



ANIMAL CONCERN

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Thursday,

11 August 2005

Ms Lorraine MacGillivray,
Supervisory Environmental Health Officer,
West Dunbartonshire Council
Garshake Road
Dumbarton G82 3PU

Dear Ms MacGillivray,

Thank you for your recent letter informing me that Merlin Entertainment's Ltd. have now submitted a formal application for a Zoo License for Drumkinnon Tower, Balloch.

I would be grateful if you would consider this letter as a third objection (in addition to our letters of November 6th 2004 and July 22nd 2005) to the granting of a Zoo License.

Merlin recently took journalists from local newspapers to see the Scarborough Sea Life Centre, the attraction on which they are modelling the Drumkinnon project.

At Scarborough a reporter said one of the otters was "fetching rocks and rattling them off the enclosure's walls". This is a display of unnatural stereotypic behaviour brought on by being kept in captivity in unnatural surroundings. Merlin also stated that two one-year-old male otters are to be brought to Loch Lomond. These will reach sexual maturity by the end of next year and are likely to fight each other as they will not be able to find their own territories and mates as they would in the wild.

Mike Stephenson, the Marine Biologist in charge of the project, has also made some very strange comments concerning the proposed keeping of Powan and Sturgeon in tanks at Drumkinnon. Indeed his comments raise concerns of his suitability to hold a Zoo License.

He was quoted as stating: "Powan fish, a fresh water herring that is pretty unique to Loch Lomond, will be introduced. In fact Loch Lomond and Loch Long are the only places in the world where it can be found."

A Marine Biologist worth his salt should know Loch Long is a sea loch in which Powan could not survive. He should also know that the Powan or Freshwater Herring or Houting is a descendent of herring trapped in many sea lochs which became land-locked at the end of the last Ice Age. They are also indigenous to Loch Eck as well as lakes in Wales, Russia, Finland, Sweden, Norway and Germany. In Scotland conservationists have also established stocks in Loch Sloy and the Carron Reservoir.

Merlin want to display Powan at Drumkinnon. However Powan are protected by law and it is an offence to deliberately catch them and if you do catch one by accident you must return it to the water or face criminal charges.

Of Sturgeon Mr. Stephenson states these were “ ... also found in Loch Lomond quite a long time ago.” It must have been a very long time ago as I do not know of even fossilised evidence of Sturgeon in the Loch.

I have been informed that Mr. Stephenson has also told people that the water from Drumkinnon will be treated at the sewage treatment plant at Ardoch, Dumbarton. If that is the case it will mean that effluent from Drumkinnon would enter the public sewage system. As this could involve a vast volume of salt water and water which could possibly become contaminated by non-native fish species, diseases or parasites, this would pose a potential danger to the local environment and fish stocks especially if there was a breach of the sewage system or an emergency overflow into the Leven or Loch Lomond due to flooding. The rare (but not unique) Powan breeds in Drumkinnon Bay and any pollution there could be disastrous.

I am sorry to have to raise yet more objections to the granting of this Zoo Licence but every time Merlin release new information about their plans it gives me greater cause for concern over the possible damage they could cause to the local environment and the wildlife which inhabit it.

Yours sincerely,

John F. Robins,
Campaigns Consultant