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Wildlife Licence Unit
Department of Culture, Heritage and the Gaeltacht
National Parks and Wildlife Service
Wildlife Licensing Unit, R. 2.03
90 King Street North
Smithfield
Dublin 7 D07 N7CV

12 March 2025

Re: Supporting Information for Application for
Annual General Bat Survey License/Roost Disturbance License 2025.

Dear Sir/Madam,

I wish to apply for an annual general bat survey license/roost disturbance license to allow me to survey bat roosts as necessary in my job as an independent consultant ecologist, mainly specialising in bat surveys. A bat survey license is necessary to allow examination of known and potential bat roosts, including all bat species and all roost types, in order to undertake environmental impact assessments for property owners or developers or scientific study within the Republic of Ireland.

Also emailed with this letter of application please find;

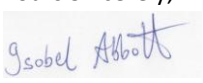
- NPWS Application Form for a Bat Derogation License.
- Appendix A: Supporting Information - NPWS checklist of items to be included with a derogation license application.

I previously emailed the following in January 2025 to wildlife.reports@npws.gov.ie and wildlifelicense@npws.gov.ie. Let me know if you need me to email these to the new reg54derogations@npws.gov.ie email address?;

- License return for my most recent annual (2-year) bat survey license, DER/BAT 2023-01.
- Article 16 Regulation 54 License Return Form for DER/BAT 2023-01 for 2023.
- Article 16 Regulation 54 License Return Form for DER/BAT 2023-01 for 2024.

Please do not hesitate to contact me if you require any further information.

Yours Sincerely,



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Appendix A. NPWS Derogation License Application Form: Checklist of Items to be Included with Applications

The NPWS Application Form for a Derogation License includes the checklist below of information to be included with applications;

"Please append a detailed report to support this application and ensure that it contains the following information:"

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.	☑
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.	☑
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.	☑
11.4	As much information as possible to allow a decision to be made on this application.	☑

Section 11.1: Consideration of Available Options and Alternatives

There is no viable alternative to obtaining a license to conduct bat surveys (or a license for roost disturbance) when you work as a consultant ecologist, mainly specializing in bats surveys. Detailed bat surveys, requiring observations and data collection at bat roosts using a range of survey techniques, are required by many projects, as bat roosts and bats themselves are legally protected under Irish and European legislation. During the course of consultancy work, I often discover new bat roosts, which I then need to re-visit for further roost characterisation surveys. I also need to carry out monitoring and inspections in known or potential bat roosts, to investigate the effectiveness of bat mitigation measures, or monitor bat numbers, for example.

Section 11.2: Bat Populations' Favourable Conservation Status

The actions permitted by a derogation license to conduct bat surveys will not be detrimental to the maintenance of bat populations 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. I do not make alterations to the roost structure or physically handle bats as part of routine bat surveys, and endeavor to minimise roost disturbance as outlined in the response to Section 11.3 below. Frequently, the main aim of bat surveys is to help developers avoid injury or distress to any bat species, and to conserve bat populations, during the course of various proposed projects/developments. By finding bat roosts and giving appropriate guidance on bat protection/licensing/mitigation, bat colonies have been protected.

Section 11.3: Bat Mitigation Measures

I follow up to date guidelines for bat surveys as per;

Collins, J. ((editor). (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition. Bat Conservation Trust UK.

Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat Mitigation Guidelines for Ireland v2. Irish Wildlife Manuals No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

There is typically little disturbance to bat roosts caused by the techniques used to discover and monitor bat roosts (e.g. dusk emergence surveys, dawn return surveys, visual/endoscope searches in buildings for bat signs or bats themselves, filming with IR camera as part of emergence surveys, passive monitoring using acoustic bat detectors).

I also follow the protocol below, that was included by the NPWS in the grant of my most recent roost disturbance license:

"Bat Roost Survey Protocol to ensure minimisation of disturbance to bats

For unknown roosts

a. Check with owner/client re presence of bats.

b. Check with Bat Conservation Ireland to determine roost records.

c. Survey for external signs of bats and roost entry points. If positive signs then treat as known /suspected roost.

d. Entry to possible roost should be made cautiously especially if survey is carried out in the winter period when signs of bats may be difficult to find. Should signs of bats be noted then treat as a known/suspected roost.

For known/suspected roosts

a. Generic measures to include:

i. Avoid using roost illumination apart from torches.

ii. Talking in low tone is preferred to whispering.

iii. Bats seen in situ should be counted where possible and then left alone.

iv. Handling of bats to confirm identification is only used as a last resort and is subject to separate licencing under the Wildlife Acts (S.23).
v. Samples of droppings, dead bats etc may be removed to facilitate species identification.
vi. Care to be taken to avoid cooling or warming effects as described below.

b. During potential hibernation season (November-March), only one person should enter roost area. If any hibernating bats are seen to be showing signs of waking then the roost survey will be abandoned immediately.

c. During the breeding season, known breeding roosts should be avoided unless emergency work is required. This will usually be the subject of a separate derogation licence." (text from last NPWS annual bat survey license)"

Section 11.4: Other Information

Outline of qualifications/experience in conducting bat surveys.

I have been consistently doing bat research and bat survey work since 2007 when I did my final year undergraduate project in UCC on the effects of sewage effluent on bats and their insect prey (Abbott *et al.*, 2009). In 2012, I then completed a PhD at UCC on the assessment of the effectiveness of bat mitigation measures employed on Irish national road schemes (Abbott 2012; Abbott *et al.* 2012b; Abbott *et al.* 2012a; Abbott *et al.* 2015).

Since starting Abbott Ecology in 2012, I work as a freelance ecological consultant, specialising in bat surveys, impact assessments, mitigation planning and monitoring. I have conducted bat surveys for a wide range of projects, including national bat monitoring programmes, road construction, wind farms, solar farms, bridge repairs, and residential, community, and industrial developments. I often sub-contract as a bat specialist with larger ecological consultancies.

I have gained a range of experience in capturing and handling bats over the years, including helping Cork County Bat Group with bat box checking, and collecting grounded bats so they could be rehabilitated. I've also gained experience in identifying, sexing, taking biometric measurements and DNA samples, and attaching transmitters to bats through radio-tracking projects as follows; (i) Vincent Wildlife Trust radio-tracking of Lesser Horseshoe Bats from a roost in Sneem, Co. Kerry in Aug 2007, with practical guidance from Conor Kelleher and Henry Schofield, (ii) radio-tracking of Lesser Horseshoe Bats from a roost near Ennis, Co. Clare in May 2009 and (iii) from Aug-Sep 2010, again with guidance from Conor Kelleher, (iv) radio-tracking of Lesser Horseshoe Bat and other bat species as part of EcIA of the Galway City Transport Project (GCTP) with Scott Cawley Ltd. and Greena Ecological Consultancy Ltd during Jul-Sep 2014 (v) and again for the GCTP in May 2015.

Further experience of bat capture and handling includes capture of bats using harp traps and mist nests at a number of underground autumn swarming sites in Northern Ireland during Aug-Nov 2013 under guidance from Dr. Daniel Buckley (Buckley *et al.*, 2014).

I have supervised and given a number of bat ecology toolbox talks to contractors working at bat roosts during the course of consultancy work. Recent on-the-job bat handling experience have been provided to the NPWS in a separate application for a renewal of my annual bat capture and handling license.

References

Abbott, I.M. (2012) *Assessment of the Effectiveness of Bat Mitigation Measures Employed on Irish National Road Schemes*. University College Cork.

Abbott, I.M., Berthinussen, A., Stone, E., Boonman, M., Melber, M. & Altringham, J. (2015) Bats and Roads. *Handbook of Road Ecology*, pp. 290–299. John Wiley & Sons, Ltd, Chichester, UK.

Abbott, I.M., Butler, F. & Harrison, S. (2012a) When flyways meet highways – The relative permeability of different motorway crossing sites to functionally diverse bat species. *Landscape and Urban Planning*, **106**, 293–302.

Abbott, I.M., Harrison, S. & Butler, F. (2012b) Clutter-adaptation of bat species predicts their use of under-motorway passageways of contrasting sizes - a natural experiment (ed N Bennett). *Journal of Zoology*, **287**, 124–132.

Abbott, I.M., Sleeman, D.P. & Harrison, S. (2009) Bat activity affected by sewage effluent in Irish rivers. *Biological Conservation*, **142**, 2904–2914.

Buckley, D., Abbott, I.M., Montgomery, W.I., Reid, N. 2014. Confirmation of swarming sites for bats in Northern Ireland. Report prepared by the Natural Heritage Research Partnership (NHRP) between Quercus, Queen's University Belfast and the Northern Ireland Environment Agency (NIEA) for the Research and Development Series No. 13.