

27 May 2020

Emil Dimitrov
Minister of Environment and Water

edno_gishe@moew.government.bg

Dear Minister Dimitrov

I am writing on behalf of our charity and supporters in regards to a proposal which has been submitted by the Municipality of Burgas for the construction of a marine park facility, which will display dolphins, to be located in Ezero Park.

We are advised that the plans are for dolphin performances in outdoor tanks, the depth of these is from 1m to 4.5m, with no protection from the elements. It is our concern that being held in such shallow tanks, the dolphins will be exposed leading to sun and windburn, 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 distressed animals and early mortality. When denied adequate space, large, wide-ranging species which can travel in excess of 100km a day, commonly develop problems such as abnormal repetitive behaviour (termed stereotypies) and aggression (Clubb & Mason, 2003). Dolphins sharing the same pool are often unrelated, from different geographical regions or species. This can result in dominance related-aggression, injury, illness or in some instances even death (Waples & Gales, 2002).

Investigations have revealed that in most cases dolphins are kept in small, smooth-sided pools, 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 utilise loud music during shows – all of which are thought to cause significant stress to cetaceans who rely on their sense of hearing (Couquiaud, 2005).

Together with the stress caused to the dolphins by handling, confinement, transport, isolation, crowding and eating an artificial diet of dead fish, generally, captive dolphins have a shorter life expectancy compared to wild dolphins - rates being approx. (5.6% vs 3.9%) (Small & DeMaster, 1995; Woodley, 1997).

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I respectfully ask you to consider the aforementioned facts and consider the impact establishing such a captive facility that is unlikely to meet Bulgaria's legal obligations, ask that the dolphinarium aspect of this proposal be refused 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, in the meantime look forward to your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Dodds', with a large, stylized flourish underneath.

Margaux Dodds

Director

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References:

- Clubb, R. & Mason, G. (2003). Captivity effects on wide-ranging carnivores. Nature 425: 473-474.*
- Waples, K.A. & Gales, N.J. (2002). Evaluating and minimising social stress in captive bottlenose dolphins (Tursiops aduncus). Zoo Biology 21: 5-26.*
- Couquiaud, L. (2005). A survey of the environments of cetaceans in human care. Aquatic Mammals 31: 279-385.*
- Small, R.J. & DeMaster, D.P. (1995). Survival of five species of captive marine mammals. Mar. Mamm. Sci. 11:209-226.*
- Woodley, T.H., Hannah, J.L., & Lavigne, D.M. (1997). A comparison of survival rates for captive and free-ranging bottlenose dolphins (Tursiops truncatus), killer whales (Orcinus orca) and beluga whales (Delphinapterus leucas). IMMA Technical Report 97-02. Guelph, Canada.*