

Application for Derogation Under the European Communities (Birds and Natural Habitats) Regulations 2011 – 2021

Supplementary Information provided by Mary Sheehan, District Conservation Officer, Killarney National Park on 06/01/2025

This application for a Derogation Licence is required in order for the NPWS Regional staff (Conservation Rangers and District Conservation Officer) in Killarney National Park to monitor Bat populations including Lesser Horseshoe *Rhinolophus hipposideros* bat roosts.

These proposed bat surveys will help to fulfil the Department's monitoring requirements under Article 11 of the Habitats Directive and are necessary to underpin our Article 17 conservation status assessments. The data will be collected using the Lesser Horseshoe Bat Roost Monitoring application. This will require inputting the results of each of the counts and identifying any Pressures and Threats to each roost.

The Lesser Horseshoe Bat species action plan 2022 – 2026 (NPWS & VWT (2022) Lesser Horseshoe Bat Species Action Plan 2022- 2026. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland) Action 4.1h states: "4.1h ACTION: Continue monitoring winter and summer roosts annually and keep the national database up to date. WHO: NPWS, VWT, NPWS database contractor WHEN: Annually"

The methodology is described in Irish Bat Monitoring Programme 2018-2021 (Aughney, T., Roche, N. and Langton, S. (2022) Irish Bat Monitoring Programme 2018-2021.) Irish Wildlife Manuals, No. 137. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland. No suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations to monitor winter roosts annually.

The staff listed in the attached application are trained and experienced bat surveyors. Any inexperienced bat surveyors will be accompanied and supervised by an experienced bat surveyor. All applicants are familiar with the Department's Bat Mitigation Guidelines (2022) and the Department's guidance on the Strict Protection of Annex IV species. They will follow the NPWS roost survey protocol at all times.

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.