

Public Petitions Clerks
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Dear Convener,

Public Petition PE1664: greater protection for mountain hares

Calling upon the Scottish Parliament to urge the Scottish Government to introduce greater protection for mountain hares on both animal welfare and conservation grounds, which may include: introducing a three-year moratorium on all mountain hare killing, permitting culls and driven hunts only under licence, and ending all culling and driven hunting of mountain hares within Scotland's national parks using a nature conservation order.

We have read the report of the Public Petitions Committee meeting on 14th September, and thank the Committee for the opportunity to respond to the petition submitted by Harry Huyton on behalf of OneKind.

This issue has been extensively debated for 2-3 years, and most recently the Scottish Government has answered Parliamentary Questions submitted by Alison Johnstone MSP. Scottish Natural Heritage (SNH) has examined the issue in considerable detail, which resulted in a joint position statement being issued in December 2014 (www.snhpresscentre.com/news/snh-gwct-sle-position-on-large-scale-culls-of-mountain-hares-to-reduce-louping-ill). Stakeholders at the Moorland Forum have worked together and agreed a collaborative guidance document for mountain hare management which is due to be published soon.

We recognise the interest and concern of OneKind in the culling of any species, but there seems to be confusion as to whether this petition is primarily about welfare of the hare, species conservation, banning of culling or the licencing of grouse moors – all have been mentioned. We note that questions from the committee members at the meeting on 14th September 2017 explored some apparent contradictions, and we will try to provide more clarity on those issues.

1. From an animal welfare perspective, culling of mountain hares is not fundamentally different to the management of deer or rabbit populations, or of culling any bird or rodent pest species. These other forms of population control have not been singled out for OneKind campaigns, but the animal welfare issue is the same. Culling is done as humanely as possible, but ultimately involves killing to control a population. Phrases used in the submission such as “*persecution and suffering*” are quite inappropriate.
2. The purposes of managing mountain hare populations include protection of trees and moorland habitat, as well as limiting the spread/incidence of tick and louping ill. Limiting the spread of Lyme disease is not a primary management objective, but keeping hare populations stable will help with

that growing problem. Preventing the build-up of high local populations also prevents disease build-up among the hares themselves (i.e. coccidiosis).

3. In some instances, culling is done purely by keepers, at other times by groups of paying guests under the supervision of professional keepers, just as paying guests stalk deer or do rough shooting. The submission states that *“recreational killing raises serious conservation and welfare concerns”* but that argument is entirely unproven and seems calculated to give an emotive impression rather than a real problem.
4. The issues of whether management culls are having a damaging impact on the hare population is unproven, with very limited observational studies which even the submission recognises could be local/cyclical. We would make the point again that keepers who manage moorland know with reasonable accuracy how many hares they have through constant observation on the ground and at all times of day. They have no interest in culling un-sustainably, and the submission quotes an estimate of 5-14% as a national cull, which is sustainable. The only real issue is that keepers cannot demonstrate scientifically that the culls they do are sustainable, and that is desirable given the EU conservation status of the mountain hare. That is why many estates are helping the James Hutton Institute (JHI) and Game & Wildlife Conservation Trust (GWCT) to carry out research and develop a standardised method of counting hare numbers. That should be completed in late 2017 and this issue can then be resolved.
5. There has been a reduction of mountain hare numbers in the north and west of Scotland, areas where grouse moor management has also died out or never occurred. Therefore, this demonstrates that predator and habitat management is positively beneficial to the mountain hare, and managed grouse moors should be seen as a vital resource or “Centre of Excellence” for a species which is found at much lower levels across most of its natural European range, and is declining in many other areas.
6. Michelle Ballantyne MSP asked what impact the 3-year moratorium being asked for would have. In places where the population is highest or is on an upwards part of the cycle, a moratorium could lead to a sharp increase in numbers with more disease and habitat damage. Where populations are lower or in a downward part of the cycle, culling would not be carried out anyway. Estates have operated voluntary restraint for a long time, as there is no point in culling when numbers are low.

I hope that these remarks are useful.

Yours sincerely,

Tim Baynes
Director Scottish Moorland Group
October 2017