

Ecological Report in Support of the Application for
Derogation Under the European Communities (Birds
and Natural Habitats) Regulations 2011-2021 for
Catherine Howarth of Kilkeeran, Ballaghaderreen, Co.
Roscommon.

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1. Introduction

In January 2025 Catherine Howarth, Ecological Consultant with Coyle Environmental is applying to NPWS for a Derogation licence under Regulation 54. The licence is being sought to survey and monitor bat roosts (without handling bats) as part of her future ecological work. The licence is requested for all bat species within the Republic of Ireland.

2. Aims and objectives

The aim of this report is to provide supporting evidence to the Application for Derogation Under the European Communities (Birds and Natural Habitats) Regulations 2011-2021 Form. The objectives of this report are to demonstrate the following:

- An outline the applicant understanding of the current bat legislation
- The best practice guidelines used in her current bat work
- A description of the type of work completed
- The limitations of this work without a license
- A description of the bat work that the applicant intends to do if granted a licence.
- Why the applicant considers that the license should be granted in line with the current legislation
- Alternatives
- Evidence of experience both theory and practical.
- A supporting letter from the applicants' company
- A supporting letter from the applicants' mentor, who holds current licenses and has many years of experience.

3. Bats in Ireland

3.1. Status

The serious decline in bat populations both in Ireland and across Europe has led to conservation measures and appropriate legislation being drawn up and implemented to stabilise population numbers. As highly specialised animals, bats serve as biological indicators and are often amongst the first animal species to show signs of population change due to the activities of man.

Bats' dependency on insects has left them vulnerable to habitat destruction, land drainage, agricultural intensification and increased use of pesticides. Their reliance on buildings has also made them vulnerable to building repairs and the use of chemicals for timber treatment. Roosting or hibernation sites in caves, mines, trees and disused buildings are also often lost to development.

It is estimated that bat populations across Europe have decreased by up to 60% in the last 30 years. Efforts should be made to retain known bat colonies and methods to lessen disturbance to these animals should be incorporated into any development. All Irish Bats are protected under national and EU legislation. Both the animals themselves and their roosts are protected, and it is an offence to disturb or interfere with them without a licence.

3.2. Species

Bats belong to the Order Chiroptera and to date nine species are recorded as resident in Ireland (Table 1), excluding vagrants such as Brandt’s Bat and Greater Horseshoe Bat. These 9 species belong to two families; eight species are in the family Vespertilionidae, and one is in the Rhinolophidae family. Several of them, like the Common and Soprano Pipistrelles, are widespread and common, others, such as the Lesser Horseshoe Bat, are relatively rare and restricted in distribution.

Table 1. Bat species resident in Ireland

Common Name	Species
Brown Long-Eared Bat	<i>Plecotus auritus</i>
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>
Daubenton’s Bat	<i>Myotis daubentonii</i>
Leisler’s Bat (Lesser Noctule)	<i>Nyctalus leisleri</i>
Lesser Horseshoe Bat	<i>Rhinolophus hipposideros</i>
Nathusius’s Pipistrelle	<i>Pipistrellus nathusii</i>
Natterer’s Bat	<i>Myotis nattereri</i>
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>
Whiskered Bat	<i>Myotis mystacinus</i>

3.3. Bat Ecology

The warmer nights beginning in March see bats emerge to feed and towards the end of the month female Bats congregate for maternity colonies and begin to roost collectively. From May to August pregnant females may give birth to a single pup with twins occasionally occurring. The pups are cared for in a nursing colony for around 4 weeks until they can fly. At 6 weeks pups are weaned.

From spring to autumn bats emerge at night to forage for insect prey. Bats rest during the day (day roosts), where for most species, they will be hidden from view, even when using roof spaces. Bats also use night roosts for temporary rest and/or as feeding perches.

Throughout autumn bats seek to build enough body fat to sustain them through their winter hibernation. Hibernation is initiated following a change in weather and day length, which stimulates hormonal changes, in Ireland this is usually after September. Irish bats will enter a state of hibernation or may migrate. Occasionally on warm winter nights bats may emerge from hibernation to forage, or in response to their metabolic requirements. It may take up to 20 minutes for them to become active from a torpid state, using up valuable energy reserves each time, making them extremely vulnerable.

For surveyors the optimum time to conduct activity surveys for bats is between the start of May and September, when bats are likely to be active and feeding on nights with favourable weather conditions.

3.4. Bat roosts

Different bat species demonstrate unique preferences for foraging habitats and roosting. Almost any structure can be utilized as a bat roost. Roosts can be in buildings (dwelling houses, farms, barns, ancient monuments, churches, fortifications, and industrial buildings),

cave-like places (natural caves, mines, cellars, limekilns, icehouses, tunnels and under bridges) and hollows in trees (including hedgerows and woodlands).

There are several types of bat roosts, including maternity roosts, harem, day roosts, feeding perches, night roosts, mating roosts, satellite roosts, transitional roosts and winter hibernaculum. Any given roost is not usually occupied entirely throughout the year as bat colonies frequently move. However, the same site tends to be occupied by the same colony during the same season each year. Distances between roosts may be only a few metres, or many kilometres.

The species most likely to be found in houses are the Pipistrelle spp., and these often roost in large numbers. In Ireland, the Leisler's Bat is the next most found species in buildings. They also roost in barge boards/soffit areas and within roof spaces. Brown Long Eared Bats prefer the open roof areas of older buildings, such as barns and outhouses. Whiskered and Natterer's Bats are occasionally found in house roofs, but more often in the stonework of bridges, tunnels, castles and other such buildings. Daubenton's bats often prefer the masonry of bridges and Lesser horseshoe bats were originally cave dwellers, but summer colonies are found in roof spaces with access that allows an uninterrupted flight to the roof apex.

3.5. Legislation

3.5.1. Irish Legislation

Under the Republic of Ireland's Wildlife Acts 1976 to 2021, it is an offence to intentionally harm a bat or disturb its resting place. All bat species are protected under the Wildlife Acts, which make it an offence to wilfully interfere with, or destroy, the breeding or resting place of these species without a licence. All species of bats in Ireland are listed on Schedule 5 of the 1976 Act, and are therefore subject to the provisions of Section 23, which make it an offence to:

- Intentionally kill, injure or take a bat.
- Possess or control any live or dead specimen or anything derived from a bat.
- Wilfully interfere with any structure or place used for breeding or resting by a bat.
- Wilfully interfere with a bat while it is occupying a structure or place that it uses for that purpose.

3.5.2. E.U. Legislation

The EC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive 1992), seeks to protect rare and vulnerable species, including all species of Bats, and their habitats and requires that appropriate monitoring of populations be undertaken. All species of bat found in Ireland are listed in Annex IV of the Directive, while the Lesser Horseshoe bat is afforded further protection under Annex II, requiring the designation of Special Areas of Conservation specifically for their protection.

All species of bat in Ireland are strictly protected under the Habitats Directive to include deliberate disturbance of these species, particularly during the periods of breeding, rearing and hibernation. It also specifies deterioration or destruction of breeding or resting places. The Habitats Directive is transposed into Irish law by The European Communities (Birds and Natural Habitats Regulations 2011 (S. I. No. 477 of 2011). These Regulations substantially strengthen the protection provided by the Wildlife Acts. All Bat species are listed on the First Schedule and Section 23 of the Regulations makes it an offence to:

- Deliberately capture or kill a bat.

- Deliberately disturb a bat.
- Damage or destroy a breeding site or resting place of a bat

3.5.3. International Legislation

Ireland has ratified two international wildlife laws pertaining to bats

- a) The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention, 1982) – part of this convention stipulates that all bat species and their habitats are to be conserved.
- b) The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, Enacted 1983). This was instigated to protect migrant species across all European boundaries.

3.6. Disturbance of Bats and Degradation Licences

Section 27 of the 2011 regulations necessitates that all public authorities have a responsibility to avoid the deterioration of natural habitats and species protected under the Birds and Habitats Directives/Regulation, and to exercise their functions and statutory powers in compliance with the Directives' requirements. Planning authorities are required to consider the presence of protected species, including bats, when considering applications for planning permission and may refuse applications on the grounds of adverse effects on these species or if an assessment of the impact of the development on protected species is inadequate.

A grant of planning permission does not constitute a licence or permit to disturb bats or interfere with their breeding or resting places. Applications may be made to the National Parks and Wildlife Service for a derogation licence under Regulation 54 to permit actions affecting Bats or their roosts that would normally be prohibited by law. The applicant must demonstrate that there is no satisfactory alternative and that the action will not adversely affect the favourable conservation status of the Bats. Each case is considered on its circumstances.

The National Parks and Wildlife Service strongly advises developers to seek the services of a professional Ecologist, with appropriate experience in assessing bat populations, when contemplating a development proposal that would affect bats or their roosts.

4. Guidance Documents consulted

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5. Statement of authority

Catherine Howarth is a Consultant Ecologist at Coyle Environmental. She has a BSc (Honours) in Conservation Biology and Ecology from the University of Exeter, a Certificate in Ecological Consultancy from ETUK and a PGCE in secondary science from the University of Chester. She has over 16 years' experience in habitat monitoring and surveying, report writing, science communication and education, project management and liaising with stakeholders and local authorities. Catherine has been based in Ireland for the last 6 years and is Bat Panel member and regular volunteer with Bat Conservation Ireland.

6. Previous Bat Survey experience

The applicant is an ecologist at an environmental consultancy and for the past two years has been carrying out various ecological surveys throughout the country. These surveys included various mammal surveys, in particular bat surveys in the form of:

- Tree inspections for PRFs,
- Visual assessments of buildings with roosting potential,
- Bat Activity Surveys and transect surveys,
- Emergence and re-entrance surveys.

Standard bat survey protocols are always followed, and our work is designed to minimise disturbance during roost survey work. Our work is undertaken in accordance with BCI, BCT and CIEEM guidance.

Catherine is a current member of Bat Conservation Ireland and regularly attends talks and events. She volunteers for the Daubenton's Bat survey, Brown long-eared bat surveys and the Bat Panel. She has trained under the supervision of highly experienced bat ecologists and is now seeking a bat licence under Regulation 54 to enable her to work more independently in 2025.

Catherine also carries out outreach projects involving education and conservation and is seeking permission to possess dead bats or part of a dead bat for education purposes. Catherine runs Toolbox talk on bats and developments within her company and associated businesses and is involved in conservation outreach programmes in the local community.

A log of Catherine Howarth's survey experience over the last year to support this application in Appendix 1.

7. Limitations without a License

Under regulation 51 of the Habitats Regulations, it is illegal to:

(b) Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration

During surveying, if bats are suspected or found to be present and observation is needed to determine the type of roost, numbers, species and to gather evidence for scientific reporting, a low level of disturbance may occur.

To gather the necessary information to complete a thorough bat roost survey (noting numbers, likely roost type and species) within a building (i.e. an attic space) or tree roost feature or to use a torch or endoscope requires a licence under current legislation (Regulation 54), as the surveyor is aware a protected species is present and there is the potential for some disturbance, even when following all best practice procedures.

Currently when conducting a roost survey, if bats are found to be present, the applicant is required to exit the roost area as quickly and quietly as possible and cease any activity which may cause disturbance. If a building is a known roost, the applicant cannot enter at all.

This often means that while bats are confirmed in the area, limited data is known on the roost type, numbers and location or bats present. Additional non-invasive surveys are carried out to gain more data, however this does not always result in a robust picture of the existing bat roost. Additional visits are then needed by a licenced bat worker. Multiple visits result in a higher level of potential disturbance to any bats present.

8. Requirements for License

The majority of bat work requests to the applicant come from house owners or those seeking planning permission for development in areas where bats are likely to be present. The Bat Mitigation Guidelines for Ireland (2022) advise that

“In order to determine what impact the proposed development will have, it is important to examine the survey information, and compare this with the proposals for development. This task is made easier by good survey information and detailed plans, showing pre-development and post-development site layout and roosts” and that *“Ideally, an impact assessment should inform the drawing up of detailed development plans, so that impacts can be avoided where possible. It is therefore important that this stage is undertaken as early as possible in the planning process.”*

National Parks and Wildlife Service Guidance Series, No. 1. (2021). Strict Protection of Certain Animal and Plant Species Under the Habitats Directive in Ireland states that is an Annex IV species could be present Ecological Surveys are required. *“The ecological survey carried out by an ecologist who is competent in relation to the species to be surveyed. The survey must use suitable methods for the species being investigated, be of an adequate duration and must take place at an appropriate time of year”.*

There is a great demand for bat ecologists and during the correct survey seasons it is sometimes not possible to employ a licenced bat ecologist, due to the high demand. To

conduct thorough surveys and collect the relevant information to properly inform the client, the ecologist should be suitable experienced, licenced and cognisant of all legislation and best practice procedures.

The applicant has sought out relevant experience and educated themselves in the legislation and best practice guidelines. They are now seeking a derogation licence to be able to conduct thorough roost surveys, to be able to carefully and quickly assess the roost type and gather details of exact locations and numbers of bats present within a roost feature, with the use of a torch and/or endoscope if required.

The Bat Mitigation Guidelines for Ireland (2022) state that:

“A typical approach to surveying buildings would include the following elements:

- *Allow sufficient daylight hours to permit a thorough inspection of each structure;*
- *Ensure that all parts of the structure can be inspected. This may require prior arrangement with owners, occupiers, caretakers etc. Access and inspection equipment, such as ladders, binoculars and a good torch, should always be available;*
- *Carry out a risk analysis and ensure safe working methods are adopted;*
- *Ask appropriate people (owners, neighbours etc.) whether there is any history of bats using the site;*
- *Carry out an external inspection of the structure looking for bat droppings on the ground or stuck to walls, suitable entry and exit points around eaves, soffits, flashing, under tiles etc.;*
- *Carry out an internal inspection of the structure. This should focus particularly on areas which provide appropriate environmental conditions for bats. This may include warm darker areas, joints and crevices in wood, ridge beams and hips as well as cool subterranean areas suitable for torpor or hibernation. Listen for bats; be aware of the characteristic smell of a bat roost; examine floors, walls and structural elements for droppings; check for other signs of bat use, such as corpses or skeletons, oily marks (from fur) around possible access points and roost areas, lack of cobwebs along beams, feeding remains such as moth wings or other insect parts;*
- *Record any signs of bats found on a plan of the structure and collect samples of droppings, bones or feeding remains for comparison with a reference collection and / or DNA analysis;*
- *Active or static detector surveys may also be necessary to ensure a full assessment of the bat usage of a building, especially where full access to all areas is not possible.”*

“Although a licence to disturb bats for scientific purposes is not essential when looking for previously unknown roosts, the requirement to withdraw if bats are discovered will limit the ability of the surveyor to carry out this work. For this reason, it is advisable for surveyors to be licensed”.

A licence is sought by Catherine Howarth to survey bats (without handling them) including use of torch and endoscope and to possess parts of a dead bat. The 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.

9. Alternatives

EU Commission Guidance section 3.2.2. (3-52) states: *“When ascertaining whether another satisfactory solution exists for a specific situation, all ecological, economic and social pros and cons should be considered, in order to identify the optimal alternative for the specific case. This analysis of pros and cons should look at the potential negative effects of the possible solutions as well as options and tools to annul or minimise any negative effects. The net result, in terms of solving the problem while avoiding or minimising secondary effects, should then be weighed against the effects of a derogation, taking into account the overall objective of the Directive.”*

(3-55) *“Only when it is sufficiently demonstrated that potential alternatives are not satisfactory, either because they are not able to solve the specific problem or are technically unfeasible, and when the other conditions are also met, can the use of the derogation be justified.”*

([https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM:C\(2021\)7301](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM:C(2021)7301))

Alternative 1: Do nothing. Do not carry out any surveys that have any potential for disturbance.

Wherever possible surveys are kept to non-invasive techniques, including use of bat detectors and infra-red technology. However, some roosts are less obvious and roosts of crevice dwelling species may require careful searching. Roosts used by a small number of bats can be particularly difficult to detect and may require extensive searching (Bat Mitigation Guidelines for Ireland. 2022).

Result of no action: Lack of accurate data for research, education and to inform correct mitigation advice to developers and those in human-wildlife conflict scenarios. Lack of scientific information is at odds with the aim of “the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”

Alternative 2: Employ a licenced individual for surveys of known bat roosts.

This is also currently done wherever possible, however there are frequently no suitably qualified and licenced bat ecologist available for all projects during the optimal survey season. This results in a backlog of surveys and has previously resulted in development plans proceeding without the recommended surveys being carried out. In this situation the

presence of bats may only be discovered after a development project has commenced, where significant disturbance has already taken place.

Result of alternative 2: Disturbance may occur to unidentified roosts, due to lack of surveys or sub-optimal survey conditions. Alternative 2 is at odds with the aim of “the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”.

10. Supporting argument for licence under current legislation

As per question 11 of the Application for Derogation Licence:

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

Our current knowledge of bats, which informs all conservation efforts is derived from scientific survey. In order to maintain Irish records there must be enough skilled and licenced bat ecologists in the field. The alternative to not granting new licences to upcoming bat ecologists is to limit the options for research, education and liaising with the public to avoid human wildlife conflict. This would be detrimental to conservation efforts and therefore does not constitute a satisfactory alternative.

Works associated with development or building work are likely to lead to an increase in human presence at the site, extra noise, lighting and changes in the site layout and local environment. All these may have a detrimental effect on the bats, which seek particular environmental conditions, such as a low incidence of direct human disturbance, particular temperature, lighting and humidity regimes and a stable internal and external layout so they can continue to follow established flight-paths. Without enough licenced bat ecologists there is an increased likelihood that developments may continue without proper surveys being carried out prior to works.

The likelihood and level of potential disturbance from a bat survey conducted during the optimal season and following best practice guidelines and the precautionary principal is low and much less than the disturbance that may be caused to an undetected roost by development.

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:

Following a precautionary principal approach any disturbance will be **slight** and **short term**. The benefit of an additional licenced bat ecologist may increase on the favourable

conservation status of bat species in Ireland, in that accurate monitoring of bat roosts, distribution and population through reporting of data aids in the protection of such species. The net result of the derogation will be neutral or positive for the species' conservation status.

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.

- Wherever possible surveys are carried out using non-invasive techniques, i.e. buildings are examined externally for signs of bats, emergence and activity surveys using bat detectors and infra-red cameras.
- Where surveys require entry to a bat roost, or may cause temporary disturbance of bats including the use of a torch or endoscope the ecologist will use the correct survey timings to maximise the data collected for the visit.
- Prior to the internal survey the surveyor will collect data on the surrounding habitats, existing data records, possible bat species present, and relevant site data to inform the aims and objectives of the survey.
- Visits should be kept to a minimum, in both number and time taken. T
- he surveyor will work efficiently, carefully, quietly and minimise the used of white light to complete the survey with as minimal disturbance as possible.
- Infra-red and red light is to be used instead of white light wherever possible.
- Best practice guidelines including BCT Bat Survey Guidelines - 4th Edition (2023) will be followed at all times. i.e.

“Ecologists should work quietly and check structures in a systematic manner, working upwards from the entrance and checking and checking any cellar space last. Upon entering an individual space, the places bats are most likely to be should be checked first.”

“Turning off all torches whilst in a dark space will allow ecologists to look for light spilling in, which will indicate gaps that bats use for entry points.”

“Crevices will require inspections using torches, mirrors and endoscopes. Care should be taken when using an endoscope, it should be inserted into crevices slowly whilst the ecologist is looking through the viewfinder or at the visual display to check for bats and their signs. An endoscope should never be forced or inserted without viewing and the endoscope should not therefore come into contact with a bat. If a bat is seen through the endoscope, disturbance should be minimised.”

11.4. As much information as possible to allow a decision to be made:

Please the following in the Appendices.

- Evidence of experience both theory and practical.
- A supporting letter from Coyle Environmental Ltd.
- A supporting letter from Catherine's mentors who have licenses and years of experience

11. Conclusion

In regard to the consideration for a Derogation Licence Catherine Howarth has addressed the three pre-conditions set out in Article 16 of the Habitats Directive, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations. The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies (see below)
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

Test 1.

Reason for seeking derogation, Regulation 54 (2) (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

Test 2.

Two alternatives were considered. To the applicant the alternatives were deemed as being at odds with the aim of "the maintenance of the populations of the species concerned at a favourable conservation status in their natural range" and therefore no satisfactory alternatives exist.

Test 3.

Under regulation 51 of the Habitats Regulations, it is illegal to:

- (a) Deliberately capture or kill any specimen of these species in the wild
- (b) Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration**
- (c) Deliberately take or destroy eggs of these species in the wild
- (d) Damage or destroy a breeding or resting place of such an animal, or

(e) Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.

It is unlawful to disturb bats, in particular if the level of disturbance can be shown to impair their ability to survive; to breed or reproduce; to rear or nurture their young; to hibernate or migrate; or to significantly affect the local distribution or abundance. The actions taken under the derogation licence sought will not lead to any significant level of disturbance.

During surveying, if bats are suspected or found to be present and observation is needed to determine the type of roost, numbers, species and to gather evidence for scientific reporting, a low level of disturbance may occur.

Following a precautionary principal approach any disturbance will be **slight** and **short term**. All mitigation measures outlined in section 10 of this report will be adhered to and best practice guidelines set out by Bat Conservation Ireland, The Bat Conservation Trust, JNCC and CIEEM will be followed at all times.

The benefit of an additional licenced bat ecologist may increase on the favourable conservation status of bat species in Ireland, in that accurate monitoring of bat roosts, distribution and population through reporting of data aids in the protection of such species.

As such a Derogation licence is requested to survey and monitor bat roosts (without handling bats) for Catherine Howarth as part of her future ecological work. The licence is requested for all bat species within the Republic of Ireland.

Appendix 1. Experience Log

Date	Location	Activity undertaken	Details	Species/Numbers encountered	Hours	Knowledge gained	Further training needs identified
27/06/2023	Crimlin, Co. Roscommon	Bat Walk	Local walk	Pip spp. Leisler's, Myotis spp.	1.5	Experience	
05/07/2023	Sligo	Bat Walk	Walk	Pip spp.	1.5	Bat detector use	More experience
12/07/2023	Hazelwood, Sligo	Bat Walk	Walk	Daubenton's, Pip spp.	1.5	Experience	
23/07/2023	Lough Errit	Bat Walk	Walk, using Bat4 & EMT2	Daubenton's, Pip spp.	1.5	Experience	
10/08/2023	Sligo	Daubenton's Waterway Survey	Second Suveyor	Daubenton's, Pip spp.	1.5	Daubenton's sound and ID on sight	Get own site next year
12/08/2023	Roscommon Town	Bat Talk and Walk	Walk round castle	Pip spp. Leisler's, Myotis spp.	1	Bats in Roscommon	
20/11/2023	Ballaghaderreen, Co. Roscommon	Training	Bat Ecology and Surveying course with ETUK	N/A	5	Survey techniques	Bats and Developments
17/02/2024	Mullingar, Co. Westmeath	Meeting/ Talk	BCI AGM	N/A	3	Meeting BCI staff	
08/03/2024	Ballaghaderreen, Co. Roscommon	Training	BCI Course 1: Introduction to Bats and Bat Detectors	N/A	3	Review of bat ecology	Bat sound analysis training
08/04/2024	Ballaghaderreen, Co. Roscommon	Training	Bat Panel Health & Safety Training	N/A	1	H&S	
13/04/2024	Moate, Co. Westmeath	Bat Walk	Bat Panel Bat Walk	Myotis spp/, Pip spp/, Leislars	1.5	Experience	
13/04/2024	Moate, Co. Westmeath	Training	Bat Panel Training	N/A	4.5	Public engagement techniques	
18/04/2024	Ballaghaderreen, Co. Roscommon	Training	Bats and Developments	N/A	5	Mitigation techniques	Handling bats, volunteer at rehabilitation center/ (Get Licence)

Ecological Report in support of Application for Derogation for Catherine Howarth. Jan 2025

Date	Location	Activity undertaken	Details	Species/Numbers encountered	Hours	Knowledge gained	Further training needs identified
24/05/2024	Hazelwood, Co. Sligo	Bat Walk	Sligo Bioblitz	Pip spp/, Myotis spp/	2	Experience	
25/05/2024	Lough Errit, Co. Roscommon	Bat Walk	Leading Bat Walk	Pip spp/ Daubenton's	1.5	Experience	
06/06/2024	Devon, UK	Survey	Emergence Survey in Stoodleigh (Barn)	Pip Spp	2.5	Experience	
07/06/2024	Exeter, UK	Bat Walk	Bat Walk in Exeter with ETUK Bat Ecologist Tutor	Pip/ Spp/ Daubenton's	2	Experience with expert	
08/06/2024	Exeter, UK	Survey	Activity Survey lead by ETUK Bat Ecologist Tutor	Pip/ Spp/ Myotis spp/, Noctule	3	Experience with expert	
19/06/2024	Manchester, UK	Survey	Emergence Survey	Pip Spp	2.5	Experience	
20/06/2024	Warrington, UK	Survey	Emergence Survey	Pip Spp	2.5	Experience	
09/06/2024	Devon, UK	Survey	Activity Survey in Stoodleigh (Farm)	Pip Spp (Barn owl seen)	3	Experience	
08/07/2024	Bohalas, Co. Roscommon	Survey	PRA of stone barn		1	Experience	
09/07/2024	Bohalas, Co. Roscommon	Survey	Emergence Survey stone barn	Pip spp.	2.5	Experience	
11/07/2024	Ballysadare, Co. Sligo	Survey	PRA of uninhabited building		1	Experience	
12/07/2024	Ballysadare, Co. Sligo	Survey	Emergence Survey	Pip spp, Natterer's, BLE	2.5	Experience	
12/07/2024	Achonry, Co. Sligo	Survey	PRA of uninhabited building		1.5	Experience	Endoscope use under supervision (Licence needed)
13/07/2024	Achonry, Co. Sligo	Survey	Emergence Survey	Pip spp, Leisler's	2.5	Experience	
15/07/2024	Cartron, Co. Roscommon	Survey	Emergence Survey derelict cottage	Pip spp.	2.5	Experience	

Ecological Report in support of Application for Derogation for Catherine Howarth. Jan 2025

Date	Location	Activity undertaken	Details	Species/Numbers encountered	Hours	Knowledge gained	Further training needs identified
15/07/2024	Cartron, Co. Roscommon	Survey	PRA		1	Experience	
16/07/2024	Ballaghaderreen, Co. Roscommon	Training	Daubentons Bat Waterways Survey Training	N/A	1.5	Daubentons survey techniques	
01/08/2024	Ballyhaunis, Co. Mayo	Survey	Emergence Survey	Pip spp.	2.5	Experience	
02/08/2024	Ballyhaunis, Co. Mayo	Survey	PRA	Pip spp.	1.5	Experience	
10/08/2024	Castlerea, Co. Roscommon	Survey	Daubenton's Waterway Survey 1536	Daubenton's, Pip spp/	1.5	Experience	
15/08/2024	Castlerea, Co. Roscommon	Survey	Daubenton's Waterway Survey 1333	Daubenton's, Pip spp/	1.5	Experience	
24/08/2024	Sligo	Daubenton's Waterway Survey	Second Suveyor	Daubenton's, Pip spp.	1.5	Daubenton's sound and ID on sight	Get own site next year
28/08/2024	Rusheen Bay, Co. Galway	Survey	PRA Survey house and sheds		2	Experience	
29/08/2024	Castlerea, Co. Roscommon	Survey	Daubenton's Waterway Survey 1537	Daubenton's, Pip spp/	1.5	Experience	
21/09/2024	Roscommon Town	Public Event	Running BCI Stall at Event	N/A	6	Experience	
23/09/2024	Inch More, Co. Clare	Survey	PRA Survey of derelict house and surrounds	LHB	2	Experience with LHB sound	Further PRA techniques: Trees
11/07/2025	Ballysadare, Co. Sligo	Survey	Emergence Survey	Pip spp/	2.5	Experience	
12/07/2025	Achonry, Co. Sligo	Survey	Emergence Survey	Pip spp/	2.5	Team Lead Experience	
28/08/2025	Rusheen Bay, Co. Galway	Survey	Emergence survey of house	Pip/ Spp/, Leislars/	3	Team Lead Experience	
23/09/2025	Inch More, Co. Clare	Survey	Activity survey of site, transect walked	LHB, Myotis spp/, Pip spp/, Leislars, BLE	2	Team Lead Experience	

Ecological Report in support of Application for Derogation for Catherine Howarth. Jan 2025

Date	Location	Activity undertaken	Details	Species/Numbers encountered	Hours	Knowledge gained	Further training needs identified
20/11/2024	Ballaghaderreen, Co. Roscommon	Training	Surveying Trees for Bats course with ETUK	N/A	5	Survey techniques	GLTA Survey experience
22/12/2024	Castlerea, Co. Roscommon	Training event	Delivering TBT on Irish Bats to Environmental Consultancy staff		1	Teaching/ Public speaking	
25/11/2024	Newport, Co. Tipperary	Survey	PRA Survey (GLTA)	None	2.5	Tree survey experience	

Appendix 2. Supporting Letters

National Parks & Wildlife Service
90 King Street North
Dublin 7
D07N7CV



tel: +353 (0) 94 962 1258
email: info@coyleenv.ie
www.coyleenv.ie

1st & 2nd Floor,
Kilmurry House,
Main Street,
Castlerea
Co Roscommon

29th January 2025

Our Ref: CHBATDL2025

RE: Supporting letter for Application for Derogation Under the European Communities (Bird and Natural Habitat) Regulations 2011 - 2021 on behalf on Catherine Howarth

Dear Sir/Madam,

Catherine Howarth is an Ecologist within our Consultancy Team at Coyle Environmental Ltd., as part of her role Catherine conducts a variety of Bat Surveys on behalf of our clients. During the 2024 survey season Catherine completed Bat Roost Inspection Surveys including Potential Roost Assessment surveys of buildings and Ground Level Roost Assessments of trees, Emergence surveys and Activity surveys across 6 counties.

Catherine has also completed CPD training on bat ecology and survey techniques and volunteers her time with Bat Conservation Ireland. Having gained survey experience under experienced ecologists and completed surveys using non-invasive techniques independently, she is now seeking to advance her surveying abilities with a Derogation Licence. She has led ecological training programmes within our company, giving toolbox talks to staff on several subjects including Bats in Ireland.

Coyle Environmental is committed to working to the highest standards, following accepted best practice guidelines and techniques and keeping up to date with current legislation and industry practices. As such we fully support Catherine in her professional development and request for a Derogation Licence to survey all bat species in Ireland for scientific research and educational purposes.

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

Yours sincerely,

A handwritten signature in black ink that reads 'D O'Neill'.

Daniella O'Neill
Consultancy Team Manager
0868427748

National Parks & Wildlife Service
90 King Street North
Dublin 7
D07 N7CV
Ireland

ETUK
Tavistock Rd
Launceston
Cornwall. UK
PL15 9EZ

29th January 2025

RE: Supporting letter for Application for Derogation Under the European Communities (Bird and Natural Habitat) Regulations 2011 - 2021 on behalf on Catherine Howarth

Dear Sir/Madam,

Catherine Howarth is an Ecologist at an Environmental Consultancy in Ireland, as part of her role Catherine conducts a variety of Bat Surveys. Catherine completed a post graduate level Certificate in Ecological Consultancy with Ecology Training UK, graduating in 2024 with a distinction plus. I am Sue Searle, BSc, PGDip, MCIEEM, the Senior Tutor, Managing Director and Principal Ecologist at Ecology Training UK, I have over 20 years' experience in Ecological Consultancy and run courses for the Chartered Institute of Ecology and Environmental Management (CIEEM), Field Studies Council and The Mammal Society and a range of bat and other ecology and conservation courses for Ecology Training UK.


As part of and in addition to the Certificate training, Catherine completed courses on Bat Ecology and Surveying, Surveying Building for Bats, Bat Activity Surveys: Emergence and Transects, Bats and Developments, Surveying Building for Bats and Surveying Trees for Bats. Training included practical work and surveys under my supervision, I hold a level 4 Bat Licence from Natural England and have held a bat licence for 22 years.

Catherine has also completed BCI training on bat ecology and survey techniques and volunteers her time with Bat Conservation Ireland on the Bat Panel and the Daubenton's Bat Survey and Brown Long-eared Bat Survey. Having gained survey experience under experienced ecologists and completed surveys using non-invasive techniques independently, she is now seeking to advance her surveying abilities with a Derogation Licence.

Catherine is committed to working to the highest standards, following accepted best practice guidelines and techniques and keeping up to date with current legislation and ecological industry practices. As such we at ETUK fully support Catherine in her professional development and her quest for a Derogation Licence to survey all bat species in Ireland for scientific research and educational purposes.

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

Yours sincerely,



Susan Searle BSc PGDip MCIEEM
Principal Ecologist
Level 4 Natural England Bat Licence, Welsh and Scottish Bat Licence.