



NPWS

An tSeirbhís Páirceanna
Náisiúnta agus Fiadhúlra
National Parks and Wildlife
Service

Application for Derogation Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended

Revision 2.0 – July 2025

- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (“the Regulations”) **or** any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.
- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > ([3D Application Form](#))
- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.
- Please read and familiarise yourself with the [NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)
- Please read and familiarise yourself with the [European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)
- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.
- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.
- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: reg54derogations@npws.gov.ie
- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department’s Open Data website.
- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**. **If this application is being submitted on behalf of a third party, please also complete Part B below.**

1. (a) Name of Applicant

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
[Mr]	[Daniel]	[Connell]
(b) Company Name, if applicable	[CECS – Connell’s Ecology and Conservation Services]	
(c) Address Line 1	[9 Gort an Ghabhann]	
Address Line 2	[]	
Town	[Claregalway]	
County	[Galway]	
Eircode	[H91 RT0X]	
(d) Contact number	[██████████]	
(e) Email address	[██████████]	
(f) Address where works are to be carried out if different from (b) above.		
Address Line 1	[]	
Address Line 2	[]	
Town	[]	
County	[]	
Eircode	[]	

Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

1. (b) Name of Person/Ecologist

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
[Mr]	[Daniel]	[Connell]
(b) Company Name	[CECS – Connell’s Ecology and Conservation Services]	
Address Line 1	[9 Gort an Ghabhann]	
Address Line 2	[]	
Town	[Claregalway]	
County	[Galway]	
Eircode	[H91 RT0X]	
(c) Contact number	[██████████]	
(d) Email address	[██████████]	
(e) Relationship to Applicant	[Self]	

Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat
- Otter
- Kerry Slug
- Natterjack Toad
- Dolphin
- Whale
- Turtle
- Porpoise

2. Please detail the exact species (scientific name): All Bat Species (Chiroptera)

3. Please provide the maximum number of individuals affected* Unknown at Present

4. Please provide the maximum number of breeding or resting sites affected* Unknown at Present

5. Please provide the maximum number of eggs to be taken* Unknown at Present

6. Please provide the maximum number of eggs to be destroyed* Unknown at Present

*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

Daniel Connell has in the past been granted general derogation licences to be involved in any works listed as either Full Licensee or Trainee under supervision of a named Full Licensee – work is for entry to a known roost (disturbance) or handling/capture of bats. Licence is for:(a) Roost disturbance; (b) Handling/capture of bat species (c) Actions authorised within the licence used for carrying out inspections of known or suspected roost sites, while separate derogation licences have been applied for on a project specific basis where required. Daniel is a trained bat ecologist, including internal and external building roost inspection, tree roost identification and inspection training, and endoscope training. He has prepared derogation licences for bats and their roosts, and overseen the discharge of licence obligations. He has conducted bat Surveys for large infrastructure projects within Ireland, as well as targeted species-specific and protect species surveys on behalf of private clients and ENGOS; from AA, NIS, EclA, and EIAR ecology reports for construction, infrastructure, forestry, solar, and windfarm projects, to conservation initiatives for national wildlife groups and individual clients.

Recent bat surveys Daniel has project-managed include, but are not limited to: Glennamong Wild Western Peatlands Project, Coillte (2025); Tralee Solar Farm Project, Fehily Timoney (2025); Actions for Nature Plan (Various Clients) (2025); Ballyfeeny, Crag, Milane Hill, and Killadeer windfarms (2024 – 2025) on behalf of Greensource/Inis; N6 GCRR (2023-2024) on behalf of Scott Cawley; Ballinasloe Strategic Housing Project (2022) on behalf of Limshill Ltd; (no. 9) Solar Farm projects in Cork, Meath, and Offaly, respectively, on behalf of Entrust Planning Services (2020-2022); N17/R320 Junction Upgrade at Lisduff to the southeast of Claremorris town in Co Mayo, on behalf of BAM (2021); and N59 Moycullen Bypass (2021 – 2022), on behalf of Wills Bros.; including applying for Bat Derogation licences with the NPWS Wildlife Licence Unit. Daniel has also volunteered with Bat Conservation Ireland (BCI) and the Vincent Wildlife Trust (VWT), respectively, on a variety of Bat conservation initiatives, and has advised clients, local

ENGOs and Citizen Scientists on Bat surveying techniques, appropriate Bat Box Schemes, and mitigation measures.

7. Species of Plant: Please indicate which species is/are the subject of the application:

- Killarney Fern
- Slender Naiad
- Marsh Saxifrage

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

Recent Derogation Licences include: DER-BAT-2025-208; C044/2025; DER/BAT 2024-53; C29/2024; DER/BAT 2024 – 96; also N59 Maigh Cuilinn (Moycullen) Bypass 2023.

9. Proposed Dates for Activities: Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

Start Date:	01.01.2026
End Date:	31.12.2026

Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

Regulation 51	
Deliberately capture or kill any specimen of the relevant species in the wild	<input checked="" type="checkbox"/>
Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	<input checked="" type="checkbox"/>
Deliberately take or destroy eggs of the relevant species in the wild	<input type="checkbox"/>
Damage or destroy a breeding or resting place of such an animal, or	<input type="checkbox"/>
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	<input type="checkbox"/>
Regulation 52	
Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	<input type="checkbox"/>
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 13(1)(b) of the Habitats Directive.	<input type="checkbox"/>

Further information should be provided in the format set out in Part E: Template for Supporting Information

Part D: Derogation Tests

Note: The following summary information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information

Test 1: Reason for the Derogation

1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats) Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

a.	In the interests of protecting wild flora and fauna and conserving natural habitats (proceed to 2a)	<input type="checkbox"/>
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property (proceed to 2b)	<input type="checkbox"/>
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 (proceed to 2c)	<input checked="" type="checkbox"/>
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 (proceed to 2d)	<input checked="" type="checkbox"/>
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 (proceed to 2e)	<input type="checkbox"/>

2a. In the interests of protecting wild flora and fauna and conserving natural habitats:

- i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

N/A

- ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

N/A

2b) To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

N/A

2c) 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:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

<p>This derogation licence is being sought for conducting bat-related surveys in relation to ecological assessments for plans and projects and biodiversity studies. Some of these surveys require entry into known or suspected bat roosts at various times of the year to determine the presence or absence of bats and the status of the roost site. In conducting ecological assessments in relation to bats, it is important to identify and assess the use of a suspect roost and bat roosting features and to document this.</p> <p>This derogation licence will be used for survey only, Daniel Connell would be considered a suitability trained and proficient ecologist and will maintain the welfare of the bat(s) and insure minimum level of disturbance as possible. The granting of the derogation will not be will not be detrimental to the maintenance of the population of any bat species.</p> <p>Preference to identifying these elements would be conducted via non-intrusive methods such as ground visual assessment, manual/automated detectors during emergence/re-entry surveys and use of an IR camera. However, this may not be feasible in hard to view or difficult to access areas and may require close inspections of potential roost features in trees/ crevices or entry into a suspected bat roost. This can confirm if features are suitable for potential roosting bats and/or if there is evidence of bats, using torchlight and an endoscope in a careful and sensitive manner. This derogation licence would aim to inform potential mitigation measures and strategies. All surveys will follow UK and Ireland good practice guidelines as outlined by CIEEM, Bat Conservation Ireland, and Bat Conservation Trust.</p> <p>Daniel is a trained bat ecologist, including internal and external building roost inspection, tree roost identification and inspection training, and endoscope training. He has prepared derogation licences for bats and their roosts, and overseen the discharge of licence obligations. While at Scott Cawley, Daniel experienced bat handling training under the guidance of Neil Middleton, as part of internal training.</p>

ii) Where the reason is 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”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

This derogation licence is being sought for conducting bat-related surveys in relation to ecological assessments for plans and projects and biodiversity studies. Some of these surveys require entry into known or suspected bat roosts at various times of the year to determine the presence or absence of bats and the status of the roost site. In conducting ecological assessments in relation to bats, it is important to identify and assess the use of a suspect roost and bat roosting features and to document this.

Preference to identifying these elements would be conducted via non-intrusive methods such as ground visual assessment, manual/automated detectors during emergence/re-entry surveys and use of an IR camera. However, this may not be feasible in hard to view or difficult to access areas and may require close inspections of potential roost features in trees/ crevices or entry into a suspected bat roost. This can confirm if features are suitable for potential roosting bats and/or if there is evidence of bats, using torchlight and an endoscope in a careful and sensitive manner. This derogation licence would aim to inform potential mitigation measures and strategies.

All surveys will follow UK and Ireland good practice guidelines as outlined by CIEEM, Bat Conservation Ireland, and Bat Conservation Trust.

Daniel Connell is a trained bat ecologist, including internal and external building roost inspection, tree roost identification and inspection training, and endoscope training. He has prepared derogation licences for bats and their roosts, and overseen the discharge of licence obligations. While at Scott Cawley, Daniel Connell experienced bat handling training under the guidance of Neil Middleton, as part of internal training.

He has conducted bat Surveys and worked as an Ecological Clerk of Works (ECoW) for large infrastructure projects within Ireland, as well as targeted species-specific and protect species surveys on behalf of private clients and ENGOS; from AA, NIS, EclA, and EIAR ecology reports for construction, infrastructure, forestry, solar, and windfarm projects, to conservation initiatives for national wildlife groups and individual clients.

If Daniel Connell is unable to conduct these surveys to accurately and appropriately assess the presence/absence of bat species, ensure their protection, and be in a professional position to provide the level of detailed information, recommendations, and suitable mitigation measures to his clients on how to maintain/restore/enhance the favourable status of the respective roost/bat species, this will have financial implications for him as a Freelance Bat Specialist/Ecologist.

Daniel Connell is requesting a licence to carry out the following activities restricted under the Wildlife Act and Birds and Natural Habitats Regulations 2011:

- To carry out bat roost surveys (Country-wide) including entry to known roosts to collect scientific data;
- To use endoscope to explore inaccessible locations in structures and trees;
- To capture bats by hand net, harp trap, by hand, and by mist net;
- To photograph bats within roosts for scientific and research purposes (Country-wide).

Daniel Connell has undertaken a variety of bat-related surveys in relation to environmental impact assessments for proposed developments. Some of these surveys require entry into known or suspected bat roosts at various times of year to determine the presence or absence of bats and the status of the roost site.

Often new bat roosts are only revealed during surveys and in the absence of a Licence the survey must be ceased, preventing collection of useful information. A licence is therefore requested to enter roosts as part of standard bat surveys. |

2d) 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:

- i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species.¹

| This derogation licence will be used for survey only, Daniel Connell would be considered a suitability trained and proficient ecologist and will maintain the welfare of the bat(s) and insure minimum level of disturbance as possible. The granting of the derogation will not be will not be detrimental to the maintenance of the population of any bat species.

This derogation licence is being sought for conducting bat-related surveys in relation to ecological assessments for plans and projects and biodiversity studies. Some of these surveys require entry into known or suspected bat roosts at various times of the year to determine the presence or absence of bats and the status of the roost site. In conducting ecological assessments in relation to bats, it is important to identify and assess the use of a suspect roost and bat roosting features and to document this.

Preference to identifying these elements would be conducted via non-intrusive methods such as ground visual assessment, manual/automated detectors during emergence/re-entry surveys and use of an IR camera. However, this may not be feasible in hard to view or difficult to access areas and may require close inspections of potential roost features in trees/ crevices or entry into a suspected bat roost. This can confirm if features are suitable for potential roosting bats and/or if there is evidence of bats, using torchlight and an endoscope in a careful and sensitive manner. This derogation licence would aim to inform potential mitigation measures and strategies. All surveys will follow UK and Ireland good practice guidelines as outlined by CIEEM, Bat Conservation Ireland and Bat Conservation Trust.

Daniel is a trained bat ecologist, including internal and external building roost inspection, tree roost identification and inspection training, and endoscope training. He has prepared derogation licences for bats and their roosts, and overseen the discharge of licence obligations. While at Scott Cawley, Daniel experienced bat handling training under the guidance of Neil Middleton, as part of internal training.

He has conducted bat Surveys and worked as an Ecological Clerk of Works (ECoW) for large infrastructure projects within Ireland, as well as targeted species-specific and protect species surveys on behalf of private clients and ENGOS; from AA, NIS, EclA, and EIAR ecology reports for construction, infrastructure, forestry, solar, and windfarm projects, to conservation initiatives for national wildlife groups and individual clients. |

¹ Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

2e) 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

i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

N/A

ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

N/A

Test 2: Absence of Alternative solutions

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the “do-nothing” alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Alternative Solution	Reasons for “Unsatisfactory”
Do-Nothing	<p>Alternative solutions were considered, and none are available in this instance.</p> <p>In the absence of this derogation licence, as bats are a protected species, Daniel Connell would be unable to carry-out his role as a freelance Bat Specialist in line with best practices, e.g. those detailed in ‘Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)’, Collins (2023).</p> <p>This license will enable Daniel Connell to carry out Internal preliminary roost assessments, seasonal bat surveys, and preconstruction checks of trees and buildings using an endoscope and internal inspection to verify the presence of bats in a suspected roost.</p> <p>Daniel Connell can then use this information to advise his clients on projects during the planning stages, for instance to alter elements of the design to prevent impact to bat roosts, or in cases where the project cannot be altered, to recommend appropriate mitigation to reduce the impact to bats such as lighting design, etc.</p> <p>He can also use this license to monitor bat boxes which have been erected as mitigation for projects to determine if they are being used and if the mitigation is effective, including the handling bats in case of emergence transfer to alternative bat boxes, should any damage have occurred to an existing bat box.</p>
Emergence Surveys/External Observations	<p>Daniel Connell has considered other methods of surveying, such as emergence surveys/external observations, but the results of these surveys are proven not to be as conclusive as internal surveys in determining</p>

the presence or absence of bats, nor the accurate size and classification (maternity, satellite, day/night, summer/winter, etc.) of the roost, especially if the potential roost features are difficult to see, and potential ingress and egress points are obscured or unsafe to access externally.

In relation to trees, Collins (2023) guidance states that “Emergence surveys are only recommended for trees in a limited number of circumstances. This includes where bat presence is already known (for example because a radio-tagged bat has returned to a roost or a roost has been identified through inspection surveys during the daytime before the survey) and roost characterisation is necessary. These surveys may also be required where a feature cannot be safely accessed for inspection (e.g. dead tree) or may be damaged by close inspection (e.g. lifted bark) – these are circumstances where emergence surveys might be the only option.”. Therefore, when assessing trees, it is recommended to use tree climbing and inspect potential roost features with an endoscope to determine presence/likely absence of bats in trees.

In relation to buildings, internal inspection is important for determining what type of roost and the number of individuals using the building. If it is possible to examine all internal areas (including voids and crevices) thoroughly and no evidence of bats is found, then Collins (2023) states further surveys are not needed. If the internal inspection cannot conclusively rule out the absence of bats, then supporting emergence surveys are recommended based on the suitability of the building to support roosting bats based on the results of the internal inspection.

Internal inspection is the most robust method of determining the presence/likely absence of bats. In the absence of this pertinent information, there is a risk that both suspected and known bat roosts in

	trees/buildings could eventually fall into an advanced state of dereliction and be lost entirely as roosting structures for bat species.
Professional Reasons	<p>If Daniel Connell is unable to conduct these surveys to accurately and appropriately assess the presence/absence of bat species, ensure their protection, and be in a professional position to provide the level of detailed information, recommendations, and suitable mitigation measures to his clients on how to maintain/restore/enhance the favourable status of the respective roost/bat species, this will have financial implications for him as a Freelance Bat Specialist/Ecologist.</p> <p>Daniel Connell is requesting a licence to carry out the following activities restricted under the Wildlife Act and Birds and Natural Habitats Regulations 2011:</p> <ul style="list-style-type: none"> • To carry out bat roost surveys (Country-wide) including entry to known roosts to collect scientific data; • To use endoscope to explore inaccessible locations in structures and trees; • To capture bats by hand net, harp trap, by hand, and by mist net; • To photograph bats within roosts for scientific and research purposes (Country-wide). <p>Daniel Connell has undertaken a variety of bat-related surveys in relation to environmental impact assessments for proposed developments. Some of these surveys require entry into known or suspected bat roosts at various times of year to determine the presence or absence of bats and the status of the roost site.</p> <p>Often new bat roosts are only revealed during surveys and in the absence of a Licence the survey must be ceased, preventing collection of useful information. A licence is therefore requested to enter roosts as part of standard bat surveys. </p>

* Please insert additional rows above if needed

Test 3: Impact of a Derogation on Conservation Status

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the derogation 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. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

See Page Below

This licence is not specific to any location and will support Daniel Connell's work as an ecologist and its intended aim is to allow Daniel to contribute to maintaining/enhancing the Favourable Conservation Status of All Bat Species in Ireland. This derogation licence will be used for survey only, Daniel Connell would be considered a suitably trained and proficient ecologist and will maintain the welfare of the bat(s) and insure minimum level of disturbance as possible. The granting of the derogation will not be detrimental to the maintenance of the population of any bat species.

Daniel Connell will follow a strict protocol outlined below to ensure the minimum disturbance:

Protocols for the Protection of Bats During Works

Bat Roost Survey Protocol to ensure minimisation of disturbance to bats (this does not cover health and safety risk assessments which are carried out)

For unknown roosts

- Check with owner/client re presence of bats.
- Survey for external signs of bats and roost entry points. If positive signs then treat as known /suspected roost.
- 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.
- Use of endoscope is to treat crevice/tree cavity as suspected roost, with insertion being conducted in a slow manner

For known/suspected roosts Generic measures to include:

- Avoid using roost illumination apart from torches
- Talking in low tone is preferred to whispering
- Bats seen in situ should be counted, photographed only if necessary and then left alone
- Handling of bats to confirm identification is only used as a last resort. This may be necessary for suspected Whiskered/Brandt's bat roosts
- Samples of droppings, dead bats etc may be removed to facilitate species identification
- Care to be taken to avoid cooling or warming effects as described below

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

During the breeding season, known breeding roosts will be avoided unless emergency work is required. This will only be conducted under a separate granted derogation licence associated with the works.

Photography in roosts

The following protocols will be complied with to minimise the risk of injury or death to bats being photographed or filmed:

Photography will not take place in nursery areas of roosts.

Photography will be minimised in roosts and will comprise taking high-resolution photographs using a standard digital camera with flash at a minimum distance of 3 metres from the bats. This will allow images to be zoomed digitally rather than putting the flash close to bats

- No bats will be handled during photography
- Video footage may be taken of bats emerging from roosts or swarming around roosts and stills taken from this footage
- Use of endoscope is to treat crevice/tree cavity as suspected roost, with insertion being in a slow manner.

Photograph will be taken if bat is present and best identifiable

These measures will serve to minimise disturbance of bats in their roosts by taking photographs.

Daniel Connell has undertaken a variety of bat-related surveys in relation to environmental impact assessments for proposed developments. Some of these surveys require entry into known or suspected bat roosts at various times of year to determine the presence or absence of bats and the status of the roost site. Often new bat roosts are only revealed during surveys and in the absence of a Licence the survey must be ceased, preventing collection of useful information.

A licence is therefore requested to enter roosts as part of standard bat surveys. |

Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

- 1) Table of Contents
- 2) Introduction
 - a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
 - b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) involved in the preparation of the application and those responsible for carrying out the proposed activity.
 - c. If this application is for the carrying out of surveys that may cause disturbance, qualifications of all involved must be provided and trainees must be clearly identified.
- 3) Background to proposed activity including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.
- 4) Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.
- 5) Ecological Survey and site assessment (Not required for applications to carry out surveys)
 - a. Pre-existing information on species at location and environs.
 - b. Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the relevant geographic scale (Test 3))
 - c. Objective(s) of survey
 - d. Description of Surveys Area
 - e. Survey methodology (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.
 - f. Survey results including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred.
 - g. Population size class assessment.
- 6) Evidence to support the Derogation Tests
 - a. Test 1 - Reason for Derogation:
 - i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

- ii. Applicants are advised to read the guidance published by the NPWS '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.1.
 - b. Test 2 - Absence of Alternative Solutions
 - i. Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives in a clear and objective manner. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.
 - ii. Applicants are advised to read the guidance published by '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.2.
 - c. Test 3 - Impact of a derogation on Conservation Status
 - i. Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied.
 - ii. Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.
 - iii. Applicants are advised to read the guidance published '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.3.
- 7) Monitoring the impacts of the derogations
 - a. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
 - b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
 - c. Applicants are advised to read the guidance published by the European Commission "[Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)" with specific reference to Section 3.4.

Part F. Declaration

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

Signature of the Applicant



Date [01/12/2025]

Name in BLOCK LETTERS

[Daniel Connell]

PRIVACY STATEMENT

See Privacy Statement at www.npws.ie/licences

npws.ie

Department of Housing, Local Government and Heritage



An Roinn Títhíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage