

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 bat survey licence for field assistant, Miss Eva Boyle. Miss. Boyle has been working with Bat Eco Services Ltd. since 2021 as a summer field assistant and has received in-house training in relation to the following:

- Bat survey techniques (dusk & dawn surveys, walking transects and static surveillance) using bat detectors and Night Vision Aids (NVAs – i.e. thermal imagery and IR cameras);
- Inspection of buildings, bridges and trees;
- Bat handling techniques;
- Specialised trapping methods e.g. harp trap.

Miss Boyle has handled the following bat species as part of in-house training and bat rehabilitation: common pipistrelle, soprano pipistrelle and brown long-eared bats under the guidance of myself.

I would like that Miss Boyle is issued a licence in order to undertake day-to-day bat work duties:

- General day-to-day bat surveys and all that this entails;
- Inspection of known bat roosts;
- Supervision of bat mitigation works;
- Bat handling, for bat welfare during works, surveys and training courses as part of routine Bat Eco Services Ltd. duties.

If you require any further information please do not hesitate to contact me.

Sincerely, Dr Tina Aughney

BAT SURVEY LICENCE

Miss Eva Boyle, Field Assistance for Bat Eco Services Ltd. – FIRST LICENCE APLICATION

Miss Eva Boyle (Field Assistant) Contact details: 087 4318942

Previous Licences: None

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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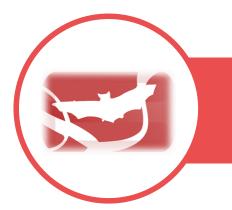
DEROGATION LICENCE

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 field assistant for Bat Eco Services Ltd. Miss Boyle is 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 to have such information to inform decisions for a particular project. This is not undertaken for	



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	routine bat surveys but completed on a case-by-case basis. Such surveys are only be undertaken by the principal bat specialist for Bat Eco Services Ltd, Dr Tina Aughney and Miss Boyle will assist only in such. Any specialised and advance survey techniques are only undertaken by Dr Aughney with assistance by additional employees, such as Miss Boyle.	
	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. In relation to this element of work, Miss Boyle will be assisting the principal bat specialist for Bat Eco Services Ltd, Dr Tina Aughney.	
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:

11.1	and no	ation as to why the derogation licence sought is the only available option for works suitable alternative exists as per Regulation 54 of the European Communities and Natural Habitats) Regulations.	
	Objecti	ves:	
	a)	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).	



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EXPLANATION

To achieve the listed objectives, as part of the part survey, entering a space where bats are present may be required – this is normally part of the **Daytime Inspection**.

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 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. Such advanced surveys are completed by the principal bat specialist for Bat Eco Services Ltd. with assistance by employees such as Miss Boyle.

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 and 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 is sufficient information for the majority of reporting and this does not require the handling of bats. Such advanced surveys are completed by the principal bat specialist for Bat Eco Services Ltd. with assistance by employees such as Miss Boyle.

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.



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	 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. 	
	 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, such as Miss Boyle, 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.	
	Miss Boyle has received training by Dr Aughney in relation to all bat survey techniques and all work that involves the handling of bats is undertaken under supervision by Dr Aughney. This will ensure the welfare of any bats handled.	
	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.	



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	Miss Boyle has also received extensive training in the used of advanced bat survey techniques by Dr Aughney. As a result, she has provide assistance on BCIreland and NPWS training courses.	
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.	\boxtimes
	All other non-invasive bat survey methods are employed to gather as much information in order to reduce disturbance or the need for potentially disturbing surveys.	
	Entering a known roost is undertaken for the minimum length of time and using only red light torches and thermal imagery aids.	
	All bat handling is only undertaken by Miss Boyle under supervision of Dr Aughney.	
	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.	\boxtimes
	A CV for Bat Eco Services Ltd. experience has been compiled to aid Derogation Licence applications. This is included with the application.	