



# ANIMAL WELFARE AND THE GUGA HUNT



LEAGUE  
AGAINST CRUEL SPORTS

# INTRODUCTION

This report concerns the annual killing of young gannets – “guga” in Gaelic – under licence on the remote island of Sula Sgeir. This practice is colloquially known as the guga hunt and will be referred to as such hereafter. It is a centuries old tradition carried out by men from the community of Ness, in the north of Lewis, that began as an important food source and has become an embedded cultural practice.

Once a year in August, around ten men travel by boat to the uninhabited island. They usually spend around two weeks there (though in 2025 there was a shorter hunt), residing in stone bothies. They move amongst the cliffside colony, with some men using a noose/grasper on a pole to lift the young gannets from their nest and pass them to others, who hit them on the head with a stick and then decapitate them. The guga bodies are then gutted and plucked and the meat salted on the island, before being taken back to Lewis on the boat.

There is now an active national discussion about whether this hunt is appropriate and should be allowed to continue. There are a range of concerns, including the conservation impacts on the species and whether the hunt is ethically justifiable. This report focuses on the animal welfare implications of the hunt, within the current legislative and regulatory framework, with the aim of informing that ongoing discussion.

**This report was produced by OneKind, working with the League Against Cruel Sports Scotland.**



# LEGISLATIVE FRAMEWORK



## Background

Wildlife law in Scotland and across the UK is fragmented, having been built up piecemeal over more than a century. It often does not recognise the sentience and agency of animals, most relevant legislation having been introduced before our modern understanding of animal welfare. Different species receive very different attitudes, treatment and legal protection. Expert criminologist Professor Angus Nurse and legal scholar Dr Helga Hejny conducted socio-legal analysis of wildlife law in its contemporary context and identified this inconsistency as a problem<sup>1</sup>. They also highlighted the prioritisation of human and commercial interests and that enforcement “largely ignores welfare concerns”.

When it comes to the Animal Health and Welfare (Scotland) Act 2006 (hereafter “the 2006 Act”), our main animal welfare legislation, wild animals are only protected when “under the control of man on a permanent or temporary basis”. This Act is currently being reviewed by the Scottish Animal Welfare Commission. OneKind welcomes this, as we believe the Act is failing to protect animals sufficiently, for various reasons.

Particularly relevant here is the offence of causing “unnecessary suffering” (s.19) under the 2006 Act. The Animal Sentience Committee has stated that there is “a need to consider whether the concept of ‘unnecessary suffering’ is fit for purpose especially in the context of the legitimacy to cause suffering.”<sup>2</sup> We agree that the interpretation and application of the Act for the past twenty years has continued to permit a range of egregious harms to all “categories” of animals. This is particularly apparent in the scale of suffering in agriculture. Millions of farmed salmon and chickens, for example, are clearly suffering, and the legislation fails to protect them.

OneKind advocates for all animals to be given equitable protection in legislation from any practice that causes suffering, regardless of the category humans have placed them in, and for that legislation to be enforced effectively. Such protection should extend well beyond killing methods, but we have raised concerns over the years about many existing methods of capturing and/or killing wild animals. Most analogous to the guga hunt, we have consistently stated concerns about the manual killing of corvids and other birds trapped under General Licences, particularly as neither the methods to be used nor the competence of the operatives are defined. Thus, the concerns expressed here about the guga hunt do not exist in isolation, rather they are linked with wider issues around the treatment and killing of wild animals, and the need for legislative reform to better protect all animals.

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<sup>1</sup> [https://aru.figshare.com/articles/report/Wildlife\\_Law\\_Reform/28920425?file=54147326](https://aru.figshare.com/articles/report/Wildlife_Law_Reform/28920425?file=54147326)

<sup>2</sup> <https://www.gov.uk/government/publications/animal-sentience-committee-letter-regarding-the-recently-published-animal-welfare-strategy/animal-sentience-committee-animal-welfare-strategy-for-england-2025>



Photo by Dan Brown

## Licensing of the guga hunt

The Wildlife and Countryside Act 1981 (hereafter, “the 1981 Act”) provides full protection for wild birds, their nests and their eggs in Scotland (s.1). It is an offence for any person to kill, injure or take any wild bird, to take, damage or interfere with a nest in use, to obstruct any wild bird from using their nest or to take or destroy an egg of any wild bird. Further provisions prohibit the possession of dead wild birds or their eggs. However, there are exceptions to these provisions, mainly to permit the shooting of certain birds for “sport” or to carry out “management” where birds such as corvids and pigeons are deemed to be causing problems. Any other interference with wild birds requires a licence.

Section 16 of the 1981 Act sets out a number of purposes for which a licence may be granted by the relevant authority, in this case the Scottish Government’s nature agency, NatureScot. A separate subsection (s.16(2)) specifically permits anything done for the purpose of providing food for human consumption in relation to a gannet on the island of Sula Sgeir, providing it is done under licence.

The guga hunt the only licensable activity for the purpose of providing food for human consumption. Unlike for other licensable purposes, there is no provision in the law that a licence shall not be granted unless the licensing authority is satisfied that there is no other satisfactory solution. Effectively, this means that NatureScot will grant this licence if it is applied for, unless it has evidence that would risk the conservation status of the species.

For years, until 2019, a licence was granted permitting 2000 guga to be killed. No licences were granted in 2020 due to the Covid pandemic, or 2022-2024 due to concerns around avian influenza. In 2025 a licence was granted to permit killing a reduced number of 500 guga, reflecting ongoing population level concerns.

NatureScot imposes a licence condition that the guga must be killed “immediately and in a humane manner”. Humane is not defined there or in legislation; the guidance to the 2006 Act states that “The destruction of an animal in an appropriate and humane manner is not unnecessary suffering. [...] The term “appropriate and humane” is not defined in the Act, and is for the courts to interpret having regard to all the circumstances of the case.”

“Humane” is generally used to mean minimising suffering or harm inflicted, and scientists have suggested that to assess humaneness one must “assess what harms are done to the animals, how bad each harm is in terms of its intensity and duration, what methods are available or can be developed to minimise each harm, and the relative effectiveness of those methods of harm minimisation”, whilst recognising that “such analyses confront us with difficult questions at the problematic interface between quantitative scientific observations and their interpretation regarding the suffering that animals may experience, as well as questions about the relativities of different types of suffering”.<sup>3</sup>

When referring to killing specifically, humaneness is generally measured by time to irreversible unconsciousness: the animal should be rendered immediately unconscious and remain so until death ensues.

The Scottish Government has stated its position that it considers the killing of guga to be humane, based on its understanding of the method used: a blow to the head.<sup>4</sup> However, this is based on assumption, not evidence. In practice, manual killing depends on the skill of the operator and the conditions they are working under, and so can vary widely in terms of its efficacy and welfare impact. (Further detail on welfare at the time of killing is below).

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This contrasts with far more controlled conditions required in slaughterhouses and laboratories, for example. While not without their welfare concerns, in those contexts, killing methods are standardised, there is oversight, and there are enforcement avenues should a violation occur. There is no independent oversight or monitoring of the guga hunt, hampering any effort to undertake an animal welfare impact assessment. Indeed, given the Scottish Government’s public commitment to the evaluation of its policies<sup>5</sup>, the lack of scrutiny of this licence condition appears particularly remiss.



Photo by Kristin Snippe on Unsplash



Photo by Lian Tomtit on Unsplash

<sup>3</sup> Mellor, D. J., & Littin, K. E. (2004). Using science to support ethical decisions promoting humane livestock slaughter and vertebrate pest control. *Animal welfare*, 13(S1), S127-S132. <https://doi.org/10.1017/S0962728600014470>

<sup>4</sup> [https://www.parliament.scot/-/media/files/committees/citizen-participation-and-public-petitions-committee/correspondence/2025/pe2202/pe2202\\_a.pdf](https://www.parliament.scot/-/media/files/committees/citizen-participation-and-public-petitions-committee/correspondence/2025/pe2202/pe2202_a.pdf)

<sup>5</sup> <https://www.gov.scot/publications/scottish-government-evaluation-action-plan/>

**‘Both animal welfare and wildlife legislation need to be updated, to better prevent the range of harms, to a variety of animals, they are currently failing to prevent.’**

Although NatureScot stipulates that killing must be humane as a licensing condition, the 1981 Act does not address welfare at the time of killing, beyond prohibiting certain methods. The only potential offence related to “inhumane” killing would be an offence of causing unnecessary suffering under the 2006 Act. Given the restricted scope and interpretation of “unnecessary” under the 2006 Act in other scenarios, as noted above, we do not have confidence that this offence will provide protection for the guga, even if better oversight meant that evidence of the animal welfare impacts was available.

Additionally, there are potential animal welfare impacts throughout the duration of the guga hunt, not only the killing itself, which NatureScot cannot easily account for in its licensing approach, as the 1981 Act does not provide for that. Any assessment of the humaneness of the practice should encompass the whole process. It is also important to consider the reason for the practice, and whether it is justified.

Both animal welfare and wildlife legislation need to be updated, to better prevent the range of harms, to a variety of animals, they are currently failing to prevent. Where the guga hunt differs from most of those harms is that it is limited to one specific occasion, group of people, and locality, and that location is so remote as to make oversight difficult. Further, the 1981 Act creates a specific exception to allow the hunt, without attaching any conditions or welfare provisions to that. Legislatively, ending the hunt would only require an amendment to remove that provision.

“The capture and killing of wildlife needs to be done with care and skill using equipment designed for the task, if suffering is to be minimised. However, like most of the killing of wildlife that the law allows, the people involved in the guga hunt do not have formal training and are not under any independent scrutiny. Further, the methods used for capture and killing have not been assessed to ensure they are humane - what little footage of the guga hunt exists does not indicate best practice. In the absence of scrutiny by people with the appropriate expertise, it cannot be stated that any part of the guga hunt, from capture to killing, meets acceptable standards of humaneness.”

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*Photo by Dan Brown*

# DISTURBANCE

Marine ornithology advice to NatureScot to inform the 2025 guga hunt licence was that the disturbance caused by the hunt would have a likely significant effect on fulmars, European storm petrels and Leach's petrels, as well as the gannets themselves. While this was identified as a conservation impact, the effects described also have an animal welfare impact. The advice reads:

Fulmar: "Human presence in the colony is expected to cause disturbance to both adults and chicks through: stress and increased vigilance, additional energy expenditure if human presence causes chicks/adults to 'spit' in defence. Human presence may prevent adult birds from provisioning chicks or cause reduced feeding times, and may increase the risk of adults abandoning their nest sites. Such disturbance could result in a reduction in breeding success through reduced chick survival post-fledging (due to chicks fledging in poor condition), or chick mortality at the colony."

European storm petrel and Leach's petrel : "The proposed activities are expected to cause disturbance to European storm petrel and Leach's petrel. Direct disturbance may be caused by the prevention of birds accessing their nest sites, for example by tarpaulin covering stone walls where birds are nesting, or equipment preventing birds accessing nest sites. Storm petrels are sensitive to human disturbance and human presence in the colony could cause stress to adults and chicks, causing adults to return to their nest sites less frequently, reducing the rate of provisioning to their chicks, or to abandon nest sites. Light disturbance could cause adult birds to become disorientated. Such disturbance could cause a reduction in breeding success through nest abandonment or chick mortality."

Gannet: "The proposed activities could cause disturbance to breeding gannets outwith the licensed activities. Human presence in the colony is expected to cause increased stress and vigilance in breeding adults and chicks, and may temporarily prevent adult birds returning to their nest sites, reducing the rate of chick provisioning or increasing the risk of nest abandonment." It references a more detailed assessment for gannets in a different document, which we have not been able to find in the public domain.

The advised mitigation measures were included as licence conditions, but it is noted in the advice that disturbance will occur despite those measures.

Using the Five Domains model of animal welfare<sup>6</sup>, the likely impacts of the disturbances described are as follows.

## Nutrition

Delayed feeding or abandonment by parents will mean restricted food intake for chicks, resulting in possible starvation and death. The adult birds may also alter their normal eating and drinking patterns, with detrimental impacts.

## Physical environment

Equipment or activities may prevent access to nests or nesting sites, limiting rest, sleep, chick provisioning, and other natural behaviours.

## Behavioural interactions

Human presence is likely to cause fear, distress, and disorientation, causing escape/avoidance behaviour and increased vigilance

## Health

The effects of disturbance on the other domains may cause reduced physical fitness, with consequences on health.

## Mental state

The negative affects (emotions) that disturbed birds may experience, associated with the welfare harms listed under the previous domains, include hunger, thirst, starvation, weakness, exhaustion, malaise, frustration, helplessness, anxiety, fear, and confusion.

<sup>6</sup> Mellor, D. J., Beausoleil, N. J., Littlewood, K. E., McLean, A. N., McGreevy, P. D., Jones, B., & Wilkins, C. (2020). The 2020 five domains model: Including human–animal interactions in assessments of animal welfare. *Animals*, 10(10), 1870. <https://doi.org/10.3390/ani10101870>



# CAPTURE

Noose or grasper poles, the method of capture used during the guga hunt, are also used elsewhere and, unlike for the guga hunt, guidance is produced. The British Trust for Ornithology (BTO), for example, publishes guidance for researchers using this method.

The Scottish Government also mentions this method in its recommended protocols for offshore wind farms.<sup>7</sup> There, it states that “birds are typically restrained by the noose for <20 seconds so this method does not cause any harm. Seabirds also have very strong necks compared to most birds allowing safe use of this method.” We presume that the perceived lack of harm refers to physical injury, which encompasses only one of the Five Domains. That document also states: “Most methods to capture seabirds at the breeding sites have been long established and are covered under conventional methods on a BTO ringing permit. More details can be found in Bub (1991) and Davis (1981).” Scientific understanding of animal sentience and animal welfare have developed dramatically since 1991. Long-established methods should be regularly reviewed to determine their animal welfare impacts, and the resulting information used to alter methods and guidance accordingly.

In contrast, the authors of the Five Domains model suggest that handling of wild animals with little to no regular visual or physical contact with humans will have a severe negative impact on the animals’ mental state.

Similarly, a 2024 Scientific Opinion of the Norwegian Scientific Committee for Food and Environment<sup>8</sup> states that: “Apart from reports describing physical and behavioural responses to capture, there has been little research investigating the impact of such experiences on the mental state of wild birds. Nevertheless, it is plausible that the birds experience capture and handling as a life-threatening situation that elicits fear and alarm. As such, the risk of immediate harm to mental states from capturing and handling could be high in some cases.”

It goes on, “Being in close proximity to humans and being touched and lifted by humans must be a threatening and fear-inducing experience for any bird. This acute strain should in itself be regarded as a harm to animal welfare, although transient, and does most probably evoke emotions like fear, anxiety and/or panic.”

Indeed, studies have shown that even routine handling of captive birds, who do not show any behavioural indications, leads to blood markers indicating acute stress.<sup>9</sup>

<sup>7</sup> <https://www.gov.scot/publications/seabird-tagging-feasibility-sectoral-marine-plan-offshore-wind-energy/pages/6/>

<sup>8</sup> <https://agris.fao.org/search/en/providers/125337/records/67daed51677d8be0233c7481>

<sup>9</sup> Le Maho, Y., Karmann, H., Briot, D., Handrich, Y., Robin, J. P., Mioskowski, E., ... & Farni, J. (1992). Stress in birds due to routine handling and a technique to avoid it. *American Journal of Physiology-Regulatory, Integrative and Comparative Physiology*, 263(4), R775-R781. <https://doi.org/10.1152/ajpregu.1992.263.4.R775>

The Norwegian Scientific Opinion emphasises the importance of training for anybody capturing or handling wild birds, as do most authorities. For example, the US Ornithological Council guidelines<sup>10</sup> state that “no one should attempt to capture birds or remove birds from nets or other traps without training.” We recognise that some of the people who carry out the guga hunt have been doing so for many years and may have the skills that official training would teach. However, as the hunt is unobserved, there is no way of verifying this. Training and oversight cannot remove the psychological harms described above, which are inevitable outcomes of any capture and handling, but could mitigate them.

Returning to the specific method employed, there appears to have been little research into the welfare impacts of noose/grasper pole capture. However, relevant notes of caution can be found elsewhere. For example, UK Government guidance on wild bird capture states that, to avoid distress or injury to birds, you must not hold birds by their head, leg, wing or tail.<sup>11</sup>



Photo by Dan Brown

<sup>10</sup> <https://birdnet.org/info-for-ornithologists/guidelines/>

<sup>11</sup> <https://www.gov.uk/guidance/wild-birds-remove-them-from-food-premises-using-nets-or-traps>

# KILLING

Manual blunt force trauma can provide acceptable welfare at the time of killing, but this is dependent on many variables and so will always pose some level of animal welfare risk. In the case of men working precariously on or near cliffsides, the potential for ineffective stunning is likely to increase.

Species and context specific evidence on welfare at the time of killing is sparse for any wild bird killing, and as far as we know non-existent for the guga hunt specifically. However, recommendations for other birds, and killing generally, do exist and are based on recent, robust evidence.

The Humane Slaughter Association (HSA), referring to killing poultry, notes that: “It is not easy to ensure an effective blow to the skull with manual concussion stunning (e.g. using a heavy rod) and it requires complete commitment in order to destroy the brain in one fast blow. If not applied accurately and with sufficient force, it will cause extreme distress and suffering.”<sup>12</sup>

The American Veterinary Medical Association (AVMA), in its euthanasia guidelines, gives more detail: “Euthanasia by manually applied blunt force trauma to the head must be evaluated in terms of the anatomic features of the species on which it is to be performed, the skill of those performing it, the number of animals to be euthanized, and the environment in which it is to be conducted.”

An evaluation of the guga hunt on these terms identifies welfare risks. Firstly, it is conducted in a very challenging environment. Secondly, the skill of the men involved, and their knowledge of gannet anatomy, may be high but is unverified. Finally, they kill a large number of animals per day, very rapidly. On this, the AVMA notes: “Personnel who have to perform manually applied blunt force trauma to the head often find it displeasing and soon become fatigued. Fatigue can lead to inconsistency in application, creating humane concerns about its efficacious application to large numbers of animals.”

The AVMA recommends manually applied blunt force trauma be replaced with other methods, and the HSA states that it must only be used in an emergency to prevent suffering.

The HSA recommends instead (for domestic poultry) the use of a captive bolt device, which is also the method employed by most wildlife rescue professionals in the UK. Unlike a manual blow, these tools apply sufficient force to a precise location with complete consistency (as long as they are well maintained).

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<sup>12</sup> <https://www.hsa.org.uk/concussion-stunning/concussion-stunning>

# SOCIAL AND EMOTIONAL IMPACTS

Animal welfare, in academia and practice, is a rapidly developing field. While the emotional (mental) state – the animals' lived experience – is widely acknowledged to be the most crucial aspect of overall welfare, it is also the most difficult to measure, which poses difficulties for policymakers who rely heavily on “hard” evidence. Models such as the Five Domains have effectively addressed this, providing reliable frameworks to assess welfare, and should be utilised more widely.

It is now recognised that complex and varied culture is widespread across a diverse range of species<sup>13</sup>, and that there is potential for human disruption of social relationships, learning, and cultural exchange to negatively impact welfare.<sup>14</sup>

Increasingly, researchers are discussing the likelihood of complex emotions such as grief in animals, including birds.<sup>15</sup> That there is not yet consensus on the depth and range of emotions experienced by different taxa should not be taken to imply that such complex emotions do not exist. Evidence has shown that researchers' assessment of animal emotions is shaped by biases (as is true for people more generally).<sup>16</sup> This, along with other factors such as funding priorities, shape the questions that are asked and hypotheses that are tested.

We urge policymakers to maintain an openness to the likely capabilities and experiences of other animals that are not yet fully evidenced, and to apply the precautionary principle to decisions affecting sentient beings.



Photo by Kristin Snippe on Unsplash

<sup>13</sup> Whiten, A. (2021). The burgeoning reach of animal culture. *Science*, 372(6537), eabe6514. <https://doi.org/10.1126/science.abe6514>

<sup>14</sup> Fitzpatrick, Simon & Andrews, Kristin (2022) Animal culture and animal welfare. *Philosophy of Science*, 89(5), 1104- 1113. <https://doi.org/10.1017/psa.2022.34>

<sup>15</sup> Millar, B. (2024). Can animals grieve?. *ERGO*, 11(17), 442-465. <https://doi.org/10.3998/ergo.6157>

<sup>16</sup> Zippel, M. N., Hazelwood, C., Webster, M. F., & Benítez, M. E. (2024). Animal emotions and consciousness: a preliminary assessment of researchers' perceptions and biases and prospects for future progress. *Royal Society Open Science*, 11(11), 241255. <https://doi.org/10.1098/rsos.241255>

# CONCLUSION

Based on the range of animal welfare risks described here, and the difficulty of mitigating them, we do not believe that the guga hunt can be considered humane. We urge the Scottish Government to take the first possible opportunity to remove the provision in the 1981 Act that permits the guga hunt. In the meantime, we ask NatureScot to consider the animal welfare impacts of the guga hunt when deciding whether to grant a licence, to the maximum extent that the law permits.

**Action on this specific issue must be the first step in wider legislative reform to better protect animals.**





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