

Ferdia Keeley application accompaniment report.

Qualifications and Experience of Applicant

Name: Ferdia Keeley **Company:** Wildlife Surveys Ireland **Address:** 12 Killarney Parade, Phibsboro, Dublin, D07KX00 [REDACTED]

Qualifications

I have a BSc and am currently undertaking a diploma in applied ecology. He has completed training courses in :

- **Surveying trees for bats**-Flight ecology 2024.
- **Bat Identification and Survey Methods:** Beginner to Intermediate Level Course- Bat Conservation Ireland 2025.
- **Specialist Bat Trapping, Handling and Identification** Course -Bat Conservation Ireland 2025.

Relevant experience

I have taken part in ongoing Daubenton's monitoring programs since a young age, learning bat survey procedure through this. I have also been present for bat rehabilitation and have conducted a large number of bat surveys in the eight years I have worked as an ecologist in different capacities. A previous Regulation 54 derogation (DER-BAT-2025-27) was held and surveys were carried out under its conditions during 2025. A return was submitted to NPWS in respect of that derogation confirming the numbers of individuals and roosts affected.

Background to Proposed Activity

Wildlife Surveys Ireland is a registered company providing ecological survey services to clients across the Republic of Ireland. Bat surveys are commissioned by a range of clients including planning consultants, architects, developers, local authorities, landowners and research bodies. The need for bat surveys arises in a wide variety of contexts including:

- Pre-planning ecological assessment for development or renovation projects
- Tree surveys prior to surgery or felling where bat roost potential exists
- Assessment of structures prior to demolition or significant alteration
- Ecological research and monitoring
- Compliance with planning conditions requiring an ecological survey
- Providing mitigations for works.

In my time with Wildlife Surveys Ireland I have taken part in each of these areas of work.

All bat species present in Ireland are listed under Annex IV of the EU Habitats Directive and are afforded strict protection under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. A Regulation 54 derogation is therefore required before any survey activity that may involve disturbance to bats or inspection of potential roost sites can be lawfully undertaken.

The geographic scope of this application is the Republic of Ireland. Survey locations will vary depending on client requirements and cannot be specified in advance, as this is a general survey licence application rather than a site-specific one.

5. Evidence to Support the Derogation Tests

Test 1 — Reason for Derogation

This application is made under Reason (d) of Regulation 54(2) — for the purpose of research and education, and to allow surveys necessary to assess and protect bat populations at sites subject to development, renovation, tree surgery or demolition.

The surveys proposed are necessary to establish the presence or absence of bat species and roosts at survey sites, and to characterise roost type, species composition and population size class where roosts are encountered. This information is essential to ensure that any works at such sites are carried out lawfully and in a manner that protects bat populations. Without survey data, any works at sites with roost potential would risk unlawful disturbance to bats or destruction of roosts, constituting an offence under Regulation 51 of the Regulations.

The purpose of the surveys directly overrides the interests of strict protection of the species in the short term, in that some temporary disturbance may result from survey activity. However, this is outweighed by the longer-term conservation benefit of identifying and recording roosts, informing mitigation measures, and ensuring that development and land management activities are carried out in compliance with the Regulations.

Test 2 — Absence of Satisfactory Alternatives

The following alternatives were considered and rejected as unsatisfactory:

Do-nothing: Unsatisfactory. In the absence of survey data, it is not possible to determine the presence, absence or conservation status of bat species at any given site. Proceeding with works without survey data would risk unlawful disturbance to bats and/or destruction of roosts, constituting an offence under Regulation 51. The do-nothing option therefore, fails to protect either the bat population or the client from legal liability.

Desk study only: Unsatisfactory. Desk-based assessment of existing records held by NPWS, the National Biodiversity Data Centre and other sources can indicate the potential for bats to be present in a given area but cannot confirm presence or absence at a specific site, nor characterise roost type, species composition or population size. Physical survey is required to provide robust and legally defensible ecological data.

Passive acoustic monitoring only (no roost inspection): Unsatisfactory for all survey objectives where roost presence is suspected. Acoustic monitoring alone cannot confirm the location, extent or species composition of roosts within structures or trees. Internal roost inspection is required to fully assess roost status, identify species present and estimate population size class, all of which are necessary to inform appropriate mitigation design.

Test 3 — Impact on Conservation Status

All surveys will be conducted by a qualified ecologist in accordance with BCI best practice guidelines and IEEM guidance. Survey methods will be applied sensitively and with minimum disturbance to individual bats and roost sites. No bats will be harmed under this derogation.

The level of disturbance associated with the proposed survey methods is considered negligible at the population level. Walked transect surveys and static detector deployment involve no direct interaction with bats or roost sites. Emergence and re-entry surveys involve observation only, with no physical interaction. Internal roost inspections will be carried out with minimum disturbance, using low-intensity torchlight and/or an endoscope, and will be limited to the minimum necessary to achieve the survey objective.

Ireland supports a population of bat species which are considered to be at or near favourable conservation status at the national level. The minor and temporary disturbance that may result from survey activity under this derogation is not considered to be detrimental to the maintenance of any bat population at a favourable conservation status in its natural range.

Survey findings will be recorded and reported to clients and, where required, to NPWS, contributing positively to the knowledge base on bat distribution and roost locations in Ireland.

Objective of Application

The objective of this application is to obtain a derogation licence permitting the carrying out of bat surveys across the Republic of Ireland throughout the calendar year 2026. Surveys will be undertaken to determine the presence or absence of bat species, characterise bat activity, assess roost potential, and identify roost type, species composition and population size class where roosts are encountered. This information is required to inform ecological assessments in support of development, construction, renovation, tree surgery, demolition and research projects, in accordance with best practice guidance issued by Bat Conservation Ireland (BCI) and the National Parks and Wildlife Service (NPWS).

Monitoring and Reporting

Verification of Compliance Ferdia Keeley will maintain records of all survey activity carried out under this derogation, including site location, date, survey method, species recorded, and roost details where applicable. These records will be retained and made available to NPWS on request.

Return to NPWS A return will be submitted to NPWS at the end of the derogation period (or upon request) confirming the numbers of individuals, roosts and sites affected by survey activity under this derogation. The return will be submitted using the NPWS return form and will include all data collected during the derogation period.

Corrective Measures In the event that survey activity results in unanticipated disturbance or impacts to bats or roosts beyond those covered by this derogation, the applicant will cease the relevant activity immediately and contact the NPWS Wildlife Licensing Unit for guidance prior to resuming any works.

This report has been prepared by Ferdia Keeley, Wildlife Surveys Ireland, in support of an application for a Regulation 54 derogation for bat survey purposes under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.