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From: [REDACTED]
Sent: Sunday 13 March 2022 18:47
To: Housing WildBirdDeclarations
Subject: Submission
Attachments: Derogation Consultation Process22.pdf

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A chara,

Enclosed please find my submission.

I would appreciate if you could send me a receipt for same.

Is mise,
[REDACTED]

County Hall
Swords
Co. Dublin

National Parks and Wildlife Service
Department of Housing, Local Government and Heritage
Public Consultation Process
Wild Birds Derogations Declaration for 2022-23

Monday, 14 March 2022

A chara,

I welcome the opportunity to make a submission as part of the Wild Birds Derogations 2022 consultation process. I am writing on behalf of people I represent in Fingal, in particular those living in Skerries, and as a citizen.

I want to bring to your attention the immediate need to deal with the public health risks posed by urban gulls. I cannot understand why Ireland remains a complete outlier in its dereliction to protect its citizens, despite overwhelming evidence that proves urban gulls pose a risk to public health.

This situation simply cannot be allowed to continue and I implore you to follow the practices in every neighbouring jurisdiction by ensuring the citizens of Ireland are protected from the public health risks posed by urban gulls.

I am dismayed as to why the Department/NPWS has failed to provide proportionate derogation to protect both public health and public safety in communities impacted by urban seagulls such as my own.

I am seeking that nest/egg removal derogation be allowed on both public health and public safety grounds for the following reasons:

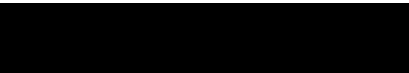
1. I have taught in St. Patrick's SNS in Skerries since 2003. When I first started teaching, students brought their food out to the yard at

two separate breaktimes. Within two years, this had to be stopped for one reason only – children were being attacked on a daily basis by urban gulls. On health and safety grounds, it was not safe for them to end outdoors. This means that our school population has been denied twenty minutes of fresh air a day as they are forced to eat their food indoors for the past 17 years.

2. Many residents of the town have contacted me about being attacked by gulls in their gardens. In summer months people cannot use their space to eat or relax due to the, sometimes aggressive, behaviour of the gulls.
3. From May until September, my sleep is disturbed from 3.30am. The arrival of summer will signal another season of sleep deprivation due to gull colonies on roofs. The impact of sleep deprivation on mental and physical health is well-documented.

In conclusion I request that proportionate and reasonable derogations are declared in the 2021-22 Declarations, in the interests 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.

Is mise, le meas,



Mayor of Fingal