



# The Society for Marine Mammalogy

<http://www.marinemammalogy.org>

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15 March 2020

Her Excellency Ivete Maibase,  
Minister of Land and Environment

Her Excellency Augusta Maita,  
Minister of the Sea, Inland Waters and Fisheries

Your Excellencies,

I am writing to you regarding the conservation of dugongs in the Bazaruto Archipelago National Park and adjacent waters, the last viable dugong population in East Africa. I do so in my capacity as President of the Society for Marine Mammalogy, the world's largest professional group dedicated to the study of marine mammals. Our membership consists of approximately 2,000 scientists from more than 25 countries and our goal is to facilitate understanding and promote conservation of marine mammals and the ecosystems of which they are a part and upon which they depend. Members of the Society include some of the world's foremost dugong experts, including scientists who have worked extensively in Mozambique.

The Society commends the Government of Mozambique for having established the Bazaruto Archipelago National Park. This action was important, but alone it is not sufficient to assure the conservation of dugongs in your country.

The global status of the dugong is a serious conservation concern; dugongs are listed as Vulnerable in the IUCN Red List of Threatened Species. However, the dugong population off East Africa likely merits the more extreme "Endangered" status considering the latest research results. Dugong numbers in the region are perilously low, the species having completely disappeared from much of East Africa and Madagascar – except in the waters adjacent to the Bazaruto Archipelago. The Bazaruto dugong population, estimated at between 250 and 350 individuals, is the last known viable dugong population within the Western Indian Ocean. Thus, Mozambique is of critical importance to this vulnerable marine mammal species.



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Members of our Society are deeply concerned about the continued survival of Bazaruto dugongs, 70% of which live outside the boundaries of the National Park. Dugongs are at extreme risk of entanglement in gillnets. Recent scientific modelling has estimated that if only two reproductively mature females die each year, this will lead to the population's extinction. Unfortunately, there is evidence that four or five mature females drown each year in illegal gillnets.

Another major concern is that key habitat of this dugong population is within the footprint of proposed oil and gas developments by Sasol Limited. Recognizing the dangers posed by industrial projects to species and areas that are the focus of conservation efforts, and in fact to Mozambique's entire coastal ecosystem, the Society for Marine Mammalogy strongly recommends that the following steps be taken:

- The recently designated “Bazaruto Archipelago to Inhambane Bay Important Marine Mammal Area” (<https://www.marinemammalhabitat.org/portfolio-item/bazaruto-archipelago-inhambane-bay/>) should be proclaimed an *Environmental Protection Area*. This would not only greatly benefit the conservation of the Mozambican “Marine Big Six” (dugongs, Indian Ocean humpback dolphins, humpback whales, sea turtles, manta rays and whale sharks), but also the local coastal communities through the sustainable tourist revenues within the framework of the development of Mozambican “blue economy”. In the longer term, the Bazaruto Archipelago National Park's boundaries should be extended northward (up to the Save River's mouth) to encompass core dugong habitat, as indicated by the “Bazaruto Archipelago to Inhambane Bay Important Marine Mammal Area”.
- Taking note of the vulnerability of the dugong population in the “Bazaruto Archipelago to Inhambane Bay Important Marine Mammal Area”, and in particular of the modelling indicating that the population cannot sustain the current level of losses in illegal gillnets, the government should ensure that the existing gillnet ban is strictly enforced.
- Before oil and gas development begins, a thorough, independent environmental review should be conducted by recognized marine mammal experts, including taking note of the “*CMS Family Guidelines on Environmental Impact Assessments for Marine Noise-generating Activities*”, to assess the ecological impacts of such development on the dugongs and associated seagrass habitats.
- Should the proposed oil and gas developments by Sasol Limited move forward, developers and operators should be required to:
  - a. use the best available mitigation, and rigorously monitor the environmental impacts of the development on dugongs and their seagrass habitat to evaluate the effectiveness of the employed mitigation, and
  - b. establish trust funds to support: (1) the establishment of gillnet free zones in the proposed Environmental Protection Area along with training of gillnet fishermen from Bazaruto Bay to obtain entry-level jobs in developing industries and wildlife enforcement and monitoring patrols, and (2) working with the University Eduardo Mondlane, establish the training of scientists and a comprehensive program of research and monitoring of the dugongs and their seagrass habitats.



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The Society for Marine Mammalogy stands ready to suggest experts who could offer their scientific input to assist your government as it moves forwards and builds upon its efforts to conserve dugongs in Mozambique.

Thank you for considering our Society's concerns on this important matter.

Sincerely,

D. Ann Pabst  
President, The Society for Marine Mammalogy

Cc: Dr. Arcilio Madede, Head of Office of the Minister of Sea, Inland Waters and Fisheries,

Mrs. Lidia Abiba, Advisor to the Minister of Sea, Inland Waters and Fisheries,

Dr. Mohamed Harun, Advisor to the General Director of the National Administration for Conservation Areas (ANAC)