

Supporting Information for the 2026 Application for
Derogation Licence for Catherine Howarth of
Kilkeeran, Ballaghaderreen, Co. Roscommon in
accordance with Derogation Under Regulation 54
& 54A of the European Communities (Birds and
Natural Habitats) Regulations 2011, as amended.

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1. Introduction

A licence is sought by Catherine Howarth to survey bats (without handling them) including use of torch and endoscope in 2026. The actions permitted by a derogation licence 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 as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations. Catherine Howarth was previously granted a derogation licence for surveying bats in 2025 (DER-BAT-2025-187).

1.1. Statement of authority

Catherine Howarth is a Consultant Ecologist at Coyle Environmental. She has a BSc (Honours) in Conservation Biology and Ecology from the University of Exeter, a Certificate in Ecological Consultancy from ETUK and a PGCE in secondary science from the University of Chester. She has over 18 years' experience in habitat monitoring and surveying, report writing, science communication and education, project management and liaising with stakeholders and local authorities. Catherine has been based in Ireland for the last 6 years and is Bat Panel member and regular volunteer with Bat Conservation Ireland.

1.2. Previous Bat Survey experience

Catherine Howarth is an ecologist at an environmental consultancy and for the past three years has been carrying out various ecological surveys throughout the country. These surveys included various mammal surveys, in particular bat surveys in the form of:

- Tree inspections for PRFs,
- Visual assessments of buildings with roosting potential,
- Bat Activity Surveys and transect surveys,
- Emergence and re-entrance surveys.

Standard bat survey protocols are always followed, and our work is designed to minimise disturbance during roost survey work. Our work is undertaken in accordance with BCI, BCT and CIEEM guidance.

Catherine is a current member of Bat Conservation Ireland and regularly attends talks and events. She volunteers for the Daubenton's Bat survey, Brown long-eared bat surveys and the Bat Panel. She has trained under the supervision of highly experienced bat ecologists.

Catherine also carries out outreach projects involving education and conservation. Catherine runs Toolbox talk on bats and developments within her company and associated businesses and is involved in conservation outreach programmes in the local community.

A log of Catherine Howarth's Bat Survey work for 2025 is below:

1.3. Bat Work Log 2025

Date	Location	Activity undertaken	Derogation required?	Species/Numbers encountered	Level of disturbance	Results of works
14.02.25	Gortnastiel, Tiernevan, Gort, Co Galway	PRA (Building and GLTA)	No	None	None	N/A – Bat report written for client
26.03.25	Carney, Co. Sligo	PRA (GLTA)	No	None	None	N/A – Bat report written for client
01.04.25	Newport, Co. Tipperary	PRA (GLTA)	No	None	None	N/A – Bat report written for client
07.05.25	Carlanstown, Co. Meath	Bat Emergence & Activity Survey	No	None	None	N/A – Bat report written for client
12.05.25	Westport, Co. Mayo	Bat Emergence Survey	No	Pipistrelle spp. and Daubenton's Bats foraging and commuting	None	N/A – Bat report written for client
13.05.25	Bofeenan, Co. Mayo	Bat Emergence Survey	No	Pipistrelle spp. Leisler's Bats and Daubenton's Bats foraging and commuting	None	N/A – Bat report written for client
14.05.25	Turlough, Co. Mayo	Bat Emergence Survey	No	Pipistrelle spp. Leisler's Bats and Daubenton's Bats foraging and commuting	None	N/A – Bat report written for client
15.05.25	Bohola, Co. Mayo	Bat Emergence Survey	No	Pipistrelle spp. Leisler's Bats and Daubenton's Bats foraging and commuting	None	N/A – Bat report written for client
21.05.25	Carney, Co. Sligo	Bat Activity Survey	No	Pipistrelle spp. and Leisler's Bats foraging and commuting	None	N/A – Bat report written for client
05.06.25	Bellakip Bridge, Co. Mayo	Bat Emergence Survey	No	Pipistrelle spp. Leisler's Bats and Daubenton's Bats foraging and commuting	None	N/A – Bat report written for client
07.07.25	Bushypark, Co. Galway	Bat Emergence & Activity Survey	No	Pipistrelle spp. and Leisler's Bats foraging and commuting. Soprano Pipistrelles emerging from under roof tile (3)	None	Further survey required
08.07.25	Belleek Castle, Co. Mayo	Bat Emergence & Activity Survey	No	Pipistrelle spp. and Leisler's Bats foraging and commuting	None	N/A – Bat report written for client

Report in support of 2025 Derogation Licence Return for DER-BAT-2025-187

Date	Location	Activity undertaken	Derogation required?	Species/Numbers encountered	Level of disturbance	Results of works
11.08.25	Bushypark, Co. Galway	Bat Emergence Survey (No. 2)	No	Pipistrelle spp. and Leisler's Bats foraging and commuting. Soprano Pipistrelles emerging from under roof tile(5)	None	Derogation licence applied for by house owner for essential roof repairs.
14.08.25	Monksland, Co. Roscommon	Bat Emergence & Activity Survey	No	Pipistrelle spp. and Leisler's Bats foraging and commuting	None	N/A – Bat report written for client
20.08.25	Portlaoise, Co. Laois	Bat Activity Survey	No	Pipistrelle spp. and Leisler's Bats foraging and commuting	None	N/A – Bat report written for client
21.08.25	Portlaoise, Co. Laois	Bat Activity Survey	No	Pipistrelle spp., Myotis spp., and Leisler's Bats foraging and commuting	None	N/A – Bat report written for client
24.09.25	Kilcorkan, Co. Clare	Roost inspection undertaken after homeowner reported possible bat in attic	Yes	Lesser Horseshoe Bats (6)	Disturbed with torch for approximated 30seconds to 1minute while a count was undertaken. Satellite roost confirmed.	Home owner put into contact with local NPWS officer, who has taken over the management of the situation, with derogation licence now in place.
09.10.25	Ballykeeran, Co. Westmeath	PRA (Building)	No	None	None	N/A – Bat report written for client

In addition, voluntary Daubenton's Bats surveys, bat walks and talks for BCI were carried out in summer 2025.

1.4. Bat Roost Survey Protocols followed

1. For unknown roosts

- a) Check with owner/client re presence of bats.
- b) Check with Bat Conservation Ireland to determine roost records.
- c) Survey for external signs of bats and roost entry points. If positive signs, then treat as known /suspected roost.
- d) 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.

2. For known/suspected roosts

- a) Generic measures to include:
 - i. Avoid using roost illumination apart from torches.
 - ii. Talking in low tone is preferred to whispering.
 - iii. Bats seen in situ should be counted where possible and then left alone.
 - iv. Handling of bats to confirm identification is only used as a last resort and is subject to separate licencing under the Wildlife Acts (S.23).
 - v. Samples of droppings, dead bats etc. may be removed to facilitate species identification.
 - vi. Care to be taken to avoid cooling or warming effects as described below.
- b) During potential hibernation season (November-March), only one person should enter roost area. If any hibernating bats are seen to be showing signs of waking, then the roost survey will be abandoned immediately.
- c) During the breeding season, known breeding roosts should be avoided unless emergency work is required. This will usually be the subject of a separate derogation

3. Proposed activity

Examination of potential bat roosts, including all bat species and all roost types, as necessary in order to undertake surveys and monitoring for property owners or developers or scientific study within the Republic of Ireland.

Use of a torch and/ or endoscope in the process of surveying for bats.

Derogation is required to: Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration

It is unlawful to disturb bats, in particular if the level of disturbance can be shown to impair their ability to survive; to breed or reproduce; to rear or nurture their young; to hibernate or migrate; or to significantly affect the local distribution or abundance. The actions taken under the derogation licence sought will not lead to any significant level of disturbance.

During surveying, if bats are suspected or found to be present and observation is needed to determine the type of roost, numbers, species and to gather evidence for scientific reporting, a low level of disturbance may occur.

Following a precautionary principal approach any disturbance will be **slight** and **short term**. All mitigation measures outlined in section 10 of this report will be adhered to and best practice guidelines set out by Bat Conservation Irelands, The Bat Conservation Trust, JNCC and CIEEM will be followed at all times.

The benefit of an additional licenced bat ecologist may increase on the favourable conservation status of bat species in Ireland, in that accurate monitoring of bat roosts, distribution and population through reporting of data aids in the protection of such species.

As such a Derogation licence is requested to survey and monitor bat roosts (without handling bats) for Catherine Howarth as part of her future ecological work. The licence is requested for all bat species within the Republic of Ireland.

4. Evidence to support the Derogation Tests

4.1. Test 1 - Reason for Derogation:

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 “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.

The majority of bat work requests to the applicant come from house owners or those seeking planning permission for development in areas where bats are likely to be present. The Bat Mitigation Guidelines for Ireland (2022) advise that

“In order to determine what impact the proposed development will have, it is important to examine the survey information, and compare this with the proposals for development. This task is made easier by good survey information and detailed plans, showing pre-development and post-development site layout and roosts” and that “Ideally, an impact assessment should inform the drawing up of detailed development plans, so that impacts can be avoided where possible. It is therefore important that this stage is undertaken as early as possible in the planning process.”

National Parks and Wildlife Service Guidance Series, No. 1. (2021). Strict Protection of Certain Animal and Plant Species Under the Habitats Directive in Ireland states that is an Annex IV species could be present Ecological Surveys are required. *“The ecological survey carried out by an ecologist who is competent in relation to the species to be surveyed. The survey must use suitable methods for the species being investigated, be of an adequate duration and must take place at an appropriate time of year”.*

There is a great demand for bat ecologists and during the correct survey seasons it is sometimes not possible to employ a licenced bat ecologist, due to the high demand. To conduct thorough surveys and collect the relevant information to properly inform the client, the ecologist should be suitable experienced, licenced and cognisant of all legislation and best practice procedures.

The applicant has sought out relevant experience and educated themselves in the legislation and best practice guidelines. They are now seeking a derogation licence to be able to conduct thorough roost surveys, to be able to carefully and quickly assess the roost type and gather details of exact locations and numbers of bats present within a roost feature, with the use of a torch and/or endoscope if required.

The Bat Mitigation Guidelines for Ireland (2022) state that:

“A typical approach to surveying buildings would include the following elements:

- *Allow sufficient daylight hours to permit a thorough inspection of each structure;*
- *Ensure that all parts of the structure can be inspected. This may require prior arrangement with owners, occupiers, caretakers etc. Access and inspection equipment, such as ladders, binoculars and a good torch, should always be available;*
- *Carry out a risk analysis and ensure safe working methods are adopted;*
- *Ask appropriate people (owners, neighbours etc.) whether there is any history of bats using the site;*
- *Carry out an external inspection of the structure looking for bat droppings on the ground or stuck to walls, suitable entry and exit points around eaves, soffits, flashing, under tiles etc.;*

- *Carry out an internal inspection of the structure. This should focus particularly on areas which provide appropriate environmental conditions for bats. This may include warm darker areas, joints and crevices in wood, ridge beams and hips as well as cool subterranean areas suitable for torpor or hibernation. Listen for bats; be aware of the characteristic smell of a bat roost; examine floors, walls and structural elements for droppings; check for other signs of bat use, such as corpses or skeletons, oily marks (from fur) around possible access points and roost areas, lack of cobwebs along beams, feeding remains such as moth wings or other insect parts;*
- *Record any signs of bats found on a plan of the structure and collect samples of droppings, bones or feeding remains for comparison with a reference collection and / or DNA analysis;*
- *Active or static detector surveys may also be necessary to ensure a full assessment of the bat usage of a building, especially where full access to all areas is not possible.”*

“Although a licence to disturb bats for scientific purposes is not essential when looking for previously unknown roosts, the requirement to withdraw if bats are discovered will limit the ability of the surveyor to carry out this work. For this reason, it is advisable for surveyors to be licensed”.

A licence is sought by Catherine Howarth to survey bats (without handling them) including use of torch and endoscope. The actions permitted by a derogation licence 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 as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.

4.2. Test 2 - Absence of Alternative Solutions

Alternative 1: Do nothing. Do not carry out any surveys that have any potential for disturbance.

Wherever possible surveys are kept to non-invasive techniques, including use of bat detectors and infra-red technology. However, some roosts are less obvious, and roosts of crevice dwelling species may require careful searching. Roosts used by a small number of bats can be particularly difficult to detect and may require extensive searching (Bat Mitigation Guidelines for Ireland. 2022).

Result of no action: Lack of accurate data for research, education and to inform correct mitigation advice to developers and those in human-wildlife conflict scenarios. Lack of scientific information is at odds with the aim of “the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”

Alternative 2: Employ a licenced individual for surveys of known bat roosts.

There are frequently no suitably qualified and licenced bat ecologist available for all projects during the optimal survey season due to high demand and limited numbers of licenced bat ecologists. This results in a backlog of surveys and has previously resulted in development plans proceeding without the recommended surveys being carried out. In this situation the presence of bats may only be discovered after a development project has commenced, where significant disturbance has already taken place.

Result of alternative 2: Disturbance may occur to unidentified roosts, due to lack of surveys or sub-optimal survey conditions. Alternative 2 is at odds with the aim of “the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”.

Our current knowledge of bats, which informs all conservation efforts is derived from scientific survey. In order to maintain Irish records there must be enough skilled and licenced bat ecologists in the field. The alternative to not granting new licences to bat ecologists is to limit the options for research, education and liaising with the public to avoid human wildlife conflict. This would be detrimental to conservation efforts and therefore does not constitute a satisfactory alternative.

Works associated with development or building work are likely to lead to an increase in human presence at the site, extra noise, lighting and changes in the site layout and local environment. All these may have a detrimental effect on the bats, which seek particular environmental conditions, such as a low incidence of direct human disturbance, particular temperature, lighting and humidity regimes and a stable internal and external layout so they can continue to follow established flight-paths. Without enough licenced bat ecologists there is an increased likelihood that developments may continue without proper surveys being carried out prior to works.

The likelihood and level of potential disturbance from a bat survey conducted during the optimal season and following best practice guidelines and the precautionary principal is low and much less than the disturbance that may be caused to an undetected roost by development.

4.3. Test 3 - Impact of a derogation on Conservation Status

It is unlawful to disturb bats, in particular if the level of disturbance can be shown to impair their ability to survive; to breed or reproduce; to rear or nurture their young; to hibernate or migrate; or to significantly affect the local distribution or abundance. The actions taken under the derogation licence sought will not lead to any significant level of disturbance.

During surveying, if bats are suspected or found to be present and observation is needed to determine the type of roost, numbers, species and to gather evidence for scientific reporting, a low level of disturbance may occur.

Following a precautionary principal approach any disturbance will be **slight** and **short term**. The benefit of an additional licenced bat ecologist may increase on the favourable conservation status of bat species in Ireland, in that accurate monitoring of bat roosts, distribution and population through reporting of data aids in the protection of such species. The net result of the derogation will be neutral or positive for the species' conservation status.

As well as following the Bat Roost Survey Protocol the following measures and guidance are adhered to at all times:

- Wherever possible surveys are carried out using non-invasive techniques, i.e. buildings are examined externally for signs of bats, emergence and activity surveys using bat detectors and infra-red cameras.
- Where surveys require entry to a bat roost or may cause temporary disturbance of bats including the use of a torch or endoscope the ecologist will use the correct survey timings to maximise the data collected for the visit.
- Prior to the internal survey the surveyor will collect data on the surrounding habitats, existing data records, possible bat species present, and relevant site data to inform the aims and objectives of the survey.
- Visits should be kept to a minimum, in both number and time taken. T
- The surveyor will work efficiently, carefully, quietly and minimise the used of white light to complete the survey with as minimal disturbance as possible.
- Infra-red and red light is to be used instead of white light wherever possible.
- Best practice guidelines including BCT Bat Survey Guidelines - 4th Edition (2023) will be followed at all times. i.e.

“Ecologists should work quietly and check structures in a systematic manner, working upwards from the entrance and checking and checking any cellar space last. Upon entering an individual space, the places bats are most likely to be should be checked first.”

“Turning off all torches whilst in a dark space will allow ecologists to look for light spilling in, which will indicate gaps that bats use for entry points.”

“Crevices will require inspections using torches, mirrors and endoscopes. Care should be taken when using an endoscope, it should be inserted into crevices slowly whilst the ecologist is looking through the viewfinder or at the visual display to check for bats and their signs. An endoscope should never be forced or inserted without

viewing and the endoscope should not therefore come into contact with a bat. If a bat is seen through the endoscope, disturbance should be minimised.”

5. Monitoring the impacts of the derogations

After each bat survey a Bat Survey Report is produced detailing the specifics of the site, methodology used, results , conclusions and further actions required.

A record log of all surveys undertaken is kept with the location, nature of the survey, species encountered, roost details and whether any disturbance occurred.

At the end of the licence period a Derogation Licence Returns Form is completed with a supporting report which is submitted to NPWS (wildlife.reports@npws.gov.ie).

Guidance Documents and References

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