



Chartered
Institute of
Environmental
Health



Pest Control Procedures Manual

Urban Gulls

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1

Effective control of urban gulls

Urban Gulls are a growing problem to the environment and public health of our towns and cities. Large colonies have now established themselves in the urban realm and are causing severe challenges to local authorities throughout the British Isles. It's not a problem confined to seaside towns with many inland cities miles from the sea. The birds are extremely long-lived, 25 years and more, many have never seen the sea enjoying the urban environment where there are all the essentials for life.

The key challenges from urban gulls are as follows:

1. Scavenging and waste spillage – It's likely the city will be operating black bag non-containerised waste collection service for both domestic and trade waste operated with a multitude of contractors. Waste spillage causes unsightly refuse scattered around streets and often in numerous locations depending on the population. Waste can be injurious to the public, broken bottles, sharp open cans, food spillage and greasy surfaces contributing to the dangers. Such regular spillages cause other urban pests such as rats, mice, flies, pigeons, cats and urban foxes etc to be interested in feeding themselves.
2. Contaminated objectionable environment – Droppings are a consequence of urban gulls and buildings, street furniture, benches and roads and pavement become contaminated sometimes extremely quickly and in a sustained period of dry weather considerable unsightly accumulations can occur with consequential objectionable odour, feathers and detritus. All this has a considerable impact to the safe enjoyment of towns and cities. This is particularly a problem in cities with considerable al fresco dining where diners' enjoying their dining experience can be marred by droppings and attacks for food.
3. Potential Health Risk – Whilst there are few documented cases of illness directly attributed to gull excreta the birds are known to carry *Salmonella*, *Campylobacter* and *E coli* spp. The national outbreak of *Salmonella* caused by Cadbury Chocolate was traced to the crumb factory in Marlbrook. It was known there was a gull issue on the roof of the factory and the investigation concluded, leaking internal roof drainage into open product ingredients was a possible cause of the outbreak. These same circumstances will exist in many food businesses in towns and cities throughout the country.
4. Building damage and additional maintenance and cleaning – Constant aerial droppings mar heritage building and risk damage to paintwork, flashings other weathering feature. Accumulating nesting material and dead birds block gutters and drainage risking floods and dampness in buildings. The constant effort in scrubbing and cleaning adds to the cost of maintaining a clean and slip free environment. Gulls are also known to cause extensive damage to buildings by attacking soft roof sub-straits, glass roof sealants and insulation which covers air condition units. They have also been known to pick up the pebbles of adjacent flat roofs and drop them onto glass atrium roofs and cars. This activity is usually as consequence of boredom or in the case of the stones that are mistaken for possible shellfish. In any event the hidden costs of constant repair is often not budgeted for.
5. Food safety and health is potentially compromised – on retail sites aerial dropping contamination is possible in food stock unloading areas and in restaurants and food manufacturing sites, internal drainage has the potential for introducing pathogenic bacteria to the food production environment. In the home the wheels of children's buggies, bicycle tyres and foot-ware has the potential of introducing such bacteria into the living environment.
6. Noise nuisance – this is the most noticeable cause of complaint in respect to gulls. Early morning first light awakenings (usually 4.00am), disrupt sleep both of city centre residents and visitors to hotels alike. Many a leisure break weekend has been spoilt to the cost of repeat business. Social media and tourist advisors damages business in some cities.
7. Gull attacks – many attacks take place from aggressive and competing birds in the urban environment particularly when they are defending young and after food. Cuts on the face, neck and hands are not uncommon some needing attendance at a local casualty department. Gulls are also expert in seeking out schools in each borough where they learn the time of the breaks taken by the children, particularly in the summer months. Attacks on the children can be reduced through management by reducing the areas in which they eat their food to under cover areas only.
8. Reputational damage – this applies to both Council's and their partners e.g. tourism and the local economy. Residents, visitors and the business sector suffer as a result of no action being taken, sometimes abusive behaviour can be directed towards council staff.

2

The urban habitat



Humans have created an environment which enables the gull to thrive away from its natural and expected seaside environment. Sustained year on year unchecked breeding has led to the gull's naturalisation in the urban environment. There is little doubt that some cities are more prone to colonisation but it is methods of waste collection, the acceptance and tolerance of the gull and the ongoing attitude that "little can be done" which leads to growth in population and long term establishment of large nuisance populations. Key factors which support colonisation include:

1. A habitat of tall buildings with ledges and parapets mimicking their wild habitat of cliffs. Here they are able to perch and observe the ground below for feeding opportunities. They can find comfortable and safe nesting and breeding sites which might include parapets, next to chimneys and valley gutters. Such places are often free from potential disturbance, observation and difficult to access. A further factor in respect to buildings might well be design. In cities where the gull and other feral birds are an issue you might expect the design to prevent colonisation by birds and design to include gull proofing measures but It is common that little if any thought of using the planning system to get ahead of the problem is considered.
2. Places to perch, rest, preen and observe their urban realm which includes the top of lamp standards, roof ridges and high ledges are a common sight after the morning feed. It will be typical to see a build-up of white droppings covering the perch place, down walls and often splattered at the base of street furniture.
3. Opportunities to scavenge and feed from the many sources of food in the urban and local rural environment. They will eat virtually anything and our discarded food waste seems to be a highly nutritious form of sustenance. They will often move out into the county-side and feed on worms and grubs on local (and sometimes quite distant) farmers' fields but those tasked with waste collection or control of urban gull populations should be under no illusion that there can be more than enough urban morsels to sustain Gull populations. If the opportunity for such feeding is not restricted then the population will spiral year on year with consequential stress and menace to both businesses and urban residents. Such sources not in any particular order of priority will include:
 - a. Scavenging of the remnants of discarded street food from the night-time and the day time economy. Sometimes the birds will swoop down in public areas of alfresco dining and steal food off plates and from the hands of people consuming it. Such behaviour can become well established where there is a developing café culture and birds can compete and become quite aggressive in these circumstances. They have been known to cause injury. As this is one of the growing issues which is unacceptable and leads to calls for bird populations to be removed or reduced both by food business owners and the public alike.
 - b. Bird Feeding – No one can deny these birds often make a spectacular sight swooping and gliding through the city scape avoiding buses, cars, buildings and street furniture to grab a morsel of food it has identified from its keen eyesight. Locals and visitors alike are often part of the problem, offering the birds a free crust or a few chips which they can be confident enough to take from the hand. In parks with ponds and river frontages birds can be attracted in large numbers and it can be quite a sight as they are whipped up into a competing frenzy from bird feeding. Food traders from market stalls and takeaways often do the same with a hand full of chips on the streets of the city. All such behaviour does is encourage birds to locate and remain near the free and readily available food source, growing in numbers over time.
 - c. Urban Domestic Waste – this represents a key source of food and encourages over time a growth in populations. In cities there are challenges in domestic storage of domestic waste. Many flat dwellers have little storage and store waste in the small kitchen bins, shopping bags or black sacks as it is produced. Some local authorities collect waste more regularly, perhaps twice each week. Many local authorities require segregation of all waste to reduce volumes to land fill. Segregation needs space in itself, not always easy in small living space characterised in the often very expensive city centre residential setting. Many authorities allow refuse to be put out in black sacks, or segregated into thin plastic shopping bags without the "hard" protection of metal or plastic bins, wheelie bins or communal containers. Where there is a gull population such collection methods will lead to gull attack, scavenging and scattering of waste in the public realm. The consequence is the objectionable appearance of early morning waste spillage, open mixed food waste on streets and greasy hazardous pavements for early starters in our cities. There is danger to the public in respect to slips, trips and falls, bags are often dragged into roads and cars and buses will often swerve to avoid obstructions with consequential risk to pedestrians and cyclists.

There are a small number of drivers who will deliberately target birds feeding on roads, some adults and many juvenile birds are killed that way, which can certainly not be condoned but is a fact of the human/bird interface in the urban realm. Some of this behaviour stems from bravado but there is evidence that some is as a consequence of the stress caused by persons who are awoken early because of the noise nuisance caused when birds start feeding at first light.

The major challenge here is also collection time. Many residents find it more convenient to put their waste out overnight ready for a collection often early in the morning. This will certainly lead to regular availability of food but these premises will be well known as spillage will be a regular occurrence.

Other factors come into play here. Increased food wastage and segregation and recycling rates are often lower in city residences. A number of factors contribute to this. Student accommodation, more takeaway foods consumed, smaller kitchens and general lifestyle of city dwellers. It all helps to contribute considerable feeding opportunities of the gulls.

- d. Trade/Commercial Waste – There is a vast amount of waste from food businesses including hotels and guest houses, restaurants and cafes, takeaways, retail stores, offices and other shops. Often it is removed daily as such premises have challenges in storing such waste due to lack of space and in terms of the risk of encouraging pests in a food environment, contrary to good food safety practice and compliance. Sometimes relatively thin and often coloured plastic sacks are used.

They identify the waste to the contractor/service provider collector and such waste is put on the streets after premises, often without protection from scavenging birds and at risk from other scavenging animals including urban foxes, pigeons, cats, dogs etc.

Trade waste management poses many challenges in urban gull reduction plans. Such challenges include:

- i) There may be fraudulent behaviour with traders doing what they can to reduce volumes and charges. This includes placing unmarked black bags amongst domestic waste on domestic waste collection days. The nature of the food waste is a good indication this is happening during scavenging and spillage incidents as a resident is unlikely to throw away vast amounts of rice, bar fruit waste, tomato and salad material and blue paper hand wiping material.
- ii) There is less likelihood of segregation of food waste and larger amounts of food waste proving highly attractive to scavenging birds.
- iii) The competing number of contractors and timings of collection can support anti-gull strategy or hinder it. Where there are numerous options for service it's highly likely that some waste can be missed, leaving it on the streets overnight. Even if the waste is left out for half an hour before collection, when the streets are empty of shoppers and city visitors the hungry gull will have enough time to start its work of pecking open bags and emptying the contents. Having numerous competing firms can be a most difficult control challenge when attempting to deny birds from this food source.

Connecting up competing service aims to common goals

Waste collection has become an engineering activity and not a pest prevention activity. Where this is the case protection of waste before collection becomes an encumbrance to the speed and economic collection of waste. This will lead to gull colonisation if other factors are present i.e. the right type of buildings with perches.



3

What can be done?



The first consideration is whether there is the political will or initiative to make a concerted effort to control the urban gull. The plan will have to be driven by the Local Authority and harness the support of local businesses and the local population. Without the political will and sufficient resources it will not be possible to have any real impact over time. The population of gulls will continue to grow and the problem of the urban gull will be compounded and expand to a wider area. The politicians will have to be in agreement and allocate sufficient resources over a sustained period if a worthwhile reduction in population is to be achieved. The Authority will have to be careful it does not fall into the “research trap” where inaction remains the norm whilst waiting for research or legislative action is awaited. There is certainly much that can be done with existing knowledge of the gulls habitat and behaviour and within the constraint of existing legalisation. Where problems exist Local Councils have a responsibility to show leadership and make an effort to grip the problem.

The key to control is reduction in population over time by denying habitat, denying food sources and environmental discouragement. There are five main phases;

1. Understanding the scale of the problem
2. Establishing the management, intervention action team and resources
3. Development of a fully co-ordinated action plan for intervention
4. Implementing the plan
5. Assessment of intervention effectiveness.

4

Establishing the scale of the problem

In many cities the population has been steadily increasing year on year leading to an escalation in the issues described earlier in this guidance note. It is important to have measurable data in order to qualify the level of issues being suffered in order to have a baseline from which any control interventions are having a beneficial impact. It must be remembered that gull behaviour and numbers fluctuate significantly in and out of the breeding season. The following are suitable parameters which should be measured:

1. Gull population – Every year a census of gull population should be undertaken. The number of breeding pairs by species needs to be professionally recorded by an Independent gull/bird expert. Without a baseline assessment of population it is impossible to know whether over time the population is increasing or decreasing and whether interventions are having an effect.
2. The number of complaint calls in the following categories should also be recorded:
 - Noise nuisance complaints from gulls
 - Domestic scavenging of waste incidents
 - Trade waste scavenging incidents
 - Gull attacks to members of the public
 - Social media complaint and interactions
 - Other gull incidents

Without this information it will be impossible to understand the gull issue and whether interventions are working. The information can form an intelligence picture which can be used to target control activity and public communication. The Authority needs to be honest and diligent in its recording and proactive to disseminate it regularly and widely in an understandable transparent form.

3. Record on dead birds – During each year street cleansing teams and all those officers must keep a record of dead birds collected and date collected. Any complaint from the public or building occupier of dead birds found should also be recorded and statistics kept for an annual total. In cities with large established populations there will be a surprising number of road-killed birds both from accidental and deliberate action. Many of the birds killed on roads will be juvenile birds from that year’s breeding season. Some bird casualties will also be from shooting, especially where there is considerable annoyance to the public. A count of dead birds over time adds to the population intelligence picture.



5 Establishment of the management, intervention action team and resources

A dedicated officer should be appointed who co-ordinates all activity, interventions and control measures. They must have a good working knowledge and have the gravitas and capability of working across the Authority with all departments. They will need sufficient personnel and resources and the Authority Chief Executive must ensure that the team is empowered to require interventions within each department. Only if effective coordination of interventions is established will control be possible.

The team must be qualified, trained and established with officers and staff which understand the gull issue, have the capability to apply interventions and have the resources for control and media activities. Staff must be experienced at working at heights, have access to all the necessary safety equipment and have a good understanding of health & safety. Flat roofs can usually be accessed safely but other roof designs will require the hire of cherry pickers for more difficult locations. They will need to be Authorised Officers for pest control, waste and litter enforcement and have access and capability to use GIS mapping.

Resources will include vehicles, office and storage facilities, access equipment etc. There would also be an advantage for a good working relationship with the local Fire Authority which would have access equipment which might be advantageous for high access to building and difficult to access locations.



A key constraint will be the protection afforded to some gulls species by the Protection of Wild Birds legislation. Further issues will be the reaction by some members of the public who misguidedly like and encourage gulls within the urban environment. Media attention and reaction can go both ways and defend the status quo. Media messages need to be clear and managed effectively otherwise the plan will run into difficulties.

The plan should include the Education Authority who can cascade the messages out to schools. Gulls have quickly recognised school breaks especially lunchtimes as a source of food as school children take delight in enticing gulls with food.

The plan should include measures which seek to work within the constraints to significantly manage the local population to levels which see a substantial reduction in complaints and gull issues. This will include:

1. An information/media campaign - to include:

Effective waste management from both domestic and commercial premises – this will require suitable containerisation of all or most waste prior to collection.

Advice “not to feed wild birds” with a posted and advertising campaign – leaflets in hotels and guest houses and in locations where tourists might take note of the request will be important for visitors. This is especially important in parks and by open water areas.

Use of local radio and cable TV to promulgate the messaging. Use of social media including Twitter, Facebook etc. Use of resident delivered newsletters

Building owners need to be clear that they are part of the coordinated control effort. They must be given information as to what legal measures they can apply which might include: Removal of nests from roofs prior and during the nesting season. Removal and replacement of eggs during the breeding season. Installing proofing measures such as netting and spikes to reduce nesting and access on ledges. A leaflet explaining the options should be widely distributed. A request to undertake the measures recommended and provide advice and assistance for a fee with regard to an egg replacement programme.

Recent anecdotal evidence suggests that bird repellent gels may also prove an effective deterrent against gulls alighting on buildings.

This needs to be a sustained, branded and co-ordinated campaign to harness the public and businesses as part of the control effort.

2. An intervention campaign - in three parts:

1. Waste management – Without enclosure and protection of waste from attack it will be impossible to prevent attacks on waste, whether commercial or domestic. The Authority needs to recognise the reason why their city has a gull problem is the plastic sack collection method which has no doubt been introduced in order to cut cost and time of collection and to allow residents and businesses ease of storage without bins the best option.
 - (a) Provision of gull proof sacks to residents in all badly scavenged streets. Require containerisation on all other waste outside of the main city area where space is not so much at a premium. Organise collections such that waste is not put out overnight.
 - (b) Trade Waste – co-ordinate and control trade waste collectors so they support the management plan not hinder it.
 - (c) Litter – control litter and street food through effective containerised bins. Takeaways need to be engaged to play their part.
2. Control on buildings – As described above this includes netting, perch denial through spikes and removal of nests pre-season and egg replacement during season
3. New/refurbished/redeveloped buildings – In cities with gull populations it is vital to design out the features which allow nesting and perching. The planning department and officers must be acutely aware of their role in reducing the gull population. Local planning policies must consider implementing conditions of consent that all large new and refurbished buildings are bird/gull proofed.

3. Enforcement

Where there is failure to support initiatives required by the Authority in the control of gulls then enforcement is an important resort which must be used under waste control power which the Authority has. Circumstances will include:

- Littering on land and in streets
- Feeding birds in public places
- Allowing domestic waste to be scavenged
- Allowing commercial waste to be scavenged

Other activities which encourage the gulls in an urban setting.

It will be important to keep records of such interventions and use the media to the authority's advantage as part of its control plan.

7

Use of GIS mapping

This vital resource is key to maintaining and understanding the measures being undertaken to effectively implement a plan. Mapping of nest sites, perches and preening locations, waste attack locations, waste bins, bathing sites etc. will all add to the intelligence picture and provide evidenced based intervention activity. The city centre can be broken down into zones and responsibilities for targeted action whether that be information campaigning, scattered waste clearing or repeat offender enforcement action. Effective use of mapping is a valuable tool which can be harnessed to the control team's advantage.

Assessment of progress – it is vital to ensure regular reports and interventions and presented to committees and local interest groups so that focusing can be adjusted and the public kept on board. It is likely this will be at least a 5 to 10 year campaign and there is a risk birds will be forced to feed further afield.





With all control activity it is important to be aware of the legal boundaries on protected species. It is also important to be aware of what is reasonable in the eyes of residents on non-protected bird interventions. Whilst many would want to rid the city and their homes of the gull menace once active interventions are applied it is surprising how some sections of the population can become upset and angry especially when there is sympathy whipped up by media attention.

The Authority needs to know and communicate the boundaries of what can be done by interested parties. This can be done on websites, through leafleting and a through media campaign. The questions that need straight answers are:

- Which birds are protected and what does protected status afford?
- What can be done legally by building owners? Can nests and eggs be removed?
- What can legally be done by residents?
- What can be done legally by local councils?
- Without clear information and guidance you cannot expect the public to be part of the plan. Without them you cannot expect to win.

A regular nest and egg removal scheme can be successful, a lot can be achieved for relatively little expenditure.

Egg replacement – This intervention is known to work but needs to be comprehensively undertaken. Egg oiling using a technical white oil prevents incubation and or real eggs can be replaced for dummy eggs which makes the bird believe they are incubating viable eggs and prevents the parent birds laying further eggs early in the season until it's too late to raise their intended offspring. It works well but assistance of flat owners, businesses is needed. Nesting sites need to be easily accessible, flat and safe. A service may be offered by the authority to provide the dummy eggs. Cost recovery is possible under the right circumstances.

Hawks – Flying a hawk regularly in City centres has been known to scare off gulls but whether this has long-term effect is doubtful.

Proofing buildings and structures – This is by far the most effective deterrent to nesting and perching. The perching locations are fitted with spike or sprung wire systems. Optical gel and electrical ledge deterrents may also be considered. Open areas are proofed with 75mm netting for the cap net and 50mm netting to the sides to prevent gulls getting caught in the netting which they can often fly into. This method will prevent anxious comments and concerns from the general public.

Optical Gel – This works on the bird's senses, their sight is affected by an optical illusion and an irritation of the retina. Touching the product also provides a stinging sensation (not harmful to the gull). Smell and auditory signals between the birds effects and changes their daily movement patterns. It has been tried with some good effect but it needs to be done comprehensively on many perching areas to act as an effective deterrent. All surfaces are not always easily accessible or treatable. Anyone wishing to prevent perching on a particular building, which might include a heritage building to prevent damage, might find this a useful treatment but it might only last a season before retreatment is required.

Electrical System – This low profile track can be fixed to a roof, parapet or ledge where perching exists. A small electrical shock is felt when a bird lands on the track. Whilst the birds do not suffer through this action, they quickly learn to avoid the property and change their daily behaviour accordingly.

Culling – Only as a last resort, care is required when considering this solution, all should be aware of the Wildlife and Countryside Act 1981 where a general license may be used. These are open licences which are valid between January and December of each year and are subject to changes of species and conditions. The detail can vary between England, Scotland, Wales and Northern Ireland. To be certain, professional advice should be canvassed before any culling programme is even considered, also be aware that media attention to any cull will be extreme.

It is not possible to be thorough enough to prevent breeding, as not all species may be culled, however a reduction in adult bird numbers through control and deterrence measures along with natural wastage should within a few years begin a steady decline to a point where the birds lose their memory of nesting in the city environment. That's not to say they will nest in another city but in that environment they might not find sufficient habitat requirements to establish the larger nuisance colonies.

Prevention of Gull colonisation

Building design – If architects are required to take account of the risk of gull colonisation then they can design out the nesting areas and perches. This is an extremely important planning consideration for our cities and it is vital it is adhered to if future problems are to be avoided.

Summary

It is entirely possible under current legislation and from current knowledge and technology to control the urban gull. There needs to be a concerted effort led by the local authority and they need to harness the community which includes businesses, residents and visitors if they are to be successful. The key to success is control of potential food sources through containerisation of waste, information campaigning to ensure everyone knows what they can do and enforcement upon those who fail to support the control effort when they have the means to support it.

A baseline needs to be set to understand and quantify the problem. Full elected members' support is required along with identified and sufficient funding to support a 5 to 10 year programme. A team needs to be established under effective management and authority. A plan needs to be formulated for intervention. The plan needs to be implemented and regular review of actions must be done to re-align resources and target activity. In this way the urban gull challenge can be beaten in a cost effective and humane way.





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