



Professor Athanasios Tsaftaris, Minister
Dr. Maximos Charakopoulos, Deputy Minister
Greek Ministry of Rural Development and Food

9 January 2014

By email

Dear Ministers

I write on behalf of the UK animal protection charity OneKind concerning information we have received today about a possible change to Articles 12 and 13 of the Animal Welfare Law 4039/2012, banning animal performances in circuses, zoos, variety shows and other establishments.

We understand from colleagues in Greece that it is your intention to revise the law, which would effectively exempt the Attika Zoo from these provisions. We are told that a dolphinarium has been operating at this zoo with performances of dolphins and sea lions, described as "educational shows" rather than entertainment, and that the proposed change would legalise these activities.

OneKind respects the right of all legislatures to consider the laws that are appropriate for their countries and we acknowledge that there are many reforms to animal welfare legislation required in the UK. We would like to make you aware, however, that there was considerable admiration in the UK for the approach taken in Law 4039/2012. As UK animal advocates we are able to point to this as a good example for our own decision-makers to emulate, and we feel it would be a retrograde step to weaken it.

Our view is that exhibiting trained behaviour which bears little or no resemblance to the natural behaviour seen in wild dolphins has no educational value. Conversely, there are serious concerns for the welfare of dolphins in captive exhibits and entertainment. These were well summarised in a review of the keeping of whales and dolphins in captivity in the European Union and EC Directive 1999/22 relating to the keeping of wild animals in zoos, published in 2011ⁱ

"Article 13 of the Treaty on the Functioning of the European Union recognises animals as sentient beings and requires Member States, in their implementation of the Zoos Directive to take into full account the biological requirements of cetaceans as highly intelligent animals which travel long distances in the wild and live in social groups. No captive cetacean in the EU has the freedom to express normal behaviour, a guiding principle for animal welfare. Dolphinariums in the EU fail to meet the biological requirements of cetaceans in captivity or to provide an appropriate species specific enriched environment. Stress and stereotypic behaviour are common among captive cetaceans. Even where veterinary care is optimal, survival rates are lower among captive cetaceans than among their counterparts in the wild."

I hope you will take these observations into account and maintain a complete prohibition on animal performances in circuses, zoos, variety shows and other establishments.

Yours sincerely

Libby Anderson
Policy Director | OneKind

ⁱ EU ZOO INQUIRY 2011:DOLPHINARIA A review of the keeping of whales and dolphins in captivity in the European Union and EC Directive 1999/22, relating to the keeping of wild animals in zoos. Whale and Dolphin Conservation Society, Born Free Foundation, ENDCAP 2011
http://www.wdcs.org/submissions_bin/Eu_Dolphinaria_Report.pdf