

Marine Management Organisation
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Date: 26th November 2015

FAO: Tim Dixon
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I write with regard the proposals made by Yorkshire Water PLC for the proposed replacement of the Wheatcroft Long Sea Outfall (WLSO),

The proposal is to replace a severely depleted and corroded pipeline, installed in 1997 which is believed to be solely dedicated to servicing the discharge of waste effluent from the nearby McCains PLC potato processing plant located at its Eastfield plant, contracted to Yorkshire Water PLC and managed by Yorkshire Water PLC as the consent holder.

I object to the replacement of the pipeline and believe an alternative means of dealing with waste from the plant should be sought and bring to your attention the following points.

- The Environment Agency (EA) throughout the summer of 2015, have been undertaking investigative surveys within the North and South Bays of Scarborough to determine the source of bacteria, which has prevented the award of the "Blue Flag".
- The data from that investigative work is yet to be released to the general public and should be considered as part of the consent process. Therefore the consent process should be delayed until at least a discussion has taken place with significant stakeholders (commercial fishermen) taking the evidence gathered by the EA into account.
- Yorkshire Water (YW) when requested for access to data (in its entirety) from their own investigations, following concerns expressed by commercial fishermen who fish the area affected within the (MMO boundaries North Sea. area 37E9) Cornelian Bay area were refused full and open access to the entire data set for reasons unknown. (They would allow access to specific requests however)
- There is a wealth of anecdotal evidence from local commercial fisherman over many years, all with regard to the decline of finfish in the area from West Pier (Scarborough) to Filey Brigg. The area currently enclosing the WLSO (see MMO boundary 37E9).

- There has been NO evidence that YW have investigated any alternative means of disposal of the effluent waste from the McCains Plant ,other than discharging into the North Sea. (McCains sister plant processes similar products from its Bedfordshire plant and processes waste into energy with clean waste into the River Nene.)
- There is NO conclusive evidence that the WLSO discharges *ONLY* effluent waste from the McCains plant, and not contaminants that may contain elements like Intestinal enterococci or Escherichia coli which have consequently discounted Scarborough achieving the Blue Flag status. See <http://environment.data.gov.uk/bwq/profiles/help.html#understand-data-tab>
- There is extensive photographic evidence of the impact of the discharge upon the marine ecology of the seafloor when the pipeline ruptured during December 2012.
- The consent (currently held by YW) was created in 1997 almost 20 years ago; we now in 2015 have a much different concept or belief of how acute the marine ecology is balanced. A new assessment should be undertaken and all with stakeholders involved, if and only if the pipeline proves to be the only way forward.
- The Blue Flag is awarded to ensure bathing water is of a sufficient high quality to prevent and minimise the danger to public health and is considered essential to a successful seaside resort. In the case of Scarborough the North Bay gains the award whereas since 2000 the award has never been awarded to the South Bay. Discharges of this kind do not assist in any way the potential of Scarborough attaining the Blue Flag status in the future

Its to be hoped that this objection will bring with it, a full and open debate on the future of onerous waste discharge and should include the stakeholders from Scarborough whom its effects noticeably, and should be not limited to fishermen, but all users of the seas either a means of recreation or gaining a living.

Best regards,
Bob Roberts
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