



Mountain hare persecution in Scotland



OneKind
Ending cruelty
to Scotland's animals



Contents

1	Summary	3
2	Scotland's mountain hares	4
3	An overview of mountain hare persecution in Scotland	6
4	Culls on grouse moors	8
6	Commercial hunting	12
7	Licensed mountain hare killing	15
8	The Scottish Government response	17
9	Recommendations	18
10	References	20

Published by OneKind 2017

Registered charity no. SC041299

50 Montrose Terrace, Edinburgh, EH7 5DL

www.onekind.scot

With thanks to

WORDS

Jane Warley www.writtenprecisely.co.uk

PHOTOGRAPHY

Adam Masterton

Andrew Parkinson www.andrewparkinson.com

Pete Walkden www.petewalkden.co.uk

SUPPORT

The Hare Preservation Trust www.hare-preservation-trust.co.uk

DESIGN

John Nicol www.industrycottage.co.uk



1. Summary

Mountain hares are native to Scotland and an important part of the upland ecosystem: shaping their habitat through grazing, and providing a range of predator species, including golden eagles and wildcats, with an important food source. Population data is sparse but suggests mountain hares are in decline. Yet they are widely persecuted for sport and as part of organised culls.

The two methods of killing mountain hare employed in Scotland have traditionally been snaring and shooting, but in March 2017, Scotland's environment agency Scottish Natural Heritage (SNH) announced that it had decided to stop issuing licences for snaring as these traps are inhumane and cause "unnecessary suffering". Whilst shooting mountain hares is arguably more humane than snaring, there are still serious welfare concerns, particularly when large-scale culls and 'driven' hunts take place. Mountain hare culls on Scottish game estates take place in remote areas, usually in winter, so often go unrecorded, but some have been reported publicly in the media. In addition, this report includes eye-witness reports of a further three to five large-scale culls that took place in the winter of 2016/2017.

The killing and taking of mountain hares in Scotland is subject to a closed season but even during that time, hares can be killed under licence from SNH. Licences have been issued for the killing of 4,113 mountain hares over the last five years, 88% of which were issued for just three sites. Most culling activity during the closed season is said to be carried out for the purpose of forestry protection.

In addition to organised culls, driven and walked-up shooting of mountain hares is one of many 'country sports'

offered by Scottish game estates, with our research finding 25 companies offering mountain hare hunting online, eight of which are promoted by the Scottish Country Sports Tourism Group through its portal www.countrysportscotland.com, which lists two Government agencies, Visit Scotland and SNH, as "partner" organisations.

To date, Scottish Government attempts to address widespread persecution have been limited. In 2014, SNH called for "voluntary restraint" on large-scale culls of mountain hares in a joint statement with Scottish Land & Estates (SLE) and the Game and Wildlife Conservation Trust (GWCT) Scotland. The effective SNH ban on snaring with mountain hares, mentioned above, represents very welcome progress, but is unlikely to reduce overall persecution levels. The Scottish Government has also commissioned a three-year research project that aims to trial different methodologies for estimating mountain hare populations. This is welcome, but it will not provide new information relating to the conservation status of mountain hares, persecution levels or welfare issues.

OneKind is calling for the urgent introduction of new protections for mountain hares, including:

- 1. No mountain hare killing except under licence, all year round**
- 2. Complete protection of mountain hares within National Parks**
- 3. Strengthened and transparent licensing arrangements**
- 4. An end to Scottish Government endorsements of companies and organisations that provide recreational mountain hare killing**

2. Scotland's mountain hares

Mountain hare ecology

The mountain hare is indigenous to the Highlands and can be found throughout this region and the uplands of Scotland. Its natural habitat is sub-alpine scrub but the hares also thrive on grouse moors, because they benefit from the same management measures aimed at delivering high densities of red grouse, including heather burning and the legal removal of predators, such as foxes, and illegal raptor persecution. The mountain hare is an important part of the upland ecosystem, shaping its habitat through grazing and providing a range of predator species, including golden eagles and wildcats, with an important food source.

Mountain hare population size and trends

Mountain hare in Scotland are poorly studied but all the signs are that the UK population is in long-term decline, as a result of habitat loss, climate change and crucially, persecution. Because of the lack of research in this area, population estimates are out of date, and the impact of these drivers of decline are poorly understood.

The last population estimate was made in 1995, when 350,000 mountain hare were thought to exist. This number is widely disputed, and the current population could be anything from 175,000 to 500,000. The population fluctuates year-on-year [1], making it hard to identify a long-term trend, but the British Trust for Ornithology (BTO) has monitored mountain hare as part of the annual Breeding Bird Survey (BBS) since 1996 [2]. This data, albeit for a limited sample size, suggests an overall decline of 34% between 1996 and 2014 (Fig 1).

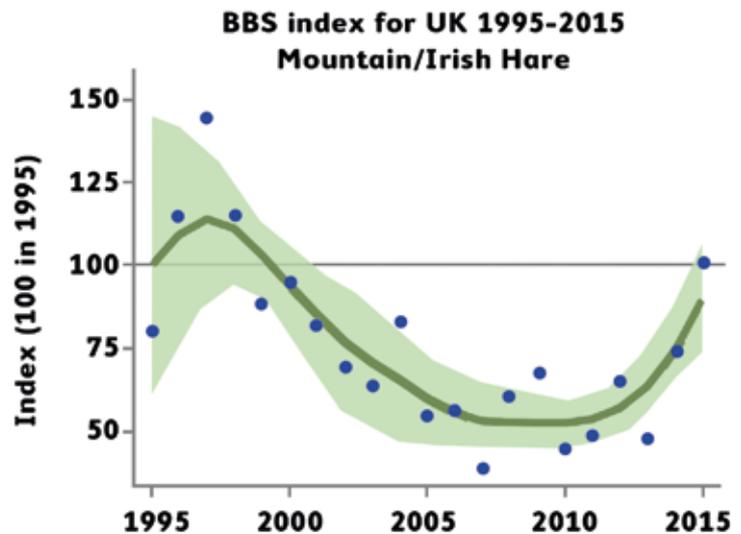


Fig 1. Population trend for mountain hares in UK from 1995–2015. Dark green line - smoothed trend; blue dots - unsmoothed trend; pale green line - upper and lower 95 % confidence limits of the smoothed trend [3].
Credit - BTO

The Scottish Government's advisor on conservation, SNH, has said that the BBS data [2], alongside data from both the Gamebag Census, which compiles voluntary returns from estates that document gamekeeping and shooting activity, and Dr Adam Watson, a renowned authority on Highland ecology, suggest a population decline [4]. This overall trend is also supported by observations on the

ground. The Mammal Society, for example, notes that on some western Scottish moors, hares are now rare where they were previously abundant [5]. Dr Adam Watson estimates that spring abundance of adults has been reduced by between five- and a hundred-fold on most grouse moors [6].

The mountain hare's conservation status in Scotland

- i. Listed on Annex V of the EU Habitats Directive (1992) which requires EU member states to maintain populations in favourable conservation status.
- ii. A priority species for conservation action under the UK Biodiversity Action Plan.
- iii. On the Scottish Biodiversity List, which means that it is considered by Scottish Ministers to be of principal importance for biodiversity conservation.
- iv. Protected by a closed season under the Wildlife and Natural Environment (Scotland) Act 2011, which makes it an offence to kill a mountain hare in the closed season (1 March to 31 July) without a licence from SNH.



3. An overview of mountain hare persecution in Scotland

3.1 How many mountain hares are killed?

For almost half the year, from March to July (inclusive), mountain hares are protected and any persecution without a licence from SNH is illegal. But, for the remainder of the year, they can be killed freely with no permissions and no transparency, and as such are persecuted on a large scale. Given that this persecution is not licensed and is carried out with no regulatory oversight, it is impossible to know how many are killed. The only estimate is that 25,000 mountain hares were killed in 2006/7, which is thought to be between 5–14% of the total population [7]. However, this is based on voluntary returns from land managers and owners and the data is now ten years old. Mountain hare killing is secretive and carried out in remote locations, but occasionally members of the public stumble upon a hunt or evidence of killing (e.g Edwards [8], The Herald [9] and The Herald [10]).

3.2 Why are mountain hare persecuted?

Most mountain hare killing is conducted as part of localised culls on shooting estates [11]. The principal reason appears to be to control louping-ill, a virus that affects red grouse and is transmitted by ticks that are carried by hare and other mammals. The only study of the issue, a questionnaire-based survey of estates in 2006/7, found that 50% of hares reported shot were culled for this reason [7]. This is substantiated by claims made by shooting organisations. For example, GWCT advises that “where grouse suffer from tick and the tick-borne louping-ill virus, hares can sustain high levels of these parasites and help perpetuate the disease. As there is no alternative form of treatment, in these cases hare numbers may need to be temporarily reduced to suppress the disease” [12].

Kinrade [7] also estimated that 10% of hares shot were culled to protect forestry interests, and 40% for sport

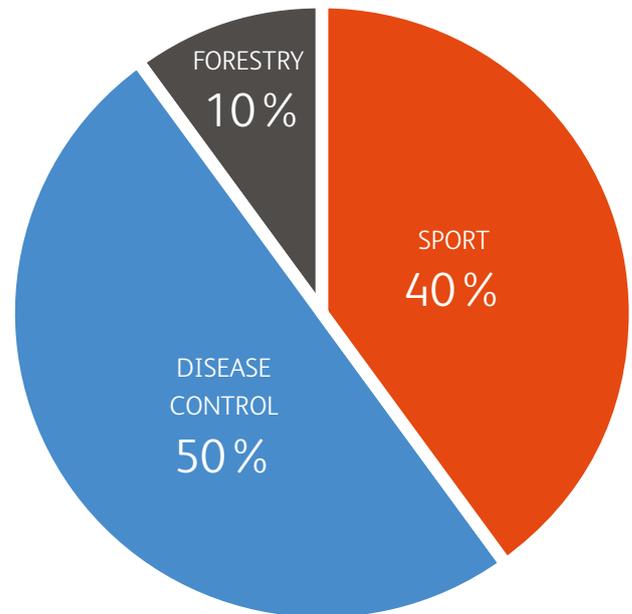


Fig 2. Reasons behind mountain persecution in Scotland, based on a 2006/7 questionnaire of estates
Credit: Kinrade et al (2008)

shooting (Fig 2). In recent years, however, it appears that large scale culling of mountain hares on grouse moors has become part of the routine management which seeks to establish very high numbers and densities of red grouse to be commercially shot [13]. This is consistent with reports in the media of large-scale culls [8-10].

There is, however, considerable doubt over the scientific basis behind these reasons for culls. For example, whilst there is no doubt that mountain hare carry ticks, there is no clear evidence that their control could be part of an effective red grouse management regime. Indeed, its scientific basis is so tenuous that SNH’s scientific experts advise that “There is no clear evidence that mountain hare culls serve to increase red grouse densities” [14]. Similarly,

the most recent scientific review of the effectiveness of mountain hare culling as a management technique for louping-ill concluded that “there is no compelling evidence base to suggest culling mountain hares might increase red grouse densities” [15].

3.3 How are mountain hares killed?

The two methods of killing mountain hares employed in Scotland have traditionally been snaring and shooting. Both of these raise major welfare concerns, as regardless of which one is used, the hare is likely to suffer. In March 2017, however, SNH announced that it had decided to stop issuing licences for snaring, with the reason being that these traps are inhumane and cause “unnecessary suffering” [16].

Snares are extremely inhumane and cause extreme physical and mental suffering to the animals they catch. As an animal becomes caught in the wire noose it tightens around its neck, abdomen or legs, preventing escape. Capture is extremely stressful for an animal that will struggle to escape and will suffer in severe agony and have a slow, painful death. A study commissioned by SNH estimated that over 5,000 mountain hares were trapped in snares and killed in Scotland in one year during 2006/7 [1]. Subsequent research by OneKind showed that the vast majority of this took place illegally, with estates setting snares without licences [17].

Whilst shooting mountain hares is arguably more humane than snaring, there are still serious welfare concerns, particularly when large-scale culls and driven hunts take place. Driven hunts involve flushing hare towards a line of waiting guns and they can involve killing hundreds of animals in the course of a day. Walking hunts are carried out as described in this eye-witness account:

EXTRACT FROM INTERVIEW WITH AN ANONYMOUS EYE-WITNESS OF A CULL

Interviewer: Can you explain what happened?

Eye-witness: ...the keepers walk along in a line and just shoot any hare that appears

Interviewer: They walk in a line?

Eye-witness: When I've witnessed it, they walk in a line, a kind of loosely organised line, shooting at hares

Interviewer: How do they flush the hares out, how does it work, forgive my ignorance?

Eye-witness: Well when you get to within 10 yards of a hare it starts running...

Interviewer: So there a lot of them about on the moor?

Eye-witness: Sometimes there can be a real high density, that's right. When the density is high, they go out and start blasting them because it's worthwhile.

Hares are notoriously challenging to shoot as they are small, fast moving animals that inhabit an environment which has plenty of cover available. The risk of causing injury rather than a clean kill is therefore heightened, especially given that commercial hunts may involve hunters with little experience. Shooting mountain hare is not a licensed activity during the open season, so there is no welfare monitoring or reporting, which makes it impossible to know the scale of the suffering.

4. Culls on grouse moors

Mountain hare culls on Scottish game estates take place in remote areas, usually in winter. This makes them difficult to monitor in any way and means there are few publicly reported culls.

Recent large-scale culls that have been reported publicly are shown in Fig 3. They include:

Lammermuir Hills, 2014

RSPB Scotland received evidence that between 1,500 and 1,700 mountain hares were shot by landowners across the Lammermuirs in the spring [9].

Balmoral, 2016

Two culls involving Balmoral and neighbouring estates were witnessed, one of which was said to have killed 500 hares [10].

DR ADAM WATSON, MOUNTAIN HARE ECOLOGIST [6]

“I would say that spring abundance of adults has been reduced by at least five-fold to 100-fold on most of these moors ...

Gamekeepers on several estates have told me they were instructed to reduce hare numbers and to try to eradicate them.”

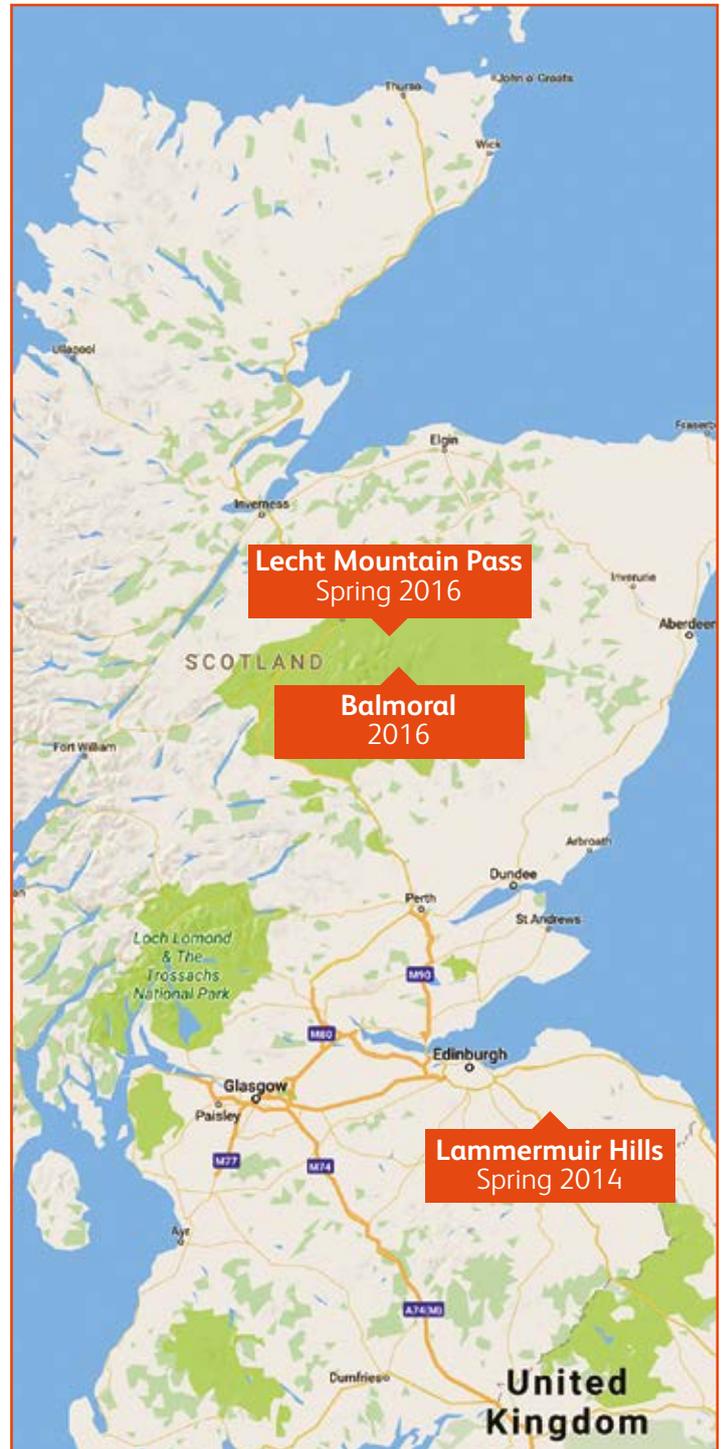


Fig 3. Map showing the location of recent large-scale culls on grouse moors that have been reported publicly in the media map data ©2017 Google



Fig 4. Photos taken by a birdwatcher of a mountain hare cull taking place near the Lecht mountain pass.
Credit - Anonymous

Lecht Mountain Pass, 2016

A birdwatcher encountered a mountain hare cull. Images, displayed in Fig 4, show a group of 20 armed gamekeepers equipped with more than a dozen high-tech off-road vehicles and hundreds of dead hares [8].



4. Culls on grouse moors

In the winter of 2016/17, a further three to five large-scale culls were reported by eye-witnesses to OneKind (Fig 5). Interestingly these all took place in and around the North Cairngorms area. Whilst this suggests this may be a hotspot for mountain hare culls, reliable conclusions cannot be drawn given that the vast majority of culling activity goes undetected.

25th October, near Tomintoul

This cull was reported to OneKind after the event by a hillwalker who preferred to remain anonymous:

“It was around lunchtime on 25th October, coming back from Cairngorm. I came across a completed cull.

The “keepers” were drinking beer and smoking outside the cottage ... There were about 5–6 Land Rovers, three ATVs and an old army truck for the dogs. They had about 30 carcasses laid out in a line.

Interestingly, they were setting out in convoy the other side of Tomintoul as I drove out earlier in the morning. Slaughtering hares doesn’t take them long! I would have loved to take a photo but the guy loading the dogs was in the lay-by and looking quite intimidating. I chickened out!”



Fig 5. Map showing location of large-scale mountain hare culls on grouse moors, reported to OneKind, winter 2016/17
map data ©2017 Google

9th February 2017, Slochd near Tomatin

An anonymous call tipped OneKind off to a large shoot taking place on Slochd summit, however by the time it could be verified the culling had finished. Intelligence was also received of large-scale shooting in the same area on 14th February.

28th February, the Farr estate, near Tomatin

A wildlife photographer, Pete Walkden, was photographing grouse and was able to take a photograph of an ATV filled with dead hares as it passed him. This happened at 16:00 on the final day of the open season. Pete reported the incident on social media and to OneKind and other organisations working on this issue the following day. A prior report of large-scale shooting in the Tomatin area had been received by OneKind on 31st January.

PETE WALKEN, WILDLIFE PHOTOGRAPHER

“I had been photographing a pair of red grouse, that appeared to be spoiling for a fight so parked up just off the road, and had my large lens poking out of the car at the birds. The ATV drove past me about half an hour earlier, whilst I was still pointing my lens out of the window.

The ATV returned, and drove back past me in the other direction, and I hoped as it went by it might spook one of the grouse into flying off. When it didn't, I glanced up at the ATV and spotted something in the back. I raised the camera and took a few shots to see what it was.

I was sickened by the sight of the dead mountain hares, as I adore these hardy, elusive creatures, and hate to see them dead beside the road, let alone deliberately killed.”



Fig 7. Mountain hare cull on Farr Estate in February and photographic evidence of an ATV filled with dead hares
Credit: Pete Walkden

5. Commercial hunting

Shooting mountain hares is one of many “country sports” offered by Scottish game estates. OneKind research has found 25 companies offering mountain hare hunting online (Table 1). Precise details vary with company and are seldom advertised, but they usually offer bags of 8–10 animals per gun for walk-up hunts and up to 200 for a driven hunt party [15].

Some of these are advertised directly by VisitScotland, the Scottish Government agency responsible for marketing Scotland as a tourist destination around the world. Some country sport businesses are promoted on www.visitscotland.com, including Mirani Hunting, which offers mountain hare hunting amongst other sports (Fig 9).

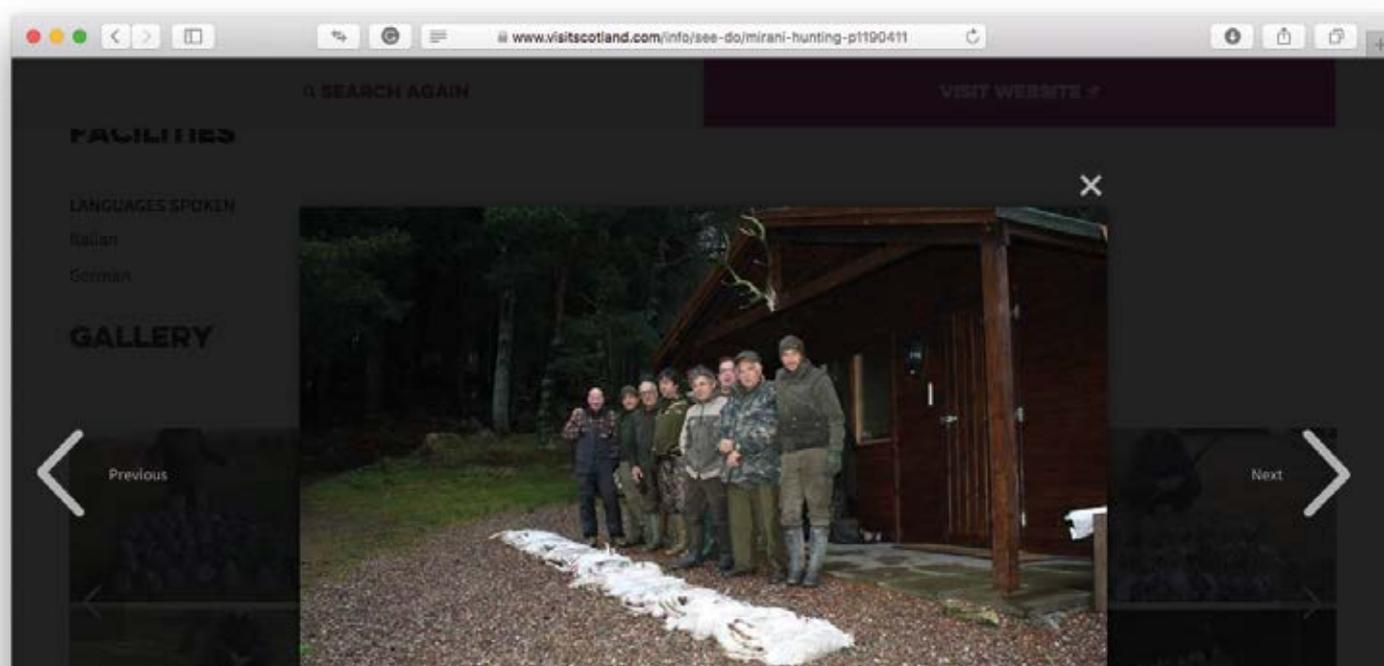


Fig 9. Mirani Hunting, as advertised on VisitScotland.com
Credit VisitScotland.com

Most marketing of country sports is, however, delegated to the Scottish Country Sports Tourism Group (SCSTG). The SCSTG was formed by the major Scottish country sporting organisations and associations, including Scottish Land and Estates (SLE) and the British Association for Shooting and Conservation (BASC) Scotland. The SCSTG portal countrysportscotland.com lists SNH and VisitScotland as ‘Partners’ and displays both their logos throughout. SCSTG appears to be funded by the country sports industry, but it has also received at least two grants worth a total of £36,675 from VisitScotland in the last five years. Following the first grant, VisitScotland Chairman Mike Cantlay said:

“The Glorious Twelfth is a renowned date and marks the start of what will undoubtedly be a good season for this important tourism sector. Through the VisitScotland Growth Fund, the SCSTG has boosted Scotland’s reputation as a country sports destination to a wider audience in the UK and Northern Europe” [18].

1 £18,750 from the 2011/14 VisitScotland Growth Fund (Question S4W-22506: Angus MacDonald, Falkirk East, Scottish National Party, Date Lodged: 24/09/2014) and a further £17,925 in 2016 (Scottish Parliament Question S5W-05930: Andy Wightman, Lothian, Scottish Green Party, Date Lodged: 22/12/2016)

CASE STUDY: BALAVIL ESTATE

www.balavil-estate.com

Extending from the River Spey into the Monadhliath mountains, the Balavil Estate is a 7,500-acre Estate within the Cairngorms National Park. Until recently, Balavil Estate advertised a range of country sports, including deer stalking, driven and walking grouse shooting, pheasant and hare shooting, and mixed rough shooting. For mountain hares in particular, the website states that:

“In recent years, we have shot up to 2,000 blue hares in the course of a season though again, like grouse, they are a fluctuating commodity. Guests are

driven towards them. In the months of November, December and January when there is snow on the ground, it can provide very entertaining sport. Up to 200 hares a day can be shot.”

This information was taken from the website in July 2017, however the Estate has since then confirmed that ownership changed in 2015 and that they have “no plans for hare shooting.”

The screenshot shows a web browser window displaying the Balavil Estate website. The page title is 'SPORTING ACTIVITIES'. The main content area is yellow and contains the following text:

SPORTING ACTIVITIES

Balavil Estate extends to approximately 7,500 acres running from the River Spey up into the mountains of the Monadhliaths. The Estate is long and narrow, approximately 8 miles long by 2 wide, and runs from marshlands around the River Spey through an agricultural belt and commercial forestry plantations, birch wood and onto moor land, which extends up into Colnagfern Estate. Our neighbour to the west is Plizmain Estate and to the east is Dunachton Estate. The land rises to approximately 1,800 feet at the highest point and is generally of rolling landscape rather than the steeper topography of the west.

The Estate has been famed for its sport since the late 18th century when Colonel Thornton rented the land and invited many guests to come and enjoy the sport there. The sport was probably at its zenith at the turn of the last century when seasonal bags of 1,300 brace of grouse were achieved and wild pheasants were to be found all over the Estate.

- [GROUSE & SMALL GAME SHOOTING](#)
- [DEER STALKING](#)
- [FISHING](#)

too of see

GROUSE & SMALL GAME SHOOTING

GROUSE - DRIVEN SHOOTS
The best days at Balavil over recent years have resulted in days of 75 brace being achieved on the hill. We are fully hunted for two separate days of driving and there are 14 separate drives on the moor.

Grouse are notoriously difficult bird to predict on a seasonal basis and with the shape of the Estate the weather is also greatly influential in the success of a day. When the grouse are plentiful, however the drives provide some of the best shooting in Scotland. We prefer to leave the booking of grouse till June so that we have an idea of the success of the breeding season.

GROUSE - WALKED UP SHOOTING
Walked up days for up to 6 guns is a speciality on the Estate and the relatively easy terrain makes for entertaining days for guests and their dogs. Bags of up to 25 brace per day are achievable.

We also encourage black powder shooting and for the past 10 years have started the season with 3 days dedicated to muzzle loading guns.

PHEASANT
Over the last 6 years we have developed a very entertaining small pheasant shoot at Balavil. We put down approximately 3000 birds and can provide days of up to 150 very sporting birds. Lunch at the house is always one of the highlights of the day.

BLUE HARES
In recent years we have shot up to 2,000 blue hares in the course of a season though again, like grouse, they are a fluctuating commodity. Guests are transported to the top of the hills where hares are driven towards them. In the months of November, December and January when there is snow on the ground, it can provide very entertaining sport. Up to 200 hares a day can be shot.

ROUGH SHOOTING
The mixed topography of Balavil provides some wonderful locations for mixed rough shooting and combined with grouse, pheasants and hares we can offer days, which include ducks on our 5 flight ponds, woodcock, snipe and rabbit. They normally have an expectation of 10 - 15 head per day per gun.

too of see

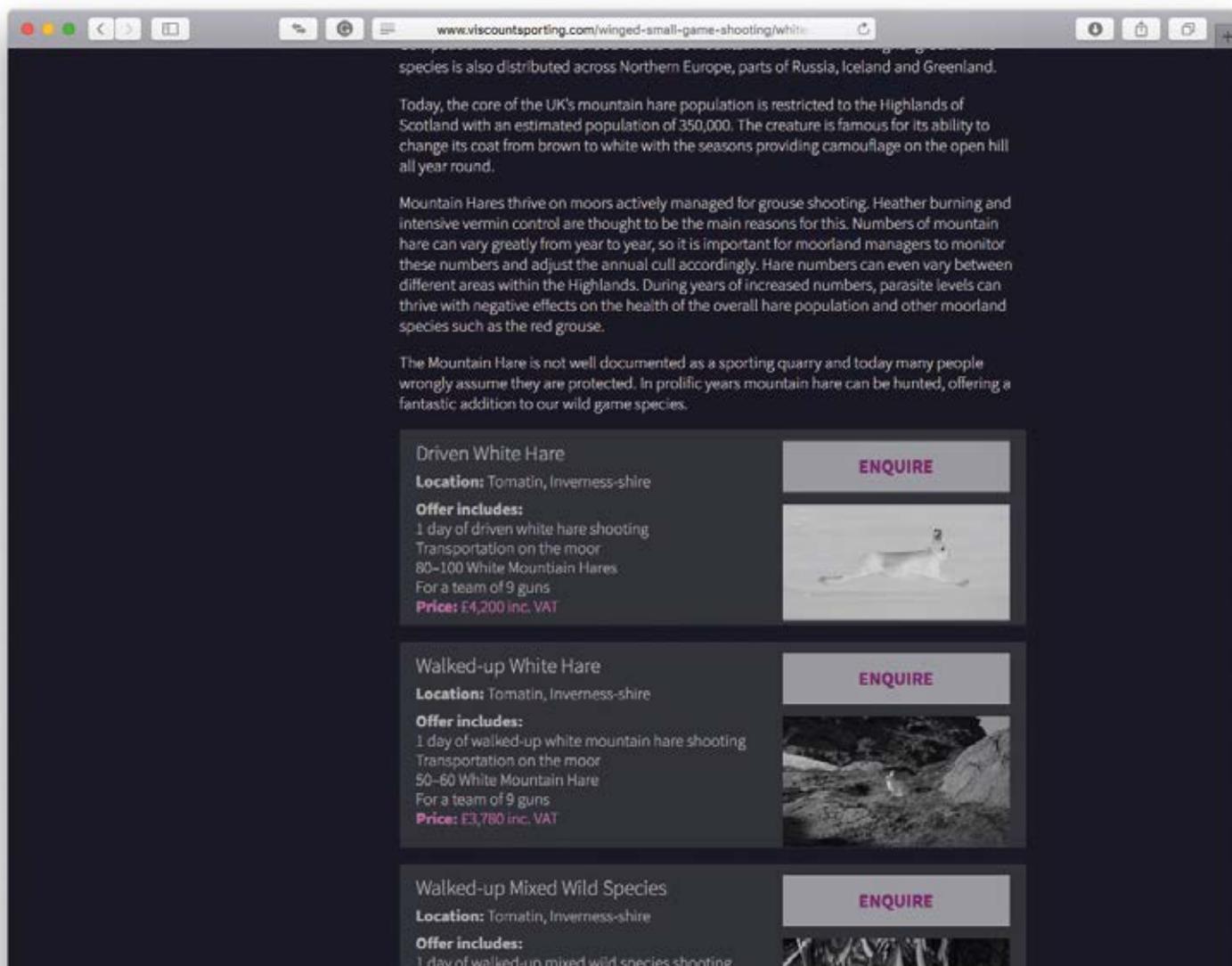
Credit www.balavil-estate.com

CASE STUDY: VISCOUNT SPORTING

www.viscountsporting.com

Based in Royal Tunbridge Wells, Viscount Sporting offer mountain hare hunting in Tomatin, Inverness-shire and state that **“Thanks to very conscientious gamekeeping and excellent habitat management, we are privileged to offer the opportunity to shoot white mountain hares over an area with a very strong and consistent population of this fantastic and unique game species”**.

Both driven and walked-up shoots are advertised with the promise of shooting up to 80–100 or 50–60 hares, respectively. A driven hunt day is advertised at £4200 for nine guns and a walked-up hunt day costs £3780.



The screenshot shows a web browser window with the URL www.viscountsporting.com/winged-small-game-shooting/white. The page content includes:

species is also distributed across Northern Europe, parts of Russia, Iceland and Greenland.

Today, the core of the UK's mountain hare population is restricted to the Highlands of Scotland with an estimated population of 350,000. The creature is famous for its ability to change its coat from brown to white with the seasons providing camouflage on the open hill all year round.

Mountain Hares thrive on moors actively managed for grouse shooting. Heather burning and intensive vermin control are thought to be the main reasons for this. Numbers of mountain hare can vary greatly from year to year, so it is important for moorland managers to monitor these numbers and adjust the annual cull accordingly. Hare numbers can even vary between different areas within the Highlands. During years of increased numbers, parasite levels can thrive with negative effects on the health of the overall hare population and other moorland species such as the red grouse.

The Mountain Hare is not well documented as a sporting quarry and today many people wrongly assume they are protected. In prolific years mountain hare can be hunted, offering a fantastic addition to our wild game species.

The page features three hunting offers, each with an 'ENQUIRE' button and a corresponding image:

- Driven White Hare**
Location: Tomatin, Inverness-shire
Offer includes: 1 day of driven white hare shooting, Transportation on the moor, 80–100 White Mountain Hares, For a team of 9 guns
Price: £4,200 inc. VAT
- Walked-up White Hare**
Location: Tomatin, Inverness-shire
Offer includes: 1 day of walked-up white mountain hare shooting, Transportation on the moor, 50–60 White Mountain Hare, For a team of 9 guns
Price: £3,780 inc. VAT
- Walked-up Mixed Wild Species**
Location: Tomatin, Inverness-shire
Offer includes: 1 day of walked-up mixed wild species shooting

Credit: www.viscountsporting.com

6. Licensed mountain hare killing

The Wildlife and Natural Environment (Scotland) Act 2011 introduced closed seasons for the killing or taking of wild hares. This means that it is an offence to intentionally or recklessly kill, injure or take a mountain hare between 1st March and 31st July. To kill mountain hares during the close season, a licence must be acquired from SNH. A licence should only be granted in “exceptional circumstances” [19].

Since this system was introduced, licences have been issued to permit the killing of 4,113 mountain hares over five years [20].

The first year of the scheme saw the highest number of mountain hares killed under licence, followed by a large drop in 2013. Since then, however, the numbers have been gradually increasing. The available information regarding the reason for culling is very limited, but for 63 % of mountain hares killed under licence, the reason stated is forestry protection. For the remainder it is unclear. This

is consistent with what we would expect as culling to protect forestry aims to maintain low numbers throughout the year.

The vast majority (88 %) of mountain hares killed under licence in the last five years have been on three sites:

- Auchtertipper woodland, a new 682ha woodland on Cawdor Estate near Carrbridge (1,700 mountain hares)
- Glenavon estate, a large shooting estate near Tomintoul and within the Cairngorms National Park (1,100 mountain hares)
- Garbole woodland, near Tomatin (800 mountain hares, ownership unclear)

This suggests that most licensed mountain hare persecution could be addressed through targeted work by SNH with the three land managers in question to deliver non-lethal alternatives.

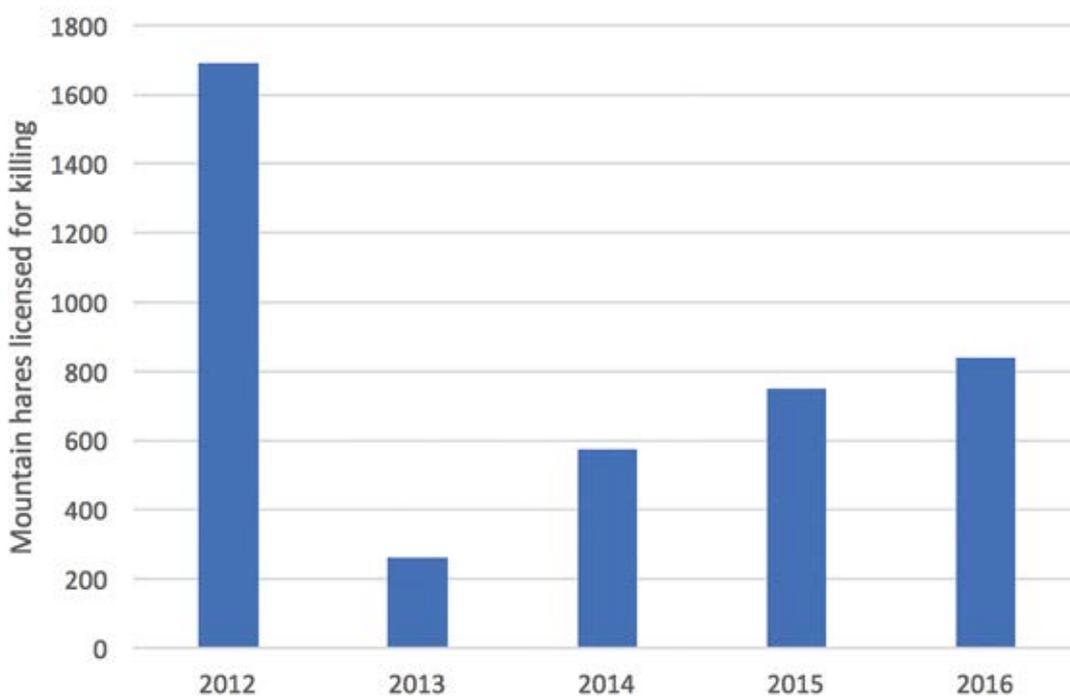


Fig 10. Total number of mountain hares killed under licence in Scotland between 2012 and 2016

Source: SNH (2016)



7. The Scottish Government response

In spite of the recognition of the importance of mountain hare conservation in multiple pieces of legislation, very little has been done to reduce large-scale persecution. The first significant response by the Scottish Government was the call for “voluntary restraint” on large-scale culls of mountain hares. This appeared in a joint statement in 2014 by SNH, SLE and the GWCT [21]. The statement recognised the legal requirement on Government to maintain the population in “Favourable Conservation Status”, but it also noted that the impact of killing hares is poorly understood. The statement acknowledged that there was no basis for culling to control louping-ill where other tick carriers, such as deer, were present, and said that it should not be undertaken for this purpose where that was the case. It supported shooting mountain hare for sport, and culling in certain circumstances such as protecting young trees.

Snaring of mountain hares was once common, with one study suggesting that approximately 5,000 mountain hares were snared in one year in 2006/7. In more recent times this has declined. Since 2012, SNH has issued only four licences that might have allowed snaring, and in 2016 two licences issued for mountain hare control were amended to remove snaring as a permitted method. Then in March 2017, the Scottish Government published a review of snaring [16] carried out by SNH, which stated that:

“Concerns have been raised with SNH over the welfare impacts of snaring hares to the effect that it is difficult to advise on a method of snaring that does not cause unnecessary suffering – that they cannot be used effectively as a killing trap because animals take too long to die and are not effective as a restraining means because there is too high a risk of killing or injury. The lack of any apparent means or guidance to avoid this means that SNH will not be minded to issue licences unless the contrary can be evidenced.”

This represents very welcome progress, particularly as it recognises the responsibility on the Scottish Government to improve wild animal welfare. Whilst it will prevent suffering as a result of snares, however, it is not expected to reduce overall persecution levels.

8. Recommendations

In 2015, ten Scottish conservation organisations, including the RSPB and the Scottish Wildlife Trust, called for a three-year moratorium (prohibition) on mountain hare culls on grouse moors **“until science can better inform the situation and the conservation status of this important native species”** [22]. However, the Scottish Government took no action to protect mountain hares in response to this call. Meanwhile, it seems clear that the research to be published by SNH in 2017 will not answer key questions around the conservation status of mountain hares, the impact of culling and large-scale hunting, and the welfare of the killed animals. An indefinite moratorium therefore remains justified.

Whilst OneKind supports a moratorium, we note the lack of appetite from the Scottish Government for such an approach. Furthermore, the moratorium as suggested by the conservation organisations would be limited in its application as it would exclude killing for other purposes, including large-scale commercial hunts.

1. PROHIBIT MOUNTAIN HARE KILLING EXCEPT UNDER LICENCE, ALL YEAR ROUND

While OneKind advocates a comprehensive ban on the persecution of mountain hares, if the Scottish Government is not minded to introduce such a measure, an alternative approach would be to extend the closed season on mountain hares so that it applies all year round. This would mean that any killing, regardless of scale or purpose, would require a licence from SNH. This approach has two important advantages. Firstly, licensing would require operators to make accurate returns of the numbers killed under each licence, and this would result in accurate collection of data on mountain hare control and hunting. Secondly, licensing is an approach that can adapt as further conservation and welfare evidence comes forward. For example, if it is proven that numbers are healthy and that the benefits of control justify the welfare consequences, the barrier for issuing a licence could be lowered, and vice versa.

2. INTRODUCE COMPLETE PROTECTION WITHIN NATIONAL PARKS

In addition, there need to be additional controls in place within Scotland’s National Parks. Scotland’s National Parks were established in 2000 with four primary aims. The first of these is to “conserve our natural heritage”, and this aim is meant to be given greater weight than the others in the event of a conflict. As an iconic native species, mountain hares are a fundamental part of our natural heritage in the Highlands. OneKind therefore recommends a complete prohibition on the persecution of mountain hares within National Parks. This could be achieved using a Nature Conservation Order. Scottish Ministers have the power to use a Nature Conservation Order to make specified activities illegal in specified areas. The Orders are provided for under Regulations 19 and 20 of the Conservation

(Natural Habitats, &c.) Regulations 1994 (as amended in Scotland) for Natura sites – which includes Special Areas of Conservation (SAC) and land linked to them.

3. STRENGTHEN AND BRING TRANSPARENCY TO THE LICENSING ARRANGEMENTS

The recent increase in licensed killing and the lack of public reporting on the issued licences is cause for concern. We believe that an obligation to report regularly on number of animals killed – similar to the reporting requirement on seal licences provided by Section 113 of the Marine (Scotland) Act 2010 – would be an important step forward. This would provide two major benefits:

(i) Less unjustified killing - It is clear from the data released by the Scottish Government on licences that have been issued over the last five years that the bar has been set too low. Whilst many concerns remain over seal licensing, that system nonetheless limits the number of animals that may be killed and places emphasis on the use of non-lethal measures rather than shooting. Lethal control is intended to be a last resort, and the numbers gathered in recent years do show a reduction in the number of seals being shot.

(ii) Greater transparency - Mountain hare licensing data is in the public domain thanks to Freedom of Information requests, whilst seal licensing data is published every quarter by Marine Scotland. Furthermore, the mountain hare licence data is too vague to determine the exact reason for control or the extent to which alternative non-lethal options have been explored.

4. REMOVE GOVERNMENT ENDORSEMENTS OF MOUNTAIN HARE KILLING

The endorsement of businesses offering recreational large-scale killing of mountain hares appears contrary to the Scottish Government's conservation obligations for this species given that it is impossible to demonstrate sustainability in the absence of population monitoring and licensing. It also promotes a reckless attitude towards wildlife and an image of Scotland that most of the Scottish public would find offensive.

We therefore recommend that SNH and VisitScotland remove their endorsement of the Scottish Country Sports Tourism Group until this is no longer the case, and that VisitScotland does not feature individual businesses offering this activity.

9. References

1. Newey, S., Dahl, F., Willebrand, T. & Thirgood, S., Unstable dynamics and population limitation in mountain hares. *Biological Reviews* 2007. 82: p. 527-549.
2. Harris, S.J., Massimino, D., Newson, S. E., Eaton, M. A., Marchant, J. H., Balmer, D. E., Noble, D. G., Gillings, S., Procter, D. & Pearce-Higgins, J. W. The breeding bird survey 2015. BTO Research Report 687. 2016, British Trust for Ornithology: Thetford. p. 24.
3. BBS. Population trend graphs. 2017; Available from: <https://www.bto.org/volunteer-surveys/bbs/latest-results/trend-graphs>.
4. Newey, S., Iason, G. & Raynor, R., The conservation status and management of mountain hares. 2008, Scottish Natural Heritage Commissioned Report No.287 (ROAME No. F05AC316)
5. The Mammal Society. Mountain hare – *Lepus timidus*. 2016; Available from: www.mammal.org.uk/species-hub/full-species-hub/full-species-hub-list/species-mountain-hare/
6. The Herald. Grouse moor owners driving mountain hares to the brink. 2014; Available from: www.heraldsotland.com/news/13131070.display/
7. Kinrade, V., Ewald, J., Smith, A., Newey, S., Iason, G., Thirgood, S & Raynor R. The distribution of mountain hare (*Lepus timidus*) in Scotland (2006/07). Scottish Natural Heritage Commissioned Report No. 278 (ROAME No. R07AC308). 2008.
8. Edwards, R. Outrage over mass killing of mountain hares. *The Ferret*. 2016; Available from: <https://theferret.scot/outrage-mass-killing-mountain-hares/>
9. Edwards, R. Outrage over mass killing of mountain hares. *The Ferret*. 2016; Available from: <https://theferret.scot/outrage-mass-killing-mountain-hares/>
10. The Herald Queen urged to stop mass killing of hares at Balmoral. 2016.
11. Patton, V., Ewald, J. A., Smith, A. A., Newey, S., Iason, G. R., Thirgood, S. J. & Raynor, R., et al., Distribution of mountain hares *Lepus timidus* in Scotland: results from a questionnaire. *Mammal Review*, 2010. 40(4): p. 313-326.
12. GWCT. Mountain hare. 2017; Available from: www.gwct.org.uk/research/species/mammals/mountain-hare/.
13. Watson, A., *Mammals in north-east Highlands*. 2013, Rothersthorpe, UK: Paragon Publishing.
14. Werritty, A., Pakeman, R. J., Shedden, C., Smith, A. & Wilson, J. D., A review of sustainable moorland management. Report to the scientific advisory committee of Scottish Natural Heritage. 2015, SNH: Battleby. p. 55.
15. Harrison, A., Newey, S., Gilbert, L., Haydon, D. T. & Thirgood, S., Culling wildlife hosts to control disease: mountain hares, red grouse and louping ill virus. *Journal of Applied Ecology*, 2010. 47(4): p. 926-930.

-
16. SNH, Review of snaring for Scottish Government. 2017, Scottish Natural Heritage.
 17. Unwin, B. Protected mountain hares die in illegal snares. The Telegraph. 2008; Available at: www.telegraph.co.uk/news/earth/earthnews/3340891/Protected-mountain-hares-die-in-illegal-snares.html
 18. Scottish Land and Estates. Strong country sports season set to open on glorious twelfth 2011; Available from: http://www.scottishlandandestates.co.uk/index.php?option=com_content&view=article&id=2817:strong-country-sports-season-set-to-open-on-glorious-twelfth&catid=94:wildlife-estates-scotland&Itemid=127.
 19. SNH. Hares and licensing. 2016; Available from: <http://www.snh.gov.uk/protecting-scotlands-nature/species-licensing/mammal-licensing/hares-and-licensing/>.
 20. SNH. Freedom of information response A1918205. 2016; Available from: https://www.whatdotheyknow.com/request/hare_licenses
 21. SNH. SNH-GWCT-SL&E position on large-scale culls of mountain hares to reduce louping ill. 2014; Available from: www.snhpresscentre.com/news/snh-gwct-sle-position-on-large-scale-culls-of-mountain-hares-to-reduce-louping-ill
 22. RSPB, Scottish conservation bodies call for compulsory three-year moratorium on the culling of mountain hares on grouse moors. 2015.

ANNEX: Companies providing mountain hare shooting in Scotland

COMPANY	DIANA HUNTING TOURS
WEBSITE	www.diana-hunting.com
LOCATION OF SHOOTING	Melrose, The Scottish Borders
DETAILS	Hunting trips in Scotland including mountain hare shooting in Melrose www.diana-hunting.com/scotland/scotland/luxurious-hunting-in-melrose/
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/agent-250-diana-hunting-tours/
<hr/>	
COMPANY	SCOTSPORT
WEBSITE	www.scotspportuk.com/hunting/
LOCATION OF SHOOTING	Estates in North East Scotland
DETAILS	Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website.
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/agent-315-scotspport/
<hr/>	
COMPANY	GEORGE GOLDSMITH LTD
WEBSITE	www.georgegoldsmith.com
LOCATION OF SHOOTING	Estates throughout Scotland
DETAILS	Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website.
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/agent-257-george-goldsmith-ltd/
<hr/>	
COMPANY	HIGHLAND LODGES
WEBSITE	www.highlandlodges-scotland.com/country-sports/
LOCATION OF SHOOTING	Perthshire
DETAILS	Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website.
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/agent-255-highland-lodges/
<hr/>	
COMPANY	DEER SCOTLAND
WEBSITE	www.deerscotland.com/
LOCATION OF SHOOTING	Strathkinness, Fife
DETAIL	Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/provider-249-deer-scotland/
<hr/>	
COMPANY	PETER SWALES INTERNATIONAL BIG GAME & BIRD HUNTING LTD
WEBSITE	www.kiltarlity.com/sportscotland.htm
LOCATION OF SHOOTING	Location of hunts not specified, based in Kiltarlity, Inverness-shire
DETAILS	Mountain hare shooting mentioned briefly on website: "Scotland is a wonderful hunting location...Red, roe, sika and fallow deer, snow hares, brown hares and rabbits, contact me and let's talk about what interests you". Mountain hare shooting is also listed on the Country Sport Scotland website.
COUNTRY SPORT SCOTLAND	http://countrysportscotland.com/agent-251-peter-swales-international-big-game-bird-hunting-ltd/

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

EAST HAUGH HOUSE HOTEL

www.easthaugh.co.uk/shooting-and-stalking/

Pitlochry, Perthshire Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website. Correspondence with a sporting consultant at the hotel confirmed availability of mountain hare shooting at a cost of around £2,800 for the day, plus accommodation.

<http://countrysportscotland.com/provider-217-east-haugh-house-hotel/>

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

DRYBURGH ABBEY HOTEL

www.dryburgh.co.uk/

Melrose, The Scottish Borders

Mountain hare shooting not mentioned on main website but offered as an option on the Country Sport Scotland website.

<http://countrysportscotland.com/provider-240-dryburgh-abbey-hotel/>

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

VISCOUNT SPORTING ESTATES

www.viscountsporting.com/

Tomatin, Inverness-shire

Hunting trips in Scotland including mountain hare shooting in Tomatin, Inverness-shire. Website mention of mountain hares - "Thanks to very conscientious gamekeeping and excellent habitat management, we are privileged to offer the opportunity to shoot white mountain hares over an area with a very strong and consistent population of this fantastic and unique game species." Driven or walked-up packages offered for £4,200 or £3,780, respectively.

—

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

HUNTING SCOTLAND

www.hunting-scotland.com

Precise location of shooting not stated, but based in Stirlingshire

Describes itself as a provider of hunting trips in Scotland and lists many activities, including white/mountain hare hunting: "The Mountain Hare lives in the high moors and mountains of Scotland... To hunt the white hare you will be transported to the tops of hills or mountains...as you raise your gun they will suddenly explode and run like the wind!".

—

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

ABSOLUTELY SCOTLAND

www.absolutely-scotland.co.uk

Precise location of shooting not stated, but based in Stirlingshire

Website no longer lists hunting activities, but Google search discovered-

www.absolutely-scotland.co.uk/driven-hare-and-rough-shooting.php which mentions offers of driven hare shooting.

—

COMPANY**WEBSITE**

LOCATION OF SHOOTING
DETAILS

COUNTRY SPORT SCOTLAND

GAME SHOOTING SCOTLAND /ESKDALE SHOOTING SERVICES

www.gameshootingscotland.com

Estates in The Scottish Borders

Lists mountain hare shooting as part of a walked-up/rough shooting packages and states "We are also able to provide days shooting Mountain Hares also known as White Hares".

—

ANNEX: Companies providing mountain hare shooting in Scotland

COMPANY	CHIRNSIDE HALL HOTEL
WEBSITE	www.chirnsidehallhotel.com
LOCATION OF SHOOTING	The Scottish Borders
DETAILS	Offers mountain hare shooting as part of its shooting packages - www.chirnsidehallhotel.com/shooting-packages.php - "A typical day's bag includes pheasants, partridge, duck, snipe, woodcock, pigeon plus ground game rabbit, brown/white hare and sometimes a few grouse", but prices are not listed.
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	EXCLUSIVELY SCOTTISH
WEBSITE	www.exclusivelyscottish.com
LOCATION OF SHOOTING	The Scottish Borders
DETAILS	Hare shooting is offered as part of a 'walked up' or 'mixed' shooting day - www.exclusivelyscottish.com/sporting-packages/walked-up-shooting-days.php
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	TULCHAN LODGE
WEBSITE	www.georgegoldsmith.com/properties/tulchan-lodge
LOCATION OF SHOOTING	Tulchan Estate, Angus, Perthshire
DETAILS	Website offers stalking, walked-up white hare, grouse and driven partridge shooting.
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	TULCHAN GLENISLA
WEBSITE	http://tulchan-glenisla.co.uk
LOCATION OF SHOOTING	Tulchan-Glenisla Estate, Angus, Perthshire
DETAILS	"During the shooting season we offer driven and walked-up shoots for Grouse, Partridge, Pheasant and Blue Hares"
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	BALAVIL ESTATE
WEBSITE	www.balavil-estate.com
LOCATION OF SHOOTING	Kingussie, Inverness-shire
DETAILS	"In recent years we have shot up to 2,000 blue hares in the course of a season though again, like grouse, they are a fluctuating commodity. Guests are transported to the top of the hills where hares are driven towards them. In the months of November, December and January when there is snow on the ground, it can provide very entertaining sport. Up to 200 hares a day can be shot"
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	SASSETTI COUNTRY SPORTS
WEBSITE	http://sassetticountrysports.com
LOCATION OF SHOOTING	Throughout Scotland
DETAILS	Offers rabbit and hare shooting and mentions white hares, but no specific details given.
COUNTRY SPORT SCOTLAND	—
<hr/>	
COMPANY	WEIROCH LODGE
WEBSITE	www.weiroch.co.uk
LOCATION OF SHOOTING	Ballindalloch, Morayshire
DETAILS	Offers rabbit and hare shooting but does not specify species of hare.
COUNTRY SPORT SCOTLAND	—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

THE GEARACH

www.thegearach.co.uk/

The Gearach at Bruichladdich

Offers rabbit and hare shooting but does not specify species of hare.

—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

TIGH NA SGIATH COUNTRY HOUSE HOTEL

www.nethybridgeaccommodation.co.uk

Grantown-on-Spey, Inverness-Shire

Offers rabbit and hare shooting but does not specify species of hare.

—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

CARSKIEY HOUSE

www.georgegoldsmith.com/properties/carskiew-house

Mull of Kintyre, Argyll

Offers rabbit and hare shooting but does not specify species of hare.

—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

GUNS ON PEGS

www.gunsonpegs.com

Lammermuirs, Southern Scotland

Offers blue/mountain hare shooting in the Lammermuirs.

—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

Lammermuir Game Services

www.lammermuirshoot.co.uk

Lammermuirs, Southern Scotland

Offers blue/mountain hare shooting in the Lammermuirs.

—

COMPANY

WEBSITE

LOCATION OF SHOOTING

DETAILS

COUNTRY SPORT SCOTLAND

MIRANI HUNTING

<http://www.miranicacciascozia.com/>

Not specified

Mountain hare shooting offered alongside other country sports.

No, but listed on VisitScotland <https://www.visitscotland.com/info/see-do/mirani-hunting-p1190411>

photograph by Andrew Parkinson



OneKind

Ending cruelty
to Scotland's animals

www.onekind.scot/harecare