

**LETTER OF CONCERN FROM THE ACCOBAMS ADVISORY COMMITTEE ON SEMI-ENCLOSED FACILITIES
REGARDING TWO DOLPHIN REFUGES / SANCTUARIES IN ITALY AND GREECE**

Note of the Secretariat

The Secretariat has received on 28th January 2026, the following communication from Dr. Joan Gonzalvo, Chair of the ACCOBAMS Advisory Committee on Semi-enclosed Facilities, regarding two initiatives presented as Dolphin Refuges / Sanctuaries in Italy and Greece.

Dear colleagues at the ACCOBAMS Secretariat,

The ACCOBAMS Advisory Committee on Semi-enclosed facilities would like to call to your attention the need for an inquiry regarding two cases that are presented to the public as Dolphin refuges / Sanctuaries. The *Guidelines for Best Practices During the Installation and Management of Semi-enclosed Facilities for Cetacean Species in the ACCOBAMS Area*, initially presented at the 16th meeting of the ACCOBAMS Scientific Committee (Dec 2024), were formally adopted by the Parties during the MOP9 in Cyprus 18-21 November 2025 (ACCOBAMS-MOP9/2025/Doc34/Annex14/Res9.19 <https://doi.org/10.70978/SEYQ9739>). Following up on this formal adoption by the Parties, we bring to your attention the two initiatives listed below as cause for concern, due to their apparent failure to comply with these guidelines. These cases are:

1. The San Paolo Dolphin Refuge (Jonian Dolphin Conservation, Gulf of Taranto, Italy)
Link: <https://www.joniandolphin.it/san-paolo-dolphin-refuge/>
2. The Aegean Marine Life Sanctuary (Archipelagos Institute of Marine Conservation, Lipsi Island, Greece)
Link: <https://archipelago.gr/fields-of-action/aegean-marine-life-sanctuary-aml/>

Based on the documentation available online and the criteria defined in the referenced ACCOBAMS and GFAS (Global Federation of Animal Sanctuaries) guidelines, we provide a preliminary technical assessment (no on-site visit has been conducted) highlighting compliance gaps, missing information, and aspects requiring clarification before any potential recognition or endorsement by ACCOBAMS should occur.

1. San Paolo Dolphin Refuge

Overview:

Presented as the “first European sea refuge for dolphins retired from captivity,” located near San Paolo Island in the Gulf of Taranto, with an estimated area of approximately seven hectares. The project foresees a 1600 m² sea enclosure and a 16 m² veterinary pool, monitoring systems, on-site accommodation, veterinary and storage facilities, and a remote-control room for environmental monitoring. The Italian Ministry for the Environment has visited the facility but there is no official feedback on what kind of authorization procedures should be followed.

Key observations:

- Habitat and dimensions: insufficient details on depth, variability, habitat enrichment, and swimming range; in case of authorization as zoological establishment, no information

on the material of construction of pools, any shadowing or separation of different water bodies to allow social segregation or quarantine;

- Water quality: no information on water exchange systems, filtration, monitoring frequency, or water quality parameter thresholds; no information on the soundscape and any measures to mitigate underwater noise, considering that the area is close to Navy activities;

- Safety, biosafety and containment: unclear contingency protocols for storms, power failures, or animal escapes (i.e., double fencing and enclosures); in case enclosures are limited by heavy netting or some alternative gear, no information on cleaning procedures or to the possibility of small marine organisms entering the enclosures (no safety and secure control on food); the area is endemic for morbillivirus: no information on biosafety measures to avoid contact with animals; no information on microbiological and toxicological examination of incoming and outgoing waters and related contingency plan;

- Veterinary and quarantine: lack of published protocols and facilities for animal health management, preventive medicine, and biosecurity; lack of 24/7 veterinary personnel on site or within an hour distance able to intervene in case of emergencies;

- Public interaction: absence of defined regulations for visitor access or educational engagement, as well as surrounded restricted area;

- Governance and sustainability: missing information on long-term funding and operational budgeting essential for the facilities running costs; no information on the interaction with local authorities including public veterinary services for inspections according to current regulations

- Environmental impact: no evidence of environmental impact assessments or corresponding national authorizations.

2. Aegean Marine Life Sanctuary (AMLS)

Overview:

Located in a sheltered bay on Lipsi Island (Greece), this project aims to provide a rehabilitation and permanent-care refuge for stranded or formerly captive dolphins and other marine species. The initiative emphasizes sustainability, renewable energy use, minimal human-animal interaction, and alignment with the GFAS “Standards for Cetacean Sanctuaries”.

Key Observations:

- Development stage: Unclear time-frame for its execution. The project appears to be under construction or in early operational phase;

- Water quality: insufficient data on currents, water quality monitoring, and seasonal variability in these;

- Barrier design: limited information on net mesh size, depth, maintenance, and risk of entanglement;
- Veterinary and quarantine facilities: protocols and infrastructure not fully described or published;
- Governance and transparency: financial sustainability and management structure not disclosed;
- Environmental and legal compliance: missing published environmental impact assessments or formal permits.

Based on the numerous uncertainties on critical aspects above-mentioned, we manifest our strong concern about the preparedness of both facilities to safely house cetaceans and other marine species. Hence, we recommend that information be gathered from the concerned entities and national authorities, asking for detailed evidence demonstrating compliance with the minimal mandatory criteria before any consideration is given to the possibility of a formal recognition as marine refuges within the ACCOBAMS area.

Both initiatives are probably well-intended, but the documentation currently available is insufficient to demonstrate full compliance with ACCOBAMS, GFAS, and associated EU legal frameworks.

Thank you for your consideration.

We remain at your disposal for further collaboration.



Joan Gonzalvo, PhD.

ACCOBAMS Advisory Committee on Semi-enclosed facilities; Chair

Reference documents

1. ACCOBAMS-MOP8/2022/Inf52. Scientific perspective on “potential marine semi-enclosed facilities” In the ACCOBAMS area. 18th meeting of the parties to ACCOBAMS, Malta, 29 November - 2 December 2022.
2. ACCOBAMS-MOP9/2025/Doc34 - Report of the Ninth Meeting of the Parties to ACCOBAMS 18-21 November 2025, Limassol, Cyprus
<https://doi.org/10.70978/XQVZ1685>

RESOLUTION 9.19. CETACEAN PASSPORT AND SEMI-CAPTIVITY GUIDELINES
 ACCOBAMS-MOP9/2025/Doc34/Annex14/Res9.19
<https://doi.org/10.70978/SEYQ9739>

3. Global Federation of Animal Sanctuaries. Standards for Marine Mammal Sanctuaries; Global Federation of Animal Sanctuaries: Phoenix, AZ, USA, 2023; pp. 1–41.