
Supporting Information append application to renew Derogation Licence No. DER-BAT-2025-289

1. Contents

2. Introduction.....	1
3. Background.....	1
4. Proposed work related to this licence in 2026	2
5. Ecological Survey and site Assessment.....	2
6. Evidence to support the Derogation Tests	2
Test 1 - Reason for Derogation:.....	2
Test 2 - Absence of Alternative Solutions	2
Test 3 - Impact of a derogation on Conservation Status.....	2
7. Monitoring the impacts of the derogations	3

2. Introduction

This licence (Licence No. DER-BAT-2025-289) was granted to me as part of my education and monitoring work on behalf of Bat Conservation Ireland in 2025. I currently hold a licence to capture bats under Wildlife Acts 1976 to 2018 – Sections 23 and 34 (C197/2021). I have been licensed to capture & handle bats for more than 30 years since carrying out my PhD at the University of Warwick and being trained in bat handling by Phil Richardson under an English Nature Licence in 1994. I have held a licence to enter roosts off and on for a number of years (excepting the years of Covid).

This licence has been applied-for so that BCIreland can undertake a bat training workshops & monitoring and research in conjunction with different bat groups, agencies and researchers in Ireland for conservation and educational purposes.

3. Background

During training events in 2025 no bats were captured but a couple of bats were observed while in the roost – a resting Natterer’s bat in Netterville. Co. Meath (tower house) and a brown long-eared bat carrying out pre-emergence flight in the summerhouse in Netterville.

4. Proposed work related to these licences in 2026

BCIreland is planning a number of events in 2026 that will require the use of this licence. This includes up to three workshops to be conducted in August/September for the training of individuals on bat survey techniques. We also plan, time permitting, to do at least one ground truthing exercise in one of the woodland sites that are part of the newly established All-Ireland Woodland Bat Monitoring Scheme. In addition, there may be a filming event in Dunmore Cave in September (subject to OPW approval and receipt of a licence to film bats for the cameraman which will be applied-for in advance).

5. Ecological Survey and site Assessment

As per Part E guidelines of the main application this is not required for applications to carry out surveys

6. Evidence to support the Derogation Tests

Test 1 - Reason for Derogation:

The derogation licence is being sought as it is the only available option in that during our proposed workshops and ground truthing events we will be examining live bats for educational and scientific purposes. No alternative is possible in order to examine the morphological characteristics of bats for ID purposes, and for teaching these relevant skills to potential bat workers.

Test 2 - Absence of Alternative Solutions

The 'Do-Nothing' approach is not applicable in, for example, bat handling training or where biometric data from bats needs to be collected. There is no alternative to handling bats for these purposes.

A good amount of the work the BCIreland does can be achieved through digital information in the form of online information, publications and presentations (either online or in person). A certain amount of theoretical information can be relayed this way but when it comes to learning the more specialised skills in bat conservation work, handling of bats is necessary. Again, this is only done when it is necessary to deliver the educational/scientific objectives of a particular training scheme or monitoring project

Test 3 - Impact of a derogation on Conservation Status

The actions permitted by this derogation licence will not be detrimental to the maintenance of the populations of the bat species involved. This is because these activities will be

Bat Conservation Ireland Ltd.,

Registered Address:

Carmichael Centre, 4-7, North Brunswick Street, Dublin 7.



www.batconservationireland.org

coordinated by a competent individual with ample experience in surveying and handling bats, and nothing will be done to place the bats or their roosts at risk. As for previous years, any activities scheduled will be done so outside of the potential hibernation period for Irish bats (November-March) and, as per Article 12, will avoid periods of the rearing of young bats.

The main mitigation measures planned for any of the potential species that will be encountered are:

- Keeping noise levels to a minimum
- Keeping artificial light levels to a minimum (where possible, to only use red light sources) and to avoid direct illumination of bat roosts, if encountered. For more guidelines on lights and bats, see https://www.batconservationireland.org/wp-content/uploads/2013/09/BCIrelandGuidelines_Lighting.pdf
- Bats to be handled/processed as efficiently and quickly as possible to minimise any potential disturbance to them.

7. Monitoring the impacts of the derogations

Some of this section is not applicable in this case, however the derogation license will allow BC Ireland to conduct important bat monitoring and training activities that otherwise would not be possible. Details of our activities and the various reports that we produce from our work can be viewed here.

<https://www.batconservationireland.org/what-we-do/publications>

These reports are also submitted directly to the NPWS on an annual basis.

Yours sincerely,

Dr. Niamh Roche

Bat Conservation Ireland

Postal/Registered Address: Carmichael House, 4-7, North Brunswick Street, Dublin 7, D07 RHA8.

Website: www.batconservationireland.org

Social Media: [Bat Conservation Ireland - Home](#) | [Facebook](#) | <https://twitter.com/BatConservIre>