



18<sup>th</sup> February 2021

National Parks and Wildlife Service (NPWS)  
Department of Housing, Local Government and Heritage  
Public Consultation Process (PCP)  
Wild Birds Derogations Declaration for 2021/2022

Submitted by email to: WildBirdDeclarations@chg.gov.ie

A chairde,

In recent years the seagull population of Blackrock Co. Louth and neighbouring areas has increased considerably with these gulls now causing a menace and real hazard which threatens public health and safety.

The increasingly aggressive behaviour of these gulls is directed at people and also protected wildlife such as seals as evidenced in many headline reports such as 'Unprovoked attacks by a gang of feathered brutes', 'Terrorist seagulls: Birds attack sick patients in Drogheda hospital' and 'Seagulls carrying drug-resistant superbugs in form of E. coli bacteria, researchers warn'.

Seagull faeces contain bacteria such as E coli and Salmonella which can lead to illnesses such as gastro-enteritis and septicaemia. Fungal infections which are carried within bird droppings from seagulls include Histoplasmosis and Cryptococcus. Seagull faeces contain Enterococcus Faecalis which causes antibiotic-resistant infections. These bacterial infections can be easily spread through surface contamination and inhaling bacteria from dried droppings. Seagull droppings can contaminate food and water when a diseased bird defecates into a human food or water source. Infections from seagull faeces can also be transferred to humans by bird mites which can bite people.

The documented year on year increase of call outs that Rentokil has received from people asking for help in dealing with gulls is clear evidence of the growing hazard that these birds are causing.

The seagulls in Blackrock county Louth are persistently soiling the seafront promenade walls and walkway where the public sit and eat throughout the year. This poses a serious health risk to the public especially to children and the elderly. The location of two primary schools in the locality further exacerbates the dangers of seagull faeces to our children as they eat and play in the school grounds.

The gulls are also soiling homes, food premises and play areas causing a serious public health risk.

The issue of attacks by seagulls on citizens and the health issues arising from the increase in the seagull population have been extensively reported throughout the European Union. The World Health Organisation publication, Public Health Significance of Urban Pests (Bonney, Kampen and Sweeney, 2008), specifically mentions the hazard associated with wild birds, including the urban gull, and the spread of coronaviruses.

With the emergence of Covid 19 and the suspected link to bats, it is imperative that the Government take the matter of protecting public health and safety very seriously and do not neglect to rectify this matter. High density seagull colonies have been allowed to establish and continue to expand in residential estates, schools and on business premises.

Ireland remains the only country in Northern Europe that does not provide proactive protection to communities impacted by urban seagull colonies and does not recognise the public health dimension of the problem – despite overwhelming evidence and precedents where all neighbouring countries including Northern Ireland and Great Britain have been addressing these issues for years.

We request that proportionate and reasonable derogations are declared in the 2021.22 Declarations, in the interest of public health and safety as catered for in Article 9.1 a) of the Birds Directive, and in the 2011 Wildlife Regulations SI 477 Section 55.2 a) and under the provisions of the Wildlife Act 2000 (amended) Section 59 wherein the authority of the Minister to issue licences to preserve public health and safety is enshrined as provided for under the health and safety provisions of EU law.

It is imperative that the Government take a proactive approach to protecting communities impacted by urban seagull colonies and recognise the public health dimension of the problem.

We make the above submission in good faith and we would appreciate an acknowledgment that it has been received by the Department/NPWS.

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