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# **Executive summary**

TUI Group is one of the world's largest travel companies, with a reported annual revenue of €23.2bn (over £19 bn) in 2024.¹ The company also plays a significant role in driving demand for the captive whale and dolphin tourism industry – one that confines powerful marine predators to tiny, barren tanks where they perform circus tricks for decades.

Globally, TUI Group sells over 400 travel experiences that feature captive whales and dolphins. Through extensive desk research and inperson venue visits, this report exposes TUI Group's empty claims regarding the welfare of these animals, collectively known as cetaceans, and the company's attempts at misleading their customers with animal welfare standards that they do not meet. While TUI Group claims not to sell tickets to venues that commercially breed whales and dolphins, breeding was found to be taking place at a number of venues sold by the company.

Tickets to at least 37 venues offering cetacean shows or visitor interactions were found on sale. Activities ranged from shows, swimming and interacting with dolphins to being a "trainer for a day". Prices ranged from £19 to £374 for one adult, depending on the activity and the venue. Offers were described as "a family day out to beat all others" with customers invited to "tick off the ultimate bucket list item and

swim with a dolphin".

Researchers visited twelve venues in Europe and Mexico and noted welfare issues such as heavily pregnant animals performing, calves separated from their mothers during performances, eye and skin lesions, and excessive aggressive markings. This is where animals 'rake' their teeth against other dolphins in an act of dominance. Although 'raking' does occur in the wild as part of determining social hierarchy, in captivity dolphins have no way to escape or avoid an aggressor.

The wider travel industry is responding to a shift in the way people view captive cetaceans, as growing numbers of travellers choose to see wild animals in their natural habitats – where they belong – rather than supporting cruel shows and direct animal interaction experiences. Governments are taking action too, with new laws banning the breeding or keeping of whales and dolphins in marine parks. This movement is gaining momentum, and companies like TUI Group are getting left behind.

Responsible travellers, ethical companies and animal protection groups have made it very clear - this must be the last generation of cetaceans in captivity. But this can only happen if TUI Group stops propping up this cruel industry.



Photo credit: World Animal Protection



# Glossary

**Cetaceans** - a term that refers to whales, dolphins and porpoises.

**Orca** - also known as killer whales, the orca is the largest species in the dolphin family, known as Delphinidae.

**Bottlenose dolphins** - the most common species of dolphin in captivity, the classic 'Flipper' dolphin is also a member of the Delphinidae family.

**Greenwashing** - this is the practice of misleading customers by publicly making impressive claims about the company's approach to social responsibility that are not implemented.

**TUI Group** - global tourism company with 20 million customers, 400 hotels, 18 cruise ships, five airlines and 1,200 travel agencies.<sup>2</sup> In 2024, TUI Group reported revenue growth to €23.2bn.<sup>1</sup>

**TUI** - one of many brands owned by TUI Group, extensively marketed and well-known as a household brand.

**Musement** - online tour and activities platform, part of TUI Group's tours and activities division.

**Stereotypies** - repetitive and unnatural behaviours. In cetaceans this may present as swimming back and forth across the tank in a seemingly endless loop or chewing at bars between the tanks.

**Sea pen** - a section of water cordoned off in the ocean in which dolphins are sometimes kept.

Raking - this is when dolphins scratch, or 'rake' each other with their teeth, as an act of dominance. This happens in the wild as well as in captivity to determine dominance. In captivity, there is no space to escape or move away from an attacking animal and groupings may change when animals are moved between parks or tanks. In these situations, hierarchies must be re-established regularly, leading to heightened occasions of raking.

**Rostrum** - this term refers to what is sometimes called the 'snout' or 'beak' of a cetacean.



Photo credit: World Animal Protection

# Introduction

The captive cetacean entertainment industry is big business, estimated to be worth up to £4bn (US\$5.5bn) annually.<sup>3</sup> A single dolphin can make up to £1.5m per year (US\$2m) for a venue<sup>3,4</sup> – in addition to the profits made from tourists buying merchandise, food and accommodation. Many dolphin venues are owned by large corporations with huge financial backing and it is in the interests of all those profiting from these venues to ignore the animal suffering at the heart of it.

Travel agencies and tour operators are huge contributors that keep the marine park industry in business. By selling tickets and promoting captive cetacean entertainment as a fun day out, they not only rake in profits but give social licence to captive wildlife entertainment. By promoting and selling tickets to dolphin shows, trusted household names like TUI reassure tourists that watching them is an acceptable and harmless day out. This could not be further from the truth.

This report focuses on the whale and dolphin venues TUI Group continue to profit from, sharing the stories of animals at these venues who suffer as a result. We also look at TUI Group's public statement on cetacean venues, and how it does not meet its own animal welfare policy. We highlight how the company is greenwashing customers by stating that it will not sell tickets to commercial breeding venues while continuing to do so.

The issues facing whales and dolphins in captivity have been reported thoroughly<sup>3,5</sup> so we only touch on a few of the major issues here to give context to the problem. For a more in-depth discussion of the suffering these complex marine predators endure as a result of being kept in captivity, see 'Behind the Smile: The multi-billion dollar dolphin entertainment industry'<sup>3</sup> and 'The Case Against Marine Mammals in Captivity.'<sup>5</sup>



#### **Space**

The most obvious issue for whales and dolphins confined to entertainment venues is the lack of space. In the wild, species like the bottlenose dolphin often have home ranges greater than 100km<sup>2</sup>. Even the largest primary tank at a dolphin venue is still 200,000 times smaller than the animal's natural range<sup>3</sup> and will never be able to provide the conditions dolphins need to thrive. The depth a dolphin may dive to depends on the species, the abundance of prey and the geographical distribution, but some species of dolphins regularly dive down 55m while hunting.6 One of the venues visited during this research had a pool depth of less than 2m.. The inadequacy of this is highlighted by the fact that a bottlenose dolphin is generally between 2 and 4m long, meaning the animal cannot even dive beyond one whole body-length. Although some wild dolphin populations do live mainly in relatively shallow coastal waters, this is certainly not true of all bottlenose dolphins. Some offshore bottlenose dolphins are recorded as regularly diving to depths greater than 450m, with many of these longer, deeper dives taking place overnight.<sup>7</sup>

At many captive cetacean venues, the tanks are designed for tourists and not for the animals. They are a far cry from the diverse environment of the ocean - barren, with smooth, featureless surfaces so that the cetacean is easily seen and the tank can be cleaned more easily. However, this offers no stimulation for animals known for their intelligence and curiosity. The water is often chemically treated and filtered for visibility and waste treatment, which may lead to eye and skin irritation. Conversely, if the water treatment is insufficient, it can lead to bacterial or algae overgrowth and related health conditions for the animals forced to call these tanks home.

Some venues have sea pens rather than tanks.

Although the seawater and currents may offer a more natural environment, the same issues apply with a lack of space, the inability to determine their own behaviours, forced interaction with tourists and no way of escaping aggression from other animals. It is also the case that many sea pen venues can be found in busy tourist areas, next to ports or marinas to ensure footfall. This means they may be exposed to run-off from outflow pipes and the contaminants resulting from heavily used marinas and other local industries, as well as noise pollution from busy maritime traffic.



#### Social bonds

The species of cetacean most commonly found in captivity is the bottlenose dolphin.<sup>3</sup> These are known to live in complex fission-fusion societies with animals coming together in large groups (fusion) for some activities, such as travelling, and breaking into smaller groupings (fission) for other activities, such as hunting. These social dynamics are not possible in captivity, which can lead to frustration and aggression between animals.

Orcas are kept in four of the venues sold by TUI Group, including the three SeaWorlds in the USA and Loro Parque in Tenerife. SeaWorld announced an end to their captive orca breeding programme in 20168 following public outcry at orca captivity after the release of the documentary film, 'Blackfish'. Loro Parque, meanwhile, continues to breed their orcas with the latest calf Teno (see case study, p26) born in March 2025.

Orcas have very strong social bonds along the matriline, meaning that offspring generally stay

with their mothers their entire lives, with multiple generations living together in pods. Orcas have very different 'ecotypes', eg 9,10 a term that refers to reproductively isolated populations that have very different behaviours, diets, dialects and even physical characteristics. In captivity, orcas that would not normally interact in the wild are confined together, often in the same tanks, and mothers and calves are separated based on park requirements, such as if an animal is moved to another park for breeding or to increase the number of animals at another venue.

#### Intelligence

Venues often highlight the intelligence of cetaceans to their audiences by making them respond to commands and perform circus-like tricks in exchange for thawed, frozen fish.

It has long been recognised that cetaceans have their own culture, with specific behaviours passed down through generations within populations or subpopulations via social learning. Examples include specialised foraging techniques or vocalisations that help maintain group cohesion.<sup>5</sup> A small population of orcas off the coast of Patagonia in South America are known to haul themselves onto the beach to catch sea lions and have been seen practising this behaviour with younger orcas.<sup>11</sup>

Populations of bottlenose dolphins in Florida, Belize and Mexico have been observed hunting using a tactic called 'mud ring feeding'. This is where one of the group swims rapidly in a circle on the seabed flicking up the muddy substrate with their tail flukes to create a wall of mud around a school of fish,

usually mullet. The fish see the mud plume as a barrier and attempt to jump over it at the water's surface, straight into the path of the waiting dolphins.<sup>12</sup>

A population of dolphins in Shark Bay, Western Australia, have been observed wearing sponges on their rostrums (or snouts) while searching for prey among the ocean sediment, perhaps to protect against the abrasive sea floor. Female dolphins have also been seen teaching their young how to do the same <sup>13</sup>

Dolphin shows or swimming with captive dolphins teach nothing of the vast breadth of behaviours that cetaceans display in the wild, not least by stunting their natural instinct to hunt. In captivity, dolphins have either been captured from the wild or bred for a life of confinement in inadequate conditions. This causes immense suffering, which is displayed through repetitive behaviours known as 'stereotypies', such as chewing the bars between tanks or scraping paint from the tank walls.



#### Food

In captivity, cetaceans are mostly fed thawed fish and it is easy to forget that they are complex marine predators with varied hunting techniques and diets that have evolved over thousands of years.

In the wild, cetaceans actively forage for food and have a wide variety of prey, depending on the species and population. Some ecotypes of orcas feed almost exclusively on marine mammals, such as seals, sea lions and porpoises.

In captivity, their food is limited to fish (such as capelin or herring) thawed from frozen, so their

natural behaviour of hunting (sometimes as a group) and consuming live prey is not possible.

In the wild, cetaceans meet their freshwater needs by consuming fresh fish, but in captivity, they are typically given supplementary water through gelatin blocks or ice. This is due to fish losing water content (and water-soluble vitamins) during the process of freezing, storing and thawing. The nutritional value of frozen fish is also lower than that of living fish and in captivity, a cetacean's diet tends to be supplemented with vitamins.<sup>5</sup> It has been noted that the "lack of diet diversity and the reliance on frozen foods present nutritional challenges". <sup>14 as cited</sup> in <sup>5</sup> It has even been suggested that the diet and

activity cycles of wild dolphins may be protective factors against metabolic syndrome, which includes excessive iron, increased insulin, glucose and fatty liver disease, when comparing a wild population to captive dolphins.<sup>15</sup>

Food is sometimes withheld before shows or tourist interactions so that the performing animal is hungry and fish can be used as an incentive to perform tricks.<sup>5</sup>

At one of the venues visited in Mexico, researchers observed that one of the dolphins did not perform the tricks as commanded so was denied fish as punishment.



Above: An orca is fed gelatin at Loro Parque, in Tenerife, to supplement the lack of water in their diet. This is not an issue in the wild where the animal's prey would meet this need.

Photo credit: Free Morgan Foundation

Adult entry ticket to Loro Parque: £38 with TUI

# The role of TUI Group in the marine park industry

TUI Group - which includes TUI and the excursions and activities provider Musement - is one of the last big tour operators still selling captive dolphin entertainment despite declining acceptability and increasing public pressure.

As of June 2025, TUI Group profits from over 400 offers that include marine parks holding cetaceans. This is across at least 37 venues, which represents approximately 589 captive cetaceans. Several of those venues are known to be breeding cetaceans.

Note that TUI's exact offers are sometimes removed and then return so this research represents a point in time and is correct as of June and July 2025. All behaviours described in this report were observed at venues sold by TUI Group (as of June and July 2025).

TUI Group once led the way in wildlife tourism, being one of the first large travel companies to stop selling elephant riding experiences and shows. However, they are woefully behind the times when it comes to captive cetacean entertainment. In the last few years travel companies such as Booking.com, Expedia Group, Jet2holidays, Nordic Leisure Travel Group, Tripadvisor and Virgin Holidays have stopped selling tickets to whale and dolphin venues, with companies including easyJet holidays and Airbnb putting in place strong policies as they developed their offers stating that they would not sell or promote marine parks.



Above: Exclusive seating at Marineland Mallorca's dolphin show for TUI customers

Adult Gold ticket to Marineland Mallorca: £31 with TUI

There has been increased public pressure on TUI Group, including from international NGOs and marine scientists, to stop selling tickets to dolphin venues. At the end of 2024, TUI Group updated the animal welfare policy on its website to state that:

"Our audits are designed to set a new benchmark for cetacean welfare in the tourism industry. They prohibit, among other things, breeding for commercial purposes, the use of drugs for behavioral modifications, the capture of cetaceans in the wild, and the use of food deprivation techniques." Ending the commercial breeding of whales and dolphins in captivity is a key milestone to break the cycle of cetaceans suffering in captivity so at first glance TUI Group's animal welfare policy looks like a move in the right direction. Yet a quick search shows that through both TUI and Musement, TUI Group continues to promote and sell tickets to breeding venues such as Loro Parque and SeaWorld parks, in contradiction of the updated animal welfare policy.



#### Why is it so important to end captive breeding?

Breeding whales and dolphins in captivity perpetuates a cycle of suffering by producing an endless stream of animals who have never had the chance to develop key skills to survive in the wild, such as hunting. When parks inevitably close due to falling acceptability or changing legislation, these animals have nowhere to go. A number of organisations, including World Animal Protection, are working hard to develop and support seaside sanctuaries, where whales and dolphins can be moved from the restrictive tanks of entertainment venues to live out their lives in a semi-natural environment, with more space to thrive, natural ocean to explore and human support where needed. In reality, this will only be possible for a limited number of animals. There are currently more than 3,000 whales and dolphins in captivity around the world and the seaside sanctuary projects already underway would provide an alternative habitat to only a very small fraction of that number. Key to ending this exploitative industry is for parks to stop breeding animals. This is built into Canada's Bill S-203, known as the Free Willy bill, which passed in 2019. Whales, dolphins and porpoises can no longer be traded or bred in captivity for entertainment in Canada.

Marineland in Niagara Falls is the last venue to have cetaceans in captivity and its future appears uncertain.

In July 2025, it was announced that Mexico has also banned the breeding of cetaceans in captivity for entertainment. This is huge progress in a country thought to have 34 dolphinariums of and around 350 captive dolphins. Accurate figures are difficult to find due to a lack of transparency in reporting in Mexico, an issue which the new legislation also promises to address moving forwards.

As the acceptability of marine parks drops, legislation changes and parks close, animals are left in a precarious position – as demonstrated by the orcas and dolphins at the now-closed Marineland Antibes. These cetaceans are currently being cared for in an empty park while their future is hotly debated. Whales and dolphins can live for decades in tanks. Cetaceans born in captivity today, such as the orca Teno at Loro Parque, face an extremely uncertain future.

At their annual general meeting (AGM) on 11 February 2025, TUI Group's leadership team were asked by NGOs why they continued to breach their own policy. The response was that while they stand by their policy, they would sell tickets to venues that breed cetaceans if it supports the natural composition of the group.

In a statement to the website 'Travel Gossip' on 24 February, <sup>18</sup> TUI Group said:

"TUI Group's audit strictly prohibits breeding for commercial purposes. However, breeding may be deemed acceptable if it supports the natural composition of social groups, encourages positive behaviours, or serves conservation efforts. "As part of our animal welfare audits, we carefully review breeding history records to ensure that animals remain within their established social structures or are relocated solely for welfare reasons. If records show frequent breeding and transfers driven by commercial interests rather than animal welfare, this is classified as an unacceptable practice."

This loophole, which is not publicly available on TUI Group's website, makes its policy an empty commitment. TUI Group continues to operate in a non-transparent way, changing its own rules to suit business requirements, effectively greenwashing customers by publishing a policy but not sticking to it.

Aside from this, it is very easy to refute each of the rationales given for the continuation of breeding, as discussed here

**Natural composition of social groups:** There are no natural social groupings in the captive cetacean industry. They are artificial groupings determined by the venue. Animals are moved between venues based on venue requirements and for breeding. In instances of aggression between animals, there is no way for animals to move away from their aggressor in a tank. Orcas are particularly known to have strong social bonds with offspring tending to remain with their mothers for most, if not all of their lives. In the wild, female orcas would have a network of related females who would help to protect and rear the newborn. <sup>19</sup> You can read Kohana's story in this report (p12), an example of orca breeding in captivity without this support network and its potential impact on the resulting calves.

**Encouraging positive behaviours:** It is likely that this refers to breeding being a natural behaviour that should not be curtailed, a common argument from breeding venues. While there is an element of truth here and ideally cetaceans would be able to display all natural behaviours as they would in the wild, the context in this case makes this a particularly frustrating argument. In an entirely unnatural setting, fed an unnatural diet, unable to hunt and made to perform tricks for frozen fish, it is convenient that the one natural behaviour that TUI Group supports is one that perpetuates the industry ad finitum and maintains a revenue stream for the company.

**Serving conservation efforts:** It is not possible to argue that breeding cetaceans aids conservation when the species being bred are not endangered and there is no plan for reintroduction to the wild to boost wild populations. Particularly with orcas, breeding over the years has often been between different ecotypes, creating hybrids that would never be able to return to the wild without threatening the composition of wild populations.

A number of conversations, emails and meetings between World Animal Protection and staff from TUI Group's head office have not provided clarification on this loophole to their animal welfare policy which is not available publicly on their website.



#### Kohana, Loro Parque

Kohana was born at SeaWorld San Diego in 2002 to Takara and Tilikum (the orca featured heavily in the documentary 'Blackfish'). Kohana was moved with her mother Takara to SeaWorld Orlando<sup>20</sup> before the age of two and then separated from her mother and moved to Loro Parque in 2006, aged three years and nine months.<sup>19</sup>

Kohana was pregnant before the age of seven by her biological uncle, Keto. In the wild, most female orcas give birth to their first calf between 11 and 17 years of age. <sup>19</sup> At the age of eight, Kohana gave birth to a son, Adan, who she rejected and the two had to be separated.

Just four months later, Kohana was pregnant again by Keto. A typical inter-calf interval (ie the time between pregnancies) in the wild is 3 to 7 years. <sup>19</sup> Kohana rejected her second calf, Vicky, who died after 10 months

It seems possible that Kohana rejected her own calves after being separated from her mother at a young age and becoming a young mother herself with no support network.

Kohana died at Loro Parque in 2022. Her son Adan is still at Loro Parque and her mother Takara lives on and is now at SeaWorld San Antonio

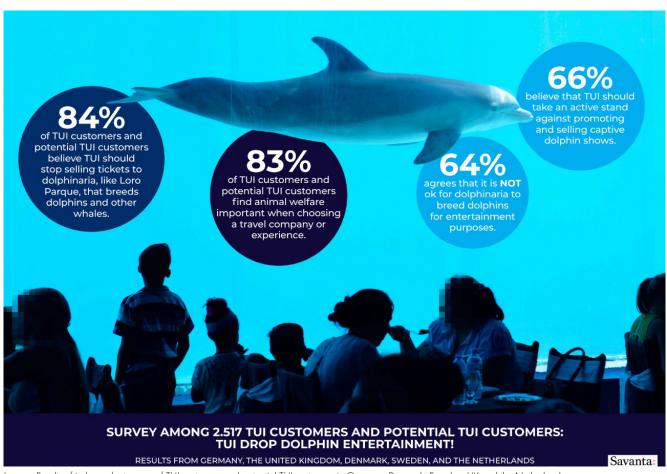


Image: Results of independent survey of TUI customers and potential TUI customers in Germany, Denmark, Sweden, UK and the Netherlands

# Customer attitudes

An independent survey run through a market research company at the end of 2024 and the start of 2025 was completed by people who had booked with TUI in the last three years or planned to do so in the next three years. A total of 2,517 people were surveyed across five countries - Germany, the UK, Denmark, Sweden and the Netherlands. Of those, 83% said that animal welfare was important to them when choosing a travel company. When shown TUI Group's latest animal welfare policy, which suggests that the brand TUI does not sell commercial breeding venues, 84% of survey respondents thought that the company should stop selling tickets to marine parks that breed dolphins and whales such as Loro Parque. Two-thirds stated that this should happen within a year. The survey also showed that if TUI stopped offering captive dolphin experiences, 83% of TUI customers and potential TUI customers across all countries surveyed would consider booking with them. However, if they continued to offer such experiences, only 49% would consider booking with TUI. By continuing to profit from captive whale and dolphin venues, TUI face a very real risk of losing business for the sake of short-term profits.

# Venue visits

The rest of this report takes a deeper dive into some of the venues that TUI Group is selling and promoting, and presents ample evidence to show that TUI Group continues to profit from venues that do not meet the company's animal welfare claims.





Photo credit: World Animal Protection

# Methodology

Initial desk-based research identified captive cetacean entertainment venues sold by TUI Group, either under the household brand of TUI or their tours and activities arm, Musement.

This was followed by in-person venue visits by researchers to document on-the-ground conditions and tourism activities. All venue visits were made unannounced and as regular visitors. Conditions

were reviewed through observations of activities and the animals' tanks or pens, as well as through conversations with staff. Photographs were used as documentation where feasible, but many venues didn't allow cameras during the tourist activity. Twelve of the venues listed below were visited in person and all visits were made between August 2024 and June 2025.

#### Table 1: List of identified dolphin venues sold by TUI Group.

All web-links were checked to be live between 13 June and 14 July 2025 for transparency.

Note: For some ticket offers in Mexico sold by both TUI and Musement, it is difficult to know exactly which venue tourists will be taken to as only a pick-up location is given. In these cases, we have used images and reviews to work out which venue is referred to.

				Number of	:
					-
V	/enue	Country	Dolphins	Orcas	Belugas
Z	Zoomarine Algarve	Portugal	27	0	0
2 Lo	oro Parque	Spain	8	4	0
3 N	Mundomar Benidorm	Spain	8	0	0
l /	Marineland Mallorca	Spain	11	0	0
5 N	Marineland Catalunya	Spain	7	0	0
S	Selwo Marina	Spain	9	0	0
7 C	Oceanografic Valencia	Spain	18	0	4
R	Pancho Texas Lanzarote Park	Spain	7	0	0
A	Aqualand Costa Adeje	Spain	10	0	0
O Po	Palmitos Park	Spain	6	0	0
1 Lo	and of Legends	Turkey	6	0	2
	SeaWorld Abu Dhabi	<b>■</b> UAE	24	0	0
3 A	Atlantis Dubai	<b>□</b> UAE	32	0	0
4 D	Discovery Cove	<b>■</b> USA	36	0	0
5 S	SeaWorld Orlando	<b>■</b> USA	30	5	2
6 S	SeaWorld San Diego	<b>USA</b>	32	8	3
7 S	SeaWorld San Antonio	<b>USA</b>	24	4	10
8 S	Shedd Aquarium	<b>U</b> SA	4	0	8
9 G	Georgia Aquarium	<b>USA</b>	13	0	5
	Six Flags Discovery Kingdom	<b>U</b> SA	13	0	0
:1 A	Aquatica Orlando	<b>U</b> SA	2	0	0
22 C	Clearwater Aquarium	<b>U</b> SA	9	0	0
23 S	Sea World Gulf Coast	Mustralia	26	0	0
4 D	Polphin Explorer Park	Dominican Republic	32	0	0
	Dolphin Cove Ocho Rios	✓ Jamaica	5	0	0
6 D	Polphin Cove Montego Bay	<b>≥</b> Jamaica	4	0	0
.7 D	Delphinus Xel-Ha	<b>■•■</b> Mexico	22	0	0
28 A	Aquaventuras Park	<b>■•■</b> Mexico	5	0	0
9 D	Dolphin Discovery Isla Mujeres	<b>■•■</b> Mexico	21	0	0
	Delphinus Riviera Maya	<b>■•■</b> Mexico	17	0	0
	Delphinus Puerto Morelos	<b>■•■</b> Mexico	8	0	0
	nteractive Aquarium Cancun	<b>■•■</b> Mexico	11	0	0
	Puerto Aventuras Dolphin Discovery	<b>■•■</b> Mexico	5	0	0
	Polphin Adventure Centre in Nuevo Vallarta	<b>■•■</b> Mexico	7	0	0
	Delphinus Xcaret	<b>■•■</b> Mexico	22	0	0
	Delphinus Playa Mujeres	<b>■•■</b> Mexico	8	0	0
	Cabo Dolphin Centre	<b>■•■</b> Mexico	5	0	0
	OTAL		534	21	34

All figures in yellow are checked with Cetabase<sup>20</sup> on 14 July 2025.

All figures in **orange** were collected during park visits in August 2024.

Figures in **grey** were taken from the 2019 database used for the report Behind the Smile and checked against venue websites for updates. Numbers may have marginally changed since the research period, due to dolphin births/mortalities.

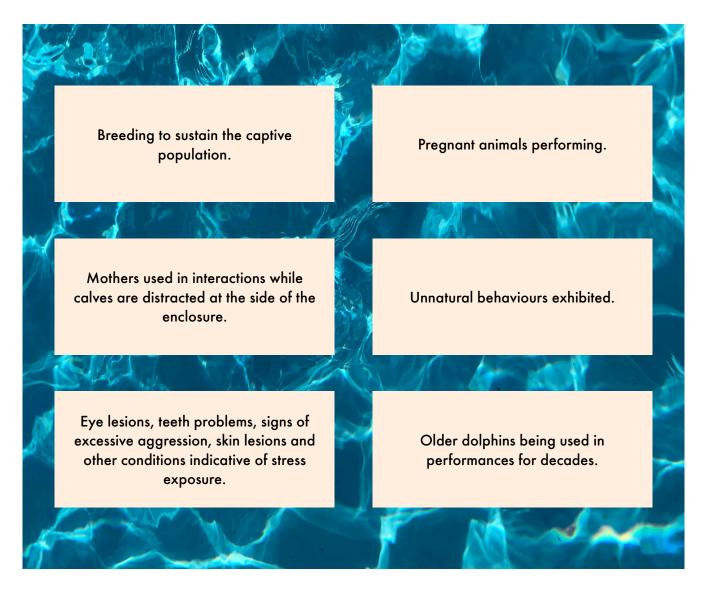
# Findings

Table 1 shows a total of 37 venues identified worldwide where tickets were sold and promoted by TUI Group under the brand names TUI and/or Musement. Researchers found over 400 individual offers for these venues, with a number of individual tours selling various levels of interaction with dolphins. Options included dolphin and orca show tickets, "trainer for a day" experiences, and interactions where "you decide just how close you'll get to the world's friendliest sea creatures". Between them, these venues house approximately 534 dolphins, 21 orca, and 34 beluga whales.

In the case of some of the venues in Mexico, offers on the TUI and Musement websites do not provide transparent information on which venues tourists will visit, only a pick-up location. Where venue names weren't mentioned, the researchers had to rely on correlating the available information with our own database of geographical locations of cetacean entertainment venues worldwide.

The majority of animals in venues sold by TUI Group are kept in small, barren onshore tanks, some in sea pens. The amount of space and quality of the environment is a far cry from what they would experience in the wild.

The in-person visits to selected venues provided additional insights and grave concerns for the welfare of the animals trapped at these entertainment facilities, including:



#### **Breeding**

As we have already highlighted, ending captive breeding is a key step towards ending captive whale and dolphin entertainment.

While TUI Group's animal welfare policy claims to prohibit breeding, breeding still occurs at a number of the venues that they are selling tickets to.

For example, SeaWorld parks have stopped breeding orcas but still breed dolphins. Across their four US parks, two bottlenose dolphins are reported to have been born in 2025, with one surviving, and three bottlenose dolphins and a beluga whale born in 2024.<sup>20</sup> The below is from SeaWorld's website.<sup>21</sup>

"Mother-calf bonds are long-lasting; a calf typically stays with its mother 3 to 6 years. The dependency period of calves in zoological facilities is much shorter because the animals are not vulnerable to predation, do not have to learn foraging techniques, and are well fed."

Here, SeaWorld acknowledges that foraging techniques and predator avoidance are natural behaviours that are not required in the unnatural setting of a marine park, an argument commonly used to justify separating calves from their mothers earlier than would happen in the wild. However, suggesting that a shorter maternal dependency period is required in captivity fails to take into account any maternal bond between mother and calf.

SeaWorld even has a resource for teachers to use which focuses on the breeding of bottlenose dolphins, aimed at 9-12 year olds.<sup>22</sup>

Apart from distinct populations, the bottlenose dolphin is not endangered in the wild and captive-bred cetaceans would not be used to bolster wild populations - so this is not relevant when educating young people about conservation. It simply teaches children about the commercial breeding of dolphins, with no reference to the fact that captivity can never meet the needs of these animals and that breeding cetaceans for entertainment venues is purely a profit-driven activity.

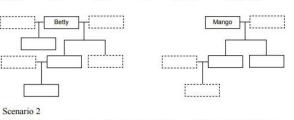
You are the director of XYZ Zoo. During the past 20 years, your zoological staff has recorded the following bottlenose dolphin (*Tursiops truncatus*) breeding histories. Now you would like to diagram this information. Using the chart below, fill in the boxes on the breeding history diagram. Use singlelined boxes for females, and dotted-lined boxes for males. The two oldest females are placed in the top single-line boxes. Use the "parents" column

to complete the diagram. Bottlenose dolphin females begin breeding between 5 and 12 years; males at 10 to 12 years. (NOTE: You may not be able to fill

in all of the boxes. Breeding histories sometimes are incomplete.)

Name:

name	studbook#	gender	age	mother/father	location
Dolly	12	F	3	4/32	Dolly's World
Fred	38	F	5	6/5	XYZ Zoo
Cracker	22	F	16	4/?	YXZ Zoo
Coconut	32	M	15	unknown	Ocean Land
Mango	6	F	25	unkown	XYZ Zoo
Bob	35	M	6	4/?	Ocean Land
Betty	4	F	27	unkown	XYZ Zoo
Jerry	26	F	17	6/5	XYZ Zoo
Jack	5	M	28	unkown	XYZ Zoo
Ginger	30	F	8	22/28	XYZ Zoo
Sammy	28	M	12	unkown	Wetworld Park
Junior	39	M	3	26/28	XYZ Zoo



You and your zoological staff want to breed Ginger. Which male(s) will you

Animal Husbandry • 9-12 Activities • page 3 @ 2001 SeaWorld, Inc



Above: Image taken from the SeaWorld Parks website where visitors are invited to watch mother dolphins and calves at the Dolphin Nursery, alongside offers of dolphin interactions at an additional cost.

SeaWorld Orlando Dolphin Encounter: £32 with TUI ((plus park admission) SeaWorld Orlando Dine with Orcas – adult ticket: £41 with TUI (plus park admission)



#### Dolphin legislation - latest developments

As this report was compiled, Mexico passed legislation banning the breeding of dolphins for entertainment and banning dolphin shows and some of the interactions that have previously been allowed, such as using dolphins to push tourists along by the feet or pull them along on their fin. This has been named 'Mincho's Law' after a dolphin who was shockingly injured after jumping from the pool during a show and hitting the surrounding concrete<sup>23</sup>. While some

interactions remain possible, such as photos with dolphins and dolphin 'kisses', this is a giant leap for Mexico and marks a move towards the end of captive dolphin entertainment in Mexico. Over the next few years it will be important to follow progress and ensure that this legislation is enforced.

There is still a long way to go but this is a big step forward.



Above: Maternity ward at Delphinus Riviera Maya in Mexico.

Photo credit: World Animal Protection

Delphinus Riviera Maya: Adult tickets range from £74-£374 with TUI



Above: Morgan performing on 13 February 2025, while heavily pregnant with Teno. Photo credit: World Animal Protection

Adult entry ticket to Loro Parque: £38 with TUI

#### Pregnant animals performing

When Loro Parque announced publicly that its only remaining female orca, Morgan, was pregnant in mid-February 2025, she was already close to full-term. Orcas have a gestation period of approximately 17 months and Morgan's son Teno was born on 31 March 2025. In February, Morgan was still performing at Loro Parque's Orca Ocean, beaching herself with her heavily pregnant belly onto the stage as part of the show. Morgan's previous calf Ula was born with a head deformity and never bonded with her mother. She was hand-reared and died at the age of two. Teno was on display to visitors less than a week after he was born.

With Morgan performing at this late stage of pregnancy, Loro Parque ignored even the best-practice recommendations of the cetacean entertainment industry. An animal training manual by SeaWorld from 2010 highlights that many of the activities Morgan was asked to perform should have been stopped much earlier during her pregnancy. For example, beaching (slide-outs) should have been stopped at eight months prior to giving birth.<sup>24</sup> At Loro Parque, Morgan was performing these tricks up until at least her last two months of pregnancy.

## Mothers used in interactions while calves are distracted

A number of the venues visited in Mexico were breeding dolphins. Researchers found several venues where the calves were being distracted by a trainer while their mothers were being used in tourist interactions, sometimes in the same pool.

When subjected to tourist interaction programmes, mothers are often forced to split their attention between the demands of trainers, the tourists, and the needs of their calves. This division of attention might result in insufficient or inadequate maternal investment, as the mother may reduce time spent nursing or providing essential guidance to her calf.

Bottlenose dolphin calves associate strongly with their mother during their first years and are usually nursed for 3-6 years. Female bottlenose dolphins are highly social animals with complex maternal behaviours, and introducing human interactions during critical periods of calf-rearing can be detrimental or stressful. This period requires uninterrupted periods of care, social integration, and exposure to other pod members, facilitating the calf's social development.

In the wild, females show strong associations with their calves, spending extensive time in the safest areas feeding, socialising, resting, and caring for them.

At one venue visited in Mexico, females with calves generally showed signs consistent with stress, making rapid movements, sudden changes of direction, being vigilant about what was happening to their young, and at times disobeying trainers' commands.

The tourist interactions in these enclosures were not adapted to be less impactful or physically demanding for the dolphins to make allowance for the fact that nursing and calving demands more of a mother's energy and is a time of greater vulnerability for inexperienced calves. The interactions were the same as those for dolphins without calves, including activities such as the foot-push (two dolphins pushing a visitor through the pool with one dolphin pushing each foot); fin riding (the visitor holding the dolphin's dorsal fin as they circle the pool); the dolphin dancing in circles with half of their body out of the water; and dolphins being made to 'kiss' tourists.

Another concern is that although tourists are told that the calves should not be touched, some of the calves come very close. In some cases, tourists were observed to be in direct contact with the calves.

Attracting the calves away from the interactions using a target for them to follow (seen mostly at Delphinus Riviera Maya), is also of concern as keeping the calves away from their mothers in a conditioned or forced manner does not allow either of them to decide which area of the enclosure is safest for them.

Some trainers mentioned that this type of activity helped the calves learn tricks or interactions, and others noted that they were already starting to eat fish, even though they were still nursing. This is a way to increase the calves' tolerance to visitors and start learning unnatural tricks rather than species-specific natural behaviours, which benefits the venue rather than the animals.



Above: Image shows adult females Azteca and Citali (left and middle) taking part in a tourist photo opportunity at Dolphin Discovery Isla Mujeres in Mexico. Moctezuma (right) is Azteca's calf and approximately one year old. Citali's 6-8-month-old calf is out of view.

Photo credit: World Animal Protection

Adult Swim Adventure at Dolphin Discovery Isla Mujeres: £112 with TUI

#### Unnatural behaviours

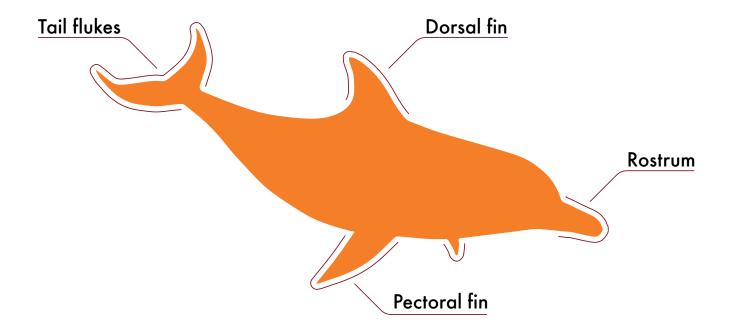
In an attempt to show that cetacean shows are not purely for entertainment, many venues argue that they provide educational value and can teach visitors about whale and dolphin behaviour, even using the word 'edutainment' to describe the shows.

In reality, these spectacles reduce wild, socially complex predators to circus-style performers and teach very little about the diversity of the animals and their lives in the ocean.

Trained unnatural behaviours performed at a number of parks visited included:

- Tail walk: Dolphins 'walk on water', moving forwards on their tails at the surface.
- Slide-out or beaching on command: Dolphins and orcas launch up out of the water and onto the stage, sliding across and sometimes waving a pectoral fin to the audience.
- Surfboard: The trainer rides around the pool, standing on the dolphin's back.

- Foot-push: Used in shows or in visitor interactions where one or two dolphins push the trainer or a visitor through the water.
- Rostrum-stand: Trainers sometimes end a foot-push by standing on the rostrums of two dolphins to face the crowd.
- Fin-riding: Used in shows or in visitor interactions, the trainer or visitor holds onto the dorsal fin of one or two dolphins to be pulled around the pool.
- 'Kissing' tourists: Very common in interactions and often with an additional fee to buy a souvenir photograph - the dolphin is ordered to rub the tourist's cheek with their rostrum to look like a kiss.
- 'Dancing' with trainers: Dolphins are asked to copy a trainer's moves or trainers act as though they are dancing with a dolphin in a close embrace as though ballroom dancing.





#### Aggression between animals

While raking (using their teeth to aggressively scratch another dolphin) occurs in the wild, excessive raking like that seen in some dolphins at the visited venues suggests signs of aggression and incompatibility within groups. The scarring around the head and eyes is a sign of highly aggressive attacks as they are considered vulnerable regions and not often attacked in the wild, where an animal is able to flee from its attacker. In captivity there is nowhere for an attacked animal to escape unless trainers intervene.





Above: Dolphin at Delphinus Xel-Ha, a venue in Mexico showing excessive raking marks

Adult dolphin swim at Delphinus Xel-Ha: £90 - £158 with TUI

**Left:** A trainer does a rostrum-stand following a foot-push at ZooMarine, Portugal

ZooMarine Algarve: £125 for dolphin show and 2 dolphin interactions with TUI

All photo credits on this page: World Animal Protection

#### Teeth

Dental problems are very common in marine mammals in captivity and teeth become worn down or break due to 'stereotypical' grinding on the tank walls. The term stereotypical is used here to refer to an unnatural persistent and repetitive behaviour. Stereotypies can occur in captive animals, such as big cats pacing their enclosures or elephants repetitively bobbing their heads and swaying from side to side. Animals usually develop these behaviours to cope with the limitations of

captivity. In cetaceans, it may be that the dolphin swims back and forth repetitively in a persistent pattern or often they will chew the bars between pools or scratch paint from the tank walls. This wears down the animal's teeth. Captive orcas in particular tend to have serious issues with this and have been known to wear their teeth down so that the pulp and nerves are exposed, putting them at risk of infection and pain.<sup>5</sup>

#### Kanab

This is Kanab, a 32-year-old dolphin at Delphinus Puerto Morelos in Mexico. His teeth are worn down and one tooth is missing. Dolphins often wear their teeth down by biting at the concrete walls, gates or other structures. The depigmentation of the frontal rostrum is also indicative of repeated injury. While this can occur in older wild

dolphins from foraging, in captivity the dolphins do not forage, so in these cases the skin damage is from the captive environment. When the venue was visited by researchers in 2024, Kanab was living in a sea pen with a depth of less than 2m.



Photo credit: World Animal Protection

Dolphin experiences at Delphinus Puerto Morelos (adult ticket): £74 – £374 with TUI

#### Eye lesions

A risk factor for eye issues in any marine mammal is the amount of UV light that the animal is exposed to. This varies between venues and tanks and is affected by the amount of shade the animal can access and how much they use that space, as well as the colour of the walls and floors around the enclosures.<sup>25</sup> The lighter and more reflective the surfaces, the higher the UV index. Direct sunlight should be avoided for feeding and training<sup>26</sup> which was not always the case at venues visited. The pH of the water is also important for eye health, as well as the temperature and any byproducts from the disinfection of the water.<sup>25</sup>

In the wild, it is estimated that cetaceans spend 80-90% of their time underwater. This has been compared to cetaceans in captivity that spend approximately 80% of their time at the water's surface, <sup>27</sup> interacting with trainers or the public, or waiting to be fed. Where tanks are shallow,

a significant amount of UV light travels through water<sup>25</sup> and it is common to see captive dolphins squinting or with their eyes closed.

A number of venues do not have any natural shade, which makes it difficult for the animal to retreat from the sun.



Above: This dolphin has a lesion over their eye, which is visible as an opaque white film

#### Yogo

Yogo, taking part in a tourist interaction at Puerto Aventuras, Dolphin Discovery in Mexico, is presumed here to have tattoo skin disease (TSD). This is often caused by a cetacean poxvirus and found in captive and wild dolphins. While there is no reported evidence of zoonotic transmission from cetaceans to humans, it is suggested that

all physical contact with dolphinarium visitors should be avoided<sup>28</sup> given that there are a number of non-human animal poxviruses that can cause diseases in humans<sup>29</sup>. The development of these lesions has also been associated with exposure to stress.



Dolphin experiences at Puerto Aventuras Dolphin Discovery: £84-£174 with TUI All photo credits on this page: World Animal Protection

#### Additional health concerns

From visits to eight venues sold by TUI Group in Mexico, researchers found dolphins with various

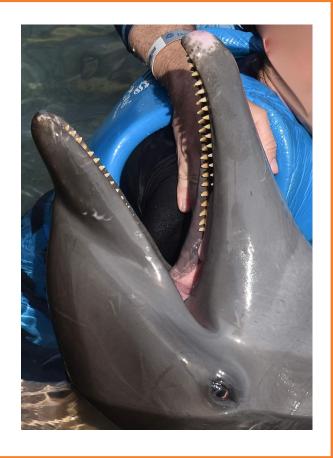
skin lesions performing or taking part in interactions with tourists.

#### **Pakal**

Pakal is living at Delphinus Playa Mujeres in Mexico. He has chronic wounds at the base of the fluke and depigmentation of the frontal rostrum, or 'snout', which can be indicative of repeated injury. When researchers visited, Pakal was being used to give tourists a 'foot-push' with another dolphin, so would have repeated pressure on his rostrum.



Dolphin experiences at Delphinus Playa Mujeres: £74-£371 with TUI



#### **Azteca**

This is Azteca, a 28-year-old female at Dolphin Discovery Isla Mujeres. She has a wound on her chest that has not healed properly and the creases under her chin are indicative of the common posture of dolphins in captivity, where they are flexing their heads to 'stand upright' in an unnatural position during interactions or shows. This is rarely seen in the wild.



Dolphin experiences at Dolphin Discovery Isla Mujeres: £67-£142 with TUI

All photo credits on this page: World Animal Protection

## Dolphins being used to perform for decades

Missy is thought to be 49 years old and was originally captured from the wild. After being transferred from park to park, she is now a main performer at ZooMarine Algarve, Portugal. Researchers were told that she performs every day. That is almost five decades in a tank, performing for tourists



**Above:** Missy was caught from the wild in Mexico in 1977. It is unclear where she was kept after her capture but she was moved to ZooMarine Algarve around 1991.<sup>20</sup>

Photo credit: World Animal Protection

ZooMarine Algarve: £125 for dolphin show and 2 dolphin interactions with TUI



#### Teno

Teno was born on 31 March 2025 to Morgan, an orca at Loro Parque in Tenerife. On 4 April, visitors were invited to visit him and Morgan at the side of their tank, ironically named 'Orca Ocean'. At just days old, this little calf was already a tourist attraction. If he survives his precarious infant years he could live to 30, possibly 40 years of age. Where will the industry be at that time? In 2055 will people

be watching orca shows? There are only two venues left in Europe with orcas: Marineland Antibes and Loro Parque. Marineland Antibes closed in January 2025 and is desperately trying to rehome their animals, including orcas Wikie and Keijo. While numerous organisations are trying to find sanctuary solutions for excaptive cetaceans, Loro Parque continues to breed more orcas into a dying industry.



Photo credit: World Animal Protection

# Greenwashing at venues

Greenwashing is a common theme in whale and dolphin venues across the world. The venues' narrative often suggests that the ocean is a dangerous and polluted place and that whales and dolphins are safer in the venues. While it is true that life in the ocean presents challenges,

removing marine mammals and breeding them for entertainment is not the solution. Instead of addressing threats in the wild, this practice creates a lifetime of confinement and deprivation, denying these intelligent animals the space, complexity, and freedom they need to thrive.



#### Dusty

Dusty was born on 7 December 2016 and his birth was celebrated by Sea World and the Australian media. However, shortly after, Dusty was quietly removed from all previous promotion and it was later discovered that he had died at only a few months old. Unlike the public celebration over Dusty's birth, his death went largely unnoticed and Sea World never provided clarity over his whereabouts.

# Male dolphin calf born at Gold Coast's Sea World, first in nine years Human Interest Wed 21 Dec 2016 Bottlenose dolphin calf Dusty swims with mum. Jinx. (ABC News: Ashleigh Stevenson)

Photo credit: Male dolphin calf born at Gold Coast's Sea World, first in nine years - ABC News

# Conclusion

In this review of TUI Group's products, the company were found to be selling tickets to over 400 offers featuring at least 37 captive cetacean venues. TUI Group is exacerbating the extreme welfare issues of over 580 whales and dolphins, while making huge profits. The level of interactions vary across the venues, with prices ranging from £19 for a park entry ticket to £374 for an encounter referred to as 'The One'. This involves 21 unlisted activities with dolphins and 45 minutes in the water with them. The average cost of an adult to take part in a TUI excursion involving a venue with captive cetaceans is approximately £122 for an adult and £102 for a child, making it extremely lucrative for TUI Group to appeal to family audiences. This can be seen from the language used to sell the offers, which includes "A family day out to beat all others"30 and a "fun-packed family day out".31

TUI Group not only continues to profit from dolphin captivity but it actually states in its animal welfare policy that it does not sell breeding venues while continuing to sell them, misleading customers into believing that it is at least attempting to move in the right direction. The birth of Teno, the orca calf at Loro Parque, proves this is not the case, and at an orca symposium in February 2025, a spokesperson for Loro Parque stated that the park has no intention of stopping the breeding of orcas in captivity.<sup>32</sup>

All around the world, travel companies and associations are cutting ties with the outdated dolphin entertainment industry by no longer selling tickets to captive cetacean venues or by putting in

place strong animal welfare policies from the outset that prohibit ticket sales. TUI Group is picking up the market share of competitors who are doing the right thing, while misleading customers.

It is also of concern that TUI Group continues to sell and promote at least four of the dolphin venues owned by The Dolphin Company, which reportedly filed for bankruptcy in March 2025 amid an investigation into animal welfare issues. For one of these venues offered by TUI Group, they even talk about putting "a big tick on the bucket list" and "you decide just how close you'll get to the world's friendliest sea creatures".<sup>33</sup>

It is shocking that TUI Group continues to drive demand for this form of animal entertainment for profit – even as marine parks become increasingly unacceptable. And all against the backdrop of a trend in Europe and the USA to move away from captive cetacean entertainment – demonstrated by the closure of Marineland Antibes and the dolphin exhibit at Madrid Zoo, the ending of orca breeding at SeaWorld parks and the imminent closure of Miami Seaquarium.

Whales and dolphins are not entertainers and can never thrive in a tank. It is time for TUI Group to take accountability and stop selling tickets and promoting captive cetacean venues. If they don't follow this sea change in attitudes and legislation, they will undoubtedly find themselves on the wrong side of history.

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