

Consultative Committee to undertake a review of the issues surrounding the impact of gulls in urban areas

First interim report on progress of the urban gull consultative committee

Chairman Dr Derek McLoughlin

March 2020

1 Overview

Following a recommendation of the Report on the Review of the Derogation Process under Article 9 of the EU Birds Directive, a Consultative Committee (CC) has been convened by the Department of Culture, Heritage and the Gaeltacht (DCHG) to consider the impact of gulls in urban areas and to provide recommendations as appropriate to deal with such impacts within the scope of national and European legislation. These recommendations will then be presented to the Minister and the DCHG for implementation as appropriate.

The CC comprises representatives of BirdWatch Ireland, Balbriggan Community Committee (BCC), Fingal County Council, and the National Parks and Wildlife Service (NPWS) on behalf of the Department of Culture, Heritage and the Gaeltacht (DCHG). It is supported by a secretariat from NPWS and an independent chairperson.

The CC has met on four occasions: the 14th June, which was preceded by individual meetings between each stakeholder group and the secretary and chair; the 16th October; the 25th November; and 4th February 2020. This is the first report of the progress of the CC.

The first meeting (CC1) provided members with an opportunity to discuss urban gulls in broad terms, with topics including gull ecology, impacts of gulls on the general urban public, management of urban gull populations, research requirements and potential solutions to human – gull conflict. The Terms of Reference of the group were also agreed and suggestions for speakers on pertinent topics were provided by members. Key issues arising from this meeting were the potential public health implications arising from gulls in urban areas and control measures used to deter nesting gulls, conservation implications of potential controls, and the potential research requirements.

The second meeting (CC2) focused in greater detail on aspects of public health, with a presentation from Associate Professor Barry McMahon who discussed his work on Zoonoses, including Anti-Microbial Resistant (AMR) contamination and his experience of the potential health risk of this in the environment. This was followed by a presentation from Mr Peter Rock, researcher with the University of Bristol, on his experience of 40 years researching urban gulls. Mr Rock described the situation regarding urban gulls in several UK towns and cities.

The third meeting comprised a presentation by Dr Gary Goggins, Environmental Sociologist, NUIG, which provided an overview of how the work of the CC fits into a participatory model. This

presentation was followed by a workshop where all members presented their views on solutions and gaps relating to the issues arising from urban gulls. These views were synthesised during the workshop and are presented as an appendix to this report.

The fourth meeting (CC4) focused on AMR with a presentation from Professor Dearbhaile Morris, Director of the EPA-sponsored AREST Project investigating AMR contamination in the environment.

The discussions of the committee and the information provided by the invited experts can be distilled into a number of salient points which are referred to in more detail below.

2 Terms of Reference

The Terms of Reference of the Consultative Committee as approved by the CC at its first meeting are as follows:

- To ascertain the impact of gulls on urban dwelling communities and to identify all suitable actions that may be addressed by Government Departments, State Agencies, local authorities, business premises, community groups, other stakeholders and individuals in urban areas in accordance with national and EU legislation.
- To provide observations and make recommendations on scientific research/monitoring projects that will inform suitable actions in relation to gulls.
- Secure the attendance of relevant experts and other interested parties to assist the Committee in its deliberations and appoint additional expertise to the Committee as required.
- Actions and recommendations to be agreed by the Committee taking account of the views of each of its members
- Interim report to be provided to the Department on progress by the Consultative Committee by the end of September 2019 and further reports to be provided as agreed between the Consultative Committee and the Department.
- The Consultative Committee is formed for an initial period of two years.

3 Observations on the functioning of the committee

Agenda items are circulated by the secretary in advance of meeting. In order to objectively manage a diverse range of views amongst the members of the committee, in general, each agenda item is presented by the chair and each group has an allocated period of time to contribute their view. This has ensured that a more or less equal amount of time is available to each group to express their views on a given item.

The input of each group to the meeting is recorded by the committee secretary in the form of hand-written notes. These form the basis of minutes which are forwarded to the chair for approval, and then circulated to the committee members. Initially, the finalisation and committee agreement on the minutes of the first meeting (CC1) was not possible, due to a divergence of views on the level of detail to be contained in the minutes, with one of the member groups (Balbriggan Community Committee) requesting detailed minutes of the meeting and other members requesting more concise minutes which would at the same time reflect the issues discussed, main points made by different groups and the action points arising. In order to resolve this disagreement, the chair made an executive decision to take concise minutes that succinctly record the key points, while ensuring that all committee members' views are broadly captured. The rationale for this approach, in the

view of the chair, is that detailed/verbatim minutes are unwieldy, excessively long, and the key points may be lost within such a document and it potentially creates an environment that is not conducive to open, frank debate. This could potentially serve to distract the committee from its key focus.

The circulation of third-party literature and information pertaining to the discussion topics was raised at CC2 whereby some members expressed reluctance to receive information in areas that they may not be qualified, such as public health. It was decided that the process for dissemination of information to the CC should be through the chair, who will decide on the relevance of the material in terms of the expertise of the committee. Topics, such as public health, sociology, etc, can be presented to the committee by experts in that area to ensure clear fact-based evidence is provided to its members.

The presentation by Dr Gary Goggins in CC3 provided an overview of how participatory approaches can be developed in addressing human-environment concerns. This contribution provided a sense of context regarding the progress of the CC in terms of participation of the various stakeholders and observation of the functioning of the CC. The key points of Dr Goggins' presentation include:

- Importance of both scientific and experiential expertise to inform and develop robust policy and to tackle societal challenges
- Long-term success requires financial and technical support for productive interaction and engagement between stakeholders
- Social capital, trust and relationships are necessary to create and share knowledge
- Effective communication underpins all other concerns and is vital for successful participatory decision-making processes

4 Consultative committee topics of discussion during the course of CC1, CC2, CC3 and CC4

4.1 Gull ecology

Recent figures of a national survey¹ of Herring Gull (2015-2018) estimated 10,333 breeding pairs, which is an increase of 87%² since Seabird 2000 (the last major national gull survey), but an overall decline of 33% since the mid-1980s. A drone survey undertaken by FCC during the 2018 breeding season indicates more than 500 pairs in a discrete area of North Dublin targeted for survey.

Information on the movement patterns and other aspects of urban gulls appears to be lacking in Ireland. This lack of information appears to create a gap in terms of understanding the nature of their foraging areas and identifying potential areas where some action could be taken in terms of ensuring the removal of food items, etc.

4.2 Impacts of gulls on urban dwellers and public health

There is a divergence of views related to the impacts of gulls on urban dwellers. Some members presented evidence of a range of impacts, including aggressive behaviour, sleep deprivation in humans as a result of the noise of nesting gulls, damage to property and the potential for gulls to

¹ Cummins, S., Lauder, C., Lauder, A. & Tierney, T. D. (2019) The Status of Ireland's Breeding Seabirds: Birds Directive Article 12 Reporting 2013 – 2018. *Irish Wildlife Manuals*, No. 114. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland

² Although an 87% increase was recorded between the gross totals of the two survey periods it may not accurately describe the actual population change due to differing levels of survey effort, coverage etc.

cause injury and to transfer disease and anti-microbial resistance (AMR) contamination. Other CC members presented their experience of members of the general public with both positive and negative opinions on the impacts of gulls in urban areas.

Considerable concern was raised by one of the CC members (Balbriggan Community Committee) regarding the public health implications of nesting gulls on or near homes, schools, food production premises, sports clubs and areas with vulnerable groups, such as hospitals and businesses. This group expressed that *“the 30 year transparent history of licensing “in the interests of public health and safety” by NPWS is/was set at the appropriate level of expertise for public health and safety considerations i.e., decisions to issue licences for over 30 years on public health and safety grounds have been made by NPWS officials without the need for clinical medical expertise and without the need for referral to external clinical or medical expertise.”*

The NPWS have previously granted licences under Section 42 of the Wildlife Act under the criteria of public health, albeit in the absence of any specific health expertise.

The key facets of the health concern for BCC include the potential for AMR contamination and disease transmission from gulls to humans, direct injury to humans and the potential impacts of long-term sleep deprivation of the public due to the noise of high densities of gulls in urban areas.

Associate Professor Barry McMahon presented on his experience of AMR in wildlife and on the latest research in this area. Based on the presentation of Associate Professor Mc Mahon, there is currently no conclusive scientific link between the risk of AMR contamination from gulls and humans. He suggested that of over 250 peer reviewed papers related to studies of general wildlife (some including gulls) and AMR, due to the nature of these studies, it is difficult to identify the nature of wildlife as a source of AMR.

Associate Professor McMahon recommended to the CC that Professor Martin Cormican (Clinical head of the AMR risk response and management in Irish Hospitals) and Professor Dearbhaile Morris also be invited to present on the topic of AMR.

Professor Dearbhaile Morris presented an overview of her work on the EPA-sponsored AREST Project investigating AMR contamination in the environment. The aim of the AREST Project is to identify the role healthcare, wildlife, farmed and companion animals play in the transmission and persistence of AMR in the aquatic environment. Professor Morris highlighted the severe health risks of AMR and its ubiquity in the Irish environment. She noted that Ireland is one of the leading countries of research on AMR in the environment.

4.3 Controlling gull populations

Gull (and all wild bird) populations in Ireland are protected under the Birds Directive and the Wildlife Act. Derogations from this can be obtained under Article 9 of the Birds Directive or Section 22 of the Wildlife Act. Section 22 licences have been granted on a number of occasions over the past number of years authorising the disturbance/destruction of gull nests. A general derogation currently applies to Herring, Lesser, and Great Black-backed Gull in the environs of Balbriggan, Co. Dublin and has been reissued annually since May 2017. Although a 2017 survey³ provided numbers of nests and eggs destroyed that year in c.15% of the derogation area, to date, there does not appear to have been any systematic assessment of the impact of the derogations on the overall gull populations.

³ Balbriggan Community Group. 2017. *Report on the efforts of a community to mitigate escalating and serious public safety and public health threats and other serious issues caused by a rapidly expanding urban gull population colonising and breeding in our town and its districts.* Unpublished report to NPWS

Mr Peter Rock presented an overview of his experience working with urban gulls over a 40 year period. Mr Rock made the following observations regarding the human/gull conflict in urban areas of the UK and several EU member states:

- Non-lethal control measures provided by many pest control companies, including spikes, deterrent artificial birds, netting, etc., do not appear to work and are generally futile:
- Persistent nest removal will also result in displacement of gulls, whereby they will simply move to another area/town:
- Gulls can nest at sites up to 250km from their natal areas and measures designed to control gull numbers through culling, nest removal and egg replacement will generally not be successful in reducing the overall population due to the replacement of these birds with those from areas further afield:
- Where there is an identified risk to vulnerable groups, such as at hospitals, daily removal of nests throughout the nesting season (March through July) may locally reduce any perceived risk.

4.4 Legal context

Whilst the breadth of topics discussed in the course of the CC meetings to date are broad and highlight the issues to be resolved, several topics make assumptions of the legal context surrounding urban gulls that may or may not be correct.

It is the view of the BCC that the governing legislation specifically caters for “the interests” of citizens in these regards and there appears to be no legal basis for any assumptions that communities would be required to suffer serious negative impacts in the interests of an animal species.

5 Consultative Committee collaboration

5.1 Background to workshop

The items of discussion in CC1 and CC2 can be divided into four broad categories: 1) urban gull ecology; 2) public health and safety; 3) control of urban gulls and; 4) communications. In order to ascertain the impact of gulls on urban dwelling communities and to provide observations and make recommendations on scientific research/monitoring projects that will inform suitable actions in relation to gulls, each of the CC members were asked to identify any gaps in knowledge and, or, solutions relating to urban gulls. These were categorised under the four headings during a workshop in CC3 and an opportunity was given to the members to review and augment their input following the workshop.

5.2 Actions suggested by the CC

Table 1 captured the output of the CC workshop designed to give all members an opportunity to express what they see as gaps in our knowledge of urban gull–human interaction. Many of the topics raised are common throughout the CC members, with some being specific to individual members.

6 Iterations of interim report and updated recommendations

6.1 Interim report iterations

This document represents the fourth draft of the interim report. Earlier drafts (see Table 2) were amended based on feedback from CC members. Version 3 of the report comprised a range of recommendations that had been accepted by all members of the CC except for BCC, for reasons contained in their accompanying Minority Report. Version 4 removed all recommendations in an effort to provide the Minister with an official update on the progress of the CC. BCC sought a recommendation to be included in the report in the interests of citizens, and in particular “in the interests of public health and safety” as catered for in Article 9(1)(a) of the Birds Directive. The absence of such a recommendation contributed significantly to BCC’s decision to submit a Minority Report.

BCC then suggested that the Natural England approach towards handling derogations for Lesser Black-backed and Herring Gulls may offer a useful contribution to a solution in Ireland provided the apparent principles underpinning it were implemented in full (“*i.e.* not ‘cherry picked’” BCC pers. comm.). The other members of the CC agreed that such an approach, or elements thereof, could be considered for Ireland, with the exception of BWI, who feel that it does not comply with the EU Birds Directive. Based on the Natural England (NE) position, the chair amended the recommendations of V3 of the interim report to take account of the licensing framework enacted by NE in February 2020, albeit yet untested. Although the UK is in the process of leaving the EU and will not be bound by the EU Birds Directive, it appears the approach follows similar criteria to that set out in Article 9 of the EU Birds Directive. It should be also noted that interpretation of the NE approach presented below is made based on published documents and these may result in some variation of what is actually foreseen in practice.

6.2 Summary of Natural England approach to licensing for the control of gulls

In summary, the licensing approach developed by NE seeks to enhance the level of protection of Lesser Black-backed and Herring Gulls through tightening their previous arrangement of general derogations where certain criteria were met. It is noted that the previous approach resulted in unsustainable levels of lethal control. It should also be noted that the NE approach allows for control of gulls (in addition to destruction of nests).

NE cite the necessity to control gull species for reasons listed in Article 9 including public health and safety, air safety, protection from serious damage to crops, livestock, forests, fisheries and water, and protection of flora and fauna.

NE will licence gull control through individual licences which will be considered on a case-by-case basis. Individual licences pertaining to the protection of human health and safety will be prioritised over the control of gulls for other purposes such as preventing serious damage to crops, livestock, forests, fisheries and water, and protection of flora and fauna.

NE cite that their licensing approach will allow the assessment of the merits of each application and the potential impacts on target species, including cumulative impacts and monitoring of the numbers controlled.

They have considered rural and urban gulls separately and suggested a 5% maximum control rate of rural gulls to be sustainable, whilst there is no limit on controls for urban gulls.

Applicants for licences are encouraged to put in place an integrated gull management strategy that comprises working with householders, businesses and local authorities to resolve problems experienced in the areas used by gulls. NE seek input from stakeholder groups to provide further guidance on how gull management strategies may be demonstrated.

NE has identified gaps in the current evidence and acknowledge that the current approach is subject to review as evidence develops further, for example on the level of gull control in urban areas.

It is the intention of NE to encourage applicants to submit individual licence applications in February and March in preparation for the bird breeding season, which allows a window for them to assess cumulative impact and prioritise licences throughout the country. They will accept licence applications outside of this period where there is a clearly demonstrated need for lethal control.

6.3 Feedback of CC regarding potential use of similar framework to that of Natural England⁴

Feedback on the potential use of a similar framework to that of NE was provided by all members. Notwithstanding that the NE policy is at an early stage and untested, this feedback is summarised to provide context for aspects of the recommendations presented herein.

BWI view the case-by-case approach as being positive, but are of the view that many aspects do not conform to Birds Directive Article 9 requirements or rulings of the European Court of Justice. They are concerned that NE have not established that the threat to human health or safety is real, quantified and significant, and are concerned with the absence of the requirement to prove that there is 'no other satisfactory solution' as specified in Article 9(1). In addition, the conditions of risk to public health and safety, or damage, etc, and scientific evidence of such, are not required to be captured in the licensing process established by NE. This also appears to fall short of EU law. Furthermore, it is acknowledged by NE that they do not have accurate or recent data of gull numbers nationally. This is similar to the Irish situation. Article 9 (4) requires that 'the Commission shall at all times ensure that the consequences of the derogations referred to in paragraph 1 are not incompatible with this Directive. It shall take appropriate steps to this end'. This final paragraph refers to the conservation of the species. BirdWatch Ireland also stated that the Royal Society for the Protection of Birds (RSPB) in the UK have similar and additional concerns in relation to the application of the new NE approach in practice.

BCC, who initially brought this new policy to the attention of the chair, regard it as well nuanced with the potential to benefit the interim report recommendations. They note that this policy assigns "overriding priority" to public health and safety and states that this is "essential" in the context of urban gull populations. In addition, BCC feel the fact that there are no limits set on the removal of nests, eggs and chicks in urban areas is recognition of the negative impacts of breeding colonies on urban areas. They suspect that the 30-day application window anticipates the breeding season well. The policy also appears to be flexible in terms of accommodating single licenses to broader spectrum 'class' licences. They also note that research gaps will be filled over time rather than delay the implementation of this policy. BCC's view is that the NE model would only work for urban areas with high-density gulls colonies when and because the Local Authorities in the impacted areas may avail of 'class' licences to provide managed services to control urban gulls.

⁴ It is important to note that as the Natural England Gull policy was published on 30th January 2020 and is of yet untested, all views of CC members of the approach taken by Natural England is assessed at face value and not of first-hand experience.

NPWS view many aspects of the policy as being potentially beneficial in an Irish context, but express caution that any such proposal should be compliant with national and EU law and that adopting a similar framework would have considerable resource implications for NPWS.

FCC is of the view that many aspects do not conform to the Birds Directive requirements in the absence of any hard data on the Gull breeding numbers in Ireland. Furthermore, they are of the view that the issuing of licences for control measures appears to make little sense in the absence of a defined health risk and details on the effectiveness of control measures. By example they cite that various local authorities in the Netherlands have indicated that the proposed control measures have had very little impact on the overall levels of problems caused by Gulls in towns as it seems that the problem gets moved on.

Table 1. Timeline of iterations of Consultative interim report in relation to CC meetings.

Item	Date	Detail
CC1	14th June 2019	
CC2	23rd October 2019	
Draft report V1	17th November 2019	CC request revision to include outcome of CC3
CC3	25th November, 2019	
Draft report V2	20th January 2020	CC3 output included. High-level recommendations included. CC comments received and report revised.
CC4	4th February, 2020	
Draft report V3	5th February 2020	CC reviewed and comments issued for further amendments
Draft report V4	28th February 2020	Recommendations removed from report due to divergence of views on recommendations.
Proposal for amended recommendations from Chair	11th March	CC to consider NE recommendations for Urban Gull licencing regime
Deadline for receipt of views on NE approach	31th March	As per request to CC
Revision and completion of interim report (V5) for circulation to CC	7 th April	Detail of proposed licensing framework removed and replaced with more general recommendation

A framework for licensing similar to the NE approach was suggested by the chair and circulated to the CC, but was not accepted by BWI or FCC for reasons including that they are of the view that it does not comply with EU Birds Directive. BCC did not accept this recommendation for the converse reason that it did not adopt all of the principles of the NE approach. The details of the proposed licensing framework have since been removed and replaced with more general recommendation in 7.5.1.

7 Recommendations

The recommendations presented expand on suggestions and topics for action given in Appendix 1 and items raised in the CC meetings to date.

7.1 Workings of the committee:

- 7.1.1 An initial draft of the minutes of meetings of the CC should be circulated within 15 working days of the meeting. A reasonable deadline for receipt of committee members' comments should be set.
- 7.1.2 Where issues arise regarding future agreement of minutes, the chair will attempt to secure consensus amongst all parties. Where this is not possible, he should make balanced decision on the final draft, following comments from relevant parties. In this case, a note of 1-2 sentences should be provided documenting the dissent of the relevant party(ies).
- 7.1.3 Following the completion of this interim report, the Terms of Reference this committee should be broadened its scope to incorporate a steering role to implement the recommendations of this report.

7.2 Public health and safety:

- 7.2.1 The level of risk, including emerging risks, urban gulls pose to the general public, in particular communities being impacted by high density urban gull colonies, and relative to other wildlife in Ireland, should be assessed by an appropriate expert (individual/group). This should comprise a full desk review by an independent (possibly academic) body. In the case that urban gulls are considered a health risk, any such study should attempt to determine the point at which gulls may pose this risk. This review should form the basis for any potential decisions relating to the management of gull populations and review the operational practices in other countries.
- 7.2.2 The public health and safety implications of sleep deprivation in humans as a result of noise (including intensity and duration) from gulls, in the context of wildlife in general, should be assessed by an appropriate expert.
- 7.2.3 The CC do not have any member with expertise in public health and this should be filled either by expert guest speakers or, ideally, by representation of a suitably qualified public health expert.
- 7.2.4 The Department of Culture, Heritage and the Gaeltacht should ensure appropriate input on public health is provided by an appropriate expert on wildlife matters pertaining to public health, particularly in communities with relatively high densities of gulls.
- 7.2.5 Consideration should be given to the inclusion of a state advocate on the CC that would act on the part of citizens that are impacted by urban gulls.

7.3 Control of gulls

- 7.3.1 The movement patterns and social dynamics of gull populations are complex. Efficacy of any prevention measures for nesting gulls at a given site appears to relate to the regularity of the removal of nests and this should be considered by the licensing authority prior to removal of nests, *i.e.* gulls will continue nesting attempts unless nest removal is carried out on a daily basis.

7.4 Communications, participatory approach and public education

- 7.4.1 Urban gull expert, Mr Rock, advised engagement of the general public through education in the ecology of gulls and the complexity of the issues in tandem with research on their local ecology including movement patterns (see ecology recommendations). This should be considered as part of any gull management plan.
- 7.4.2 A communications/public engagement framework for how a participatory approach could be implemented should be developed, including dissemination tools (possibly including web-site) for the general public and for accurate reporting for media.
- 7.4.3 Communications events and briefing materials should be developed by NPWS and relevant Local Authorities for politicians (government, national, local) to ensure proper dissemination, and press briefings.

7.5 Legislative and policy requirements regarding urban gulls

- 7.5.1 A policy framework should be developed by DCHG for urban gulls in consultation with the Gull CC and legal advice. This should be fully compliant with national and EU law and follow a review of licensing systems in EU countries that are compliant with EU law.
- 7.5.2 An expert on the legal obligations surrounding Article 9 of the Birds Directive and relevant jurisprudence should join the committee to ensure all potential recommendations are within the law.
- 7.5.3 The threshold for what is “in the interests of public health and safety” in terms of Article 9 of the EU Birds Directive and the Irish Wildlife Act, in the context of urban gulls should be assessed by a relevant legal expert. This should also consider the approach in other similar EU member states.
- 7.5.4 Policy regarding urban gulls should be reviewed by a relevant expert (possibly within NPWS) to fully align with the findings and outcomes of other recommendations contained in this report. This should be a review to ensure full alignment between government departments, and with EU policy and law.
- 7.5.5 The roles of all relevant public authorities in relation to urban gulls should be clarified by DCHG on a collaborative basis. This process should clearly delineate roles and clarify responsibility on resource issues appropriate to the respective Department/Public body.

7.6 Urban Gull ecology

- 7.6.1 Data should be gathered by NPWS to provide estimates of the population level.
- 7.6.2 Colour-ringing of gulls in urban areas should be promoted by NPWS, along with specific tracking studies to assess the movement patterns of target populations of urban gulls.
- 7.6.3 Further information on the behaviour of gulls in these sample areas should be gathered by NPWS.

7.7 Impact of gulls on urban dwellers

- 7.7.1 The experience of (a representative sample of) the general public, schools and other education facilities, businesses and healthcare facilities should be measured as part of an integrated programme that, depending on scope, may encompass quantitative

and qualitative data such as surveys and the inclusion of focus groups with participants that are particularly affected by urban gulls (Local Authority & academic institute). This should be an objective and scientific-based study and should primarily focus on areas with relatively high densities of gulls.

7.8 Other recommendations and timelines

- 7.8.1 The recommendations outlined above should be considered by DCHG and the NPWS, ranked in order of priority and given a suggested timeframe.
- 7.8.2 Resources for how these recommendations can be achieved should be carefully considered. Where limited resources hinder the progress on realising the recommendations presented above, this should be clearly expressed to the CC.
- 7.8.3 In terms of enacting these recommendations, the CC recommends the potential to trial several of the recommendations contained herein during the 2020 breeding season, for example through a school-based programme. If, due to the COVID-19 restrictions, this is not possible, this should be deferred to 2021.

8 Recommendation towards 2020/21 Derogation

Recommendations for the 2020/21 Derogation have been made by both BCC and BWI to DCHG independent of this report. Any decisions pertaining to the 2020/21 Derogation should be made to protect the interests of public health and safety in keeping with national and EU law. The limited period of time available between the completion of this report and the annual Declaration should be noted, in addition to the COVID-19 emergency. On account of this exceptional year, consideration should be given to facilitate those in selected pilot target areas, where legitimate needs arise, to avail of a licence.

9 Conclusion and next steps

Urban Gulls have a complex ecology and issues arising in urban areas require broad-ranging and multifaceted solutions. Through the discussions of the CC, a number of gaps in knowledge are apparent. Many of these gaps were identified in a workshop in CC3, and can be categorized under four broad themes including gull ecology, control of urban gulls, communications and public health. Within each of these themes a range of research topics, gaps in knowledge, and suggested solutions are presented. Recent policy developments in England can also inform potential solutions for developing an context-appropriate gull management strategy for Ireland. These outputs can provide a strong foundation for producing recommendations for urban gull management. The recommendations contained in this document provide a starting point for agreeing a coherent and appropriate long-term framework to manage gull species in Ireland. The CC will continue to work toward this objective.

Appendix 1. Output of workshop at CC3 to identify gaps and / or solutions relating to urban gulls

Suggested by	Urban Gull Ecology		Control of Urban Gull		Communications		Public Health	
	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions
FCC	Baseline data on Herring Gull at national level (publish data)	Monitor response to control measures and movement patterns	Efficacy of control measures	Identify the target of any gull programme	Quantitative and qualitative evidence of public opinion on urban gulls	Undertake public opinion poll	Providing evidence of the risk of AMR	Invite an expert to present on AMR risk
FCC			Resources		Resources	Ask Peter Rock to do a presentation in Fingal		Produce paper on AMR
BWI	What is the effectiveness of solutions		Quantify problems / conditions of risk	Alignment with EU law	Quantify impact of urban gulls on the public	Science-based public awareness campaigns	Scientific evidence as to risk	
BWI	Align data requirements with any proposed solutions		Reporting of numbers of species killed		Data on public opinion on attitudes and opinions		Condition of risk	
BWI	Conservation plan for the species		Effectiveness of solutions					
BWI	National gull population survey							
DCHG		Full survey of gull population in north Dublin	Efficacy of managed services		Reconciling risk/problem versus response	Public education (by local authorities)	Robust scientific evidence of impact on human population	Bring health expert onto the CC
DCHG		Survey of gull movement patterns	Quantify problems with urban gulls					
DCHG		National urban gull survey	Case-law relating to Art. 9					

	Urban Gull Ecology		Control of Urban Gull		Communications		Public Health	
Suggested by	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions
BCC	Survey number of nesting gulls	Deter high-density colonies of urban gulls	Robust policy	Policy leadership from DCHG		Public engagement campaign	Common EU-wide policy	Alignment with EU policy
BCC			Inadequate licencing system and operational services	Alignment with EU law (including operational policy)		Briefing local authorities	Evidence as to risk regarding AMR	Citizen-focused approach
BCC			Citizen-focused approach	Fast-track licencing system		Introduce issue reporting system, gull ate my food, etc.	Clear policy at national level	
BCC				Introduce 'Class-licencing' system		Briefing politicians on issues		
BCC				Managed services through the Local Authority		Level and type of impact on human population		
BCC				Introduce systematic approach to deter gull from areas of high density living				

Suggested by	Urban Gull Ecology		Control of Urban Gull		Communications		Public Health	
	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions	Gaps	Solutions
Chair		Urban gull population census	Efficacy of nest removal or other measures			Design framework for pilot public engagement programme, including schools	Identify and quantify risk posed by gulls (with reference to other wildlife)	Desktop review by independent health expert
Chair		Assessment of movement patterns of gulls	How would proposed control measures/solutions fit with the law?			Survey of opinions on gulls in urban areas	Level at which sleep deprivation is a public health issue	Health expert should join CC
Chair		Study on behaviour of sample population						DCHG follow expert advice re decision on public health and safety

FCC: Fingal County Council

BWI: BirdWatch Ireland

DCHG: Department of Culture, Heritage and the Gaeltacht

BCC: Balbriggan Community Committee