PE2202/E: Stop the Guga Hunt

Petitioner written submission, 19 February 2026

1. Engagement with NatureScot since last consideration

Since the Committee's previous consideration, I have been in direct correspondence with Nick Halfhide, Chief Executive of NatureScot. His response clarified NatureScot's legal position and restated the basis on which licences are issued. However, several substantive conservation and welfare concerns remain unanswered, particularly regarding monitoring, verification, and cumulative risk.

2. Absence of on-site monitoring and verification

The most significant unresolved issue is that **the hunt itself on Sula Sgeir is unmonitored**. Licences are granted on trust, with no NatureScot staff, independent observer or third-party present on the island to verify compliance with licence conditions.

Compliance is inferred, not demonstrated. This is a critical weakness in any regulatory system, particularly where lethal activity is authorised within a protected site.

3. Intensity of killing in 2025 and operator fatigue

In 2025, the hunt took place over one day, rather than over a longer period as in some previous years. During that single day, **500 birds were killed by approximately 10 men**, equating to an average of **50 birds per person**.

. It is not credible to assume that the 50th bird can be killed with the same speed and effectiveness as the first, particularly as physical fatigue accumulates. This raises legitimate concerns about **consistency of welfare outcomes**, which cannot be assessed without independent observation or post-kill verification.

4. Reliance on self-reporting of disease and mortality

Licence conditions require licence holders to report any sick or dead birds of any species observed during the harvest, where entanglement is not the cause of death. However, this relies entirely on **self-reporting** by those conducting the hunt.

There is an inherent conflict of interest: reporting sick or dead birds could have implications for future licence applications. Without independent verification, there is no way to assess whether observations are complete or selective. Given the ongoing presence of avian influenza in seabird populations, this is a significant biosecurity and conservation concern.

5. Disturbance, stress and sentience

NatureScot's own licence documentation acknowledges that the proposed activities are expected to cause disturbance and disrupt breeding activities of non-target birds, with impacts of stress and disturbance. Licence conditions attempt to minimise this

through restrictions on lighting, movement, storage of equipment, and avoidance of other species' nesting sites.

These conditions implicitly recognise that seabirds are sentient animals whose behaviour and breeding success are affected by human presence. This acknowledgement sits uneasily alongside the authorisation of lethal force within the same colony. The conditions themselves demonstrate awareness of disturbance-related stress, yet there is no mechanism to assess how prolonged human presence (up to ten people on the island) affects adult behaviour, chick provisioning rates, or breeding success.

6. Post-HPAI recovery and emerging science

NatureScot has stated that its 2026 Population Viability Analysis will include scenarios for one-off mortality events and cumulative anthropogenic pressures. While this is welcome, the absence of such considerations in current decision-making remains problematic.

NatureScot has also stated that there is no data indicating that populations may decline in subsequent breeding seasons as a result of the 2022 HPAI outbreak. However, peer-reviewed research published in 2025 (https://www.scotsman.com/news/environment/bird-flu-concerning-finding-among-scotland-seabirds-that-have-survived-avian-flu-after-bass-rock-studies-5332712), led by Dr Sue Lewis of Edinburgh Napier University, demonstrates that breeding success at Bass Rock in Scotland remains significantly below historical averages, with elevated nest failure rates linked to disrupted pair bonds and colony structure following HPAI.

Bass Rock was the world's largest gannet colony prior to HPAI and provides the most robust post-HPAI dataset available. There is no scientific basis to assume that Sula Sgeir will not experience similar delayed demographic effects, particularly given that full recruitment of birds affected as chicks in 2022 will not occur for five to six years.

7. Conservation risk in the context of changing pressures

Sula Sgeir is now the only Gannet Special Protection Area in Scotland below its citation level. The colony faces cumulative pressures from disease, climate change, prey availability and offshore development. Authorising additional mortality at this stage increases risk during a period of unresolved demographic instability.

8. Closing consideration

Finally, I ask the Committee to consider this issue not only in technical terms, but in ethical and conservation terms. The guga hunt was historically associated with food security and survival. That context no longer applies. The cultural and communal aspects of the tradition can be acknowledged and preserved without continuing to kill the young of a species facing unprecedented pressure.

Nearly 100,000 people have signed this petition, reflecting a widespread desire to see Scotland lead in science-based conservation and biodiversity

protection. I respectfully ask the Committee to consider whether continued licensing of the guga hunt is compatible with that responsibility.

Annex Summary – Petition PE2202

Scientific and Conservation Concerns Regarding the Licensing of the Guga Hunt

1. Conservation Status

- Northern Gannets in Scotland have declined by approximately 22% nationally following Highly Pathogenic Avian Influenza (HPAI).
- Sula Sgeir is now the only Gannet Special Protection Area in Scotland below its official citation level, despite a three-year pause in hunting.
- Full demographic impacts of HPAI will not be known until affected cohorts either return to breed (or fail to do so), 5–6 years post-outbreak.

2. Population Modelling Limitations

- NatureScot's Population Viability Analysis shows that the current quota of 500 chicks is not a recovery level, but the maximum level that avoids immediate decline.
- Even under this quota, the population is predicted to remain suppressed and not return to pre-2013 levels.
- Current modelling does not account for future disease outbreaks, climate-driven prey changes, offshore wind impacts, or cumulative pressures.

3. Lack of On-Site Monitoring

- There is no independent monitoring of the hunt on Sula Sgeir.
- Compliance with licence conditions is based entirely on trust and self-reporting.
- No NatureScot staff or third-party observers are present to verify:
    - Killing methods
    - Compliance with welfare conditions
    - Reporting of sick or dead birds

4. Intensity of Killing in 2025

- In 2025, 500 birds were killed in a single day by approximately 10 people.
- Manual killing methods depend on operator skill and physical condition.
- There is no evidence that killing effectiveness remains consistent as fatigue increases.
- No post-kill verification or photographic evidence is required.

5. Welfare and Disturbance Concerns

- Licence conditions acknowledge that activities will cause disturbance and stress to breeding seabirds.
- Conditions aim to minimise disturbance through lighting and movement restrictions.
- This recognition of disturbance conflicts with the authorisation of lethal force within the same colony.

- Effects of prolonged human presence on:
  - Adult behaviour
  - Chick provisioning
  - Breeding success

are not monitored or assessed.

6. Emerging Scientific Evidence

- Peer-reviewed research published in 2025 (Edinburgh Napier University) shows significantly reduced breeding success at Bass Rock following HPAI.
- Elevated nest failure linked to disrupted pair bonds and colony structure.
- There is no scientific basis to assume Sula Sgeir will not experience similar delayed effects.

7. Key Policy Question

Given:

- A declining and suppressed SPA population
- Absence of independent monitoring
- Known modelling limitations
- Emerging post-HPAI evidence

Is continued licensed killing compatible with:

- The precautionary principle?
- Scotland’s biodiversity commitments?
- Public confidence in conservation governance?