Application for Derogation Under Regulation 54 & 54A

Supporting Information

Derogation Licence
Supporting
Information
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1 Introduction

1.1.1 Objective of the proposed works

This derogation licence is being sought for the assessment of unknown bat roosting locations for the purpose of establishing an ecological baseline for assessment.

In competing baseline assessments for ecological impact assessment, it is important that the relevant and potentially suitable bat roosting features are identified and assessed. Where no known roosts occur, the assessment of a feature may require the use of an endoscope to check for the presence of roosting bats within a feature.

1.1.2 Science staff

Dr Miles Newman (Associate Ecologist)

Dr Miles Newman is a principal terrestrial ecologist with over 14 years of ecology experience. He is a full member of CIEEM (MCIEEM) and a Chartered Environmentalist (CEnv). Miles currently coordinates and leads the bat survey work carried out by RPS in the Republic of Ireland. He is an experienced bat activity surveyor and bat roost assessor (including ground-based assessment, tree climbing, and endoscopy). Dr Newman has held the following derogation licences in relation to bat roost disturbance for assessment:

- DER/BAT 2023-116 (survey licence) (Amended 18/01/2024-31/12/2024);
- DER/BAT 2023-116 (survey licence);12/10/2023-31/12/2023;
- DER-BAT-2020-44 (survey licence); 22/5/2020-22/05/2021
  - Inchicore, Co, Dublin. Assessment of attic space (4x structures) with torch. No evidence of roosting bats.
  - Phoenix Park, Carba, and Glasnevin, Co, Dublin. Assessment of rail bridge and tunnels (4x structures) with torch. No evidence of roosting bats.
  - Leixlip, Co. Kildare. Endoscopy and mobile elevated platform pre-felling assessment of mature beech tree. No evidence of roosting bats from endoscope assessment of multiple suitable features.
  - Shankhill, Co. Dublin. Assessment of attic space with torch. No evidence of roosting bats.
- DER/BAT 2019-25 (survey licence); 28/03/2019-28/3/2020
  - Naas, Co. Kildare. Assessment of attic space (3x structures) with torch. No evidence of roosting bats.
- DER/BAT 2017-144 (amended); 27/04/2017-10/11/2018
  - Stilorgan, Co. Dublin. Assessment of attic space (20x structures) with torch. No evidence of roosting bats.
  - Shankhill, Co. Dublin. Assessment of attic space with torch. No evidence of roosting bats.
  - Navan, Co, Meath. Endoscopy and tree-climbing assessment of 3 mature trees. No evidence of roosting bats from endoscope assessment of multiple suitable features
  - Dunboyne, Co, Meath. Endoscopy and tree-climbing assessment of 14 mature trees. No evidence of roosting bats from endoscope assessment of multiple suitable features

Dr Robert Rowlands (Technical Director Ecology)

Dr. Rob Rowlands is a Senior Associate with RPS' ecology team. He is a full member of CIEEM (MCIEEM) and a Chartered Environmentalist (CEnv). He has worked in private practice for over 20 years; advising on the ecological aspects of multiple projects throughout the UK and Ireland. These have included large-scale housing and commercial developments, urban regeneration schemes, linear infrastructure projects and renewable energy projects. With respect to bat surveying, he has advised on the survey strategy on multiple projects over 20 years ranging from surveying with respect to small-scale residential conversions, urban regeneration projects involving complexes of dilapidated buildings through to the characterising bat activity at a landscape scale. He has supported and accompanied licensed bat works on multiple project including the completion of internal/external inspections of trees and buildings with respect to bat roost potential. He has been present on surveys where bats were identified roosting (summer) including in roosts with particularly sensitive species such as lesser horseshoe bats. He has been a surveyor on multiple emergence/re-entry surveys and transect surveys. He is currently advising clients with respect to bats within the offshore environment.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Mr William Lishman (Principal Ecologist)

William Lishman is a professional ecologist with over 12 years' experience in a variety of ecological assessment procedures and report writing. He has a BSc in Ecology from the University of Durham. He has been a surveyor on multiple emergence/re-entry surveys and transect surveys. He is a full member of CIEEM (MCIEEM).

Ms Aoife Edgely (Principal Ecologist)

Aoife has 15 years' experience in the marine environment. She is a full member of the Institution of Environmental Sciences (MIEnvSc) and is a Chartered Environmentalist (CEnv). Aoife has a wide range of technical expertise including benthic ecology and habitat mapping, water and sediment quality, GIS, marine mammals and marine ornithology.

Dr Julie Larkin (Senior Ecologist)

Julie Larkin is a professional ecologist with 10 years' experience in a variety of ecological assessment procedures and report writing. She has a B.Sc. (Hons) in Ecology, an M.Sc. in Ecological Assessment and a Ph.D. in Agri-Ecology. She has undertaken numerous bat roost assessments through-out her career comprising ground-based surveys of trees and other structures such as buildings and bridges in addition to cavity and crevice searches with the aid of an inspection camera. This includes a full inspection of a three-story mill in Fermoy for the development of a Primary Care Centre, bridge inspections in Co. Clare for major electrical infrastructure upgrades and tree and bridge inspections in counties Laois, Kildare and Mayo for flood defence upgrade works. She has also undertaken a number of dusk and dawn emergence/re-entry surveys in addition to back-tracking surveys to identify roost locations. Dusk and dawn surveys included pipistrelle and brown long-eared bat roost assessments for Bat Conservation Ireland.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Dr Siobhán Atkinson (Senior Ecologist)

Siobhán is a Senior Project Ecologist with a PhD in freshwater biology and a first-class honours degree in environmental biology, both obtained from University College Dublin. She is a full member of the Institution of Environmental Sciences (MIEnvSc) and is a Chartered Environmentalist (CEnv).

Dr Thomas Drinan (Senior Ecologist)

Thomas is a Senior Ecologist with 17 years' experience. He has a PhD in freshwater ecology and an honours degree in ecology, both obtained from University College Cork.

Ms Hannah Fearon (Senior Project Ecologist)

Hannah Fearon is an Ecologist with over 5 years' experience in bat roost assessment. She holds a B.Sc. in Agri-environmental Science and an M.Sc. in Applied Environmental Science. Hannah is a

Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is currently working toward her Associate membership. She is a highly capable individual in the bat roost assessment of trees and structures including emergence and re-entry surveys. After completing her fourth bat field season, she has worked on a wide range of projects requiring bat roost assessment and surveys. Hannah is proficient in bat good practice guidelines and relevant wildlife legislation and is capable of using her professional judgement to make informed decisions. Hannah also volunteers with Bat Conservation Ireland.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Ms Lorna Gill (Senior Project Ecologist)

Lorna Gill is a senior project ecologist with over 5 years' experience in bat roost assessment. She holds a B.A. in Zoology and an M.Sc. in Biodiversity and Conservation. She is a highly capable individual in the bat roost assessment of trees and structures including emergence and re-entry surveys. Lorna has completed four bat field seasons; she has worked on a wide range of projects requiring bat roost assessment and surveys. Lorna is proficient in bat good practice guidelines and relevant wildlife legislation.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Mr Declan McGovern (Project Ecologist)

Declan McGovern is a project ecologist with 4 years' experience in bat roost assessment. He holds a B.Sc. in Applied Freshwater and Marine Biology and an M.Sc. in Applied Environmental Science. Declan is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is currently working toward his Associate membership. He is a highly capable individual in the bat roost assessment of trees and structures, bat transect surveys and emergence surveys of structures. Declan has completed three bat field seasons; he has worked on a wide range of projects requiring bat roost assessment and surveys. Declan is proficient in bat good practice guidelines and relevant wildlife legislation. Declan has held the following derogation licences in relation to bat roost disturbance for assessment

- DER/BAT 2023-116 (survey licence);12/10/2023-31/12/2023

Licence for examination of potential bat roosts and roost disturbance at Moneypoint Generation Station, Carrowdotia, Kilrush, Co. Clare V15 R963.

- DER/BAT 2023-116 (survey licence) (Amended 18/01/2024-31/12/2024)

Licence for examination of potential bat roosts and roost disturbance at Moneypoint Generation Station, Carrowdotia, Kilrush, Co. Clare V15 R963.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Mr PJ Maguire (Ornithologist)

PJ is an ecologist with 5 years' experience. He holds a Degree in Animal Science (Agriculture) and a Master's degree in wildlife Conservation & Management (Agriculture), both from UCD. PJ has a background in ornithology and has led/assisted on many surveys (e.g. red grouse, kingfisher, wintering birds).

Ms Rachel Shaw (Project Ecologist)

Rachael is a Project Ecologist with 6 years' experience. She holds a BSc (Hons) in Marine Science from NUI Galway, and an MSc in Climate Change and Managing the Marine Environment from Heriot-Watt University in Edinburgh. Her environmental interests are broad, but she is particularly interested in marine ecology and conservation. Rachael has a wide range of technical expertise including GIS, marine ecology and habitat mapping. Rachel is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Ms Rajshree Anand (Project Ecologist)

Rajshree is a Project Ecologist with 11 years' experience. She holds a BSc and MSc in Biotechnology from Amity University Noida in India, and a MSc in Global Change: Ecosystem Science & Policy from UCD & JLU in Germany. Rajshree is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Ms Aisling O'Sullivan (Project Ecologist)

Aisling is a Project Ecologist with 6 years' experience. She holds a joint international master's degree in Global Change: Ecosystem Science & Policy from UCD and JLU and a bachelor's degree in Ecology & Environmental Biology from UCC. Aisling's fieldwork experience includes protected mammal surveys (badgers, otters, bats), aquatic surveys, invasive species surveys, habitat classification and the supervision of ground investigation surveys as Ecological Clerk of Works. Aisling is currently working towards her Qualifying membership with the Chartered Institute of Ecology and Environmental Management (CIEEM).

Ms Brónagh Boylan (Ecologist)

Brónagh is an ecologist with 2.5 years' experience in bat roost assessment surveys. She holds a BSc in Environmental Science from NUIG. Brónagh is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is currently working toward his Associate membership. Brónagh has completed numerous bat roost assessments of trees and structures, as well as emergence and re-entry surveys.

Mr Colin Keane (Ecologist)

Colin Keane is an ecologist with 3 years' experience in bat roost assessment surveys. He holds a B.Sc. in Zoology in UCC and an M.Sc. in Environmental Sustainability in UCD. Colin is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is currently working toward his Associate membership. Colin is a volunteer for Daubenton All Irelands Waterways Survey for Bat Conservation Ireland. He is a highly capable individual in the bat roost assessment of trees and structures including emergence and re-entry surveys.

Mr Conor Maloney (Ecologist)

Conor is an Ecologist with 4 years' experience. Conor graduated from UCD with a masters in Applied Environmental Science in 2022. Conor's field survey experience includes terrestrial mammal surveys, habitat surveys, wintering bird surveys, breeding bird surveys, and bat surveys. He also has experience in the preparation of ecological assessments to inform Appropriate Assessment (AA) Screening, Natura Impact Statements and Ecological Impact Assessments. He is experienced in completing desktop studies, data analysis and the assessment of impacts. Conor is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Mr Fionn O'Donoghue (Ecologist)

Fionn is an ecologist with 2 years' experience. He has been a Birder and wildlife enthusiast for the last 15 years and has 4 years' experience in Wildlife filming. Fionn has countless hours spent in the field and has gained a considerable amount of knowledge with bird ID skills and animal tracking. Fionn is currently working towards his Qualifying membership with the Chartered Institute of Ecology and Environmental Management (CIEEM).

Mr James Glackin (Ecologist)

James Glackin is an ecologist with 2 years' experience in bat roost assessment surveys. James holds a B.Sc. in environmental science. Through this time, he had gained experience assisting lecturers in using bat detectors both in his spare time and to help inform best practice when developing a habitat management plan on the University of Galway grounds.

- DER/BAT-2022-164 (survey licence); 07/12/2022-07/12/2022

Ms Katrina Walsh (Ecologist)

Katrina Walsh is an ecologist with 1 years' experience in bat roost assessment surveys. She holds a B.Sc. in Ecology and Environmental Biology in UCC and an M.Sc. in Environmental Sustainability in UCD. Katrina is currently working towards her Qualifying membership with the Chartered Institute of Ecology and Environmental Management (CIEEM). Katrina has completed numerous bat roost assessments of trees and structures, as well as emergence and re-entry surveys.

Mr Michael Suttle (Ecologist)

Michael Suttle is an ecologist with 1.5 years' experience in bat roost assessment surveys. He has a B.Sc. in Botany with TCD and a MSc in Applied Environmental Science with UCD. Michael Suttle is currently working towards his Qualifying membership with the Chartered Institute of Ecology and Environmental Management (CIEEM). Michael has completed numerous bat roost assessments of trees and structures, as well as emergence and re-entry surveys.

Ms Rosalind Graves (Ecologist)

Rosalind is an ecologist with 2 years' experience in bat roost assessment surveys. She has an B.Sc. in Marine Biology and an MSc in Applied Environmental Science. Rosalind has completed numerous bat roost assessments of trees and structures, as well as emergence and re-entry surveys.Rosalind has held the following derogation licences in relation to bat roost disturbance for assessment

- DER/BAT 2023-116 (survey licence);12/10/2023-31/12/2023

Licence for examination of potential bat roosts and roost disturbance at Moneypoint Generation Station, Carrowdotia, Kilrush, Co. Clare V15 R963.

- DER/BAT 2023-116 (survey licence) (Amended 18/01/2024-31/12/2024)

Licence for examination of potential bat roosts and roost disturbance at Moneypoint Generation Station, Carrowdotia, Kilrush, Co. Clare V15 R963.

Ms Roisin Murphy (Graduate Scientist)

Róisín is a Graduate Marine Scientist with 2 years' of experience. She is part of the Marine Ecology Team and works as part of the wider Ecology team. Before joining RPS, Róisín worked as Project Manager for the Recording Irish Otters Project with Cork Nature Network, organising and overseeing the EU funded IMPETUS scheme. Her MSc thesis focused on the population genetics of migrating brown trout in the Burrishoole river system. Róisín has experience in marine and riverine surveys, otter surveys, collection and identification of plankton, genetic analysis (QPCR) and statistical analysis (R Studio).

Mr Vineth Sumanapala (Graduate Ecologist)

Vineth Sumanapala is an ecologist with 1 year of experience in bat roost assessment surveys. He holds a B.Sc. in Agri-environmental Science and an M.Sc. in Applied Environmental Science, both from UCD. He is an associate member of the Institution of Environmental Sciences (AMIEnvSc), and a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Vineth has completed numerous bat roost assessments of trees and structures, as well as emergence and re-entry surveys.

1.1.3 Supervisor and trainee identification

The role as supervisor or trainee of all proposed scientific staff is outlined in **Table 1-1**.

Table 1-1: Role as supervisor or trainee of all proposed scientific staff

Forename(s)	Surname	Supervisor or Trainee
Miles	Newman	Supervisor
Robert	Rowlands	Supervisor
William	Lishman	Supervisor
Aoife	Edgely	Trainee
Julie	Larkin	Supervisor
Siobhán	Atkinson	Supervisor
Thomas	Drinnan	Trainee
Hannah	Fearon	Supervisor
Lorna	Gill	Supervisor
Declan	McGovern	Supervisor
PJ	Maguire	Trainee
Rachel	Shaw	Trainee
Rajshree	Anand	Trainee
Aisling	O'Sullivan	Trainee
Brónagh	Boylan	Trainee
Colin	Keane	Supervisor
Conor	Maloney	Supervisor
Fionn	O'Donoghue	Trainee
James	Glackin	Supervisor
Katrina	Walsh	Trainee
Micheal	Suttle	Supervisor
Rosalind	Graves	Supervisor
Roisin	Murphy	Trainee
Vineth	Sumanapala	Trainee

2 Background to proposed activity

This licence, if awarded, will cover surveys across the Republic of Ireland. In order to complete ecological baseline assessments of unknown bat roosting locations, it is important that the relevant and potentially suitable bat roosting features are identified and assessed. The derogation license is being applied for by RPS with named ecologists as the scientific agents. Dr. Miles Newman will be the lead contact for any bat surveys completed under this licence.

3 Full details of proposed activity

In competing baseline assessments for ecological assessment, it is important that the relevant and potentially suitable bat roosting features are identified and assessed. Where no known roosts occur, the assessment of a feature may require the use of an endoscope to check for the presence of roosting bats within a feature.

This limited disturbance may be required to confirm if a feature is in use by bats. Once a roost is confirmed as occupied, no further disturbance will be carried out under this derogation licence. Any further disturbance to a known roost will be the subject of a separate derogation licence application.

4 Ecological survey and site assessment

The application for derogation form (Revision 2.0, July 2025, pp. 11) states that the completion of this section is "*Not required for applications to carry out surveys*"; however, information on the objective of the survey and proposed survey methodology has been included for context.

4.1.1 Objective(s) of survey

The objective for acquiring this derogation licence is for the assessment of unknown bat roosting locations for the purpose of establishing an ecological baseline for assessment. Where no known roosts occur, the assessment of a feature may require the use of an endoscope to check for the presence of roosting bats within a feature.

This limited disturbance may be required to confirm if a feature is in use by bats. Once a roost is confirmed as occupied, no further disturbance will be carried out under this derogation licence. Any further disturbance to a known roost will be the subject of a separate derogation licence application.

4.1.2 Survey methodology

RPS have considered alternative methods of assessment (e.g. daytime visual inspections and emergence surveys); however, the results of such surveys are not always conclusive in determining bat presence/likely absence, particularly if the potentially suitable roost feature(s) is difficult to see. For example, Collins (2023)[1] notes that "*It is often difficult to have confidence in negative PRA* [Potential Roost Assessment] *surveys results. For example, evidence of bats can be weathered away or bats could roost in inaccessible cracks and crevices, leaving little or no external evidence. It may therefore be necessary to spend more time searching and employ equipment such as mirrors and* ***endoscopes***". We consider that the use of endoscopes represents a more precautionary approach, which maximises the reliability of the survey results in terms of bat presence/likely absence.

Furthermore, Collins (2023)[1] guidance states: "*Emergence surveys are* ***only recommended*** *for trees in a limited number of circumstances. This includes where bat presence is already known and roost characterisation is necessary. These surveys may also be required where a feature cannot be safely accessed for inspection (e.g. dead tree) or may be damaged by close inspection (e.g. lifted bark) – these are circumstances where emergence surveys might be the only option*". Therefore, when assessing trees (suitable for inspection), it is recommended to use tree-climbing techniques and endoscopes to access and inspect cavities to determine presence/likely absence of bats in trees.

Internal inspections using an endoscope will only be conducted where necessary. For example, if we can thoroughly assess all areas of a building (both internal and external) and no evidence of bats is found, then no further surveys will be undertaken (as per Collins[1] 2023).

A 'do nothing' scenario would result in RPS ecologists being unable to undertake internal investigations of potentially suitable roost features (using endoscopic investigations). Instead, we would have to undertake alternative, non-invasive assessments, which may provide less reliable results (as stated above). In this scenario, we increase the risk of a false negative (i.e. we fail to detect the presence of a bat roost), which could lead to the increased risk of inappropriate assessment and mitigation being applied. This could (potentially) adversely affect that local bat population.

[1] Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition).

5 Evidence to support the derogation tests

5.1.1 Test 1

It is proposed that this application qualifies under Regulation 54(2)(c) of the European Communities (Birds and Natural Habitats) Regulations. The *Applications for Regulation 54 Derogations for Annex IV species: guidance for applicants* document (Version 1, dated 1 July 2025) states that:

"It *may be appropriate to choose Reason C for scenarios such as carrying out surveys to inform impact assessments of development proposals, where such surveys have the potential to commit* one of the offences under Regulation 51 and 52 of the Regulations."

In this case, there is potential to commit an offence under Regulation 5 (Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration).

With regard to this application, the nature of the public interest is:

- complying with national planning policies. Specifically the National Planning Framework Project Ireland 2040 highlights:

"The importance of our biodiversity is not restricted to legally protected areas and there are a range of measures in place to protect species and habitats more broadly. In this regard, the Habitats Directive contains obligations to protect certain species wherever they occur, while the Birds Directive contains protections for all birds, and they may only be disturbed or controlled subject to licence or derogation, as appropriate."

- supporting economic or social development (nationally important infrastructure development projects, employment, regeneration, mineral extraction, housing etc.)"

With regard to the conservation interest of the species under strict protection:

- By undertaking these assessments using an endoscopic, in a minimally invasive manner, we consider that such assessments will not be detrimental to the maintenance of bat populations 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.

5.1.2 Test 2

The alternative solutions that have been considered include the options of "do-nothing", "daytime visual inspection" and "emergence surveys".

A 'do nothing' scenario would result in RPS ecologists being unable to undertake internal investigations of potentially suitable roost features (using endoscopic investigations). Instead, we would have to undertake alternative, non-invasive assessments, which provide less reliable results (as stated above). In this scenario, we increase the risk of a false negative (i.e. we fail to detect the presence of a bat roost), which could lead to the increased risk of inappropriate assessment and mitigation being applied. This could (potentially) adversely affect that local bat population.

The results of both alternative methods of assessment, daytime visual inspections and emergence surveys are not always as conclusive in determining bat presence/likely absence, particularly if the potentially suitable roost feature(s) is difficult to see. For example, Collins (2023)[1] notes that "*It is often difficult to have confidence in negative PRA* [Potential Roost Assessment] *surveys results. For example, evidence of bats can be weathered away, or bats could roost in inaccessible cracks and crevices, leaving little or no external evidence. It may therefore be necessary to spend more time searching and employ equipment such as mirrors and* ***endoscopes***".

5.1.3 Test 3

As stated above, and in-keeping with Collins (2023)[1], we consider endoscopic inspections of buildings and tree-climbing represent the most comprehensive assessments to confirm the presence/likely absence of bat roosts. When performing an internal inspection, we will ensure we minimise light and sound to ensure bats are minimally disturbed, while still being thorough and determining the presence/likely absence of bats. Furthermore, we will remain mindful of bat welfare by slowly inserting the endoscope into the suitable roost feature, to ensure that if bats are present, they will be disturbed as little as possible.

By undertaking these assessments using an endoscopic, in a minimally invasive manner, we consider that such assessments will not be detrimental to the maintenance of bat populations 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.

We will remain cognisant of the guidance provided by Marnell *et al*. (2022)[2] and Collins (2023)[1] when undertaking any assessments. There are no site-specific roost location for which this application applies. All surveys carried out will be non-destructive and minimally invasive. Furthermore, once a roost is confirmed as occupied, no further disturbance will be carried out under this derogation licence. Any further disturbance to a known roost will be the subject of a separate derogation licence application.

[2] Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

6 Monitoring the impacts of the derogations

6.1.1 Details of how we propose to verify whether the derogation have been implemented correctly

The derogation license is being applied for by RPS with named ecologists as the scientific agents, both and supervisors and trainees. The implementation of the derogation license will be overseen by Dr Miles Newman. A named 'trainee' will not complete any works outlined above within the guidance of a 'supervisor'.

A team review will be completed at multiple occasions during the timeframe of the derogation licence to ensure all proposed methods are being effectively followed.

6.1.2 Details of proposed reports to be submitted to the NPWS including the results of monitoring

A Regulation 54 Returns Form will be completed and submitted to the NWPS on the completion of the licence operation timeframe. No monitoring is proposed.

6.1.3 Understanding of the published guidance by the European Commission

This application has been made with cognisance of the guidance published by the European Commission "*Guidance document on the strict protection of animal species of Community interest under the Habitats Directive*", with specific reference to Section 3.4 (monitoring and reporting of derogations).