Supplementary Information to Inform an Annual Survey Derogation Application under Regulation 54

Applicant: Donnachadh Powell BSc (Hons) Ecology and Environmental Biology
Date: 3rd November 2026
Application Type: General Annual Survey Derogation (Non-Project-Specific)
Target Taxa: All 9 Resident Irish Bat Species

Section 1: Objective of the Proposed Activity

The purpose of this application is to enable the lawful execution of precautionary, non-destructive baseline bat surveys, preliminary roost suitability assessments, and internal/external feature inspections in the course of professional environmental consultancy.

These actions provide objective scientific data required to inform Ecological Impact Assessments (EcIA), Natura Impact Statements (NIS), and environmental planning reports. Gathering high-confidence baseline data ensures that proposed social and economic developments are designed in strict compliance with wildlife legislation, allowing appropriate, early-stage avoidance and mitigation measures to be successfully integrated into project designs.

Strict Limitation Statement:
Activities under this licence are strictly limited to non-invasive inspections and monitoring. **No physical capture, hand-picking, mist-netting, handling, or humanely killing of any bats will take place under this licence.**

Section 2: Qualifications & Technical Experience of Applicant

The applicant is a professional ecological consultant with over 5 years of dedicated field experience leading bat surveys across various landscapes and structural environments in Ireland.

Key technical proficiencies include:

- **Acoustic Data Management:** Advanced proficiency in deploying full-spectrum static detectors and managing automated data streams using Kaleidoscope software. Competence includes identifying species via echolocation calls and peak frequencies, as well as interpreting sonograms to distinguish between commuting paths, foraging zones, and localized roost emergence signatures.
- **Technological Integration:** Extensive experience pairing handheld Echo Meter Touch Pro detectors with specialized thermal imaging equipment to accurately monitor heat-signature emergences and track structural access slots in complex features.
- **In-Situ Feature Assessment:** Competence in conducting internal and external structural sweeps for cryptic field signs, including bat droppings, urine staining, and feeding remains.

Section 3: Survey Protocols and Field Methodology

All field checks, assessments, and monitoring schedules will be executed in strict accordance with recognized best-practice standards, specifically:

- *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins, 2023)
- *Bat Mitigation Guidelines for Ireland* (Marnell et al., 2022)

Field equipment utilized for non-contact, non-destructive roost inspection will be limited to:

- Handheld and automated full-spectrum bat detectors.
- High-resolution thermal imaging cameras.
- Low-intensity torches and visual aids.
- Video endoscopes for inspecting high-level structural cavities, wall crevices, and tree Potential Roost Features (PRFs) without altering or dismantling any features.

To ensure zero disturbance, light intensity and visual exposure will be kept to the absolute minimum required to confirm presence/absence. If roosting bats are encountered during an internal crevice or building check, the surveyor will immediately withdraw from the feature to prevent prolonged disturbance.

Section 4: Satisfaction of the Three Statutory Derogation Tests

Test 1: Reason for the Derogation

The derogation is sought under **Regulation 54(2)(a)**: *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 collection of robust, baseline ecological data is a mandatory prerequisite for the lawful assessment of infrastructure, residential, and commercial development schemes. Providing developers and local planning authorities with high-confidence, early-stage data ensures that overriding social and economic projects can be advanced safely without causing accidental or unmitigated harm to protected wildlife populations.

Test 2: Absence of Alternative Solutions

A "do-nothing" alternative is entirely unsatisfactory as it would force ecological impact assessments to rely exclusively on non-invasive, external activity surveys. External activity monitoring alone cannot reliably confirm cryptic internal roost features, accurately pinpoint access slots, or verify specific species usage within complex structural voids or mature treelines. Operating without the ability to inspect internal cavities would result in an unacceptable risk of critical data gaps, potentially leading to inaccurate impact assessments

and inadvertent harm to strictly protected species during subsequent construction phases. Therefore, there is no satisfactory alternative to internal visual and endoscope inspections to ensure robust legislative compliance.

Test 3: Impact of a Derogation on Conservation Status

Granting this survey derogation will have a completely neutral or positive impact on the conservation status of all nine Irish bat species. The proposed activity is entirely non-destructive and non-invasive; no physical handling or capture of animals will occur. Furthermore, all surveys will be managed by a competent, peer-reviewed professional capable of identifying local risks and executing works safely. Comprehensive survey records will be maintained, and standard annual returns detailing all survey observations will be submitted to the NPWS licensing unit at the close of the calendar year.