



To the Minister of Environment and Water, Emil Dimitrov

To the Chief of the Regional Inspection of Environment and Water - Burgas, Tonka Atanasova

To the Mayor of Burgas, Dimitar Nikolov

To the Chief Architect of the Burgas Municipality, Veselina Ilieva

Dear Sir/Madam,

As an organization for the protection of animals and the environment, The Last Cage expresses our strong disagreement regarding the proposal issued by the Municipality of Burgas to for the construction of a marine park with a dolphinarium, sealarium, an area for penguins and enclosures for other exotic and farm animals in Ezero Park. We are strongly opposed to the keeping of animals in captivity and the participation of marine mammals in commercial performances.

We believe that violations of the current legislation in the field of animal protection have been committed in the proposal:

1. The proposal includes a "sealarium", with 500 audience seats, to be inhabited by seals. In Bulgaria, the use of wild mammals for entertainment establishments is prohibited by the **Animal Protection Act / EPA / Art. 27, para. 1**.
2. The performances of involving marine mammals in the proposal are in conflict with the internationally recognized principles of animal welfare and the **EU Zoo Directive 1999/22**, which requires Member States to ensure that zoos shelter their inhabitants "*under conditions that aim to meet the **biological and conservation requirements of individual species***." Such conditions cannot be met when it comes to marine mammals in captivity. This is why dolphinaria worldwide are closing.

In the wild, marine mammals inhabit large territories of hundreds of kilometers, swim hundreds of kilometers a day and dive to a depth up to 300 meters. The largest pool in a dolphinarium in the world is approximately 0.0001% of the size of the smallest natural habitat of dolphins in the wild. Cetaceans are intelligent and social animals that live in groups in which they are highly dependent on each other and every individual in the group has an important role to play. Their relationship is complex - dolphins choose whether to stay with their family all their life or leave when they grow up. In captivity, they do not have this choice, and are routinely separated from their loved ones and forced to live with strangers. Living in a tight space is a source of constant stress and often causes tension and aggression between animals. This often leads to situations in which certain individuals are constantly harassed by others without the opportunity to escape, as they would in the wild. Severe stress leads to stereotypical behavior which is common among captive cetaceans and can escalate into self-harm and suicide attempts (there is such an example in the Varna Dolphinarium). It is usually necessary to [medicate these animals regularly with antidepressants](#) in order for them to continue to function, precisely because **it is impossible to recreate the necessary living conditions for them and to meet the biological requirements of their captive species**. No captive marine mammal has the freedom to express natural behavior, which is a guiding principle in animal welfare.

3. The proposal fails to meet the requirement of the EU Zoo Directive 1999/22 to **provide species-specific enrichment of enclosures, in fact it offers the exact opposite**: complete isolation and dulling of the senses. Dolphins live in a world of sound and they rely on their hearing as we rely on our vision. Echolocation - the ability to locate objects or "see" through sound - is their main sensory system. In the wild, they use echolocation to communicate and navigate, but in captivity they do not use this skill. Small tanks do not offer anything interesting and challenges to explore, and the concrete and glass walls of tanks and aquariums reflect sounds and amplify them, which bothers animals with highly developed and sensitive hearing.

In the wild, dolphins live surrounded by other marine animals and are an integral part of the marine ecosystem. Because the water in the pools is chemically treated (usually with chlorine), the survival of other species, such as fish, invertebrates and marine vegetation, is impossible there and the pools in the dolphinariums are bare and empty.

4. The outdoor pools described in the proposal plan "the stands to be covered with sun protection facilities", however nothing is mentioned about **protecting the animals from the sun**. Shallow outdoor tanks are known to go hand in hand with severe sunburn and sunstroke for dolphins, which can be fatal. This is observed in dolphinariums around the world. One example is Marineland in Antibes, France. There, the weather is not as hot as on the Bulgarian seaside during the summer, but there are cases of dolphins who were injured even died by heat stroke. This is happening in a pool with a depth of 10 meters, which is more than twice the depth planned in the proposal. Outdoor tanks, such as the ones described in the proposal, are inhumane, inappropriate and inconsistent with the **Bulgarian Animal Protection Law Art. 7, para. 1, 3 and 9, which prohibits causing prolonged or repeated suffering of animals, damage to their health, stress and exposure to temperature or other adverse weather conditions**.

5. Due to inadequate living conditions, mortality among captive dolphins is significantly higher than among wild dolphins, despite all the challenges of survival in the ocean. Captive birth rates are very low and babies who survive are rare. Because of the high numbers of premature deaths and low breeding success, dolphin populations cannot maintain themselves on their own. There is a constant need for the import of others - new wild-caught dolphins. Between 1978 and 2008, data on 285 cetaceans imports in the EU were recorded, despite the ban under EU Regulation CITES 338/97 on imports of cetaceans into the EU for commercial purposes. Capture of wild dolphins poses a serious threat to cetacean populations in the wild.

Cetaceans in EU dolphinariums do not come from a wide variety of populations around the world, they come from smaller, specific populations that inhabit a certain area and breed in limited groups. Systematic capture of individuals from these populations to supply **the dolphinarium industry can affect the survival of entire populations and species.**

The **dolphinarium industry is a threat to wild populations**, and is incompatible with protection of species and the environment, and therefore cannot meet the requirements of the EU Zoo Directive 1999/22 for **participation in conservation, research and education activities expected to benefit conservation of the species.**

6. A number of studies have shown that keeping wild animals in captivity and performances in which animals perform tricks and demonstrate unnatural behavior are of **no educational value.** However, they can achieve the **opposite effect:**

- The animals are shown to visitors mainly during performances, while being forced to demonstrate unnatural behaviors that cannot be found in the wild. This creates a misconception about the animals and teaches children that animals have no right to choose their way of life, and that the total breaking of their will for the sole purpose of entertaining the audience is something acceptable and fun.
- Keeping animals in captivity as exhibits such as zoos also has no educational value for visitors. A number of studies show a [lack of increased knowledge](#) in most children after a visit, that less than 1/3 of the visitors [read the information signs](#) about the animals and that the leading motive for visiting the zoo is entertainment and the [leading motive](#) for visiting a dolphinarium is the possibility of close contact with animals (for example swimming with dolphins).
- [A study of visitors' attitudes towards the zoo](#) shows that the average visitor's concern for animals and interest in biology and ecology **decreases** after a visit. In their place arises a sense of superiority and dominance of man over other living beings, as well as a **negative attitude towards animals** (such as avoidance, hostility or indifference). This is why the members of society who are most interested in active environmental protection avoid visiting such places.
- Behavior shown during performances (close contact with trainers and feeding the animals by hand) can encourage the audience to take similar action when meeting an animal in the wild. This is far from educational and can result in a serious accident.

- The behavior demonstrated and learned during the attractions, such as giving the opportunity for close contact with the animals - photos and "kisses" with animals, swimming with dolphins and so-called dolphin therapy programs - is completely unnatural for wildlife. In addition to being anti-educational, they pose a significant risk to public safety.

7. Risks to the health and safety of participants:

- Direct contact between the public and animals always poses a significant risk to the health and safety of both parties. Dolphins are large and strong animals, and no matter how well trained they are, they can become unpredictable in situations of severe stress. Numerous **incidents have been reported in swimming with dolphins programs, often involving children who have suffered injuries, bites, and broken bones**. For this reason, in Italy there is a law banning contact between cetaceans and the public.
- Direct contact between the animals and the trainers is also not safe. There are cases of **trainers killed by animals** they have been working with for years.
- Marine mammals pollute swimming pools to an impressive degree. Each 136 kg dolphin that eats 6.6 kg of fish per day produces approximately 4 liters of urine and 1.4 kg of feces per day. Nitrogen wastes provide a favorable environment for the cultivation of bacteria and fungi. In addition, water contains an abundance of other bodily secretions, including leftover food, vomited fish (dolphins often vomit under stress), blood, etc. Contact between open wounds and the water always comes with a serious **risk of infection** for both dolphins and visitors. The water in the pools is practically a breeding ground for a rich variety of drug-resistant infections.

8. Risk of spreading zoonotic infections:

Direct contact between the public and animals carries a significant risk of disease transmission. It is known that dolphins can carry viruses, bacteria and parasites that [can be transmitted to humans and cause disease in humans](#), and vice versa.

Currently, the whole world is trying to keep safe and changing drastically to limit the spread of **COVID-19**, which is transmitted by **airborne droplets**. In this situation, which no one can yet say how long will last, we consider it is completely absurd for a public institution to plan a program that involves **a large number of visitors - most of whom will be tourists from all around the world - entering the same water as wild animals**. This is in complete contradiction with the global epidemiological crisis, and all the recommendations that go with it worldwide.

Recently, 7 tigers at the New York Zoo tested positive for COVID-19. Experts believe the animals were **infected by an asymptomatic zoo employee**. Epidemiologists say they are not surprised that **captive wildlife is susceptible to COVID-19**, and the data from this case will be used to study the virus among a wider population of wildlife. This process is only just beginning, and will

take time, as any animal test requires anesthesia. For this reason, scenarios in which routine animal testing is performed between visits or contact with different visitors are not possible.

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We consider the Burgas Municipality's investment proposal immoral, outdated, and unacceptable for a civilized country in the 21st century. The fact that it was proposed by a public institution is outrageous. The global trend in this century is to close - not to open new dolphinariums and zoos. Public attitudes against keeping animals in captivity are growing rapidly, with more and more people actively rejecting the use of sentient animals for entertainment. Dolphinariums are becoming less and less popular and causing public discontent. Today, we need sustainable solutions to conserve biodiversity and save species, not to reproduce already rejected, inhumane practices.

We believe that it would be disgraceful and tragic for Bulgaria if this investment project is approved by the institutions whose role is to protect animals and the environment.

We insist that the above facts be taken into account in the environmental impact assessment and that all attraction with animals be removed from the investment proposal.

The Last Cage