

## **Barbara McInerney: Report for application of Derogation Licence**

**Previous licence** DER/BAT 2023-50

### **To whom it may concern:**

I wish to apply for a derogation licence to survey potential bat roosts and known bat roosts throughout the country of Ireland. I am an ecological consultant with over 20 years of experience of working with bats and bat roosts. I am a long standing member of Conservation Ireland and worked for National Parks and Wildlife Service (NPWS) in the past.

### **11.1: Explanation as to why the derogation licence sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.**

This derogation Licence is sought to allow the determination of bat species at any given site. This may be a previously identified site (such as Brown Long- Eared Bats roost sites) where surveys are necessary to contribute to the ongoing monitoring of bat species by Bat Conservation Ireland under contract to NPWS, or sites which are highlighted for potential planning and the conservation of Irelands bat species is at risk due to changes on the site such as vegetation and built structure alteration or removal.

In these cases it is often necessary to enter a structure to determine the location and type of a bat roost and to determine numbers present. This in turn provides information that is necessary to provide adequate mitigation measures should development or changes on a site take place.

At times it is just not possible to obtain accurate counts of bats present from the exterior of a building and an internal count is necessary. This occurs at a Brown Long- Eared roost site in the monitoring scheme which I have been a part of for 12 years - where there are multiple exit points for the bats which cannot be covered in one night.

In other situations it may be necessary to disturb a roost site for the provision of mitigation measures or exclusion measures.

### **11.2: Evidence that actions permitted by a derogation 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.**

All bat surveys carried out are done so with the objective of conserving and protecting the species in their current location and status. As these surveys are sometimes driven by the potential development of a site, the ability to enter and observe a bat roost location is sometimes vital in providing adequate advice and information about the roost to protect it into the future. Site inspections in conjunction with the use of infra-red cameras, and ultrasonic recording equipment reduce the impact on roost sites by not having to be present in the roost for extended periods.

The aim is to always conserve the roost location and in the case of one of the Brown Long - Eared roosts in the monitoring scheme - to enhance the roost site to protect the bats further. In this case the exit/entry point of the bats was modified to maintain access for the bats but to exclude predators and the roost numbers have steadily increased since doing so.

**11.3: Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.**

Mitigation measures ideally comprise of continued access to the original roost site and perhaps enhanced as in the above example of the Brown Long-Eared bats. Bat boxes, or purpose-built spaces within buildings have been employed successfully in some cases. In some sites a specific built structure is provided to replace a structure that was in need of removal. Having also been involved in various bat box schemes, monitoring of these boxes has revealed bat usage and information on improvements, e.g. “self-cleaning boxes” replacing those types that accumulate guano and are difficult to access and clean on a regular basis.