

Mairéad Stack

Conservation Ranger Fingal South

Additional Information for Bat Derogation License renewal 2025_2026

26th May, 2025

Mairéad Stack information:

- a) *Explanation as to why the derogation 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:*

There is no alternative to catching bats to record biometrics for gathering data on that roost and species. Under the guidance of Paul Scott (EGAU and Dublin Bat Group) and Colm Clarke (Scott Cawley Senior Ecologist and Dublin Bat Group), I wish to continue my training, commenced last year, under NPWS license, to gain experience at catching, handling and carrying out biometric assessments of bat species in Dublin. This information is used to assess the Conservation Status of species. Hand held nets are used to capture the animals when exiting their roosts and sometimes mist nets to catch the bats in flight. Biometrics such as species, sex, wing measurements, body length and condition are taken when the bats are safely removed from their traps. Methods used are those taught by Bat Conservation Ireland e.g. use of palm grip to safely hold the bat, which biometrics to take e.g. use of callipers to measure forearm, how to sex the bat, the presence or absence of a tragus which helps to identify the species.

For species such as Nathusius pipistrelle (*Pipistrellus nathusii*), where the Range and Population are 'Unknown' in its Conservation Status, it is important that suitably qualified persons are trained and hold Regulation 54 licenses to trap bats at roosts to identify species and add to the presently limited data on that species in Ireland. The same applies to species such as Natterers Bat (*Myotis nattererii*), Daubentons Bat (*M. daubentonii*), Brown long eared Bat (*Plecotus auritus*), Whiskered Bat (*M. mystacinus*) and Leislers Bat (*Nyctalus leisleri*) where, although the Conservation Assessment is Favourable, it is based on limited data so more data are needed, which can only be achieved by suitable qualified and experienced license holders gathering those data.

The season for being able to trap and measure bat biometrics is very short, from when bats emerge from hibernation and set up summer roosts to before they start becoming heavily pregnant and giving birth. The lack of suitably qualified and licensed bat handlers in the Dublin District means that very limited data are gathered from year to year. By continuing with my mentorship, I hope to be fully qualified in a couple more years thus becoming able to conduct my own trapping and start mentoring others.

- b) *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:*

Catching and handling bats in Dublin, as a Conservation Ranger, under the mentorship of licensed bat handlers, for the purpose of gathering biometric data will not affect the Conservation Status of this species. The 2019 Article 17 Report to the European Commission, showed that the following bat species' Conservation Status was Favourable; Common Pipistrelle, Soprano Pipistrelle, Daubentons Bat, Brown Long eared Bat, Leisler's Bat and Whiskered Bat. Thus, the methods used to gather these data cannot be having an impact on the bat populations in Ireland as these all have Favourable Conservation Status. I will mostly be catching and handling Common and Soprano Pipistrelle species and Leislers Bat species. If the catching and identifying bats reveals other species such as Whiskered Bat, then I will be able to gather biometrics on these individuals as I will have a correct license and thus I will maximise the benefit of the trapping event by being able to record data on all species caught and released.

- c) *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 to be applied includes the requirement that training will only take place in the presence of agreed licensed and experienced mentors; that is Colm Clarke and Paul Scott. Catching and handling the bats and taking biometrics is done following best practice methodology. Bat Conservation Ireland holds training courses in bat handling and their methods taught on these courses are the same as are being taught to me by my mentors. I have undertaken one of these training courses in Killarney and started my field training in 2024, under license.

Best practice methods observe requirements as laid out in the NPWS Bat Mitigation Guidelines (2022) which require level of effort to be clarified, for example, in most instances, harp nets are not required.

Methods used to ensure most data is collected with least disturbance include firstly a survey, to identify where the bats are emerging and thus the set up for capture is in the right location in terms of the roost exit/entrance. The methodology requires that you use a 'Processing table', have the correct tools e.g. callipers for measuring forearm which assists with species identification, use of Palm Grip to hold the bat, have cotton cloth bags to hold the bats, knowing how to gently remove the bat from the catching net and place in a holding bag and knowing how to retrieve the bat from this holding bag and after how long.

Using best practice guidelines ensures least disturbance to the bats and the roost and allows for gathering important data on status of the population.