

John Curtin B.Sc
Eire Ecology,
Moyglass,
Kylebrack,
Co. Galway
29th January 2025

To Dan Simpson.
Wildlife Licencing Unit.

Dear Dan.

I wish to apply for a bat roost disturbance derogation licence. I have been conducting bat surveys since 2012 and have previously held roost disturbance licences (Der/Bat 2023-07, Der/Bat 2022-17, Der/Bat 2020-114).

Please find attached responses to three queries with regards the Derogation Licence request.

1: In order for a derogation licence to be granted, it's purpose must fall under one of the options under Regulation 54 (2) (a-e) of the Birds and Natural Habitats Directive. Could you please advise which option the derogation licence you are applying for qualifies under and also outline why you believe that your application for a licence falls under this reason:

- (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,*
- (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, or*
- (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.*

Answer 1.

A, B, C and D

A. & D.

As the Co-chair of Bat Conservation Ireland I regularly participate in field-trips including inspections of bat roosts. A roost disturbance license would be required to continue these works. Also as a member of BCI and in my private capacity I conduct research on bat species. I have a bat box scheme in Derrycrag Woods in Woodford Co. Galway where I conduct bat counts.

B. & C.

In my work capacity I am the lead ecologist with Eire Ecology. We perform bat surveys for commercial and private developments. In this capacity I conduct pre-construction surveys and follow through with construction phase and post construction monitoring of bat roosts.

2: The second question is whether the actions to be carried out under the requested derogation licence are the only option available and there is no satisfactory alternative. This is something which must be proven under Regulations 23 and 24 of the Habitats Regulations. Please outline in detail what alternative solutions you have considered and why you believe that they are not satisfactory.

Answer 2.

There are only really two options available.

a) Do not conduct surveys of bat roosts

This option is possible however will prevent me from conducting bat roost searches that are necessary to inform good practice risk assessment. Surveying roosts is only conducted when deemed necessary.

b) Conduct surveys of bat roosts

Surveying roosts is only conducted when deemed necessary. Sometimes it is necessary to enter a roost in order to gain information on a bat roost. For instance, in 2024 a site visit was conducted of Kylemore gothic church where works were occurring on a side tower. The internal site visit allowed for a sample of bat droppings which were sent for DNA analysis while I was located in the tower by a potential access point in order to identify if bats were moving between the roost section and the works area.

Another example where a disturbance licence is required was during EcOW works carried out in 2024 during the construction of a pedestrian bridge attached top the existing Wolfe Tone bridge in Galway. A 2023 survey revealed a single Pipistrelle bat roosting under the existing bridge. Further surveys were required in order to understand the extent of the roost (was it a satellite, transition or hibernation roost). Surveys from on top of the bridge would not provide sufficient information thus accessing underneath the bridge via boat provided the most accurate information. This helped guide mitigation and risk assessment for the project.

Of the two choices, I obviously feel option B, obtaining a roost disturbance licence is the better option.

3: A derogation licence is issued with the condition that it is not 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 – (Regulation 54 (2) of the Birds and Natural Habitats Directive). In order for a derogation licence to be issued it must be proven that the actions proposed will not have a detrimental effect on the local bat population. Please provide this information in support of your application.

Answer 3.

As a member of BCI and as an ecologist my first aim is to protect and conserve Irelands bat population. Roost disturbances are not conducted without appropriate cause and are out at appropriate times as guided by the Bat Mitigation Guidelines for Ireland – V2 (2022).

Should you have any queries do not hesitate to call on 085-1179428

Regards,

John Curtin B.Sc

29th of January 2025