

BAT ECO SERVICES LTD., ULEX HOUSE, DRUMHEEL, LISDUFF, VIRGINIA, CO. CAVAN, IRELAND A82XW62

WILDLIFE LICENCING UNIT

NATIONAL PARKS & WILDLIFE SERVICE, 90 NORTH KING STREET, DUBLIN 7 D07 N7CV.

9th February 2025

To whom it may concern,

I would like to apply for a renewal of my bat survey licence (licence listed in bold in left-hand panel).

I have been working as a bat specialist since 2000. I have also provided a returns of surveys completed in 2023 and 2024 for the previous survey licence in operation. I have provided a Bat Eco Service Ltd. CV which provides greater information on my expertise as principal bat specialist for Bat Eco Services Ltd. I would like to apply for a renewal of my survey licence to undertake day-to-day bat work duties for bat surveys:

- General day-to-day bat surveys (dusk & dawn surveys, walking transects, static surveillance, daytime inspections) and all that this entails;
- Inspection of known bat roosts;
- Supervision of bat mitigation works;
- Bat handling, surveys and training courses as part of routine Bat Eco Services Ltd. duties.

I have provided supporting information for the Derogation Licence Application – Survey Licence below. If you require any further information please do not hesitate to contact me.

Sincerely, Dr Tina Aughney

BAT SURVEY LICENCE

Dr Tina Aughney

Contact Details of Dr Aughney: 086 4049468 tina@batecoservices.com

Licenced Bat Specialist:

NPWS licence C17/2023 (Licence to handle bats, expires 23rd January 2026);

NPWS licence 017/2025 (Licence to photograph/film bats, expires 31st December 2025);

NPWS licence DER/BAT 2022-36 (Survey licence, expires 24th March 2025).



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DEROGATION LICENCE

A NPWS Derogation Licence (Survey Licence) is required for permission to undertake disturbance of bat roosts during Bat Eco Service Ltd. Work duties.

The following two questions are taken from the derogation licence application in order to provide information requested to allow NPWS to undertake an assessment of the licence application.

10. Please tick which reason below explains How this Application Qualifies under Regulation 54(2)(A-E) of the European Communities (Birds and Natural Habitats) Regulations:

a.	In the interests of protecting wild flora and fauna and conserving natural habitats	
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property	
C.	In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.	\boxtimes
	EXPLANATION	
	As a bat specialist for Bat Eco Services Ltd. I am employed to undertake bat surveys. The purpose of a bat survey is to document the potential roosting, foraging and commuting areas of local bat populations with reference to a specific project. Bat surveys entail an array of survey techniques, the majority of which are non-invasive and therefore do not cause disturbance to roosting bats:	
	 Bat detector surveys (e.g. dusk emergence surveys or dawn surveys) Thermal imagery or IR filming during bat detector surveys (Night Vision Aids employed as part of dusk and dawn surveys and during daytime inspections) Static surveillance (i.e. deployment of a bat detector to record nightly for a set period of time) 	
	However, one important aspect of a bat survey is the daytime inspection of structures, building and trees, which may potentially provide a roosting site for bats. While the daytime inspection is undertaken in a manner to prevent or reduce disturbance (e.g. using red light torches) it is also important to ensure that as much information is gathered to provide accurate information on bat usage of a potential roosting site. This may involve entering an attic space where bats are likely to be roosting and aiming to identify the bat species present and type of roost (e.g. maternity roost).	
	If the roosting site is not accessible, in order to determine the bat species or type of roost, it may also be required to capture and handle bats to achieve this. Trapping may be undertaken using a hand net or other appropriate trapping method (e.g. harp trap). Such decisions to undertake this type of surveying is only undertaken where it is deemed important	



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to have such information to inform decisions for a particular project. This is not undertaken for routine bat surveys but completed on a case-by-case basis.

Bat Box & Bat House checks are also an important element of bat mitigation monitoring that Bat Eco Services Ltd also undertake. This involves the daytime checking of bat boxes and/or bat houses for roosting bats. Depending on the level of information required, bats maybe handled to identify species, sex and gather biometric data. However, more often than not, the occupancy and number of bats in a bat box or bat houses is sufficient information for the majority of reporting and this does not require the handling of bats.

d.	For the purpose of research and education, of re-populating and re-introducing these	
	species and for the breeding operations necessary for these purposes, including	
	artificial propagation of plants	

e. To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule

The following table requires detailed information, which this bat survey report provides. Some of this information is presented as part of the table below while other sections within the report (as directed) are required to be consulted.

11. Report Checklist: Please append a detailed report to support this application and ensure that it contains the following information:

(Birds a Objectiv	and Natural Habitats) Regulations.			
	Provide accurate information on the location of bat roosts			
b)	Provide accurate information of species identification (e.g. <i>Myotis</i> species to species level)			
c)	Provide accurate information on the type of roost present (e.g. maternity roost confirmed by presence of pregnant or lactating females).			
d)	Provide information on whether bat mitigation measures are appropriate.			
e)	Provide appropriate bat conservation measures during the implementation of bat mitigation measures (e.g. ensure bat safety).			
EXPLANATION				
	eve the listed objectives, as part of the part survey, entering a space where bats are may be required – this is normally part of the Daytime Inspection .			



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If the roosting site is not accessible, in order to determine the bat species or type of roost, it may also be required **to capture and handle bats** to achieve this. Trapping may be undertaken using a hand net or other appropriate trapping method (e.g. harp trap). Such decisions to undertake this type of surveying is only undertaken where it is deemed important to have such information to inform decisions for a particular project. This is not undertaken for routine bat surveys but completed on a case-by-case basis.

Bat Box & Bat House Inspections

Bat Eco Services Ltd. are involved in the erection of bat box schemes and the design, building and monitoring of artificial bat houses are part of bat mitigation measures.

Bat Box checks are also an important element of bat mitigation monitoring that Bat Eco Services Ltd also undertake. This involves the daytime checking of bat boxes for roosting bats. Depending on the level of information required, bats maybe handled to identify species, sex and gather biometric data. However, more often than not, the occupancy and number of bats in a bat box is sufficient information for the majority of reporting and this does not require the handling of bats.

Bat House inspections are also essential to ensure that such measures are work appropriately for the bat species designed for. As part of the Rish bat mitigation guidelines, monitoring of bat houses are essential in order to allow projects to go forward. Therefore, regular inspections are required to document bat usage and undertake tweaks of designs, where required.

Alternative Solutions Considered:

a) Alternatives – Non Invasive Bat Survey

The following methods are undertaken routinely by Bat Eco Services to ensure that disturbance of bats is kept at a minimum. However, for specific projects, these alternatives may not provide the detailed information required and therefore these alternatives are not fully suitable.

- Daytime Inspections limit inspections to reduce potential disturbance to bats. Only use red light torches and thermal imagery scopes for inspections.
- Set up trail cameras (with low light IR) in areas (where accessible) likely to be a roost to document if used by bats.
- Routinely deploy static units (bat detectors) in areas (where accessible) likely to be roost (where accessible) for a number of nights to determine if used by bats (audio recordings will also facilitate the species identification for the majority of Irish bat species).
- Using Night Vision Aids(NVAs) routinely employ thermal imagery and infra-red technology to gather information on exit points etc. to reduce the need to disturbs potential roosting site.



DR TINA AUGHNEY BAT ECO SERVICES LTD., ULEX HOUSE, DRUMHEEL, LISDUFF, VIRGINIA, CO. CAVAN, IRELAND A82XW62 | LINK TO OTHER

	 Accurate counts of emerging bats using NVAs during the appropriate survey periods will provide information on the type of roost present (e.g. typical number of individuals in a roost according to species). 	
	b) Alternatives – Do Not Carry Out Bat Box or Bat House Checks	
	If bat box or bat house checks are not completed, then is it not possible to determine if this regularly deployed bat mitigation measures works and is appropriate.	
	These checks also provide an essential learning tool for Bat Eco Services employees as it is an opportunity to see bats and gain experience in species identification and handling under the safe control of an experienced specialist such as Dr Aughney.	
	The data collected by Bat Eco Services Ltd. is regularly submitted to Bat Conservation Ireland database to help the conservation of Irish bats through distribution maps and research. Without such information, there would be a gap in knowledge for the conservation of the Irish bat population.	
	Bat Eco Services Ltd. used the experience gained to compile a CV of case studies which provides NPWS with information on projects. This is routinely updated and submitted as part of derogation licence applications.	
11.2	Evidence that actions permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.	
	Dr Tina Aughney is a trained bat handler with extensive experience. As a result, she is a trainer for Bat Conservation Ireland and routinely is requested to undertaken specialized bat surveys. Her extensive experience of handling bats and species identification ensures that any disturbance is kept to a minimum and will not result in the harm of individual bats or detriment to the maintenance of the population of species.	
	Dr Aughney is also trained in advance bat survey techniques with extensive experience of numerous trapping methods, bat ringing and radio telemetry. She also has the appropriate trapping equipment to ensure that the health and well-being of captured bats. In addition, any captured bats are feed (meal worms) and monitored to ensure that there well post-surveying.	
	Bat handling is also completed according to IUCN guidelines.	
11.3	Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.	
	All other non-invasive bat survey methods are employed to gather as much information in	



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	Entering a known roost is undertaken for the minimum length of time and using only red light torches and thermal imagery aids. Photography is undertaken only for the aid of reporting and/or identification of bat species. A separate licence is held for this element of the survey.	
	Bat handling is also completed according to IUCN guidelines (i.e. gloved hands, face mask and vaccinated surveyor).	
	Bats are captured using appropriate methods and equipment, stored individually in cotton bags and released (after feeding) with the minimum amount of time in captivity to reduce stress.	
	Bats, after release, are monitored to ensure their well-being.	
	Bat Eco Services Ltd. follow the rule, strictly, to only undertake the capture and handling of bats where the information is essential to the a specific project. It is not a routine to undertaken such invasive surveys.	
11.4	As much information as possible to allow a decision to be made on this application.	
	A CV for Bat Eco Services Ltd. experience has been compiled to aid Derogation Licence applications. This is included with the application.	