



Dr Peter S. Ross
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Dear Minister Chiau, Wen-Yan,

It is with deep regret that I learned of an impending decision on the Kuokang Petrochemical Company plan to reclaim as much as 4000 hectares of prime Indo-Pacific humpback dolphin (*Sousa chinensis*) habitat.

As you know, I am Chairman of the *Eastern Taiwan Strait Sousa Technical Advisory Working Group* (ETSSTAWG), an international team of 17 marine mammal scientists dedicated to providing expert reviews, advice, and perspectives on the pressing issue of *Sousa* in Taiwan. Our group is concerned about this isolated and Critically Endangered population of dolphins, and these concerns have been consolidated in the workshop reports of 2004 and 2007. A third workshop, held in Taipei in 2009, characterized the geographical boundaries for '*Priority Habitat*' for the ETS *Sousa* population. This *Priority Habitat* description is described in a scientific manuscript which is currently in press in an international journal.

The Kuokang reclamation project falls right in the middle of the *Priority Habitat* of ETS *Sousa*, and as such, threatens the well-being and survival of this population.

I am deeply troubled by i) the failure to notify the ETSSTAWG about the EIA or associated deadlines and hearings, ii) the failure to consult with our expert group on the content of the Environmental Impact Assessment, and iii) based on our very quick assessment of the EIA, the large number of serious flaws and gaps in the content of the EIA documentation.

This letter cannot do justice to our very important concerns, as time is too short. However, we do note that the current documentation suffers from fatal errors and logical gaps:

- the reclamation project will divide *Sousa Priority Habitat* into two parts, and is likely to prevent many *Sousa* individuals from moving north-south and vice-versa past this development.
- 'training of dolphins' is entirely without scientific merit, and is likely to disturb or harm the dolphins.
- A 'dolphin channel' is very likely to fail, as such engineering 'fixes' have been dismal failures elsewhere in the world.

- The reclamation project not only will divide *Sousa* habitat into two parts, but will directly destroy 4,000 hectares of prime importance for these estuary-dependent dolphins.
- There is no mention of water use, diversions or loss, related to the Kuokang project, something that is likely to change the nature of the estuary upon which these dolphins depend.

The ETSSTAWG has made itself freely available for consultation on any matter related to *Sousa* and its habitat. Our working group has identified the following major threats to Taiwan's humpback dolphins: reduced river flow into estuaries, habitat loss, entanglement in fishing gear, industrial and municipal pollutant discharges, and underwater noise.

The ETS *Sousa* require urgent protection measures. Without due attention to their habitat needs, this population is likely to go extinct.

We would appreciate direct and immediate engagement with our working group on this very important project and answers to the above-listed questions and concerns.

Thank you for your attention.

Sincerely,



Dr Peter S. Ross
Chair
Eastern Taiwan Strait *Sousa* Technical Advisory Working Group

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