

# **PE2202/B: Stop the Guga Hunt**

## **Petitioner written submission, 12 January 2026**

This submission provides new scientific and regulatory information relevant to Petition PE2202, which seeks to amend the Wildlife and Countryside Act 1981 so that Gannets on Sula Sgeir receive the same legal protection as Gannets elsewhere in Scotland.

The central question before the Committee is whether the continued licensed killing of Gannet chicks on Sula Sgeir is compatible with conservation science, animal welfare standards and Scotland's statutory obligations following the unprecedented decline of seabird populations.

### **1. Population status of Sula Sgeir**

Highly Pathogenic Avian Influenza (HPAI) has caused severe mortality in Northern Gannets across Scotland. New national data for 2024–2025 shows over 11,000 Gannets lost nationally and a 22 percent decline in Scotland's breeding population. The Sula Sgeir colony itself has declined by between 9 and 22 percent.

Sula Sgeir is now the only Special Protection Area for Gannets in Scotland that has fallen below its official citation level. This has occurred despite a three-year pause in hunting, indicating that the colony was already struggling prior to avian influenza and is now failing to recover. This places Sula Sgeir in a significantly more vulnerable conservation position than in previous licensing periods.

### **2. NatureScot's population modelling**

NatureScot's Population Viability Analysis (PVA) was used to justify the 2025 quota of chicks. However, the modelling shows that the quota is not a recovery level but the maximum level that avoids immediate decline. Even at a reduced quota, the predicted change over 25 years is only +0.67 percent, meaning the population remains suppressed and does not recover to pre-2013 levels.

Higher quota levels produce significant and major declines. Importantly, NatureScot's own technical notes state that the model cannot account for one-off catastrophic events such as further HPAI outbreaks, offshore wind impacts, or climate-driven prey shifts. This means the modelling underestimates risk and overstates sustainability.

Internal NatureScot statements further indicate that if the same projected population impacts were assessed in a marine energy context, they would be classified as an

adverse effect on site integrity and rejected under conservation law. This demonstrates that the precautionary principle is not being applied consistently.

### **3. Regulatory and monitoring failures**

Freedom of Information responses obtained during 2024 and 2025 show that NatureScot did not carry out compliance monitoring or enforce licence conditions in the years 2017, 2018 and 2019. During this period, licence holders were required to record killing methods, but no records were kept, no internal checks were carried out, and no enforcement action was taken. Despite this, licences continued to be issued.

The Licensing Compliance Monitoring Team was only established in 2023 after these failures became apparent. This means the Scottish Government's assertion that the hunt is legal only if carried out humanely under licence is not supported by verified historical evidence.

At present, no independent observer is present on Sula Sgeir during the hunt. There is therefore no independent verification that licence conditions relating to humane killing are being complied with.

### **4. Welfare and ethical concerns**

Multiple animal welfare organisations have publicly raised serious concerns about the killing method used in the guga hunt. The authorised method involves striking chicks with a club, which is considered lawful if done under licence. However, there is no independent monitoring to confirm that birds are rendered unconscious immediately or that suffering is avoided.

The absence of independent oversight combined with historic failures in enforcement means there is no credible basis to conclude that welfare standards are being reliably met.

### **5. Public support and cultural relevance**

A new public poll commissioned in 2025 shows that only 16 percent of Scottish respondents regard the guga hunt as culturally important. Among those who express an opinion, 72 percent do not see it as culturally significant and 69 percent support a ban. This indicates that the hunt persists largely because of low public awareness rather than widespread support.

### **6. Purpose of the hunt in 2026**

The key policy question is whether the continued killing of Gannet chicks on Sula Sgeir serves any necessary or proportionate purpose today. The hunt is no longer required for food security or subsistence. The colony is below its conservation threshold and still recovering from mass mortality. Removing young birds delays population recovery and increases extinction risk.

Cultural heritage can be acknowledged without requiring continued killing, as many traditions have evolved in response to modern environmental and ethical standards.

## **7. Relevance to the petition**

The petition seeks to remove the legal exemption that denies the Sula Sgeir colony the protection given to all other Scottish Gannets. The scientific evidence shows that the population is suppressed, vulnerable and unable to recover under current quota levels. Regulatory failures show that the licensing system cannot reliably enforce welfare conditions. Public opinion does not support continuation.

Taken together, this means the current legal framework fails to meet the objectives of conservation law, the precautionary principle and animal welfare legislation.

For these reasons, Petition PE2202 is realistic, necessary and justified. Ending the exemption for Sula Sgeir would align Scottish wildlife law with science, ethics and public interest, while still allowing cultural recognition through non-lethal means.