

All Ireland Bat Derogation Licence Supporting Document

July 2026

This report considers the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Quality Assurance

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The findings outlined within this report and the data we have provided are to our knowledge true and express our bona fide professional opinions. This report has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) good practice guidelines. Where pertinent CIEEM Guidelines used in the preparation of this report include the *Guidelines for Ecological Report Writing* (CIEEM, 2017a), *Guidelines for Preliminary Ecological Appraisals* (CIEEM, 2017b) and *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2024). CIEEM Guidelines include model formats for Preliminary Ecological Appraisal and Ecological Impact Assessment. Also, where pertinent, evaluations presented herein take cognisance of recommended Guidance from the EPA such as *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2022), and in respect of European sites, *Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (European Commission, 2019).

Due cognisance has been given at all times to the provisions of the *Wildlife Acts 1976-2024*, the *European Union (Natural Habitats) Regulations*, the *European Communities (Birds and Natural Habitats) Regulations 2011-2021*, EU Regulation on Invasive Alien Species under *EU Regulation 1143/2014*, the *EU Birds Directive 2009/147/EC* and *Habitats Directive 92/43/EEC*.

No method of assessment can completely remove the possibility of obtaining partially imprecise or incomplete information. Any limitation to the methods applied or constraints however are clearly identified within the main body of this document.

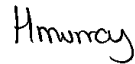
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Project Reference		Title	All Ireland Bat Derogation Licence Supporting Document	

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1. INTRODUCTION

Inis Environmental Consultants Ltd. (INIS) undertake specific bat assessments and surveys to be conducted at sites throughout the Republic of Ireland. This is to ensure the protection of any bat species during development and construction projects. This document seeks to support an application for derogation under regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

1.1. Statements of Authority

Howard Williams BSc CEnv MCIEEM CBiol MRSB MIFM is Lead Ecologist with INIS and signed off on this report. He is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He is a Chartered Environmentalist (CEnv) with the Society for the Environment (Soc Env) and a Chartered Biologist (CBiol) with the Society of Biology. Mr. Williams is principal ecologist with INIS Environmental Consultants Ltd and currently project manager on all INIS projects in the Republic of Ireland and the UK.

He has completed in excess of 100 bat surveys since 2000, held licenses to carry out bat surveys and disturb Annex II lesser horseshoe bats at roost sites. As part of his work, he has safely handled bats (Pipistrelles, Brown Long Eared and Leisler's) on occasion when they have been found on the ground during site investigations. He has also assisted with mist netting bats for scientific study under license.

Dr Alex Copland BSc PhD MEnvSc MCIEEM is Technical Director with INIS and has over 30 years of professional ecological experience working in both statutory and private companies, in third-level research institutions and with environmental NGOs. He is a full member of the Institute of Environmental Sciences (IES) and the Chartered Institute of Ecology and Environmental Management (CIEEM). He is proficient in experimental design and data analysis and has managed several large-scale, multi-disciplinary ecological projects, managing staff and resources to meet budgetary constraints and the successful delivery of projects on time. He is a licensed bird ringing trainer and has held an annual Section 32 ringing license since 2000, several restricted species licenses (for ringing species such as Barn Owls, terns and gulls) and several Section 22(9)(d) licenses in relation to disturbance of nesting birds. He also sits on the Editorial Panel of the scientific journal, *Irish Birds*, which publishes original ornithological research relevant to Ireland's avifauna, and CIEEM'S *Irish Policy Group*.

Emer Hannon BSc is the Team Lead Manager with Inis and has a BSc in Ecology and Environmental Biology. She has bat surveying experience including Preliminary Roost Assessments, bat activity surveys, and she has also worked with Bat Conservation Ireland as a volunteer for the All-Ireland Daubenton's Bat Waterways Surveys. She is experienced in Ecological Bird Survey techniques, both in the field and with data management. She has extensive training in team management and health and safety practices and processes. She is a Qualifying member of CIEEM.

Heather Murray BSc MSc is an Ecologist at Inis Environmental Consultants Ltd., and Team Lead for the Bat Ecology Team. Heather holds a BSc (Hons) in Animal and Conservation Biology from Edinburgh Napier University and a MSc in Environmental Management from the University of Stirling. She has four years' experience in environmental consultancy work throughout Scotland and Ireland. Heather is experienced in conducting bat transects, emergence and re-entry surveys on trees and buildings, static detector deployment and bioacoustics analysis as part of her role in the bat team. She is well

versed in the function and use of multiple brands and models of handheld bat detector and thermal cameras, in addition to receiving specific training for operation of FLIR thermal imaging cameras. She has previously conducted close inspection surveys on known bat roosting locations under licence using endoscopes and high-powered torches. She is also a qualifying member of CIEEM.

Chloe Finn BSc is an Assistant Ecologist with Inis Environmental Consultants Ltd. with a BSc in Zoology from UCC. Chloe has experience conducting a wide variety of surveys including bat activity surveys (Nighttime Bat Walkovers) and roost emergence surveys, all in line with best practice guidance, as well as working with Bat Conservation Ireland, conducting nocturnal surveys along waterways to monitor Daubenton's bat activity using bat detectors and standardized survey methods. She has over 5 years of ecology related experience through volunteer surveys and education and 10 months of experience within an environmental consultancy. She is a qualifying member of the Chartered Institute of Ecology and Environmental Management.

Katie Power BSc is an Assistant Ecologist at Inis Environmental Consultants Ltd. Katie has achieved a BSc (Hons) in Wildlife Biology from the Munster Technological University, Kerry. She has completed a wide array of ecological surveys including bat emergence, transects, static detector deployment and bioacoustic analysis. Prior to joining INIS, Katie gained for nearly four years of bat survey experience through volunteering and also worked on the Natterjack toad project for NPWS. She has one year of experience within the environmental consultancy sector.

Sheela Slattery BSc (Assistant Ecologist, INIS). Sheela is an assistant field ecologist. They are a Qualifying member of CIEEM. They received an BSc (Hons.) in Zoology from University of Galway in 2023. Their thesis was based on the effects of abiotic factors on bat activity on the campus ie. wind, rain, humidity, light and noise. Sheela is a member of the bat team at Inis and has 1 year and 9 months experience working professionally in Ecology.

Daelyn Purcell BSc is an Ecologist within Inis Environmental Consultants Ltd., holding a BSc (Hons) in Wildlife Biology from the Institute of Technology Tralee. Daelyn's expertise lies within the area of field ecology, with six years' experience conducting various ecological surveys in line with best practice guidelines with various Ecological Consultancies and has worked on several conservation projects with BirdWatch Ireland in previous years. Daelyn has experience conducting emergence surveys, transect surveys and static detector deployments in addition to use of handheld bat detectors thermal cameras. Daelyn is also a qualifying member of CIEEM.

Camille Groh MSc BSc ACIEEM: Camille is a field ecologist/project manager. BSc (Hons) in environmental science from Northeastern University and an MSc (Hons) in wildlife conservation and management from University College Dublin. Camille has conducted bat transect surveys and emergence surveys since 2022 for small-large windfarm projects. Has experience identifying species by call using standard handheld bat detectors. Camille has three years' experience working in consultancy in Ireland.

Chris McKiernan BSc ACIEEM (Ecologist, INIS): Chris is a field ecologist/project manager. They received a BSc in Ecology and Environmental Biology from UCC in 2020. Chris has conducted bat transect surveys and emergence surveys since 2022 for small-large windfarm projects. They experience identifying species by call using standard handheld bat detectors. Chris has six years' experience working in consultancy.

Kevin Mc Elduff BSc (Ecologist, INIS): Kevin is an Ecologist, Field Team Lead and Project Manager. He has a BSc (Hons) in Environmental Science from the University of Galway. Kevin has conducted

preliminary roost assessments, bat transects, night-time bat walkovers, and emergence and re-entry surveys since 2021 for a variety of projects including renewable energy projects, transport infrastructure projects, residential and mixed-use housing developments, utilities infrastructure projects, and protected buildings. He has experience identifying bat species using standard handheld bat detectors to analyse calls. He has four and a half years' experience working in environmental consultancy.

James O'Connell BSc ACIEEM (Ecologist, INIS): James is a field ecologist/project manager and. He was awarded a BSc (Hons) in Wildlife Biology from IT Tralee. Has conducted bat transect surveys and emergence and re-entry surveys since 2022 for small-large windfarm projects. Has experience in deploying static bat detectors on small-large scale windfarm projects since 2023. Has experience identifying species by call using standard handheld bat detectors and has five years' experience working in ecology and consultancy.

Natasha Collins BSc (Assistant Ecologist, INIS): Natasha is a field ecologist/project manager. She is an ecologist and was awarded an honours B.Sc. in Wildlife Biology from IT Tralee. They are a Qualifying member of CIEEM. Has conducted bat surveys since 2020 following best practice guidance for numerous projects. She has experience with PRAs, has located and assessed trees and structure as potential roost site. Natasha has also carried out emergence, transects and activity surveys for sensitive bat species to light pollution and windfarm projects. Natasha has six and a half years' experience working in consultancy.

Darren McCartney BSc (Hons) HDip ACIEEM Darren has worked in both the Field Ecology and GIS teams at Inis and is Associate member of CIEEM. He has conducted experience conducting Bat Emergence surveys, using handheld bat detectors and thermal cameras. He is also a qualified drone pilot. He has four and a half years' experience working in consultancy.

2. BACKGROUND TO THE PROPOSED ACTIVITY

Inis Environmental Consultants Ltd. (INIS) works on sites throughout the Republic of Ireland; therefore, it is highly likely that our work will cover areas where protected bat species will occur. To confirm if protected species are present on proposed development sites a desktop review is required before site work commences. Sources that are consulted within a desktop review include:

- Bat Conservation Ireland www.batconservationireland.org
- National Biodiversity Data Centre. Biodiversity Maps. <https://maps.biodiversityireland.ie/>
- National Parks and Wildlife Service. Maps and Data. <https://www.npws.ie/maps-and-data>

Typical projects which INIS would be required to complete bat survey for include:

- Renewable energy projects such as wind farm developments and solar farms throughout Ireland. These include ground level surveys for pre-construction of new wind farms, and repowering of existing wind farm sites.
- Grid connections for wind farms and renewable energy projects. These include close inspections of water crossings and buildings along the grid connection that may be impacted by the proposed works for evidence of roosting bats using endoscopes and high-powered torches.
- Construction projects such as building renovations for public works.

- Bat box inspections for public bodies using endoscopes to determine presence or absence of roosting bats within the structure.
- Ground level tree inspections for wind farms to determine roosting suitability for bats within the tree. Inspection may include endoscope surveys or inspection with high powered torch.
- Aerial inspection of preliminary roost feature at height including endoscope surveys and inspection with high powered torch.
- Aerial roosts reached by tree climbing.
- Hibernation surveys to determine if bats are using a building or feature to roost over winter. Close inspection of roosting features would require the use of an endoscope to detect bat presence.

A derogation licence has previously been granted on two occasions for bat inspections using endoscopes at water crossings along a grid route in County Tipperary, (**DER-Bat-2025-341** and **DER-Bat-2026-31**).

3. PROPOSED ACTIVITY

3.1 Tree Surveys

Ground level tree assessments are required to ascertain if trees can support roosts for individual bats or maternity roosts. These surveys are conducted on the ground by surveyors observing the roost with binoculars where the roost is visible. Methodology has been created and adapted from best practice guidelines published by Bat Conservation Ireland and the Bat Conservation Trust to observe and categorise roost features. In cases where a roost feature is present in the tree and is accessible from the ground an endoscope may be required to determine the presence or absence of bats to categorise the roost feature.

3.1.1 Aerial tree inspections

Where ground level assessments of potential roosts are not possible, INIS has provided tree climbing training to develop a team of tree climbing bat ecologists to assess roosting potential of a feature in a tree at height.

To confirm the presence or absence of bats on site in tree roost at height, an aerial inspection will be carried out by an appropriately trained surveyor ascending to the site of the roosting feature using ropes and then inspecting the roosting feature with an endoscope following recommended endoscopy guidelines as set out in Collins 2023. Where additional guidelines are published focusing on endoscope use in bat surveys, then methodologies will be updated to reflect these. This will be repeated on features deemed capable of holding maternity roosts (cracks deep enough or wide enough to hold more than three bats) for a maximum of three aerial visits.

The endoscope survey will be undertaken by an experienced ecologist in accordance with current best practice guidelines (Collins 2023). During inspection, the surveyor will look for direct presence of bats as well as indirect evidence such as droppings, urine staining or prey remains. Care will be taken to ensure that disturbance to any bats using the roosting feature is minimised. The endoscope will be inserted only as far as necessary to determine occupancy. Bright lights and loud noises will be avoided, and the duration of the check will be as short as possible

3.2 Buildings and Structure

Close inspection with an endoscope or high-powered torch is required to determine exact locations for roosting bats in buildings and structures. The endoscope survey will be undertaken by an experienced ecologist in accordance with current best practice guidelines (Collins 2023). During inspection, the surveyor will look for direct presence of bats as well as indirect evidence such as droppings, urine staining or prey remains. Care will be taken to ensure that disturbance to any bats using the roosting feature is minimised. The endoscope will be inserted only as far as necessary to determine occupancy and excessive bright lights and loud noises will be avoided. The duration of the check will be as short as possible.

Where it is not possible to access a structure via climbing then a thermal drone may be used to be flown close to the opening of the crevice and the feed observed for signs of bat presence within the structure. The drone will not enter the structure and the crevice will only be viewed from the outside.

3.3 Bat Boxes (emergences)

Close inspection with an endoscope is required to determine the number of bats occupying a box. The endoscope survey will be undertaken by an experienced ecologist in accordance with current best practice guidelines (Collins 2023). During inspection, the surveyor will look for direct presence of bats as well as indirect evidence such as droppings, urine staining or prey remains. Care will be taken to ensure that disturbance to any bats using the box is minimised. The endoscope will be inserted only as far as necessary to determine occupancy and excessive bright lights and loud noises will be avoided. The duration of the check will be as short as possible.

3.4 Hibernation surveys

Hibernation surveys may be carried out on a structure to determine the presence of roosting bats over winter. Suitable structures require high levels of humidity and constant temperatures throughout winter such as tunnels, caves, mines, cellars and lime kilns for example. Under guideline published by Collin 2023, the surveys would require close, systematic inspection of crevices within the structures to check for signs or presence of roosting bats.

Close inspection with an endoscope or high-powered torch is required to determine exact locations for roosting bats in buildings and structures. The endoscope survey will be undertaken by an experienced ecologist in accordance with current best practice guidelines (Collins 2023). During inspection, the surveyor will look for direct presence of bats as well as indirect evidence such as droppings, urine staining or prey remains. Care will be taken to ensure that disturbance to any bats using the roosting feature is minimised. The endoscope will be inserted only as far as necessary to determine occupancy and excessive bright lights and loud noises will be avoided. The duration of the check will be as short as possible.

4. EVIDENCE TO SUPPORT THE DEROGATION TASKS

4.1. Test 1 – Reason for Derogation

A derogation is being sought under Regulation 54(2)(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”

The proposed endoscope inspections at potential bat roosting features within proposed development sites in Ireland are necessary to determine the presence or likely absence of roosting bats. All bat species in Ireland are protected due to significant declines in their populations driven largely by habitat loss, disturbance, and fragmentation. Carrying out these surveys will contribute to an understanding of how bats are using the local environment and helps ensure they are not inadvertently harmed or displaced by proposed developments or renovation work. The inspection of potential roosting sites will enable the provision of suitable mitigation measures if required. This work reflects a precautionary approach that supports the public interest in maintaining healthy bat populations and wider ecosystem integrity.

4.1.1 Trees (Ground Level and Aerial Inspections)

Under best practice guidelines from The Bat Conservation Trust (Collins 2023) closer inspection of tree roosts is recognised as a more reliable and cost-effective way to check for bats in a highly volatile environment where roost-switching occurs regularly between individuals and trees and roost features can appear and disappear quickly in response to natural conditions.

Close inspection of roosting features allows for more precision when determining bat roosts in trees as some features may look ideal from the ground but upon closer inspection the feature may reveal that the roost feature is not hollow enough, too exposed or is collecting eater and would not be suitable for roosting bats.

Determining if a feature within a tree is not suitable for roosting bats eliminates the need for further surveys to be conducted on the tree, reducing disturbance and making better use of an ecologist’s time. Finding evidence of bats within trees such as droppings, staining or even individual bats help inform mitigation measures for the proposed development and can allow for the retention of trees within a development which contain active roosting features, helping to maintain bat populations throughout Ireland.

4.1.2 Buildings and Structures

Buildings are more reliable roosting features for bats, human error can lead to inaccurate location of roosting features as bats emerge very quickly and can often be missed by the naked eye. Where required close inspection of cracks and crevices in suitable buildings and structures will help to accurately identify roosting locations of bats will aid the planning of mitigation measures for proposed development so suitable roosting features can be retained.

This method of survey is particularly useful out of the summer season when emergence surveys are less likely to capture roosting bats emerging from structures and would likely be employed then to determine roosts when required.

4.1.3 Bat boxes

Using endoscopes on bat boxes will give a more accurate count of the number of bats using a box, as individuals can be missed by human error on emergence surveys. In addition to this, endoscope inspections on bat boxes are useful when surveys need to be conducted out of peak emergence season, such as winter months from October to March. This can give ecologists an idea of how well mitigation measures, such as bat boxes are doing to protect and enhance population numbers throughout Ireland. Surveys will only be carried out where deemed necessary or requested as part of a project.

4.1.4 Hibernation

Hibernation surveys are typically conducted out of peak bat survey season where emergence surveys would not be an option to count roosting bats. Cracks and crevices of hibernation sites are inspected to check for evidence of roosting bat and determine precise roosting locations. Mitigation measures can then be developed around these locations to protect and enhance bat populations within Ireland.

4.2. Test 2 – Absence of Alternative Solutions

4.2.1 Trees

The use of an endoscope to inspect the potential bat roost features within trees and within trees at height represents the only effective method to determine the presence or likely absence of roosting bats within these features. The potential roosting features are internal and not visible from the exterior. External inspections alone cannot confirm whether bats are roosting within these enclosed spaces, and they can't reliably identify signs such as droppings or staining inside the cavity. These checks with an endoscope are accepted as best practice for assessing small or concealed roosting features.

If bat presence is confirmed during an aerial inspection, then the ecologist will remove the endoscope and to avoid future disturbance, subsequent visits to the tree will be replaced by an emergence survey instead of an additional tree climb. However, this method may result in surveyors missing emergences as most bat species emerge after dark and are difficult to detect by human eye. Visual aids, such as thermal cameras can be used to help identify emergence events but differentiating bats from moving objects within the background of the video such as swaying branches from trees can also increase the chance of emergences being missed.

Following the Wildlife Act 1976 it is illegal to disturb nesting birds, therefore if a tree containing a bird's nest is identified as also containing a potential roosting feature for bats, then aerial inspections cannot be carried out. Instead, emergence surveys will be the preferred method of survey.

2.2 Buildings and Structures

The use of an endoscope to inspect potential bat roost features within buildings and other structures represents one of the most effective methods for determining the presence or likely absence of roosting bats. Many such features—such as cavities within walls, soffits, roof voids, or behind cladding—are enclosed and not visible from the exterior. Visual inspections from outside alone cannot confirm whether bats are using these spaces, nor can they reliably detect internal evidence such as

droppings, staining, or roosting remains. Endoscopic inspection is therefore widely accepted as best practice for assessing small, inaccessible, or concealed roosting features within built structures.

If evidence of bat presence is identified during an internal inspection, the endoscope will be withdrawn to minimise disturbance. To avoid repeated intrusion, any subsequent survey effort will typically rely on external emergence surveys rather than further invasive inspection. However, this approach may result in some limitations, as many bat species emerge after dark and can be difficult to observe directly, increasing the risk that some emergences may go undetected.

4.2.3 Bat Boxes

In the event an emergence survey is unable to be carried out then the next preferable survey method would be using an endoscope. For sites where bat box checks are required, emergence surveys will be the preferred method of surveying however there are limitations to performing emergence surveys on bat boxes, as mentioned in section 4.1.3.

4.2.4 Hibernation

There are little alternative solutions to conducting hibernation surveys with an endoscope as hibernation surveys are carried out in winter months when bats are hibernating and emergence surveys or static detector surveys are unlikely to record bats as they are less active than in summer months.

4.3. Test 3 – Impact of Derogation on Conservation Status

The inspections of potential bat roosts with an endoscope are minimally invasive and carried out in accordance with best practice and legal requirements. As such, the activity will have no negative effect on the conservation status of bat species in Ireland. All inspections will be undertaken by experienced ecologists following best practice guidelines to minimise disturbance to any bats using the features. Should a bat be observed during inspection or clear evidence of a roost identified the inspection will cease and the feature will be left undisturbed. This approach eliminates the risk of direct disturbance to roosting individuals. These potential roost feature inspections form part of a wider process to ensure that legally protected bat species are protected during any future works. By identifying potential roosts early, the activity directly contributes to responsible planning and mitigation, thereby supporting broader conservation goals.

Every effort will be made to ensure alternatives can be arranged instead of an endoscope survey and will only be carried out where necessary.

5. MONITORING THE IMPACTS OF THE DEROGATIONS

They surveys will be carried out by suitably qualified ecologists. The methodology will strictly follow best practice guidance and all licence conditions.

A record of each inspection will be maintained, including:

- The exact location and type of feature inspected;
- Date, time, and weather conditions;
- Observations made (e.g. signs of bat use or absence);

These records will be submitted in a report to the NPWS, demonstrating that the activity was undertaken in full compliance with the conditions of the derogation.