

# Guidance Note

## **Gull Management**

## **Background**

The presence of large numbers of either breeding or non-breeding gulls, particularly in urban environments, can sometimes cause significant health and safety problems for people in residential, commercial or industrial areas. Behavioural issues include aggressive defence of nest and chicks, foraging and scavenging such as spreading litter from bins, guano (gull droppings) and noise issues. These could be accepted as public health and safetly issues, however these isues are likely to be case specific. It is important to stress that just because something presents a minor inconvenience, (e.g. bird droppings on a window or a parked car), cases of mere nuisance will not constitute a public health or safety issue. Gull species affecting public health or safety issues in urban areas are normally herring gull and lesser black-backed gull, and in rural areas it is normally herring gull, lesser black-backed gull and great black-backed gull.

#### Gulls, licensing and the law

The Wildlife and Countryside Act (1981, as amended) provides legislation that protects all wild birds, including gulls and their nests, eggs and chicks. Whilst many actions can be undertaken to help prevent or minimise problems caused by gulls without the need for a licence, sometimes it may be necessary e.g. the removal of nests or eggs where problems are evident or expected. In these instances Natural Resources Wales (NRW) are able to licence such activities to preserve public health or safety. However, NRW must be assured there is no other satisfactory alternative and all other preventative measures have been trailed or ruled out because of other factors.

### What is gull management?

If the presence of gulls is causing or expected to cause a public health or safety issue it is critical to address this at the earliest possible opportunity to minimise the risks posed. Failing to do this not only increases the risk but also means that it is unlikely to provide a longer-term solution to problems.

A hierarchical approach to gull management measures must be taken. We would recommend undertaking the following hierarchial courses of action i) prevention measures, ii) non-lethal alternative solutions, iii) licence application with supporting evidence and iv) control measures. In the first instance the site owner and/or

manager should aim to prevent problems occurring (avoidance) through the use of scaring devices and physical preventative measures such as nets, wires, spikes, removal or the covering of potential attractants (e.g. bins or food waste), and annual pre-nesting season debris removal (see NRW Fact Sheet – Deterring birds from farms, fisheries, airfields, landfill sites and urban environments). Some measures may need to be used in combination to increase or maintain their effectiveness over time. Where this fails to deter birds, nest and egg removal should be undertaken to prevent breeding. Only as a very last resort, when all other measures have failed should chicks and adult birds be killed.

It should be noted that the problems caused by gulls are not necessarily restricted to breeding birds, and that during the winter our towns and cities may be visited by birds that have migrated from the continent – this means that measures to resolve problems will be dependent on exactly what those problems are and when in the year they are occuring. A good, reputable, professional pest controller can be invaluable in helping to develop an effective prevention plan depending on the specifics of the problem(s) being experienced.

#### Who should undertake gull management?

It is important to note that many gull management activities do not necessarily have to be carried out by specialists. One of the keys to success is concerted and frequent effort, particularly early in the gull breeding season. Therefore it may be possible for the people normally present at the location to carry out tasks (for example ensuring nesting materials are removed, keeping areas tidy and free of food or other attractants). Where problems are being experienced across a wide-area and a number of properties or premises we strongly advise that a collaborative and strategic plan is developed between all parties and with professional input.

## **Key points**

- Clearly identify which species of gull you are dealing with. The history of gull management at that site. e.g. what preventative action has been undertaken.
- There are a variety of means by which problems can be minimised or avoided. If you have a problem you should try as many deterrents as possible, in combination, in the hierarchical order described above.
- > Prevention is better than cure.
- Early intervention is extremely important (pre-nesting and early in the breeding season debris clearing and scaring).
- > Efforts must be concerted and regular.
- Consider both short and long-term solutions.
- Licensed activities should be a last resort.

#### Applying for a licence – useful tips

You must answer all questions in the application form. If you do not, your application will be delayed or refused.

#### Explain:

- The problem that needs to be addressed.
- · How severe this problem is (include examples and figures).
- Why gulls need to be controlled to solve the problem.

#### You should include:

- All information on the numbers of gulls present, including a map(s) of nest locations if appropriate.
- When the problem occurs (for how long and how often).
- Specific details of the impacts for example, you must state exactly which other species the gulls are affecting and how many would be conserved by controlling gulls.
- Evidence that specifies any other alternative measures that you have tried ie visual or audible scaring techniques
- If you refer to reports and other information, you must provide these with the application.

#### Other information to provide:

- A map provide this if the boundary of the site is not clear from the details in the application form, for example a large urban area, a farm or a nature reserve.
- Any reports or other information you refer to in the application.

#### **Management plans**

You will need to submit a Gull Management Plan with any application for an urban site. Natural Resources Wales will only issue licences for urban sites where the licensed action is part of a Gull Management Plan. The same plan can cover a number of urban sites..

The plan needs to show what measures will be put in place to reduce the problem and prevent problems with gulls in the future. It needs to show how these measures will be coordinated – where, when and how long they will be done, and who will do them. An effective plan will typically employ a range of methods. These should also include "good house keeping" such as ensuring potential food sources are removed on a regular basis or kept out of reach of gulls. It is important that each method is employed at the right time, in the right way, and that any deterrant methods are varied regularly. Deterrants can be used incombination to increase or prolong their effectiveness.

Where the problem affects a number of different properties, a Gull Management Plan needs to show how all those responsible for affected properties are working together to reduce the problem. This might include:

- Owners
- Occupiers
- Property Management Companies
- Local Authorities.

The plan should be proportionate to the scale of the problem. The number of people and properties involved will depend on the scale of the problem. For example, a householder applying to remove a problem nest might only need to involve immediate neighbours if a measure to solve the problem requires them to take action or give permission. However, an application to control gulls over a large area will need to involve all major landowners and local authorities. At both ends of the scale, reputable, professional pest control companies or businesses with experience of installing measures such as proofing, can be invaluable in helping to develop an effective plan to address the specifics of the problem being experienced.

The Gull Management Plan will also record how effective your actions have been, which will help you to adapt the plan in future.

Options for managing gull problems: The following list gives options, as well as recommended dates and frequency, for carrying out activities to reduce or avoid problems caused by gulls.

Action	Detail	Who can do it?	Suggested timing	Suggested frequency
Physically prevent nesting	Physically excluding birds from potential problem nesting sites is often the best way of preventing or minimising problems caused by gulls. Whilst this can be expensive in the short-term, in the long-term this may be far more cost-effective and successful than year-on-year management. There are a wide variety of products available to prevent birds from nesting, including netting or wiring to prevent use of potential nest sites, antinesting spikes to 'proofing' key areas such as chimney pots or guttering/roof valleys. All exclusion measures do need to be appropriately maintained to ensure that they remain effective and do not cause welfare problems (e.g. entanglement).	Advice from a reputable and experienced pest control company is likely to be helpful, especially for larger projects.	Any time outside of breeding season (September to March).	Once, but maintenance may be required.
Remove old nests and potential nesting materials	Clearing of nesting material from areas where gulls have previously nested and caused problems in the past is very important in terms of good roof maintenance and management to prevent problems such a blocked drain pipes and gutters and could possibly reduce the attractiveness of a site for birds to nest in future.	Anyone, unless there are specific access or health and safety considerations.	Prior to birds arrival/ commencement of breeding season. March.	Once.
Regular removal of attractants such as litter and food waste	The presence of food, unprotected bins and food waste can exacerbate problems caused by gulls, particularly where they are causing mess or other problems at ground level. By ensuring that bins are secure and emptied regularly and that litter and food waste is minimised any problems should also be minimised. Whilst undertaking these measures at an individual site level is recommended, it may be far more effective as part of a coordinated plan over a much larger area.	Anyone.	At all times, particularly prior to and during breeding season.	Preferably daily and at least weekly.
Human disturbance	The presence of people on site is a great deterrent to nesting.  However it is critical that these are employed from the very start of the nesting season. By putting in effort at the start of the season, and particularly when problems first arise, gulls may choose to attempt to nest elsewhere.	Anyone, unless specific access or health and safety considerations.		Preferably multiple times daily
Static/ automated scaring devices	There are a wide range of commercially available 'scaring' devices to help discourage birds from using or nesting at a site. These can range from static audio devices emitting noises from sirens or distress calls of the same species of bird to visual deterrents to the use of pyrotechnics, lasers, starter-pistols firing blank cartridges. These can be effective but as with many measures they need to be part of a more integrated effort involving multiple approaches and should be varied regularly for maximum effect. These devices may not be acceptable in urban environments as they may not be accepted in residential areas due to their persistent noise.	Anyone, although advice from an experienced and reputable pest control company is likely to be helpful.	Throughout breeding season. With particular emphasis immediately prior to the start of the nesting season.	Constant but change device very regularly (every two weeks).
Hawking by birds of prey	The flying of captive-bred birds of prey by a falconer may sometimes be useful to help dissuade birds from nesting. This should be used most intensively at the start of the breeding season.	An experienced falconer.		As often as possible

Disturbance by dogs	Use of dogs to patrol potential nesting areas at ground level can be an effective means of ensuring that birds do not settle at the start of the breeding season.	Anyone, unless specific access or health and safety considerations.		As often as possible
Nest removal (licence required)	As soon as birds start to settle and scrape out a depression in the ground or to bring in, move or arrange nesting materials you can consider that they are nesting and therefore that destruction or removal of that structure could only be carried out under licence. By doing so, and continuing to do so as frequently and intensively as possible, particularly at the start of the breeding season, it may be possible to minimise problems caused by gulls. By keeping on top of this it may be possible to avoid the need for the removal of eggs in future and it may possibly help persuade the birds to move elsewhere.	Anyone covered by the appropriate licence, unless specific access or health and safety considerations.	Throughout breeding season. With particular emphasis immediately prior to and at start of nesting season	Preferably daily or multiple times daily at the start of the nesting season. At the very minimum this must be carried out weekly.
Egg removal (licence required)	Regular removal of nests as they are built should reduce the need to remove and destroy eggs. However this may still be necessary in some cases. Once eggs are removed (along with the nests) birds will likely attempt to re-lay and can do this multiple times. Therefore, as with removal of nests, effort should be targeted as early as possible and very frequently and this can ultimately reduce the size of the breeding population at that site. If egg removal is carried out very regularly at the start of the season, it can be successful in resulting in the colony being abandoned.	Anyone, unless specific access or health and safety considerations.		
Egg destruction (licence required)	Large gulls are particulalry noisy during chick-rearing. Where roof nesting gulls can be persistenly a problem egg removal and replacement with dummy eggs appears to prevent eggs from hatching, prolongs incubation and leads to eventual nest abandonment. The preferred method for egg destruction is to place removed eggs in a freezer for six to eight hours, after which time they will be unviable and can be returned to the nest. Alternatively, remove the eggs and replace withartifical or 'dummy eggs', (these can be legally purchased commercially) By replacing gull eggs with unviable or dummy eggs minimises the need to repeatedly remove relayed eggs.	Anyone although advice from an experienced and reputable pest controller is advised.		
Killing of adults or chicks (licence required)	This should be an absolute last resort. Removal of nests or eggs, or the pricking of eggs should mean that this circumstance does not arise. We expect to only licence this in exceptional circumstances where it has not been possible to be able to remove nests and eggs and where there is a clear and imminent risk to public health or safety	Recommend that this should be carried out by an experienced and reputable pest controller.	If and when the need arises	As necessary