii* var. *tambalang*, and  
692 *Eucheuma alvarezii* var. *ajak-assi* were identified based on external and internal morphology of the  
693 vegetative and reproductive structures of each variety. In 1988, all the three names were changed to  
694 *Kappaphycus alvarezii* var. *alvarezii*, *Kappaphycus alvarezii* var. *tambalang* and *Kappaphycus alvarezii* var. *ajak-*  
695 *assi*, respectively. At the present time, only *Kappaphycus alvarezii* var. *tambalang* is grown by farmers for  
696 commercial cultivation, because it is a fast growing species. There are still a number of *Eucheuma* species and  
697 the literature still has many references to "cottoni," *Eucheuma cottoni* and *Kappaphycus*. Many different color  
698 morphotypes of *Kappaphycus* have been identified and the native tongue of each locality adds more  
699 confusion to the scientific nomenclature. Molecular taxonomy and systematics using genetic markers have  
700 recently been applied to the identification of seaweeds. In one study, one hundred and thirty seven  
701 samples of *K. alvarezii*, *K. striatum*, and *Eucheuma denticulatum* from Hawaii, Indonesia, Madagascar, the

702 Philippines, Tanzania, Venezuela, and Vietnam had similar mitochondrial cox 2-3 and plastidal RuBisCo  
 703 spacers indicating that all cultivated *K. alvarezii* from around the world have similar mitochondrial and  
 704 chloroplast haplotypes. Unfortunately, these markers did not differentiate all the morphotypes known in  
 705 cultivated *K. alvarezii* (Hurtado et al., 2015). Morphological variations in color and shape can be the result  
 706 of environmental influences on the same species. Naming can also be associated with geographical  
 707 reference for a variety or species and the name of the phylogenist. It follows that many of the naming  
 708 conventions may be duplicative or redundant.

709 This concept is illustrated in Table 5 where the authors have compiled all of the species of algae throughout  
 710 the world, their actual use and the country of origin. The table includes 221 species: 32 Chlorophytes (green),  
 711 125 Rhodophytes (Red) and 64 Phaeophytes (Brown). The predominant uses are for food, phycocolloid  
 712 production, agricultural inputs and animal feed. Many of the separate species names are for the same  
 713 species, e.g. *Eucheuma alvarezii*, *Kappaphycus alvarezii* and *Kappaphycus cottonii* (Zemke-White and Ohno,  
 714 1999). As more is known about the polymorphic nature of the algae and molecular techniques are used to  
 715 better elucidate genomic differences, a clearer understanding of the diversity in algal phylogenetics will  
 716 likely emerge.

717  
 718 Table 5 Algal species used for economic purposes\*

719 (Format of entries – Species | Use (F, A, C, Al, M, RoK, Ag or P) | Country of Origin)

720 F = Food, A = Agar, C = Carrageenan, Al = Alginate, M = medicine, RoK = Roe on Kelp, Ag = Agricultural,  
 721 P = paper

722

<i>Species</i>	<i>Use</i>	<i>Country of origin</i>
<b>Chlorophyta</b>		
<i>Acetabularia major</i>	M	Indonesia, Philippines
<i>Capspsiphon fulvescens</i>	F	Korea
<i>Caulerpa spp.</i>	F	Malaysia, Thailand
<i>Caulerpa lentillifera</i>	F/M	Philippines
<i>Caulerpa peltata</i>	F/M	Philippines
<i>Caulerpa racemosa</i>	F	Bangladesh, Japan, Philippines, South Pacific Islands, Vietnam
	M	Philippines
<i>Caulerpa sertularioides</i>	F/M	Philippines
<i>Caulerpa taxifolia</i>	F/M	Philippines
<i>Codium spp.</i>	F	Argentina
<i>Codium bartletti</i>	F	Philippines
<i>Codium edule</i>	F	Philippines
<i>Codium fragile</i>	F	Korea, Philippines
<i>Codium muelleri</i>	F	Hawaii

<i>Species</i>	<i>Use</i>	<i>Country of origin</i>
<i>Codium taylori</i>	F	Israel
<i>Codium tenue</i>	F	Indonesia
<i>Codium tomentosum</i>	F	Indonesia
<i>Colpomenia sinuosa</i>	F	Philippines
<i>Dictyosphaeria cavernosa</i>	Ag	Kenya
	M	Philippines
<i>Enteromorpha spp.</i>	Ag	Portugal
	F	Bangladesh, France, Hawaii, Myanmar
<i>Enteromorpha compressa</i>	F	Korea, Indonesia
	M	Indonesia, Philippines
<i>Enteromorpha clathrata</i>	F	Korea
<i>Enteromorpha grevillei</i>	F	Korea
<i>Enteromorpha intestinalis</i>	F	Indonesia, Japan, Korea
	M	Indonesia

Species	Use	Country of origin
<i>Enteromorpha linza</i>	F	Korea
<i>Enteromorpha nitidum</i>	F	Korea
<i>Enteromorpha prolifera</i>	F	Indonesia, Japan, Korea, Philippines
	M	Indonesia
<i>Monostroma nitidum</i>	F	Japan
<i>Scytosiphon lomentaria</i>	F	Korea France
<i>Ulva spp.</i>	Ag	Italy, Portugal
	F	Argentina, Canada, Chile, Hawaii, Japan, Malaysia
	P	Italy
<i>Ulva lactuca</i>	F	Vietnam, Indonesia
<i>Ulva pertusa</i>	M	Philippines
<i>Ulva reticulata</i>	F	Vietnam
<b>Rhodophyta</b>		
<i>Acanthophora spicifera</i>	C	Vietnam
	F	Philippines, Vietnam
<i>Ahnfeltia plicata</i>	Ag	Chile
<i>Asparagopsis taxiformis</i>	F	Hawaii, Indonesia;
	M	Philippines
<i>Betaphycus gelatinum</i>	F/C	Vietnam
<i>Calaglossa adnata</i>	F	Indonesia
<i>Calaglossa leprieurii</i>	M	Indonesia, Vietnam
<i>Catenella spp.</i>	F	Myanmar
<i>Chondria crassicaulis</i>	F	Korea
<i>Chondrus crispus</i>	C	France, Spain, US
	F	Ireland, France
<i>Chondrus ocellatus</i>	F	Japan
<i>Euclidean alvarezii</i>	C	Malaysia, Kiribati

Species	Use	Country of origin
<i>Euclidean cartilagineum</i>	F	Japan
<i>Euclidean denticulatum</i>	C	Philippines, Madagascar
<i>Euclidean gelatinae</i>	C	China, Indonesia, Philippines
	F	Indonesia, Japan, Philippines
<i>Euclidean isiforme</i>	F	Caribbean
<i>Euclidean muricatum</i>	F/M	Indonesia
<i>Euclidean striatum</i>	C	Madagascar
<i>Gelidiella acerosa</i>	A	India, Malaysia, Vietnam
	F	Philippines
<i>Gelidiella tenuissima</i>	F	Bangladesh
<i>Gelidium spp.</i>	A	China, Japan
	F	Hawaii
<i>Gelidium abbotiorum</i>	A	South Africa
<i>Gelidium anansii</i>	F/M	Korea, Indonesia
<i>Gelidium capense</i>	A	South Africa
<i>Gelidium chilense</i>	A	Chile
<i>Gelidium latifolium</i>	A	Spain
	F	Indonesia
<i>Gelidium lingulatum</i>	A	Chile
<i>Gelidium madagascariense</i>	A	Masagascar
<i>Gelidium pristoides</i>	A	South Africa
<i>Gelidium pteridifolium</i>	A	South Africa
<i>Gelidium pusillum</i>	F	Bangladesh
<i>Gelidium robustum</i>	A	Mexico
<i>Gelidium rex</i>	A	Chile
<i>Gelidium sesquipedale</i>	A	Morocco, Portugal, Spain
<i>Gelidium vagum</i>	A	Canada

Species	Use	Country of origin
<i>Gigartina canaliculata</i>	C	Mexico,
<i>Gigartina chamissoi</i>	C	Peru, Chile
<i>Gigartina intermedia</i>	C	Vietnam
<i>Gigartina scottsbergii</i>	C	Argentina, Chile
<i>Gloiopeltis spp.</i>	F	Vietnam
<i>Gloiopeltis furcata</i>	F	Korea
	C	Japan
<i>Gloiopeltis tenax</i>	C	Japan
	F	Korea
<i>Gloiopeltis complanata</i>	C	Japan
<i>Gracilaria spp.</i>	Ag	Portugal
	C	Malaysia
	F	Myanmar, Thailand
	P	Italy
	M	Vietnam
<i>Gracilaria asisatica</i>	A	China, Vietnam
	F	Vietnam
<i>Gracilaria bursa-pastoris</i>	F	Japan
<i>Gracilaria caudata</i>	A	Brazil
<i>Gracilaria changii</i>	F	Thailand
<i>Gracilaria chilensis</i>	A	Chile
	Ag	New Zealand
<i>Gracilaria cornea</i>	A	Brazil
	F	Caribbean
<i>Gracilaria coronopifera</i>	F	Hawaii, Vietnam
<i>Gracilaria crassissima</i>	F	Caribbean
<i>Gracilaria domingensis</i>	F	Brazil, Caribbean, Chile
<i>Gracilaria edulis</i>	A	India

Species	Use	Country of origin
<i>Gracilaria eucheumoides</i>	F	Indonesia, Vietnam
	M	Indonesia
<i>Gracilaria firma</i>	A	Philippines, Vietnam
	C	Philippines
	F	Vietnam
<i>Gracilaria fisheri</i>	A/F	Thailand
<i>Gracilaria folifera</i>	A	India
<i>Gracilaria gracilis</i>	A	Namibia, South Africa
<i>Gracilaria heteroclada</i>	A	Philippines, Vietnam
	F	Vietnam
<i>Gracilaria howei</i>	A	Peru
<i>Gracilaria lemaneiformis</i>	A	Mexico, Peru
	F	Japan
<i>Gracilaria longa</i>	A	Italy
<i>Gracilaria pacifica</i>	A	Canada
<i>Gracilaria parvispora</i>	F	Hawaii
<i>Gracilaria salicornia</i>	A	Thailand
	F	Thailand, Vietnam
<i>Gracilaria tenuistipitata</i> <i>var. liui.</i>	A	China, Philippines, Thailand, Vietnam
	F	Thailand, Vietnam
<i>Gracilaria verrucosa</i>	A	Argentina, Egypt, Italy
	F	France, Indonesia, Japan, Korea
	M	Indonesia
<i>Gracilariopsis lemaneiformis</i>	A	Canada
<i>Gracilariopsis tenuifrons</i>	A	Brazil

Species	Use	Country of origin
<i>Grateloupia filicina</i>	F	Indonesia, Japan
<i>Gymnogongrus furcellatus</i>	C	Chile
<i>Halymenia spp.</i>	F	Myanmar
<i>Halymenia discoidea</i>	F	Bangladesh
<i>Halymenia durvillaei</i>	F	Philippines
<i>Halymenia venusta</i>	Ag	Kenya
<i>Hypnea spp.</i>	F	Myanmar
<i>Hypnea musciformis</i>	C	Brazil
<i>Hypnea muscoides</i>	C/F	Vietnam
<i>Hypnea nidifica</i>	F	Hawaii
<i>Hypnea pannosa</i>	F	Bangladesh, Philippines
<i>Hypnea valentiae</i>	C/F	Vietnam
<i>Iridaea ciliata</i>	C	Chile
<i>Iridaea edulis</i>	F	Iceland
<i>Iridaea laminarioides</i>	C	Chile
<i>Iridaea membranacea</i>	C	Chile
<i>Kappaphycus alvarezii</i>	C	Philippines, Tanzania
	F	Philippines
<i>Kappaphycus cottonii</i>	C/F/M	Vietnam
<i>Laurencia obtusa</i>	F/M	Indonesia
<i>Laurencia papillosa</i>	Ag	Kenya, Philippines
<i>Laurencia pinnatifida</i>	F	Portugal
<i>Lithothamnion corallioides</i>	Ag	France, Ireland, UK
<i>Mastocarpus papillatus</i>	C	Chile
<i>Mastocarpus stellatus</i>	C	Portugal, Spain
	F	Ireland
<i>Mazzaella splendens</i>	A/F	Canada
<i>Meristotheca papulosa</i>	F	Japan

Species	Use	Country of origin
<i>Meristotheca procumbens</i>	F	South Pacific Islands
<i>Nemalion vericulare</i>	F	Korea
<i>Palmaria hecatensis</i>	F	Canada
<i>Palmaria mollis</i>	F	Canada
<i>Palmaria palmata</i>	F	Canada, France, Iceland, Ireland, UK, US
<i>Phymatolithon calcareum</i>	Ag	France, Ireland, UK
<i>Porphyra spp.</i>	F	Israel, New Zealand, UK
<i>Porphyra abbottae</i>	F	Alaska, Canada
<i>Porphyra acanthophora</i>	F	Brazil
<i>Porphyra atropurpureae</i>	F/M	Indonesia
<i>Porphyra columbina</i>	F	Argentina, Chile, Peru
<i>Porphyra crispata</i>	F	Thailand, Vietnam
<i>Porphyra fallax</i>	F	Canada
<i>Porphyra haitanensis</i>	F	China
<i>Porphyra kuniedae</i>	F	Korea
<i>Porphyra leucostica</i>	F	Portugal
<i>Porphyra perforata</i>	F	Canada
<i>Porphyra psuedolanceolata</i>	F	Canada
<i>Porphyra seriata</i>	F	Korea
<i>Porphyra spiralis</i>	F	Brazil
<i>Porphyra suborbiculata</i>	F	Korea, Vietnam
<i>Porphyra tenera</i>	F	Japan, Korea
<i>Porphyra torta</i>	F	Alaska, Canada
<i>Porphyra umbilicalis</i>	F	France, US
<i>Porphyra vietnamensis</i>	F	Thailand
<i>Porphyra yezoensis</i>	F	China, Japan, Korea

Species	Use	Country of origin
<i>Pterocladia capillacea</i>	A	Portugal
	F	Korea
<i>Scinaia moniliformis</i>	F	Philippines
<i>Solieria spp.</i>	F	Myanmar
<i>Pterocladia lucida</i>	A	New Zealand
<b>Phaeophyta</b>		
<i>Alaria crassifolia</i>	F	Japan
<i>Alaria fitulosa</i>	Ag/F	Alaska
<i>Alaria marginata</i>	F	Canada
<i>Alaria esculenta</i>	F	Iceland, Ireland, US
<i>Ascophyllum nodosum</i>	Ag	France, Canada, China, Iceland, US
	Al	Ireland, Norway, UK
<i>Cladosiphon okamuranus</i>	F	Japan
<i>Cystoseira barbata</i>	Al	Egypt
<i>Desmarestia spp.</i>	RoK	Alaska
<i>Durovillaea antarctica</i>	F	Chile
<i>Durovillaea potatorum</i>	Al	Australia
<i>Ecklonia cava</i>	F	Japan
<i>Ecklonia maxima</i>	Ag	South Africa
<i>Ecklonia stolonifera</i>	F	Korea
<i>Egregia menziesii</i>	F	Canada
<i>Fucus spp.</i>	Ag	France
<i>Fucus gardneri</i>	Ag	Canada
	F, RoK	Alaska
<i>Fucus serratus</i>	Al	Ireland
	F	France
<i>Fucus vesiculosus</i>	Al	Ireland
	Co	Ireland

Species	Use	Country of origin
	F	France, Portugal
<i>Hizikia fusiformis</i>	F	Japan, Korea
<i>Hydroclathrus clathratus</i>	Ag	Philippines
	F	Bangladesh, Philippines
<i>Laminaria angustata</i>	F	Japan
<i>Laminaria bongardiana</i>	F/RoK	Alaska
<i>Laminaria diabolica</i>	F	Japan
<i>Laminaria digitata</i>	Al	France, Ireland
	F	Ireland
<i>Laminaria groenlandica</i>	F	Canada
<i>Laminaria hyperborea</i>	Al	Ireland, Norway, Spain, UK
<i>Laminaria japonica</i>	Al	China;
	F	China, Japan, Korea
<i>Laminaria longicuris</i>	F	US
<i>Laminaria longissima</i>	F	Japan
<i>Laminaria ochroleuca</i>	Al	Spain
<i>Laminaria octotensis</i>	F	Japan
<i>Laminaria religiosa</i>	F	Japan, Korea
<i>Laminaria saccharina</i> RoK Alaska	F	Alaska, Canada, Ireland
<i>Laminaria setchelli</i>	F	Canada
<i>Laminaria schinzii</i>	Ag	South Africa
<i>Lessonia nigrescens</i>	Al	Chile, Peru
<i>Lessonia trabeculata</i>	Al	Chile
<i>Macrocystis integrifolia</i>	Al	Peru
	RoK	Alaska, Canada
<i>Macrocystis pyrifera</i>	Ag	Australia
	Al	Chile, Mexico, Peru, US

Species	Use	Country of origin
	F	Argentina
	RoK	Alaska, US
<i>Nemacystis decipiens</i>	F	Japan
<i>Nereocystis luetkaena</i>	Ag	Alaska, Canada
	F	US
<i>Pelvetia siliquosa</i>	F	Korea
<i>Postelsia spp.</i>	F	US
<i>Sargassum aquifolium</i>	F	Indonesia
<i>Sargassum crassifolium</i>	Al	Vietnam
	F	Thailand
<i>Sargassum spp.</i>	Ag	Brazil, Vietnam
	Al	Vietnam
	F	Bangladesh, Hawaii, Malaysia, Myanmar, Philippines, Thailand, Vietnam
	M	Brazil, Vietnam
<i>Sargassum filipendula</i>	F	Egypt
<i>Sargassum graminifolium</i>	Al	Vietnam
<i>Sargassum henslowianum</i>	Al	Vietnam

Species	Use	Country of origin
<i>Sargassum horneri</i>	F	Korea
<i>Sargassum ilicifolium</i>	Al	India
<i>Sargassum mclurei</i>	Al	Vietnam
<i>Sargassum myriocystum</i>	Al	India
<i>Sargassum oligosystem</i>	F	Thailand
<i>Sargassum polycystum</i>	F	Indonesia, Thailand
	Al, M	Vietnam
<i>Sargassum siliquosum</i>	Al	Vietnam
	F, M	Indonesia
<i>Sargassum wightii</i>	Al	India
<i>Sargassum vachelliannum</i>	Al	Vietnam
<i>Turbinaria spp.</i>	Ag	Vietnam;
	M	Philippines
<i>Turbinaria conoides</i>	Al	India
<i>Turbinaria decurrens</i>	Al	India
<i>Turbinaria ornata</i>	Al	India
<i>Undaria pinnatifida</i>	F	Australia, China, France, Japan, Korea
<i>Undaria peterseniana</i>	F	Korea

723

724 \*Table adapted from Zemke-White and Ohno, 1999

725

726 **NOSB Question #4. Contamination: Seaweeds can sequester metal ions such as arsenic, lead, zinc and**  
 727 **copper. What is the indication from the most recent scientific research on sequestration of heavy metals**  
 728 **by marine algae? Is there a difference in sequestration between species of algae? Are there additional**  
 729 **processing steps taken to reduce and control for heavy metal content from the raw seaweed material?**

730 The algae have a large capacity to sorb metals. Numerous chemical groups may be responsible for metal  
 731 biosorption by seaweeds e.g. carboxyl, sulphonate, hydroxyl and amino with their relative importance  
 732 depending on factors such as the quantity of sites, their accessibility and the affinity between site and  
 733 metal. The main metal binding mechanisms include ion-exchange and complex formation but these may  
 734 differ according to biomass type, origin and the processing to which it has been subjected (Murphy et al.,  
 735 2008). Algal components such as the phycocolloids that contain carboxyl, sulphonate, hydroxyl groups are  
 736 most commonly involved in metal binding. Factors such as metal concentration, biomass, pH, temperature,  
 737 cations, anions, and metabolic stage all play a role in the binding of metals to algae. Dead cells sorb better  
 738 than living ones (Mehta and Gaur, 2005).

739 Zinc and copper are not generally considered “heavy metals.” The term “heavy metals” is used widely in  
740 the literature to refer to lead, cadmium and others, but it is not a scientific term. On the periodic table,  
741 elements in the first row are transition metals. They have a role in many biologically functions. Some  
742 examples are manganese, cobalt, iron and zinc.

743 Arsenic (As, atomic number=33) is a ubiquitous element occurring naturally in the earth's crust. Of all the  
744 naturally occurring elements arsenic ranks 20th, 14th in seawater and 12th in the human body. It was first  
745 isolated in 1250 A.D. Most sources of arsenic are naturally occurring. Arsenic pollution is produced  
746 through mining, burning fossil fuels and pesticide application. In seawater, the concentration of arsenic is  
747 usually less than 2 micrograms per liter. (Sharma and Sohn, 2009). Arsenic toxicity is related to its chemical  
748 form. Inorganic As is considered more toxic than the organic form. The toxicity resulting from arsenic  
749 exposure is considered to be linked to an imbalance between pro-oxidant and antioxidant homeostasis that  
750 results in oxidative stress. (Ventura-Lima et al., 2011).

751 Arsenic exists in four oxidation states, +V (arsenate), +III (arsenite), 0 (arsenic), and -III (arsine). Arsenite,  
752 arsenate, and their methylated derivatives are the most commonly occurring as compounds. Arsenosugars  
753 are considerably less toxic than these, but are commonly found in marine algae including species used in  
754 human food. Arsenosugars are also found in marine animals feeding on algae such as scallops and fish.  
755 Arsenobetaine (AB) is the most commonly reported arsenosugar in marine organisms, but it is virtually  
756 absent in freshwater organisms. In relation to the inorganic arsenic species, arsenosugars are relatively  
757 nontoxic to animals and humans. However, biotransformation of arsenosugars can result in production of  
758 toxic arsenicals. In humans arsenosugar biotransformation produces toxic dimethylarsenic acid (DMA) as a  
759 major metabolite (67%) in urine. Diethylarsinoylethanol and trimethylarsinic oxide have been found as  
760 other minor constituents of arsenic metabolites. Metabolism of arsenosugars yielded DMA in excreted  
761 urine samples of sheep fed with seaweed. Biotransformation of arsenicals in soil amended with the  
762 seaweed species, *Laminaria digitata* and *Fucus vesiculosus*, containing 85% total arsenic as arsenosugars  
763 produces DMA, arsenate, and arsenite (Sharma and Sohn, 2009). High concentrations of arsenosugars have  
764 been found in some seaweed species (e.g. *Hizikia fusiforme*) in which the concentration of arsenic was as  
765 high as 100 micrograms per gram. Urinary arsenic levels after Hiziki ingestion in humans was similar to  
766 individuals with hyperkeratosis and hyperpigmentation in regions endemic for arsenite poisoning;  
767 accordingly, long-term ingestion of Hiziki can cause arsenic poisoning (Besada et al., 2009).

768 Dulse (*Palmaria palmata*) is a red algae commonly found in cold Atlantic intertidal and shallow subtidal  
769 environments. It can be harvested wild or cultivated and grows on rocks or other seaweed species, e.g.  
770 kelp. Dulse is commonly consumed as food. As with many other algal species, dulse naturally  
771 accumulates low levels of arsenic. It is likely that an average portion of dulse will contain 5-10 micrograms  
772 of arsenic, well below 5% of most international maximum residue limits (MRL) for arsenic. Based on  
773 sampling in Europe, mercury, cadmium and lead absorption by dulse harvested from non-polluted water  
774 contained much less than 5% of the international MRL for these metals (Mouritsen et al., 2013).

775 Algal species are often used as biosensors for contamination with arsenic and heavy metals. Their analysis  
776 in heavy contaminated areas, particularly in agricultural soil, can be used to determine required  
777 bioremediation strategies (Singh et al., 2016).

778 The life-cycle of the seaweeds, their physiological behavior, their element accumulation patterns, and  
779 natural geochemical processes involved in the environmental production of different elements in the ocean  
780 affect the accumulation of particular metals. These parameters are also strongly species dependent. The  
781 capacity of algae to accumulate metals depends on a variety of factors, the two most relevant ones being  
782 the bioavailability of metals in the surrounding water and the uptake capacity of the algae. Uptake takes  
783 place in two ways: 1) concentration dependent, temperature, light, pH and age independent surface  
784 reaction in which metals are absorbed by algal surfaces through electrostatic attraction to negatives sites  
785 (main uptake mechanism for zinc) and 2) slower active uptake where metal ions are transported across the  
786 cell membrane into the cytoplasm. Active uptake is enzyme dependent, likely to be the mechanism for  
787 copper, manganese, selenium and nickel and temperature, light and age dependent. Metal concentrations  
788 are low in summer when growth rates are high and the accumulated metals are diluted, and high in winter  
789 when the metabolic processes slowdown (Besada et al., 2009).

790 Cadmium concentrations in various algal species throughout the world have been found to be variable.  
791 The cadmium concentration in red algae is generally higher than in brown algae or green algae. (Besada et  
792 al., 2009).

793 Algae samples taken from the St. Lawrence river, including brown algae (*Ascophyllum nodosum*, *Fucus*  
794 *vesiculosus*), red algae (*Porphyra palmata*) and green algae (*Ulva lactuca*) and others analyzed in a study  
795 to determine food health risk were not found to contain dangerously high levels of mercury, arsenic,  
796 cadmium, cobalt, chromium, copper, iron, manganese, lead, and zinc levels. Green alga, *Ulva lactuca* and  
797 *Enteromorpha spp* showed the highest concentrations of cobalt, chromium, copper, and iron, while the  
798 brown algae *Fucus vesiculosus*, *Laminaria longicuris*, and *Fucus distichus* had the highest arsenic and  
799 cadmium levels. Arsenic partial speciation revealed that this element is found mostly as a nontoxic organic  
800 compound, i.e., arsenobetaine or arsenocholine. Levels were all well below safe levels set by the US EPA  
801 (Phaenuf et al., 1999). In general, algae collected from unpolluted areas contain safe levels of heavy metals,  
802 while algae that is collected from polluted areas are likely to contain elevated levels of heavy metals and  
803 other contaminants (Caliceti et al., 2002; Giusti, 2001; Al-Shwafi and Rushdi, 2008; Gaudry et al., 2007;  
804 Abdallah and Abdallah, 2007). Thus, increased pollution will lead to higher levels of arsenic and heavy  
805 metal in algae for human consumption (Kim and Wolt, 2011).

806 **NOSB Question #5. Organic certified Wildcrafting: Which marine algal species are being harvested**  
807 **under the “wild crafting” Organic standard, and in which geographic locations?**

808 Section §205.207 of the National organic standard is for wild-crop harvesting practice or wildcrafting. It  
809 provides that a wild crop that is intended to be sold, labeled, or represented as organic must be harvested  
810 from a designated area that has had no prohibited substance, as set forth in § 205.105, applied to it for a  
811 period of 3 years immediately preceding the harvest of the wild crop, and (b) a wild crop must be  
812 harvested in a manner that ensures that such harvesting or gathering will not be destructive to the  
813 environment and will sustain the growth and production of the wild crop. Subsequent guidance for  
814 §205.207 was provided in NOP 5022 *Guidance Wild Crop Harvesting*. Herein, operations may be certified for  
815 the wild-crop harvesting of species from a defined terrestrial or aquatic area described in an organic system  
816 plan (OSP) in a manner that maintains or improves the natural resources of the area. Eligible species can be  
817 plant or other non-animal species, such as mushrooms, kelp, or seaweed, that are fixed to a defined  
818 location by a species part, such as a root, holdfast, mycelial thread, rhizoid, or stolon. A distinction between  
819 crop and wild crop certification is made when any management technique other than sustainable  
820 harvesting is employed.

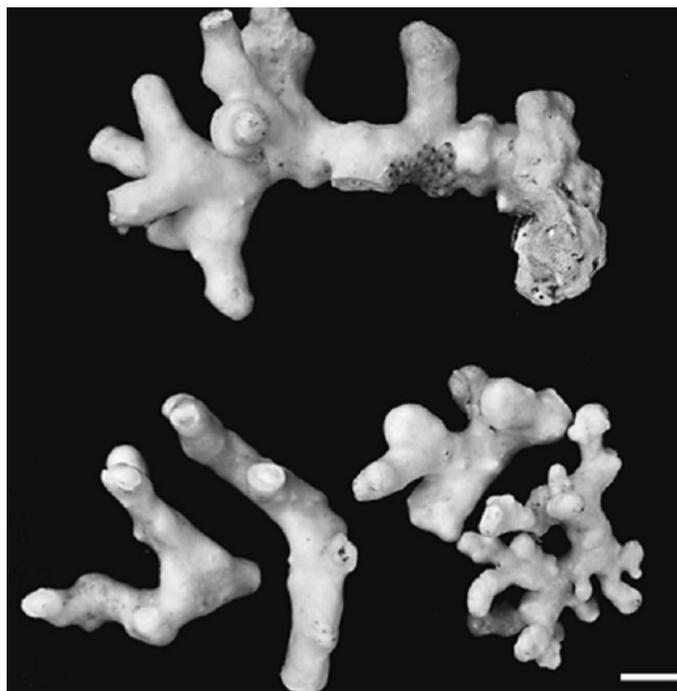
821 The [USDA NOP Integrity database](#) lists eight operations that are certified to produce algae, fresh seaweed,  
822 seaweed, calcareous algae and algae products under the wild crops scope certification. Three of these,  
823 Cerule, LLC, Klamath Algae Products and the New Algae Company located in Oregon produce blue-green  
824 algae (cyanobacteria), harvesting single celled blue-green algae from freshwater lakes. The blue green algae  
825 harvested (e.g. spirulina and other species) are not marine algae.

826 Aladermis Industria E Comercio Ltd. in Vitoria, Brazil harvests benthic coralline algae called *Mesophyllum*  
827 *superpositum* and *Lithothamnium superpositum*. These are red algae species (Rhodophyta) that have a thick  
828 calcareous coating called a rhodolith (Fig. 2). The rhodolith is also called maerl. Maerl is a harvestable  
829 commodity that is usually dredged from the ocean floor. These red algae are responsible for building reefs  
830 in the ocean and ecologically sensitive. Not much is known about their diversity or the diversity of their  
831 ecological communities (Henriques et al., 2012). Rhodolith beds are found throughout the world, provide  
832 an oceanic carbon budget and are represented by many different species, although the taxonomy is not  
833 clear (Basso et al., 2011). These algae are found in communities that range from shallow to deep water; the  
834 deepest having been found in excess of 260 meters. They grow about twelve percent per day (Potin et al.,  
835 1990). The coralline algae are a good source of [seaweed derived calcium](#) that has been found to be GRAS by  
836 the FDA and is approved for use in organic production through the existing listing of nutrient minerals on  
837 the National List §205.605(b).

838 Nantong Haida aquatic food Co., Ltd produces nori and is certified to the wild crop standard. This  
839 company is located in Nantong, China. Nantong is at the center of much of China's Nori production. Nori  
840 is produced from *Pyropia yezoensis*, formerly *Porphyra yezoensis*, a widely distributed species of red  
841 algae. This algae has two growth stages, a diploid and a haploid phase, each with a different morphology.  
842 The haploid phase gametophyte is cultivated to produce Nori. *Pyropia* is one of the most improved strains

843 and tremendous effort has gone into traditional breeding, mutagenesis and hybridization to develop  
844 improved varieties (Zhang et al., 2014). Although it is readily cultivated on nets, this species can also be  
845 wild harvested.

846



847

848

Fig. 2 Coraline Red Algae

849

from Henriques et al., 2012.

850

851 *Eucheimia cottoni*, *Gracilaria veruca*, *Gracillaria eucheumoides*, *Sargassum spp.*, *Ulva lactuca* are among 41 species  
852 recognized along the Vietnamese coast. These species are farmed, but may also be wildcrafted. There is  
853 one NOP certificate provide for Pure diets Vietnam Co., Ltd. Seaweed Project Ninh Thuan and Khanh Hoa  
854 in the Eastern sea, Khanh Hoa and Ninh Thuan province. These seaweed species are used for both food  
855 and phycocolloid production.

856 In Japan various kinds of food made from kelps are recognized as Kombu, one of the most important of the  
857 marine vegetable preparations. Kombu manufacturing dates back to 1730. Although now cultivated more  
858 than wild cropped, the gathering of kelp still provides employment for many people. The seaweeds used in  
859 the manufacture of Kombu are coarse, broad-fronded members of the kelp family (Laminariaceae), and  
860 were almost entirely from Hokkaido, the most northern of the main islands of the Japanese archipelago,  
861 until *Laminaria japonica* was introduced to the Chinese coast. The kelps grow in abundance on all parts of  
862 that coast, but those of best quality, that is, with the widest and thickest fronds, are obtained from the  
863 northeastern coast, within the influence of the Arctic current. Those most used are of the numerically large  
864 genus *Laminaria*, and include the species *japonica*, *religioisa*, *anoustata*, *longissima*, *ochotensis*, *yezoensis*, *fragilis*,  
865 *diabolica*, *gyrata*, and several others. Other kelps utilized in Kombu manufacture are *Arthrothamnus bifidus*  
866 and *kurilensis*, *Alaria fistulosa*, and various other species of *Alaria* (Smith, 1904). Since 1904, many of these  
867 species have been determined to be morphs of the same species or have been renamed.

868 The gathering of kelp begins in July and ends in October, and is engaged in by many fishermen. The  
869 fishermen go to the kelp grounds in open boats, each boat with one to three men and a complement of  
870 hooks with which the kelp is torn or twisted from its strong attachment on the rocky bottom (Fig 3). The  
871 hooks are of various patterns; some are attached to long wooden handles, and some are weighted and  
872 drugged on the bottom by means of ropes while the boats are under way (Smith, 1904).



Fig 3. Gathering Kelp from Smith, 1904

873  
874  
875

876 In Argentina, several commercial species are wildcrafted and cultivated such as *Undaria*  
877 *pinnatifida*, *Gracilaria gracilis*, *Gracillaria verrucosa*, *Gigartina skottsbergii*, *Lessonia vadosa*, *Macrocystis*  
878 *pyrifera*, *Porphyra columbina*, *Ulva lactuca* and *Codium fragile* (Boraso de Zaixso, 1987; Rebours et al.,  
879 2014). In 1958, *G. gracilis* and *G. skottsbergii* were already harvested for the agar and carrageenan  
880 industries, respectively. Since 1980, *L. vadosa* and *M. pyrifera* have been exported to the USA and  
881 China to supply the alginate industry, and since 1999, the uses of the Argentinian seaweeds have  
882 expanded to new markets for human consumption, nutraceuticals, and cosmetics including the  
883 fucoidan industries. All seaweed is harvested in Patagonia, mostly in the provinces of Chubut  
884 and Santa Cruz. Local farmers directly sell the seaweeds to the processing companies or  
885 companies with concessions which directly employ their own workers for harvesting during the  
886 year and contracted divers in the summer. The harvest has been regulated since 1970 by the local  
887 government through special 3, 10, and 30 years licenses. Today, there is only one company  
888 (Soriano SA, Chubut, Argentina) producing agar and carrageenan. Soriano holds an NOP wild  
889 crop certificate for seaweed. The National Center of Patagonia (CENPAT) guarantees that the  
890 harvesting methods are performed in a sustainable way. Regulations for the management of  
891 brown seaweeds and marine concessions are particularly well developed, and the supply in  
892 brown seaweed to the alginate industry is well managed and organized (Rebours et al., 2014).

893 [Thorverk hf.](#) is an Icelandic company whose products include rockweed (*Acophyllum nodosum*)  
894 and kelp (*Laminaria digitata*). Mechanical harvesting uses specialized equipment and takes place  
895 between April and October. As with other areas where *Ascophyllum nodosum* and *Laminaria*  
896 *digitata* are harvested commercially, ecological concerns about changes in species diversity  
897 resulting from harvesting have been noted (Ingolfsson, 2010).

898 The vulnerability of seaweed as a resource has been shown a number of times in South America  
899 and Canada. Now, better management of shoreline resources is becoming prevalent for  
900 *Ascophyllum nodosum*, *Gracillaria* and *Laminaria spp.* It has become a priority for harvesters and

901 regulators to recognize marine plants as a habitat and important primary producers and include  
902 this as a part of every management plan (Ugarte and Sharp, 2012).

903 **NOSB Question #6. Cultivation: Which species are being cultivated, and in which geographic**  
904 **locations? What are the environmental issues associated with farming marine algae?**

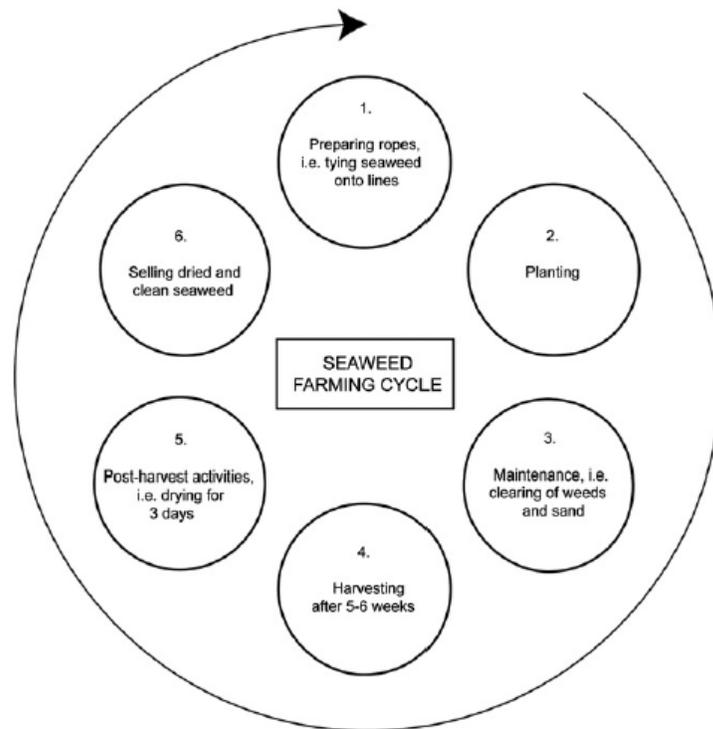
905 One company, Bold Coast Seaweed, LLC., located in Lubec, Maine, produces organic alaria, kelp, seaweed  
906 and dulse. This operation farms and/or harvests edible seaweed products including Alaria, kelp, Kombu,  
907 Tali and dulse, potentially from the brown alga, Alaria esculenta, *Laminaria digitata*, *Laminaria hyperboea*,  
908 *Saccharina* spp., *Ascophyllum nodosum* and the red alga, *Palmaria palmata*. Both of these species are  
909 readily cultured, however it is likely that these species are wild harvested in Maine. Another company in  
910 Maine certified for organic production of sea vegetables, including Algae (Alaria), Algae (Kelp), Algae  
911 (Seaweed), Dulse and wild crops is Maine Coast Sea Vegetables. This operation produces several  
912 additional algae species including Irish moss (*Chondrus crispus*) and sea lettuce (*Ulva latuca*). As with the  
913 operations in Maine an operation in British Columbia, Outer Coast Seaweed produces Alaria and other  
914 seaweed, most likely kelp. These companies are likely to contract with local harvesters and farmers to  
915 purchase wild cropped or cultured crops for further processing. Seaweed farmers and harvesters in Maine  
916 and British Columbia are licensed and must abide by strict harvest rules to ensure the renewability of the  
917 seaweed crop. The use of seaweed has strong roots in China, Japan and the Republic of Korea (McHugh,  
918 2003). Hai'an Lanbo Co., Ltd., Jangheung Musanim Co., Ltd., Kakunaka Co., Ltd. and Nantong Haida  
919 Aquatic Food Co., Ltd., respectively in China, the Republic of Korea, Japan and China are NOP certified  
920 producers of sea vegetables, seaweed and dried seaweed within the crops scope. These companies may  
921 contract directly with local farmers or a local fishery cooperative to obtain their crops each year.

922 In Indonesia, the Philippines, the United Republic of Tanzania, India, Mexico and the Solomon Islands  
923 carrageenan seaweed farming is profitable for coastal communities with abundant labor and few  
924 alternative activities (e.g. fisheries or tourism). A short production cycle, low capital requirement, and  
925 relatively simple farming technology are factors making carrageenan seaweed farming a means of poverty  
926 alleviation that is attractive to smallholder farmers or fishermen. Carrageenan seaweed farming also faces  
927 challenges that include storms, disease outbreaks, uncertain and fluctuating market conditions,  
928 competition from other sectors (e.g. fisheries, tourism and urban development), a lack of value-added  
929 products and value-adding activities in seaweed farming countries, low incomes of seaweed farmers in  
930 some countries, and occupational health hazards (Valderrama et al., 2013).

931 Seaweed farming is difficult work in along tropical coasts. In Zanzibar, Tanzania most seaweed farming is  
932 performed by women for the carrageenan producing seaweeds *Kappaphycus alvarezii* and various *Eucheuma*  
933 *denticulatum*. Farming takes place throughout the year and all of the product is exported (Fig 4). When the  
934 general health of seaweed farmers was compared with women involved in other activities it was found  
935 that seaweed farmers suffer greater health impacts than women who don't farm seaweed. These  
936 differences are likely to be the result of poor working conditions such as handling of heavy objects,  
937 intensive work and limited access to drinking water for long hours in combination with the exposure to  
938 strong sun, wind, seawater and toxic vapors. The most prominent health problems include general fatigue,  
939 musculoskeletal pains, hunger, respiratory and eye related problems, injuries from sharp shells and  
940 hazardous animals in the water, and allergies. Poor health has been reported by women of all ages and  
941 regardless of time spent on this activity, which shows that seaweed farming has negative impacts also in a  
942 shorter period of time. The income generated from seaweed farming in Zanzibar is very low in proportion  
943 to the workload. Most women work despite pregnancy or illness, which is most likely a consequence of  
944 poor living standards and the risk of losing important income (Frocklin et al., 2012).

945 In the Philippines the culture of the tropical seaweed species *Kappaphycus alvarezii* and *Eucheuma*  
946 *denticulatum* began in the 1960s, with commercial-scale production reached in 1971. Cottonii and Spinosum,  
947 respectively, are the commercial names of these two species. Both of these species support the carrageenan  
948 and phycocolloid industry and are now grown in the Phillipines, Indonesia, Tanzania, and Madagascar,  
949 with *Kappaphycus alvarezii* also grown in Vietnam and Malaysia. China, Indonesia and the Philippines  
950 culture most of the world's carrageenaophytes (Hurtado et al., 2013). From these regions combined come  
951 about 220, 000 metric tons of product. Seaweed farming is a good alternative to fishing in highly exploited  
952 fisheries. Farming takes place in the open ocean, sheltered bays and lagoons (Fig 5). Because there is an  
953 alternation in generations, gametophytes must be allowed to produce sporophytes (vegetative stage) that

954 can be captured on ropes and in nets. The ropes and nets are suspended in the water and the algae product  
 955 is permitted to grow. Another way is to set the sporophytes on rocks which are hurled into the farmed  
 956 area. In the Philippines there is a close interaction between the farmers, and the buyers (Juanich, 1988;  
 957 DeSan, 2012).  
 958



959  
 960 Fig. 4. The seaweed farming cycle in Zanzibar from Frocklin et al., 2012.  
 961

962 Seaweed culture is practiced using a number of distinct cultural methods and each of these methods  
 963 impacts the environment in differently. For example, *Gracilaria* culture has been developed in abandoned  
 964 shrimp ponds in the Philippines, Thailand and Indonesia, making use of otherwise wasted resources. In  
 965 sea-based systems, large surface area requirements for viable seaweed culture in many areas could result in  
 966 damage to coastal ecosystems and potential loss of some species of conservation interest, such as  
 967 seagrasses. Large areas covered by *Laminaria japonica* culture in China influence coastal water movement  
 968 and enhance sedimentation.



969  
 970 Fig. 54 Seaweed Farm in the Philippines from DeSan, 2012

971 However, the seaweed farm may also protect coastal areas from erosion and protect other sensitive species  
972 such as mussels or scallops. In shallow waters, seaweed farms for *Gracilaria* or *Eucheuma* can result in  
973 additional damage through trampling and accidental damage. Physical shading of an area by seaweed  
974 farms can affect benthic communities and primary production in the water column. The potential aesthetic  
975 impact of aquaculture has dominated arguments over aquaculture development in some countries and  
976 aquaculture planners must generally ensure potential aesthetic changes are considered during the  
977 development of new aquaculture ventures. Large surface areas required for economically viable seaweed  
978 culture can result in significant conflicts with users concerned with visual impact and others such as  
979 fishermen and tourists concerned with access (Phillips, 1990).

980 Seaweed culture requires a natural nutrient supply, which increases the potential to deplete coastal waters  
981 of nutrients. Reduced nutrient levels have been studied in *Laminaria japonica* culture areas. Nutrients  
982 diverted into macroalgae culture, rather than phytoplankton food chains, could affect patterns of nutrient  
983 recycling and secondary productivity. The removal of nutrients in high density culture areas also has  
984 implications for the long-term viability of seaweed farming itself. There are indications that over-  
985 intensified seaweed farming is resulting in outbreaks of disease and production losses. Some diseases in  
986 seaweeds may be linked to nutrient decline and over-intensification resulting in losses in *Undaria* and  
987 *Porphyra* culture. In some areas, nutrient depletion is reduced by fertilization. *Laminaria japonica* culture  
988 areas may be fertilized with inorganic fertilizers or manure when nitrate levels fall below 20 micrograms  
989 per liter. In intensive and semi-intensive aquaculture, various chemicals have been used for the prevention  
990 and control of disease, water treatment, removing predators and prevention of fouling organisms.  
991 Formaldehyde has been used for controlling the growth of epiphytes on *Gracilaria* and slaked lime has  
992 been used to control other predators. Concern has been raised over the potential impacts of such chemicals  
993 on the environment and the health of farm workers and consumers. Shading or smothering by large scale  
994 seaweed farming potentially reduces benthic productivity in shallow inshore areas. Increased  
995 sedimentation of organic matter from seaweeds and associated organisms can increase benthic production  
996 in areas with low current velocity, and there may be some community changes. The world-wide expansion  
997 in aquaculture has resulted in a very significant increase in the number of species of aquatic animals and  
998 plants which are moved beyond their native ranges for the purposes of aquaculture. These translocations  
999 carry the risk for potential adverse effect on aquaculture and wild species, either through introduction of  
1000 new diseases or competition with native species. Seaweeds have also been accidentally or deliberately  
1001 transplanted beyond their native range, with positive and negative impacts. *Laminaria japonica*, native to  
1002 Japan was introduced to China, where it forms the basis of the largest seaweed industry in the world.  
1003 *Sargassum muticum* and *Undaria pinnatifida* have spread throughout much of Western Europe, from  
1004 Northern Spain to Sweden, and are now regarded as a major nuisance species in Western Europe causing  
1005 significant problems to navigation in some areas (Phillips, 1990).

1006 *Laminaria japonica* is a widely cultured brown algae in Japan and China. Ideally it grows in temperate cold  
1007 water reefs. *L. japonica* exhibits alternation of generations as do many commercial algae species. The  
1008 sporophyte generation or vegetative stage develops and releases male and female zoospores that swim  
1009 around but eventually settle onto the substratum to form male and female gametophytes. In autumn, the  
1010 female and male gametophytes respectively produce eggs and sperm that can fertilize them. The fertilized  
1011 egg grows into a sporophyte or thallus. Culturing *L. japonica* is as follows: 1) selection of parent before  
1012 general harvest, 2) drying stimulation and collecting zoospores, 3) seedling rearing, gametophyte  
1013 generations, 4) your sporelings, 5) intermediate culture, 6) transplantation to ocean, 7) raft culture, 8)  
1014 harvest (FAO, 1989).

1015 To stem the effects of intense harvest of the giant kelp *Macrocystis (integrifolia)* in northern Chile,  
1016 laboratory-grown juvenile sporophytes were fixed to different substrata (plastic grids, ceramic plates, or  
1017 boulders) by elastic bands or fast-drying glue (cyanoacrylate). After reaching 150–200 cm in length within 5  
1018 months (relative growth rate  $\approx 1.3$ – $1.7$  % day<sup>-1</sup>), and reproductive maturity in 5–7 months seedling were  
1019 placed at 8 m depth on the sea bottom in cotton gauze sleeves attached to boulders of different origin. Sixty  
1020 percent of clean boulders collected on the beach produced up to seven recruits per boulder. In contrast, 20  
1021 % of the boulders from the sea bottom, colonized by epibionts, showed up to two recruits. Relative growth  
1022 rates, however, were similar ( $\approx 2.4$ – $2.6$  % day<sup>-1</sup>). Laboratory grown seedlings can be used to establish new  
1023 recruits on rocky substrata (Westermeier et al., 2014). In addition to efforts for maintaining *Macrocystis*,  
1024 culture of *Gracilaria chilensis* remains a major cultivated species in Chile (Bushman et al., 2005).

- 1025 An integrated multitrophic aquaculture system for seaweed farming for human consumption in  
1026 combination with mussel rafts was developed in Galicia (NW Spain). A productive marine farming system  
1027 of *Saccharina latissima* ("sugar kelp") combined with mussel rafts was integrated in terms of harvest and  
1028 protein content as well. Oceanographic conditions in Northwest Spain cause *S. latissima* to behave like a  
1029 winter-spring species in culture with a growing period of just 5–6 months. Nonetheless, production values  
1030 in this experiment equaled or exceeded those recorded in northern parts of the Atlantic where the culturing  
1031 period is almost twice as long. Compared to natural populations, *S. latissima* from mussel-integrated  
1032 culture systems had almost twice as much protein content, giving greater added value to the species both  
1033 as food and feed (Freitas et al., 2015).
- 1034 The red alga *Chondrus crispus* (Irish moss) has been commercially harvested in Eastern Canada for almost  
1035 60 years. Open-water aquaculture of cold-temperate species of carrageenophytes, and in particular of *C.*  
1036 *crispus*, at Basin Head, in eastern Prince Edward Island (P.E.I.), and at 5 transplant sites in western P.E.I.  
1037 Basin Head has been successful yielding productivity comparable, or even higher than wild cropping  
1038 (Chopin et al., 1999).
- 1039 Kelps in Spain are confined to northern temperate regions with relatively cold water, and the Iberian  
1040 Peninsula (northern Spain and Portugal) represents the southern distribution limit of many species in  
1041 Europe. *Undaria pinnatifida* (wakame) and *Saccharina latissima* (sugar kombu) are two of the most valuable  
1042 seaweeds in northern Spain due to their high demand and economic value. The retail prices of wakame  
1043 and sugar kombu are approximately 61–66 and 40–49 euros per kg dry weight of useful blade, respectively,  
1044 in markets whose goods are intended for human consumption, which is their principal use today. Supply  
1045 from wild harvest cannot meet increasing current and future demands and mariculture of these kelp  
1046 species is a growing enterprise. On a commercial basis along the Atlantic coast of Europe, particularly in  
1047 northern Spain, water movement is a key factor controlling the production and quality of kelp. *U.*  
1048 *pinnatifida* is best cultured at more exposed sites rather than at sheltered sites, whereas both sheltered and  
1049 exposed sites are suitable for *S. latissima* cultivation; hanging rope culture is best in sheltered areas, while  
1050 horizontal rope culture is better suited for exposed locations. The fixed-pole anchor system for raft culture  
1051 has been used successfully in exposed open-ocean sites as an alternative to the traditional system with  
1052 concrete blocks; outplanting dates for the *U. pinnatifida* and *S. latissima* on the Atlantic coast of southern  
1053 Europe are from October to November and from November to December, respectively. Harvesting is  
1054 conducted from March to April and from April to May for these two outplanting seasons, respectively.  
1055 Seawater temperature and seawater nitrogen concentration are the main determinants of the start and end  
1056 of culture in the sea for both species. *S. latissima* is more economically and environmentally advantageous  
1057 than *U. pinnatifida* (Peteiro et al., 2016).
- 1058 On the Caribbean and Pacific coasts of Costa Rica an agriculture approach to cultivation of marine algae is  
1059 under investigation for tropical countries wishing to add biodiversity, food and productive services to their  
1060 economies. Species of *Codium*, *Gracillaria* and *Sargassum* can provide up to two crops per year and  
1061 provide up to 15% (dry weight) substitutable food to farming families (Radulovich et al., 2015).
- 1062 Especially in the hydrocolloid industry, sourcing seaweeds that are applicable for a particular products is  
1063 very important. There has been a concerted effort in this industry to move from wild cropped species to  
1064 cultivated species. For example in 1999 the readily cultivated *Laminaria spp.* from France, Ireland, the  
1065 United Kingdom and Norway represented only about 6% of the alginate seaweed harvest, but in 2009 it  
1066 registered at 32%. In contrast, *Macrocystis* from the US, Mexico and Chile and *Ascophyllum* from France,  
1067 Iceland, Ireland and the United Kingdom represented together represented 58% of the alginate seaweed  
1068 harvest in 1999, but only 8% in 2009. To some extent this is due to market demand, but also to seaweed  
1069 availability (McHugh, 2012).
- 1070 **NOSB Question #7. Carbon Dioxide (CO<sub>2</sub>) sequestration: What does recent research indicate about the**  
1071 **ability of marine algae to positively impact the environment, including global climate change, by their**  
1072 **ability to absorb excessive CO<sub>2</sub>?**
- 1073 In prehistoric times there was a stable balance between carbon dioxide in the atmosphere and reserves of  
1074 biological and geological carbon. Now that we are actively using fuels and building new structures the  
1075 balance is rapidly changing. The air is filling up with CO<sub>2</sub>. Because CO<sub>2</sub> is toxic to us, the air is less  
1076 breathable. Global warming is also increasing, since CO<sub>2</sub> is a heat trapping gas. The problem with the  
1077 equilibrium is that processes releasing the additional carbon dioxide into the atmosphere e.g. burning fuel,

1078 building with concrete, removing forests, etc., are much faster than those that bind it into a non-  
1079 atmospheric form. In our own history, since 1750, the beginning of the industrial era when the  
1080 concentration of CO<sub>2</sub> in the atmosphere was 280 parts per million until today, CO<sub>2</sub> in the atmosphere has  
1081 increased about 40% to 404 parts per million (Canadell et al., 2007;  
1082 <http://www.esrl.noaa.gov/gmd/ccgg/trends/>). Some feel that more than 350 parts per million of CO<sub>2</sub> in  
1083 the atmosphere is not safe for a sustainable earth ([www.350.org](http://www.350.org)).

1084 There are four major carbon reservoirs on earth that can change in years or even centuries to bind carbon or  
1085 release it as CO<sub>2</sub>: fossil fuels, terrestrial ecosystems with vegetation and soils, the atmosphere and the  
1086 oceans. Most gases are not very soluble in water, thus only about 1% of the world's oxygen is in the oceans.  
1087 Because of the chemistry of seawater; however, 98.5% of the carbon in the ocean-atmosphere systems is in  
1088 the sea (Houghton, 2007). The oceans can bind carbon with three natural pumps for taking CO<sub>2</sub> from the  
1089 atmosphere. CO<sub>2</sub> dissolves in water to form bicarbonate, carbonate and undissociated CO<sub>2</sub>. These products  
1090 are called dissolved inorganic carbon (DIC). The solubility pump takes cold water with dissolved inorganic  
1091 carbon down into the deep ocean: cold water sinks and warm water that rises becomes cold as a result of  
1092 polar winter temperatures, again sinking and renewing the cycle. The polar regions of earth and cold  
1093 coastal areas are the best places for this pump to work. The solubility pump accounts for about 25-40% of  
1094 carbon sinking in the ocean. Thus, the intactness of the ice caps is recognized as an indicator of atmospheric  
1095 CO<sub>2</sub> conditions (Arenas and Vaz-Pinto, 2015).

1096 The carbonate pump relies on calcifying planktonic organisms such as coccolithophorides, cysts of  
1097 dinoflagellates, foraminifera and pteropods. Carbonates formed by these organisms fall to the bottom of  
1098 the ocean (Shutland et al., 2013). The coralline algae participate in this pump.

1099 The third pump is the biological pump. Photosynthesis drives this pump, taking solar energy, water and  
1100 nutrients to convert oxidized inorganic carbon into energy rich organic carbon. In the ocean phytoplankton  
1101 and other organisms contribute 15% of the carbon sinking of about two thirds of the dissolved organic  
1102 carbon, called blue carbon and DIC (Arenas and Pinto, 2015). In fact, flow throughout the world of water  
1103 currents containing carbon cycling from one or more pumps tends to drive seasonal changes in the  
1104 biological pump (Behrenfeld, et al., 2009; Ritschard, 1992). At least half of the carbon captured in the ocean  
1105 by the biological pump is linked to phytoplanktonic activity. Blue carbon, carbon captured at sea, is not  
1106 exclusive to phytoplankton. Marine macrophytes including seagrasses and marine algae also have a role.  
1107 Combined the macrophytes capture up to 2.5% of blue carbon. *Ascophyllum nodosum*, *Macrocystis*  
1108 *integrifolia*, *Sargassum horneri*, *Postelsia capillacea*, and *Ecklonia radiata* are all capable of capturing a  
1109 substantial quantity of CO<sub>2</sub> (Arenas and Vaz-Pinto, 2015). Kelp forests can also serve as carbon sinks with  
1110 substantial benefits. Afforesting 6% additional percent of the ocean floor with macroalgal farms and forests  
1111 would provide enough carbon fixing to reduce 2026 anticipated atmospheric CO<sub>2</sub> of 430 parts per million  
1112 to 350 parts per million. This can serve as testimony to harvesters and farmers that increasing the supply  
1113 and use of marine algae has the potential to benefit the planet (Arenas and Vaz-Pinto, 2015).

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