

FutureEnergy Ireland

Cummeennabuddoge Wind Farm, Co. Kerry

Kerry Slug Derogation Licence Application 2025

Supporting Report

APEM Group Woodrow

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1. INTRODUCTION

APEM Group Woodrow was commissioned on behalf of the client, FutureEnergy Ireland, on 2 October 2025 to carry out Kerry slug *Geomalacus maculosus*, surveys. These surveys are to support a Request for Further Information as part of planning permission for the proposed Cummeennabuddoge Wind Farm, located in County Kerry, Republic of Ireland. The proposed development includes the construction and operation of 17 wind turbines, a permanent met mast, a substation and an underground grid connection.

Previous surveys for Kerry slug, *Geomalacus maculosus*, at the site were conducted under licence by Malachy Walsh and Partners in 2021. Kerry slug was recorded at all eight transect locations as well as 89 additional records from hand searches and incidental observations (Figure 1).

APEM Group Woodrow employs a dedicated Ecology team, experienced in scoping, undertaking, and reporting on ecological and entomology surveys.

1.1. Statement of authority

Sophie Papczyk is an Ecologist with Woodrow APEM group. Sophie holds a BSc (Hon) in Environmental Sciences. A significant portion of Sophies works have been on researching orthoptera and hymenoptera, and her professional experience has primarily been in habitats and botany.

Leona McSharry is an Ecologist and Biological Data Officer with Woodrow APEM Group. Leona holds a BSc (Hons) in Zoology from the National University of Ireland Galway. Leona role primarily focuses on delivering field surveys, species identification and ecological assessments for invertebrates, reptiles, bats and other terrestrial mammals.

Emmi Virkki is a Principal Ecologist with Woodrow APEM group. Emmi holds a BSc (Hons) in Environmental Biology, and a MSc in Environmental Science. Emmi has Vertigo snail survey

experience. Emmi's diverse ecological background includes birds and mammals, but her primary area of expertise is habitat and botany.

2. BACKGROUND

2.1. Site description

The Site is centred at Irish Transverse Mercator (ITM) coordinates 520354 583232 in the Townlands of Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabudoge in Co. Kerry (Figure 1). The Site is located in the Derrynasaggart Mountains ca. 4.5 km north of Ballyvourney Village. The dominant land use in the surrounding area is forestry. Clydaghroe Wind Farm is immediately south of the Site, Caherdowney Wind Farm to the east and Gneeves Wind Farm to the northeast. The Site covers a total area of ca. 709 ha across an elevation of ca. 270 to 580 m. The Site is dominated by active forestry plantation sub-divided by access tracks. Some remnant sections of degraded heath and peatland are present in small pockets within the Site. A number of small tributary streams of the River Clydagh flow through the Site. Two small loughs are present on the southern boundary of the Site.

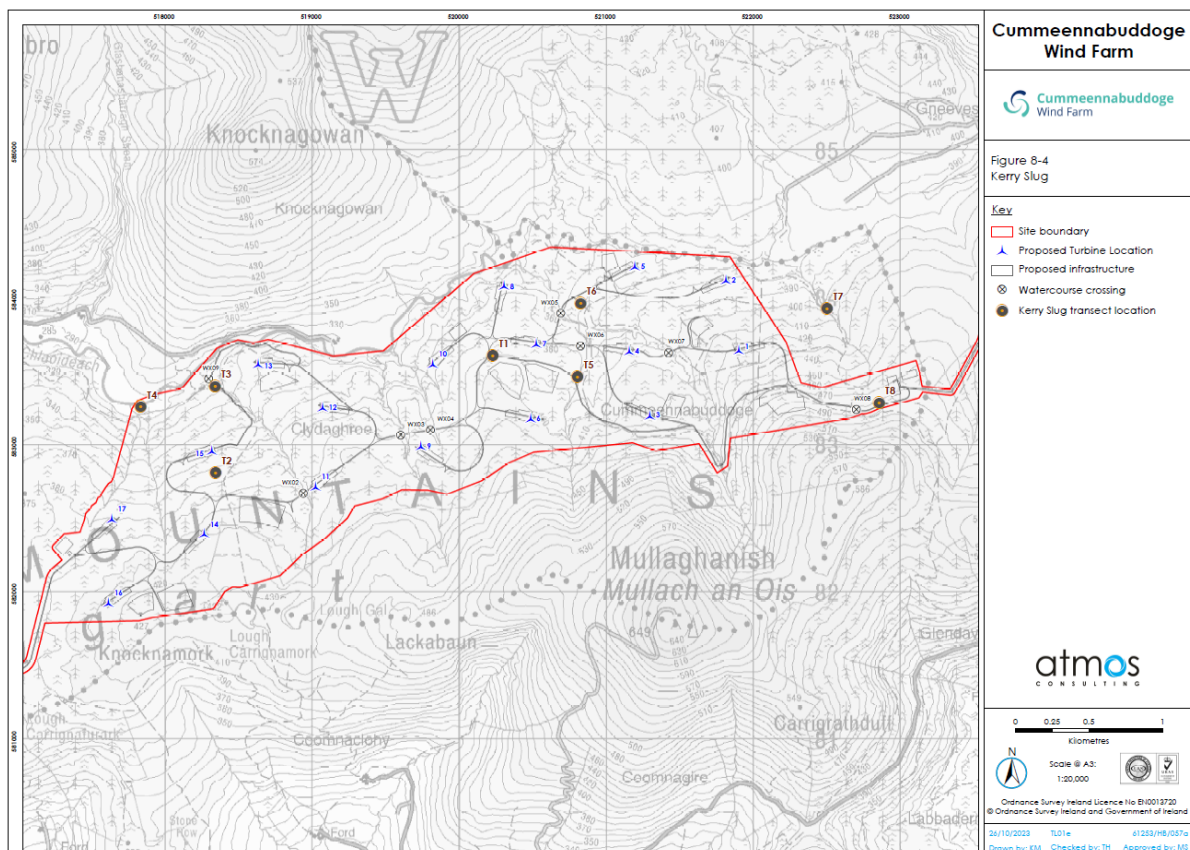


Figure 1: Site layout, and previous Kerry slug transect locations (FEI)

2.2. Proposed development

Planning Permission is being sought by FutureEnergy Ireland for the construction and operation of 17 wind turbines including a permanent met mast, on-site substation and all ancillary works and the construction of an underground grid connection to Ballyvouskill, Co. Cork. Planning permission is being sought for a 35 year operational life from the date of commissioning of the entire wind farm.

3. PROPOSED ACTIVITY

3.1. Desk study

A desk study will be carried out to collate all available information on Kerry slug populations within the Site and surrounding area (up to ca. 2 km).

- The site and surrounding area were reviewed using available satellite imagery to identify potentially suitable Kerry slug habitat. These findings will be ground-truthed during field surveys to confirm presence and habitat condition.
- The National Biodiversity Data Centre (NBDC) online resource was accessed for information on Kerry slug previously recorded within the 2 km grid squares W18Q, W18R, W18V, W18W, W28B, W28C, W28G and W28H within which the Site is located.
- Data from the NPWS collected as part of the Article 17 reporting on Kerry slug were also accessed during the desktop survey and input to a GIS for interpretation.
- The desk study included a review of previous ecology reports prepared for this development including the draft Biodiversity Chapter of the Environmental Impact Assessment Report (EIAR) prepared for the proposed wind farm (Atmos 2022), and the previous methods statement composed by APEM Ireland (Twomey, 2023).

3.2. Field survey

Kerry slug surveys will be undertaken from 1 November to December 31, 2025, by Leona McSharry and Sophie Papczyk or another licenced member of staff. The survey will entail artificial refuge/refugia trapping, and hand searching for Kerry slug under licence. In line with best practice (NPWS 2010) (Reich 2012) Matric mats sourced from De Sangosse will be used as refugia. Metric mats provide standardised, moisture-retaining refugia that mimic natural shelter (leaf litter, stones), increasing detectability of *Geomalacus maculosus* during surveys.

They enable repeatable, low-impact sampling across sites and seasons. When used and checked to best-practice protocols they improve survey efficiency while minimising habitat disturbance.

Approximately groupings of five traps will be set out at eight locations that have been deemed appropriate to support Kerry slug. The traps will be deployed and include a maturation phase – i.e. set out and left to sit for a period of one week. Presence absence surveys will commence following this period. This is in line with approved best practice (Mc Donnell 2011).

Between deployment of the matric mats and collection, hand searches will be conducted on features such as exposed rocks and moss-covered trees. Particular attention will be given to features which

provide cover such as any crevices, or where moss cover may be most dense, and under mats of moss and or flaking bark. The hand searches will be carried out under suitable weather conditions when this species is more likely to be active in the open, such as damp and humid conditions, on overcast warm damp days either during or after rain, at dawn, dusk or during the night periods during mild weather (NPWS 2011) (Mc Donnell 2013).

All surveys conducted are presence absence surveys, and a full count of the number of Kerry slugs identified will be kept.

4. EVIDENCE TO SUPPORT THE DEROGATION TESTS

4.1. Reason for derogation

The project is of overriding public interest as it contributes directly to Irish national and EU targets for renewable energy generation and greenhouse gas reduction, in line with the revised renewable energy directive (amending directive (EU) 2023/2413), which updates the renewable energy directive 2018/2001.

In the interest of public health and safety, the transition to clean, renewable energy is essential to mitigate the increasing risks associated with climate change, including deteriorating air quality, the spread of climate-sensitive diseases, food and water insecurity, and the growing frequency of extreme weather events.

The project also provides economic and social benefits through local employment, infrastructure investment, and a community benefit fund, supporting the sustainable development of the region.

While the site supports the protected species Kerry slug, appropriate mitigation and monitoring measures have been incorporated to ensure minimal impact. On balance, the long-term environmental and social gains arising from renewable energy production represent an imperative reason of overriding public interest that justifies the proposed works.

4.2. Absence of alternative solutions

Two alternatives were considered as opposed to derogation, the “Do-Nothing” and “desk-based study” options. Under the Do-Nothing alternative, no further surveys would be undertaken. This was deemed unsatisfactory as it would prevent the collection of current ecological data needed to assess the potential effects on the Kerry slug and ensure compliance with relevant legislation.

The desk based study alternative, relying solely on previously collected data, was also considered. While earlier surveys have been undertaken, habitat conditions and species distribution may have changed over time. Maintaining up-to-date data is important to ensure the assessment remains relevant and accurately reflects current site conditions. Both alternatives were therefore considered unsuitable for providing the level of confidence required to inform the assessment and any associated derogation application.

4.3. Impact of a derogation on conservation status

The survey approach and scope are outlined in Sections 1-3 of this report. In summary, the works involve non-destructive refuge trapping and hand searches for Kerry slugs within suitable habitats across the Site. These surveys are designed to update baseline data and inform ongoing ecological monitoring. Potential impacts on the population are expected to be minimal. Activities are limited to short-term disturbance and minor handling stress to individual slugs during temporary lifting of cover objects and inspection of suitable microhabitats. No mortality, injury, or translocation should occur, and all individuals will be returned immediately to their original microhabitat. No vegetation clearance or habitat removal will take place, and the structure and integrity of the habitat will remain unaffected. Mitigation measures are embedded within the survey design and include: completion of all surveys by licensed, experienced ecologists, adherence to NPWS best-practice

handling and welfare protocols, minimisation of disturbance and search time, and reinstatement of all natural materials temporarily displaced during survey work. Surveys will also be undertaken under suitable environmental conditions to reduce stress to individuals. These measures have been applied successfully during previous surveys at this site (Twomey 2023) with no recorded adverse impacts. Given the limited scale and temporary nature of the works, the strict implementation of established mitigation measures, and the evidence of successful outcomes from previous comparable surveys, the proposed activities are not expected to have any detrimental effect on the population or habitat of Kerry slugs. The derogation is therefore not considered detrimental to the maintenance of the species at a favourable conservation status within its natural range.

5. MONITORING THE IMPACTS OF THE DEROGATION

Monitoring will be undertaken to confirm that the survey activities carried out under this derogation have not resulted in any adverse effects on Kerry slugs or their habitat. The purpose of monitoring is to verify the effectiveness of mitigation measures and to ensure that the population remains at a favourable conservation status. The following actions will be implemented:

- **Post-survey inspection:** All search areas will be checked to ensure habitats and microhabitats are fully reinstated.
- **Record-keeping:** Details of survey locations, effort, and all Kerry slug observations will be documented, including the condition of individuals.
- **Comparison with previous data:** Results will be reviewed against past survey records from the site to identify any unexpected changes in population presence or distribution.
- **Adaptive review:** If any evidence of adverse impact is identified, survey methods and mitigation measures will be reviewed and adjusted for future works.
- **Reporting:** A summary of monitoring outcomes will be included in the post-survey report.

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