Second Nature

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Scottish Wild Sanctuary

SCIENTIFIC FEASIBILITY / REGULATORY ENGAGEMENT / PARTNERSHIP / PHASE-ONE FUNDING

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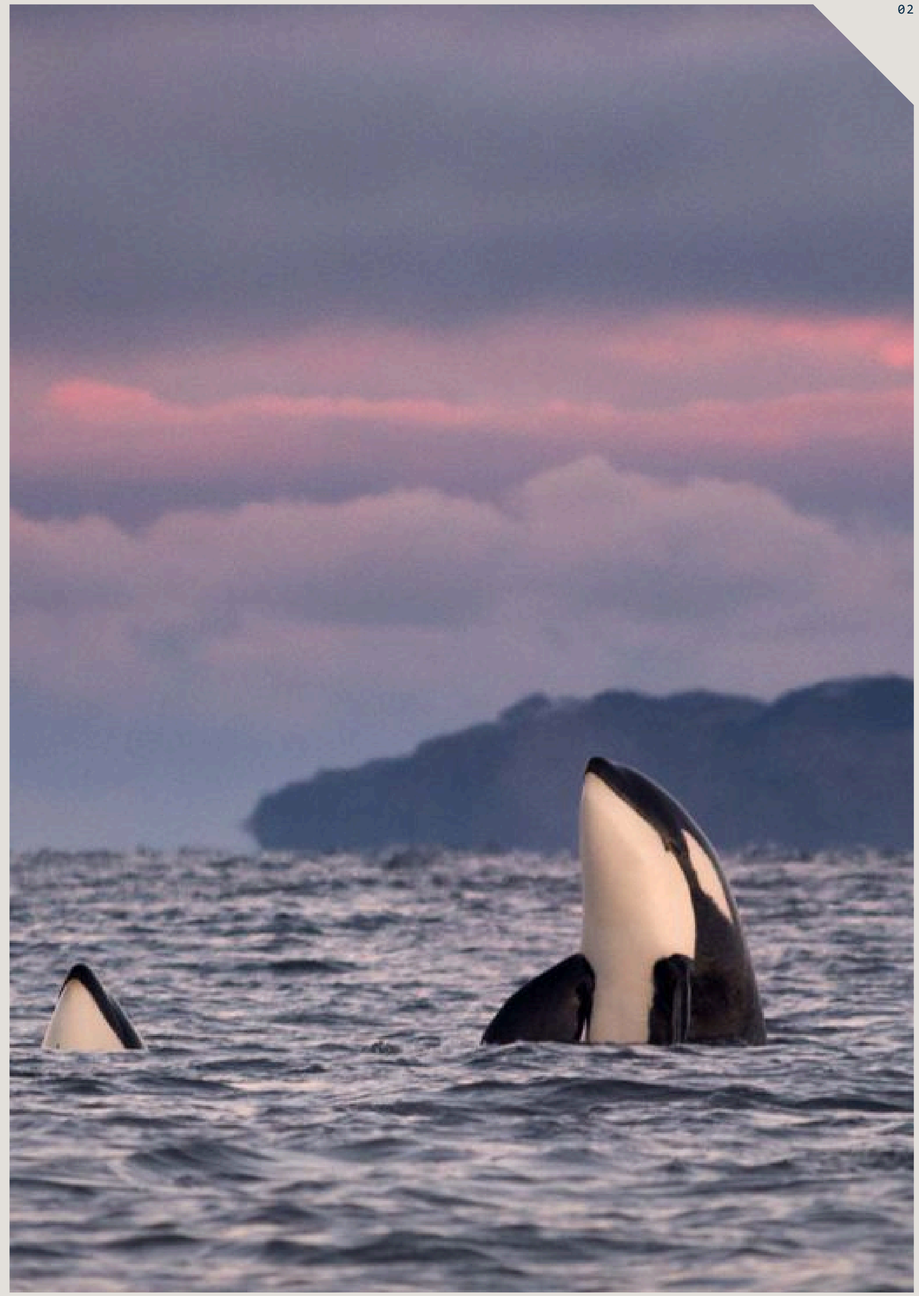
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A proposal to investigate a permanent, welfare-led, open-water sanctuary for previously captive orcas in Scotland.

For consideration by Scottish public bodies, marine scientists, veterinary and welfare specialists, Marineland Côte d'Azur and French authorities, potential philanthropic partners, and other organisations whose expertise could shape an evidence-based solution.

The request at this stage is to help establish whether the proposal is viable—not to endorse a location, commit to construction or approve an animal transfer.

SCOTTISH WILD SANCTUARY IS A WORKING PROJECT NAME. NO DELIVERY ORGANISATION, PARTNER AGREEMENT, SITE ALLOCATION, OPERATING LICENCE OR TRANSFER ARRANGEMENT IS PRESENTED AS ESTABLISHED.







A place beyond captivity. A proposal grounded in responsibility.

Wikie and Keijo are a mother and son born into captivity, now among the remaining cetaceans associated with the closed Marineland Antibes park in France. Their future is urgent and contested. The question is not simply where they can be moved, but what form of care might offer them the greatest achievable welfare, safety and dignity for the remainder of their lives. [1–3]

Scottish Wild Sanctuary proposes to investigate whether a carefully selected coastal setting in Scotland could accommodate a long-term, professionally managed, open-water sanctuary. It would allow previously captive orcas access to a natural marine environment while retaining the feeding, medical care, monitoring, social protection and human support they may need throughout their lives.

This is not a proposal to release captive-born orcas into the open ocean. It is not a marine park, a performance venue or a commercial attraction. It is a proposal for supported lifetime care in a different physical environment—subject to independent evidence that the outcome would be better for the animals and acceptable to the surrounding marine ecosystem.

Scotland is a candidate for serious investigation because of its coastal geography, established marine science community and mature planning and environmental systems. These strengths make the country worth assessing. They do not establish that a suitable location exists, that the relevant consents could be secured, or that Scottish waters would be appropriate for Wikie and Keijo as individuals.

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We are inviting expertise, scrutiny and constructive participation at the earliest possible stage.

The first goal is an independently informed, costed feasibility process with explicit reasons to progress, revise or stop. We are now seeking:

Expertise & public bodies

Help define the evidence, assessments and approvals a Scottish proposal would require.

Marineland & French counterparts

Open a factual, confidential dialogue about animal needs, records, decision-making and any realistic long-term pathway.

Philanthropic supporters

Support or underwrite a scoped feasibility commission, with transparent use of funds and independent review.

The case for a different model

The ethical premise is straightforward:

Where an animal cannot safely return to independent life in the wild, its circumstances should be designed around its welfare rather than public entertainment.

Captive orcas are long-lived, socially and cognitively complex mammals. A life in human care may require ongoing intervention; it need not require performance, breeding or a permanently artificial tank environment.

An open-water sanctuary offers a possibility worth examining: a natural tidal and acoustic setting, changes in depth and water movement, a more varied sensory environment and space for self-directed behaviour, accompanied by skilled care. These are potential opportunities, not guaranteed welfare outcomes. Moving animals into an unfamiliar environment could also introduce new physical, behavioural and veterinary risks.

Our commitment is therefore to test the premise rather than assume the conclusion. The project would ask independent cetacean veterinarians, welfare scientists and marine specialists to judge whether any proposed arrangement could provide measurable benefits over the realistic alternatives. No preferred ideology should override animal-specific evidence.





Wikie and Keijo as individuals

The original proposal identifies Wikie and Keijo as the immediate inspiration for this work. Their established mother–son relationship, histories of managed care and potentially changing clinical needs must be central to any consideration of relocation. Their care team's knowledge would be essential; a project developed without credible access to individual welfare records and specialist advice cannot responsibly claim to be ready to receive them.

The proposed sanctuary should be designed for specific animals, not simply for a species in the abstract. Housing configuration, depth, physical access, temperature exposure, nutritional management, social contact, behavioural training and emergency facilities all depend on the residents' needs.

A wider responsibility

The future of Wikie and Keijo is a compelling case, but the problem extends beyond two individuals: other cetaceans held in artificial settings may eventually require non-exploitative lifetime care. If an independently reviewed Scottish model proves viable, its methods and lessons could inform later projects.

This proposal does not assume the capacity to take additional animals or promise a wider sanctuary network, however, we aspire to develop a model capable of informing future sanctuary placements of formerly captive cetaceans.

The French context: urgent welfare, realistic sequencing

France's Law No. 2021-1539 established restrictions on the keeping of cetaceans in dolphinaria from 1 December 2026, subject to defined exceptions. Marineland ceased operations in January 2025, creating urgent questions over the animals remaining there. [1–3]

In January 2024 the French secretary of state for biodiversity launched a call for expressions of interest (AMI - Appel à Manifestation d'Intérêt) with the mission to explore different options for the future of cetaceans at Marineland Côte d'Azur. Several proposals were put forward however, none were deemed suitable or feasible at the time. [12]

In a statement dated 15 May 2026, the French ministry described serious structural risks associated with the Marineland pools and stressed the need for an immediate solution. In parliamentary responses published on 29 September 2026, the French government described transfer to Loro Parque in Spain as the solution offering the strongest current prospects of feasibility and timing. The government's assessment is a material part of this proposal's context, whether or not all animal-welfare organisations agree with that placement. [2–3]

A newly developed Scottish sanctuary cannot credibly be presented as an immediately available destination. Regulatory engagement, environmental studies, engineering, clinical assessment, capital finance, construction and commissioning would all precede any move. It would be irresponsible to suggest that these processes can be compressed to meet the immediate circumstances in France.

Two decisions must therefore be kept separate: the immediate welfare and safety of Wikie and Keijo, and whether Scotland can develop a responsible sanctuary model over a longer period.

The initiative seeks dialogue with Marineland Côte d'Azur, the relevant French authorities and animal-welfare representatives about the animals' needs and potential longer-term outcomes. It does not assume that transfer would be offered, that the animals remain available, or that Scottish authorities would authorise receipt. Should Wikie and Keijo ultimately be placed elsewhere, the project would reassess its purpose, its animal-specific basis and whether continued sanctuary feasibility work remains justified.



What this proposal asks of French and Marineland representatives

01.

Clarify the current decision-making process, legal ownership or custodial responsibilities and any relevant long-term placement considerations.

02.

Where authorised, facilitate professional-level dialogue with the animals' existing veterinary and care teams, including baseline health and behavioural requirements.

03.

Identify what welfare, legal, logistical and financial conditions would be required even to consider a future proposal.

04.

Help ensure that public advocacy does not create confusion about immediate animal safety or an unsupported relocation timeline.

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Why Scotland is being investigated

Scotland has a varied coastline, sheltered sea lochs and other coastal formations, a strong marine research community and statutory frameworks that require projects to address impacts on wildlife and the marine environment.

The project will seek to draw on relevant expertise in marine mammal ecology, oceanography and underwater acoustics from across Scotland as the feasibility work develops, subject to availability and agreement for the appropriate experts.

There is also substantial practical Scottish experience in the installation, operation and regulation of marine infrastructure. That experience may offer transferable methods for survey design, moorings, navigation risk, environmental monitoring and maintenance. A wild sanctuary is not an aquaculture facility, therefore regulatory treatment cannot be assumed to be identical.

The presence of wild orcas in Scottish waters offers an ecological context, not proof that captive-born orcas would thrive there. Indeed, the risk of wild-cetacean interactions, disease transmission, underwater noise or disturbance would be significant topics for assessment. Cold exposure, storm loads, tides, seabed conditions and accessibility could equally rule out candidate sites.

The location will be selected by exclusion and evidence, not by scenery.

Initial geographic screening would draw on the Scottish National Marine Plan, National Marine Plan Interactive datasets and specialist mapping to establish broad constraints. Only after individual welfare criteria have been defined would the project identify potential coastal areas. [5]

A plausible location would need to demonstrate:	A location may be excluded because of criteria such as:
Suitable water conditions including but not limited to; depth, flushing and seasonal environmental performance.	Storm or wave exposure, unsuitable currents or unsafe water temperature profiles.
Reliable year-round access for animal care, veterinary response and emergency vessels.	Poor medical accessibility, hazardous navigation or an inability to provide critical care, and emergency response.
Manageable environmental effects and compatibility with other legitimate marine users.	Protected-site conflicts, ecological harm, commercial and community displacement.
An attainable tenure, planning and licensing pathway, with a viable whole-life cost.	Unclear rights, unacceptable permit risk, engineering impracticality or unaffordable lifetime obligations.

Scotland will be a credible candidate only if one or more sites survive this process. Until then, the project is national in scope, and no particular coastline, community or sea loch is being proposed for development.


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The sanctuary we propose to study

The physical concept is a protected open-water enclosure located in an appropriate coastal environment, supported by a land-based clinical, operational and logistical base. A specialist design would have to reconcile the animals' welfare needs with local wind, wave, current, tidal and seabed conditions. The project does not currently propose a fixed enclosure size, depth, net type or layout: these must arise from the evidence.

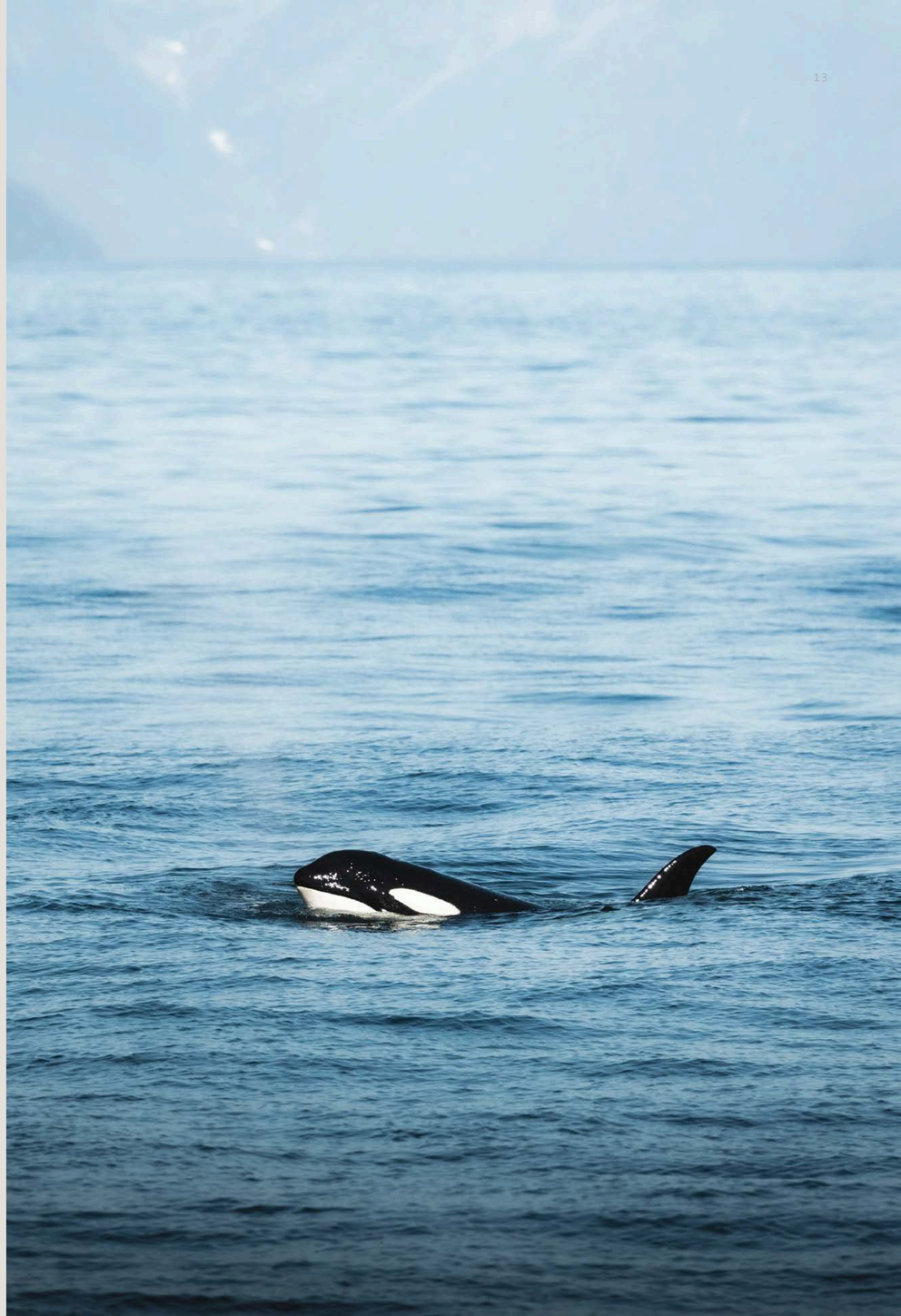
The Global Federation of Animal Sanctuaries (GFAS) published the first set of best practices for cetacean (whales and dolphins) sanctuaries in 2023. This set of guidelines was a pioneering collaboration between the SEA LIFE TRUST, Merlin Entertainments, The Whale Sanctuary Project and the National Aquarium. The standard will be used and referenced throughout the project to meet, and hopefully exceed, the level of care the project is aiming for regarding best practices and appropriate criteria for the effective and efficient operations of an animal sanctuary. [4]

A home, not a display facility

Any future sanctuary would be governed by permanent non-exploitation commitments: no performances, no breeding programme, no public swimming, and no activities that compromise care to generate revenue. Public communication and education could be conducted away from the animals, with any on-site access subordinate to welfare, conservation law, privacy and biosecurity.

Care remains permanent

Sanctuary does not mean abandonment of professional care. The operating model would provide trained animal-care professionals, appropriate nutritional support, monitoring, veterinary capability, specialist containment and emergency response. Any transition to a more natural marine environment would be gradual, assessed against predefined indicators and reversible where clinically indicated.



Two connected environments

An open-water area may be appropriate only if the design also includes protected medical handling arrangements and the ability to separate, examine, stabilise or temporarily house an animal when necessary. This secondary containment area of the facility must be encompassed and tested alongside the wider enclosure. A concept that creates greater space but loses the ability to intervene safely would not meet the project's welfare objective.

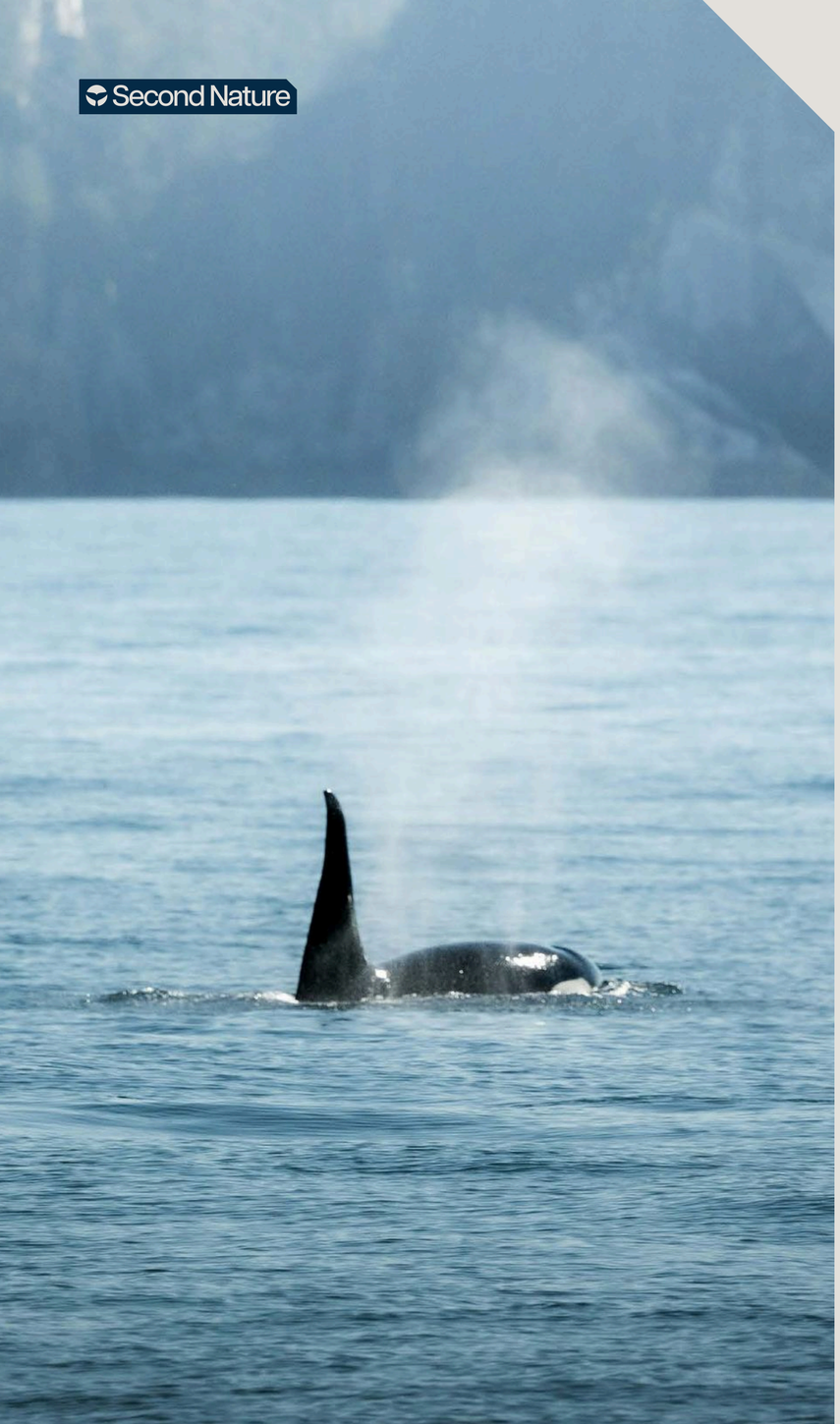
A permanent stewardship commitment

The project would plan for residents' potential lifetimes, staffing continuity, coastal conditions, system maintenance, major asset replacement, veterinary events and contingency care if the primary facility became unusable. It would also address eventual decommissioning and stewardship obligations. These are design and financial requirements from the beginning, not later additions.

Evidence before commitment: the proposed feasibility programme

A full feasibility study is the first major deliverable we are asking the partnership to help scope. It should be independently reviewable, explicit about uncertainty and commissioned in defined packages rather than framed as a single general report.

Study stream	Central question	Proposed output
A. Individual welfare & clinical	Could a sea-based environment improve welfare for these animals without unacceptable health, behavioural or social risks?	Independent care requirements, suitability criteria and stop conditions.
B. Coastal geography & ocean science	Where could the essential depth, water quality, exposure and access conditions coexist?	Scotland-wide exclusion mapping and candidate-area shortlist.
C. Ecology & acoustics	Could the facility operate without unacceptable harm to wild species, habitats and marine users?	Baseline study scope, key receptors, impact pathways and survey design.
D. Engineering & operations	Could the enclosure and critical-care infrastructure be built, run and maintained safely?	Concept options, failure-mode review, access and emergency strategy.
E. Legal, finance & governance	Could consents, animal-transfer authorities, lifetime care and credible institutional oversight be secured?	Permission pathway, programme cost ranges, governance and funding tests.



Independent animal welfare assessment

The clinical workstream must lead rather than follow site design. Specialist veterinarians and experienced carers would need access to suitable records, subject to lawful sharing agreements, to evaluate health history, environmental tolerances, diet, handling, medication, social compatibility, trauma or stress factors, and transfer risks. An independent welfare assessment should compare a Scottish sanctuary against realistic alternative places of care, including the risks of moving animals at all.

Potential benefits should be monitored as hypotheses, such as increased behavioural choice, a more diverse activity programme, different acoustic experience or other agreed welfare indicators; rather than promised outcomes. Any animal-specific veto, medical contraindication or inability to offer prompt treatment would be grounds not to proceed.





Marine science and impact assessment

The study should evaluate seasonal water temperature and salinity, oxygen conditions, pathogens and contaminants, harmful algal events, wave exposure, currents, seabed ecology, underwater noise, protected species, vessel movements, fisheries interactions and climate risks. Survey durations would be defined by specialists, recognising that a short desk study cannot establish full-year suitability.

The Icelandic SEA LIFE TRUST Beluga Whale Sanctuary offers a valuable lesson: its operators announced in July 2026 that additional preparation, testing and familiarisation were necessary before attempting a reintroduction to the open water bay, which has been postponed until 2027. The lesson is that real-world animal readiness and engineering readiness must both be demonstrated, rather than assumed from a completed structure. [6]

Consent, public interest and legal safeguards

The sanctuary would be a new and unprecedented proposal within Scotland's regulatory landscape.

There is no assumption that a single licence will cover its operation or that marine infrastructure consent would authorise holding cetaceans. Legal advisers and the relevant regulators would need to establish the correct classification and all applicable approvals for the specific design and use.

Scotland's National Marine Plan, which covers the management of both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles), will be consulted throughout the project and will assist with determining which principles may be applicable to the proposal.

All of the named regimes are complementary and none should be represented as an approval at this stage [7-10].

Marine Directorate – Licensing Operations Team (MD-LOT)

MD-LOT are responsible for the integrated management of Scotland's seas, working closely with delivery partners NatureScot, Joint Nature Conservation Committee (JNCC) and the Scottish Environment Protection Agency (SEPA).

The Scottish Government's marine licensing guidance identifies MD-LOT as the central authority for applicable marine licensing, with potential additional responsibilities for environmental assessment and consultation.

Preliminary communication has identified the following probable requirements:

- A marine license
- Pre-Application Consultation (PAC)
- Screening to determine if an Environmental Impact Assessment (EIA) is required
- Habitats Regulations Appraisal (HRA) and environmental consideration
- A European protected species (EPS) licence.

NatureScot

NatureScot are Scotland's Nature Agency and are currently consulting internally to identify the relevant legislation and conservation issues for the proposed Scottish Wild Sanctuary.

NatureScot deal with almost all species licensing in Scotland, including non-native species licensing and will need to be consulted on whether there are any legal considerations of long term containment of Orcas in Scottish waters.

Dolphins, whales and porpoises, known collectively as cetaceans, are given the highest possible protection in Scottish inshore waters and NatureScot advise on and are the responsible authority for issuing licences for conservation work, photography, survey or research in inshore waters where that work could result in an offence in relation to cetaceans.



Maritime and Coastguard Agency (MCA)

MCA is responsible for compliance with maritime safety legislation, including the safe operation of a vessel and compliance with pollution prevention legislation.

The MCA would consider the implications of any structures, installations, moorings, markers, pontoons, habitat enhancement features, or other infrastructure associated with the project in order to ensure that any navigational risks are identified, assessed, and mitigated so that they are reduced to a level that is As Low As Reasonably Practicable (ALARP).

As a statutory consultee to the marine licensing regulators, the MCA advises on the potential impacts on other marine users, including shipping, navigation safety, and emergency response operations.

Preliminary communication with MCA has identified the following requirements:

- Preliminary hazard assessment
- Programme of works and construction methodology
- Tools and assessment techniques
- Navigational risk assessment (NRA)
- Impacts on emergency response and search and rescue operations
- A Marine Emergency Response Plan

If the proposed location falls within the jurisdiction of a Statutory Harbour Authority, the MCA would typically defer to the harbour authority on matters relating to navigational safety within their area of responsibility.

Northern Lighthouse Board (NLB)

The Northern Lighthouse Board is the General Lighthouse Authority (GLA) for Scotland and the Isle of Man and will be consulted throughout the project to identify any navigational issues.

Early engagement with NLB has identified that they are the authority to advise and guide on lighting and navigational marking of marine infrastructure. NLB will consult on the requirements of the Scottish Wild Sanctuary in terms of aids to navigation, providing a list of what they advise the site to encompass and any recommendations. In the preliminary stages, assessment of volume of traffic and degree of risk is high priority when addressing the following:

- An NRA
- An emergency response plan
- Consideration of wildlife and planning requirements (EIA consideration)

There will also be a requirement to implement Automatic Identification Systems (AIS).



Crown Estate Scotland (CES)

Crown Estate Scotland are the public corporation of the Scottish Government responsible for the management of land, property and marine assets in Scotland. They manage many seabed and foreshore rights and are the authority to identify existing rights, leases, options or agreements in place. CES would need to be consulted on potential sites to determine if a seabed agreement, lease or other form of tenure would be required and if so, would be the authority to grant this.

They would be consulted solely in related to structures attached to the seabed; such as moorings laid on the seabed, or piles driven into the seabed. They have identified that there is potential for other activities to take place in a marine area which do not require CES agreements (e.g. fishing, shipping, recreation) and they would not be able to advise on these.

Marine Directorate - Planning and Policy

MD- Planning and Policy are The Marine Directorate's division that covers three main policy areas, namely, marine spatial planning, offshore marine renewables and marine conservation, as well as covering the Licensing Operations Team.

Scotland's first National Marine Plan (NMP) (adopted in 2015) provides the guiding framework for sustainable management of marine activities and resources. Initial communication with Marine Planning has identified that the NMP does not have specific provisions that should be considered when assessing potential sanctuary locations.

This division will be consulted to understand any policy issues regarding the proposal.



Scottish Environment Protection Agency (SEPA)

SEPA is Scotland's principal environmental regulator, regulating relevant water and pollution activities, and early engagement has identified that activities affecting the water environment may require authorisation from SEPA under the Environmental Authorisations (Scotland) Regulations (EASR).

Authorisation would be required for activities that fall into the categories of abstractions, discharges, engineering works, impoundments and control of pollution and SEPA has advised that most, if not all of these regimes will be of relevance.

SEPAs regulations only apply within coastal waters up to 3 miles out from the coast, and engineering works may not fall under EASR but instead fall to Regulations governed by Marine Scotland.

In terms of the shore-based facilities, the preference is that any discharge from these facilities be discharged to the public sewer network if available.

Scottish marine science and oceanographic expertise

Scotland has an established marine science community with expertise in oceanography, marine ecology, underwater acoustics and environmental assessment. The project will seek to identify and engage relevant marine science organisations and independent specialists who could contribute to an initial scientific scoping exercise and more detailed feasibility work as the project progresses.

- Identify the key marine evidence gaps relevant to assessing potential locations
- Review available scientific and marine environmental datasets to interpret and advise on appropriate methods
- Advise on water depth, temperature, currents, tidal exchange and other oceanographic parameters
- Advise on underwater acoustics and the surrounding marine environment
- Consider the scope of environmental baseline surveys and monitoring that may be needed
- Identify potential interactions with marine habitats, protected species and other marine users
- Outline the potential costs, timescales and sequencing of further scientific work
- Identify any additional scientific or technical expertise required.

Any involvement would be subject to separate discussion and agreement.
No organisation or individual has been appointed or committed to this work.

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Scottish marine mammal research expertise

Scotland has a strong marine mammal research community, including academic researchers and specialists with experience in marine mammal biology, ecology, behaviour and conservation. The project will seek to identify appropriate expertise to help assess the potential implications of introducing captive-born orcas into a Scottish coastal environment.

This expertise could help inform:

- The ecological and environmental requirements relevant to orcas in a Scottish coastal environment
- Potential interactions with wild cetaceans and other marine mammals
- Potential impacts on local marine mammal populations and the wider marine ecosystem
- Scientific considerations associated with transferring captive orcas into a Scottish coastal environment
- Appropriate monitoring requirements, including the behaviour of the orcas and their interactions with wild cetaceans
- The independent scientific evidence needed to assess environmental compatibility, potential risks and overall feasibility

Any involvement would be subject to separate discussion and agreement. No organisation or individual has been appointed or committed to this work.

This work would need to be considered alongside independent veterinary and animal-welfare advice.





Other topics for early Scottish regulatory engagement

- Classification of resident captive-born cetaceans in open seawater under Scottish animal welfare, animal health and other applicable law
- Land-use planning and operational authorisations
- France–Great Britain animal-transfer, CITES, health certification, custody and transport requirements [11]
- Consideration of Marine Protected Areas (MPAs)

Local consent must be earned

The project must not arrive in a coastal community as a finished decision.

It would first seek to understand working harbours, fisheries, crofting and land interests, recreational use, transport, local employment, infrastructure and the concerns of residents. Where site investigations become appropriate, participation should be meaningful, documented and capable of changing the proposal—including leading to a different location or no development.

How the proposal would be delivered

The programme is deliberately staged. Each phase releases more detail only when earlier evidence justifies the additional cost and commitment. The time needed for animal welfare assessment, environmental seasonality, permits and construction is not being presented as fixed before scoping.

Stage	Purpose	Condition to move forward
A. Scoping & partnerships	Secure expert advice, data access, an evidence plan, legal triage and a realistic Phase 2 budget.	Clear research questions; credible specialist capacity; initial funding and access to essential information.
B. Comparative feasibility	Evaluate individual welfare, multiple Scottish coastal areas, impacts, designs, costs and alternative placements.	Independent results identify at least one potentially acceptable and affordable pathway.
C. Site-specific development	Conduct required surveys, engage communities, progress design, legal pathway and detailed financial commitments.	Evidence-based permission route; community engagement; fundable full-care model.
D. Consents, construction & commissioning	Obtain approvals, licenses and land/seabed rights; build, test and validate the complete facility.	Formal authorisations, demonstrated operations, clinical and emergency readiness.
E. Any animal transfer	Only if animals remain eligible and an independent decision supports the move.	Lawful custody and transport, welfare sign-off and a fully funded lifetime-care obligation.

There is no automatic commitment between stages. A conclusion that a Scottish site is unsuitable, that a proposed move would be detrimental, or that financial security is insufficient would be a valid and useful result of responsible feasibility work.

The first three months: a proposal for mobilisation

01. Agree a small steering and scientific scoping group, with clear boundaries between project advocacy and independent expert advice.
02. Seek a substantive discussion with marine science and oceanographic expertise as well as other clinical, marine and engineering specialists; obtain scoped work proposals and potential costs.
03. Request a formal clarification of the French welfare, custody and decision context, alongside appropriate access to animal-care expertise.
04. Prepare a Scottish government and regulator briefing note describing the concept sufficiently to obtain early pathway guidance without implying a site decision.
05. Set up a restricted feasibility-funding process and transparent reporting protocol; publish a short public summary of confirmed progress and open questions.



Accountability and lifelong duty of care

A sanctuary should be judged not by the strength of its campaigning message but by the quality of its care. For that reason, a formal delivery entity and governance model would be developed before any significant contracts, donations for construction or animal-transfer obligations are taken on.

Possible legal structures, including a Scottish charity vehicle, require legal assessment. The body ultimately responsible for the animals must be clearly identified, with enforceable arrangements for the holding of funds, data protection, land and marine rights, health and safety, veterinary authority, management of conflicts and continuity if a founder or major donor leaves.

The founding team's role is to convene an investigation and a diligent feasibility assessment. It does not seek to replace the professional decision-making of scientists, veterinarians or regulators.

Proposed Safeguards:

An independent veterinary and welfare panel with authority to challenge or halt unsafe activities, supported by documented escalation procedures.

Transparent published accounts and restricted use of gifts where contributions are made for a particular feasibility stage or care obligation.

Independent scrutiny of significant scientific, financial and welfare claims before they are used to justify major commitments.

Governance arrangements that prevent commercial objectives, media access or fundraising deadlines from overruling animal care.

A funded plan for critical incident response, emergency relocation or temporary holding where lawful and feasible, and long-term organisational succession.



A fundable first step



The initiative is seeking conversations with foundations, private philanthropists, animal-welfare funders, research partners and mission-aligned supporters about supporting an evidence-led first phase. The immediate case for funding is not a promise of a completed sanctuary. It is a clearly defined piece of public-interest feasibility work that can produce a defensible conclusion—including a recommendation not to build.

What early funding would enable

- **Professional scientific scoping and independent animal-welfare review, including specialist time and relevant data acquisition.**
- **Preliminary Scottish GIS (Geographic Information Systems) screening, oceanographic and ecological desk studies and identification of seasonal survey needs.**
- **Marine engineering and veterinary infrastructure concept scoping, plus preliminary operating and emergency-care budgets.**
- **Specialist French and Scottish legal advice regarding custody, animal movement, classification, planning and marine permissions.**
- **Essential project coordination, documentation, financial oversight and proportionate communication with partners and communities.**

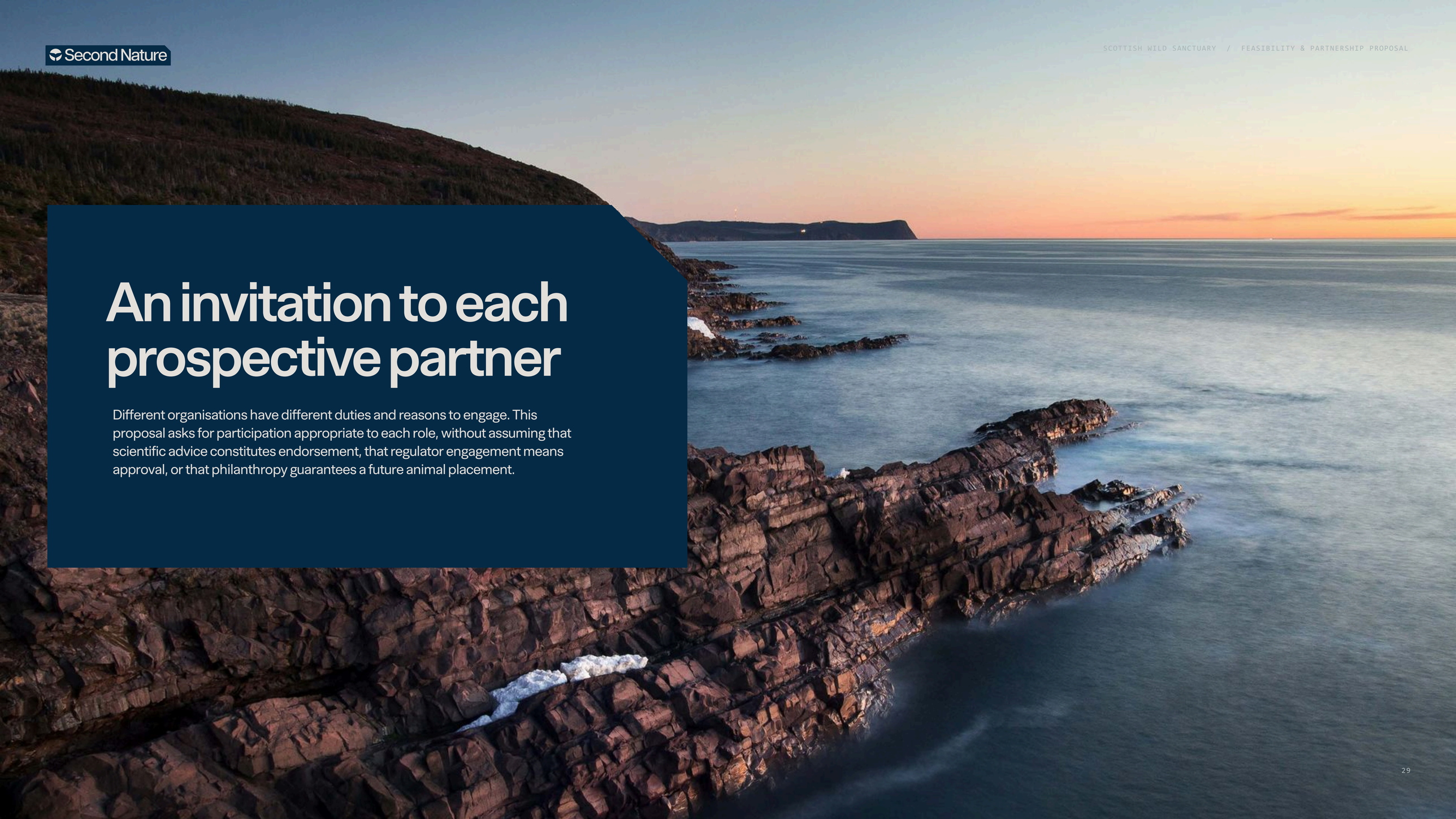
A fixed funding target would be premature before work packages and quotes are agreed. We propose commissioning an itemised Phase One budget with named outputs, qualifications and independent review arrangements. Donors would receive a scoped allocation of costs, a defined reporting schedule and a clear statement of what the funding does—and does not—secure.

Lifetime care economics matter from day one

A later feasibility study must distinguish capital works from annual care, operational contingency, extreme-event resilience, maintenance and periodic asset replacement. A credible long-term financial solution may combine restricted reserves, committed philanthropic support and other legally permissible resources; it cannot depend on the assumption that tourism will support the operation.

The immediate funding proposition: support the evidence that determines whether a sanctuary should be created—not a construction pledge before feasibility exists.

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An invitation to each prospective partner

Different organisations have different duties and reasons to engage. This proposal asks for participation appropriate to each role, without assuming that scientific advice constitutes endorsement, that regulator engagement means approval, or that philanthropy guarantees a future animal placement.

Scottish Government, Marine Directorate and statutory bodies

We invite a preliminary inter-agency conversation to understand the legal classification of a marine sanctuary for captive cetaceans, relevant licensing and conservation interfaces, information needed for screening and the order in which prospective applicants should engage.

We would value procedural guidance and referrals to the appropriate units. We are not seeking a decision on an unidentified site.

Marine science experts, universities and research organisations

We invite early, clearly scoped scientific collaboration, beginning with an assessment of the environmental and marine-mammal research questions. We would welcome advice on study design, oceanographic and acoustic datasets, methods of exclusion-based location assessment and how to engage suitably independent veterinary expertise.

A funded, documented work package would follow only by mutual agreement.

Marineland, its clinical team and French decision-makers

We invite a respectful and evidence-led discussion about the individual welfare and long-term care requirements of Wikie and Keijo, the present decision framework, practical constraints and the conditions under which any future alternative could be considered. Their care team's knowledge and the urgency of their situation must be acknowledged.

This is not a request to suspend or substitute for any immediate clinically necessary action.





Cetacean and animal-welfare organisations

We invite constructive scrutiny of the sanctuary principles, ethical safeguards, existing precedents, independent welfare metrics and emergency arrangements. There may be valuable opportunities to share expertise and avoid duplication of international sanctuary work.

The project does not presume alignment between organisations or seek endorsement without formal review.

Veterinary, marine mammal experts, marine engineering and maritime professionals

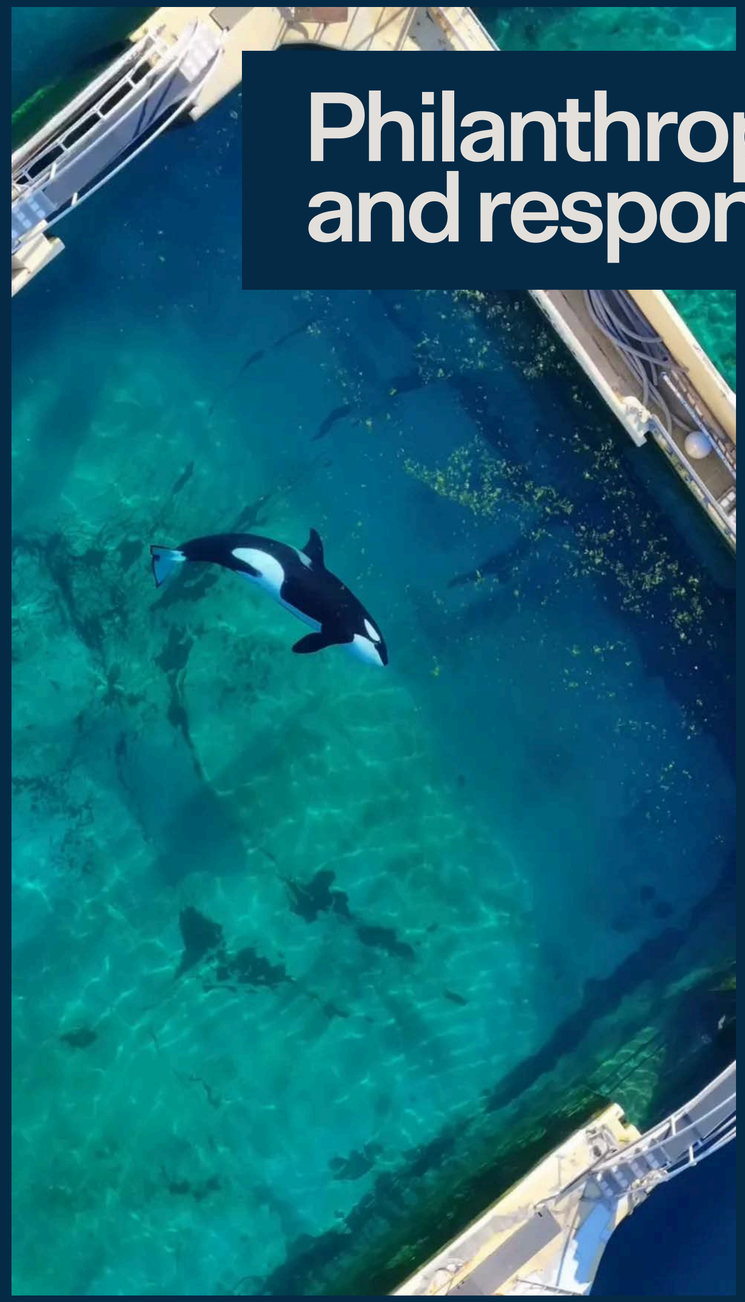
We invite potential specialist leads to identify hard constraints early: medical and handling feasibility, environmental exposure, enclosure safety, emergency access and realistic design and operating costs.

Evidence that changes or disproves our proposal would be treated as important progress.

Coastal communities and marine users

When there is a geographic basis for meaningful discussion, we invite local people, businesses and marine users to test the project's assumptions. Local knowledge may identify opportunities, conflicts or unacceptable impacts before significant resources are committed.

No coastal community should be asked to accept a predetermined location.



Philanthropic trusts, donors and responsible sponsors

We invite discussion of restricted feasibility grants, commissioning partnerships, technical support and introductions to specialist expertise. We would not seek unrestricted promises on the assumption that a site or transfer is secured.

Funders would be able to assess a defined budget, governance arrangements, reporting plan and conditions for later funding stages.



The partnership proposition

This work can succeed only if its ambitions are matched by technical rigour, openness to challenge and the willingness to change course.

The immediate outcome sought is not a sanctuary announcement, but a jointly understood route to independent feasibility—and clarity about who, if anyone, is willing and able to help deliver the necessary work.

We are inviting organisations to respond with one or more of the following: a preliminary discussion; a named specialist contact; existing evidence or data guidance; an indication of willingness to scope studies; procedural or legal guidance; or a conversation about supporting a ring-fenced feasibility commission.

A response does not constitute endorsement, a promise of support or acceptance of any future development. Contributions would be recognised only where agreed, and confidential or animal-specific information would be handled through appropriate arrangements.

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A different future is possible

Creating a wild sanctuary requires collective expertise, commitment and action. We are seeking partners, marine specialists, conservation organisations and funders to help shape, assess and ultimately deliver a safe, sustainable future for orcas in captivity.

Together, we have an opportunity to establish a new standard for their care, dignity and freedom.

Appendix A: The initial feasibility commission

The proposed first commission is designed to be affordable enough to fund at discovery stage while producing useful, independently reviewable outcomes. The scope should be finalised jointly with the appointed scientific and technical leads; the following describes intended outputs rather than confirmed contracts.

Package	Essential deliverables	Acceptance question
Scientific & clinical framing	Reviewed research questions; animal-specific information requirements; evidence-gap note; peer review plan.	Can the project describe precisely what a viable welfare outcome would require?
Coastal constraints	Data inventory; national-level exclusions; plausible area categories; priority further surveys.	Is there a rational basis to commission location-specific work?
Regulatory triage	Authorities and classifications to confirm; legal jurisdiction and transfer questions; preliminary consent sequence.	Could the concept fall within an attainable approval and custody pathway?
Engineering/operational concept	Feasibility of enclosure, critical-care, access, utilities and emergency operations at high level.	Are the likely hard constraints understood well enough for an indicative cost model?
Funding and governance	Itemised Phase Two plan; costing assumptions and range; viable governance options and required safeguards.	Is there a fundable next stage with named experts, outputs and boundaries?

Intended standard of evidence

All substantive conclusions should distinguish verified records, published evidence, informed professional opinion and untested assumptions. Where a specialist cannot reach a conclusion, the output should state what additional evidence would be required. Independence, clear authorship, version control and explicit limitations matter more than presenting a predetermined positive result.

Appendix B: Principles that would bind a future sanctuary

- **The animals' interests take precedence over fundraising, public access and organisational reputation.**
- **No live performance, breeding programme, visitor interaction or commercial display of resident orcas.**
- **Individual suitability is assessed before any move, with veterinary authority and the ability to refuse or stop a transfer.**
- **Clinical support, emergency care and long-term care arrangements remain available for the animals' lives.**
- **Wildlife, habitat and marine users are protected through an appropriate assessment, consent and monitoring regime.**
- **No new resident is accepted unless the sanctuary can lawfully and sustainably meet that individual's needs.**
- **Public reporting is accurate about uncertainty and outcomes, with independent scrutiny of significant decisions.**

Appendix C: Verified context and disclosure

Point	Status at issue
Wikie and Keijo; French situation	Public French government statements in May and September 2026 identify urgent risk and a proposed existing placement. No solution agreed. [1–3]
Scotland science capability	Scotland has established expertise in marine mammal science, underwater acoustics and marine ecology. Preliminary scientific outreach has begun, but no formal partnerships have been agreed.
Potential Scottish regulatory pathway	Marine licensing, seabed rights, species protection, SEPA and other permissions are likely topics; applicability is site/design-dependent. [7–10]
Potential Scottish location	None selected or represented as suitable.
Animal-specific suitability	Not clinically established in the documents available to the project.
Funding and legal entity	No secured funding package or established delivery organisation is represented here.
Construction, commissioning, transfer date	None promised, funded or approved.

Appendix D: Sources and reading

Second Nature

Numbered citations refer to the following public materials. They establish the cited policy, decision or precedent; they do not certify the project's future feasibility. Links were reviewed for this working version on 1st November 2026.

[1] **French National Assembly, written question 16594 and government response (29 September 2026):** https://www.assemblee-nationale.fr/dyn/17/questions/QANR5L17QE16594

[2] **French Ministry for Ecological Transition, Marineland transfer statement (15 May 2026):** https://www.ecologie.gouv.fr/presse/avenir-cetaces-marineland-mathieu-lefevre-annonce-que-feux-sont-vert-cote-etat-leur

[3] **French National Assembly, written question 13240 and government response (29 September 2026):** https://questions.assemblee-nationale.fr/q17/17-13240QE.htm

[4] **Global Federation of Animal Sancturies "Standards For Cetacean Sanctuaries"**: https://whalesanctuaryproject.org/wp-content/uploads/GFAS-Cetacean-Standards-2023.pdf

[5] **Scottish National Marine Plan Interactive mapping platform:** https://marinescotland.atkinsgeospatial.com/nmpi/

[6] **SEA LIFE TRUST, Putting Animal Welfare First (29 July 2026):** https://belugasanctuary.sealifetrust.org/en/about-us/news/putting-animal-welfare-first/

[7] **Scottish Government, Marine licensing: before submitting an application:** https://www.gov.scot/publications/marine-licensing-overview/pages/before-submitting-an-application/

[8] **Scottish Government, marine European protected species and basking sharks licensing:** https://www.gov.scot/publications/marine-european-protected-species-and-basking-sharks-licensing/

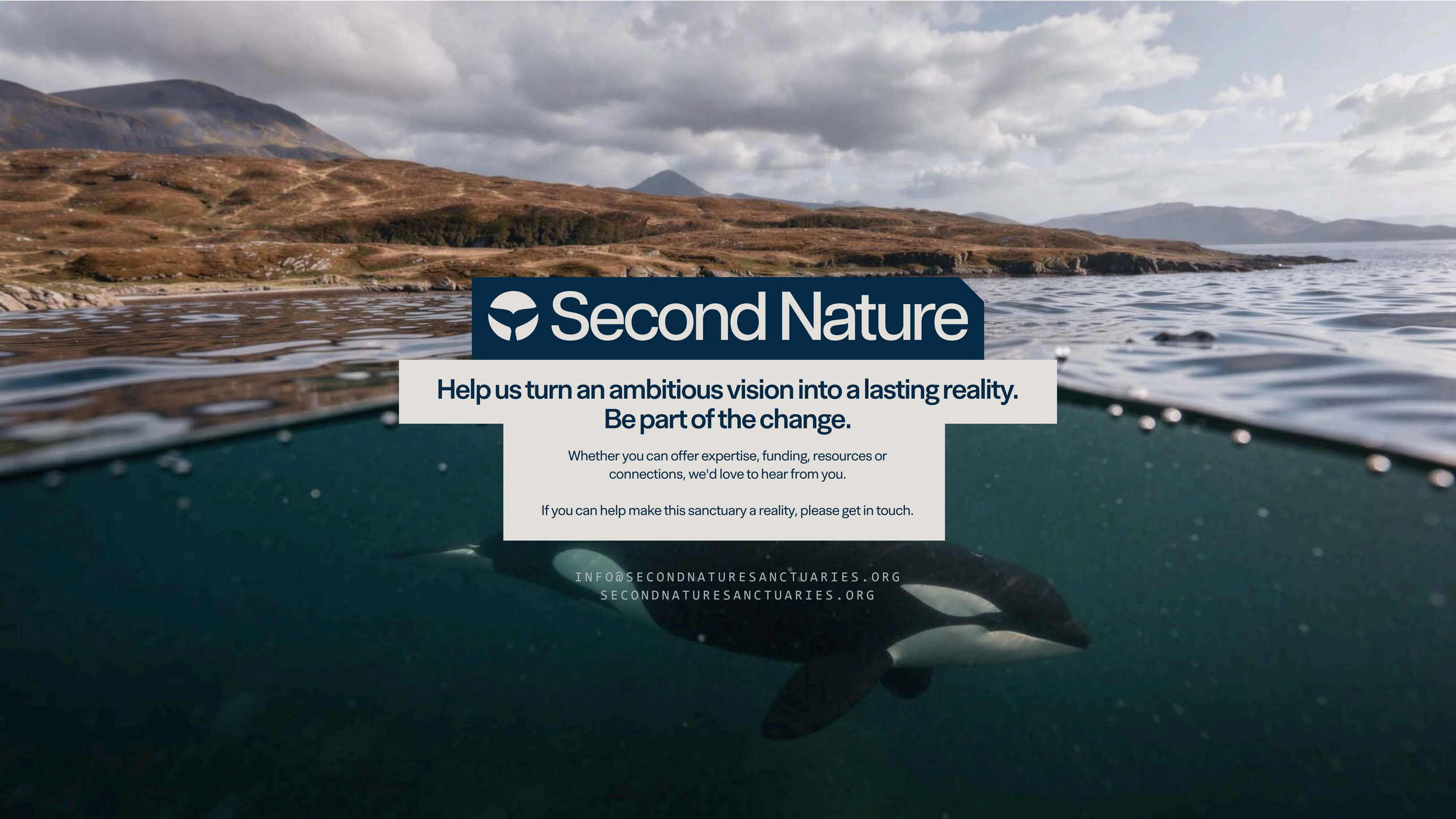
[9] **Crown Estate Scotland, marine works, rights and permissions:** https://crownestatescotland.com/scotlands-property/coastal/marine-works

[10] **SEPA, Moving to the new Environmental Authorisations (Scotland) Regulations:** https://beta.sepa.scot/regulation/authorisations-and-compliance/easr-authorisations/moving-to-the-new-regulations/

[11] **GOV.UK, CITES imports and exports and APHA permit advice:** https://www.gov.uk/guidance/cites-imports-and-exports

[12] **IGEDD report "Mission d'exploration des différentes options relatives au devenir des cétacés du Marineland d'Antibes" (June 2024):** https://igedd.documentation.developpement-durable.gouv.fr/notice?id=Affaires-0013623

Source documentation supplied by the project: "Scottish Wild Sanctuary | Project Framework, Feasibility and Development Plan", working draft v0.1, 4th November 2026. Relevant reported conversations with Crown Estate Scotland, MD-LOT, SEPA, MCA, Northern Lighthouse Board and NatureScot have been reflected only as preliminary engagement; no endorsement or permission is attributed to those bodies.


Second Nature
Help us turn an ambitious vision into a lasting reality.
Be part of the change.
Whether you can offer expertise, funding, resources or connections, we'd love to hear from you.
If you can help make this sanctuary a reality, please get in touch.
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