28 February 2011

Mr. Bernard Van Goethem  
Acting Deputy Director General  
DG Health and Consumers  
Office F101 6/172  
Rue de la Loi 200  
European Commission  
B-1049 Brussels

Subject: European Union strategy for animal welfare

Dear Mr. Van Goethem,

The European Association for Aquatic Mammals (EAAM) is a non-profit organisation founded in 1972 and dedicated to the knowledge, welfare and conservation of marine mammals. Its members are zoological facilities across Europe that display marine mammals to the public, engage in conservation education, and conduct or participate in scientific research for the benefit of the *in situ* and *ex situ* conservation of marine mammal species.

EAAM operates in cooperation with the European Association for Zoos and Aquariums (EAZA) under a Memorandum of Understanding in which EAAM and EAZA work toward joint management strategies for aquatic mammal species, share information, and engage in dialogue about species management, public education, conservation, etc. Approximately 200 million European people visit EAAM and EAZA facilities every year, enjoying this unique opportunity to learn about these species.

EAAM members also play an important role in emergency response alongside governments and other stakeholders, providing expertise, equipment and facilities to rescue and rehabilitate stranded or otherwise compromised marine mammals.

The EAAM has developed detailed guidelines addressing all aspects related to marine mammals and has initiated an inspection and qualification process for EAAM membership.
Concerning the various policy options identified by the Commission on 31 January 2011 for the EU's new animal welfare strategy (2011-2015), the EAAM supports the concept of co-regulation established through the creation of an EU framework law. The management of marine mammals under human care is highly specialised. Any proposals for European or national regulations, standards or guidelines must be informed by marine mammal specialists and experts: these are the members of the EAAM and EAZA. By following the co-regulation approach, the EU will be assured that animals' health and welfare needs will be addressed by guidelines, codes of practice specifically developed for various species, sectors and/or activities.

The EAAM and its members also would be pleased to work with EU officials to consider the development of objective animal welfare indicators for marine mammals.

Finally, the EAAM supports the development of a strategy that would result in strong, science-based and accurate communications from the European Commission about animals in human care for the general public as part of the new strategy. The public is often subjected to a great deal of inaccurate information as part of campaigns against zoological institutions and other animal facilities: it is our hope that the new welfare strategy will result on broad dissemination of unbiased information about animal health and welfare for the benefit of the public.

Thank you for this opportunity to submit our views. We also would appreciate being added to the consultation list so that we might continue to be involved as the new strategy is developed.

Sincerely,

Claudia Gili, DVM, PhD
President of the EAAM