

10 June 2020

Dimitar Nikolov  
Mayor of Burgas  
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Dear Mayor Nikolov

I am writing to you on behalf of the Dolphinaria-Free Europe (DFE) coalition, a partnership working in Europe to protect whales, dolphins and porpoises and whose members include eminent marine mammal scientists, conservationists and NGOs from around the world, concerning a proposal submitted by the Municipality of Burgas for the construction of a marine theme park facility that will display dolphins, to be located in Ezero Park.

It has come to our attention that the plans are to hold dolphins for performances in outdoor tanks, whose depth will be 1–4.5 m, with no protection from the elements. We are concerned that the dolphins will be exposed to sun and seasonally to colder weather (captive bottlenose dolphins are from, or descended from, temperate and tropical populations), making these tanks unsuitable to sustain their welfare. We believe this to be contrary to a number of existing laws and directives for the protection of animals, including the EU Zoo Directive 1999/22 and several articles of the Bulgarian Animal Protection Law. In addition to legal requirements, there are also significant animal welfare concerns regarding the keeping of dolphins in captivity.

Scientific studies have not only concluded that dolphins are highly intelligent, on a par with great apes, but further that the restrictive conditions in captivity lead to chronic stress and in many cases to early mortality. When denied adequate space, large, wide-ranging species (dolphins typically travel 40 km each day) commonly develop problems such as abnormal repetitive behaviour (termed stereotypies) and aggression (Clubb & Mason, 2003). Dolphins sharing the same tank are often unrelated, from different geographical regions. This can result in dominance related-aggression, injury, illness or in some instances even death (Waples & Gales, 2002).

In the majority of cases, captive dolphins are kept in small, smooth-sided tanks, virtually devoid of the stimuli essential for these highly intelligent and social mammals. Noise is also a problem. Not only do the animals have to tolerate the continuous, repetitive noise of pumps and filters, but also facilities utilize loud music during shows – all of which are thought to cause significant stress to dolphins, who rely on their hearing to sense their environment more than sight (Couquiaud, 2005).

Together with the stress caused to the dolphins by handling, confinement, transport, isolation, crowding and eating an artificial diet of dead fish, the issue of survival/reproductive rates of captive dolphins compared to free-ranging animals must also be considered.

Some studies indicate that captive bottlenose dolphins live as long, and have the same mortality rates, as their counterparts in the wild (Venn-Watson et al., 2015). Other studies, however, indicate a higher year-to-year mortality rate for cetaceans in captivity than for those in the wild (Small & DeMaster, 1995, Woodley et al., 1997). However, even if captive mortality rates match those seen in the wild, this is not impressive – zoo animals often live longer than their wild counterparts due to protection from predators, veterinary care and reliable food.

Captive cetaceans at best only match the mortality of their free-ranging counterparts and in many facilities, their mortality still exceeds what is seen in the wild. This strongly suggests captivity has impacts on cetacean longevity similar to predation, food shortages and other natural threats. I respectfully ask you to consider the aforementioned facts and the impact establishing such a captive facility, which is unlikely to meet Bulgaria's legal obligations, could have.

There is already some international concern over the welfare of dolphins at the Festa Dolphinarium in Varna. Records of exact number of dolphins who have been held there vary, but it is thought that since 1984, at least 28 dolphins have been on display at this facility, some wild-caught. Concern over husbandry and welfare of the animals at Festa Dolphinarium heightened when, on 9 August 2019, a calf born to Yoanna died during a performance at the facility just nine days after birth. Yoanna herself was born at Festa in 1992 and suffers disfigurement of her rostrum due to swimming at full speed at one of the gates when she was younger, breaking her teeth and jaw. Clearly there are serious issues at this facility, which must not be replicated at a new facility.

Captures of dolphins from wild populations continue to stock this type of facility. This endangers not only the individual animals taken into captivity, but also the animals left behind, who are traumatized by capture operations. In addition, most dolphinariums choose young animals, who are vital to the long-term survival of wild populations. If the dolphins supplied to stock this new facility were wild-sourced, this would be an added concern. We therefore strongly urge that permission for the dolphinarium aspect of this development proposal be rejected and removed from the plans.

Thank you for taking the time to consider our comments. I would be happy to answer any questions you may have and in the meantime look forward to your response.

Yours sincerely,



**Margaux Dodds**

**Chair**

**Dolphinaria-Free Europe**

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