



256398-06/11/2025-EIAR Appendix 6.6 Kerry Slug Derogation Licence Report



APPENDIX 6-6

KERRY SLUG DERROGATION LICENSE REPORT

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Kerry Slug Derogation Licence Application

Curraglass Wind Farm Planning Application

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1.

INTRODUCTION

This report has been provided in support of an application for a derogation license for Kerry Slug (*Geomalacus maculosus*) on behalf of Enerco Energy Ltd., who are preparing an application to Cork County Council for a renewable energy development proposed within a decommissioned wind farm site in Curraglass, Co. Cork (hereafter referred to as the “proposed development”).

This report has been prepared by Pádraig Desmond BSc of MKO and reviewed by Corey Cannon MSc BSc CEcol MCIEEM Project Director (Ecology) at MKO.

1.1

Legislation

The Habitats Directive is transposed into Irish law by the European Communities (Birds and Natural Habitats Regulations) 2011 (S.I. No.477 of 2011) which replaced earlier Regulations from 1997 to, amongst other things, take account of Case law in the interim. These 2011 Regulations have had a number of amendments (S.I. No. 290 of 2013; S.I. No. 499 of 2013, S.I. No. 355 of 2015 and S.I. No. 293 of 2021). The 2011 Regulations were also amended by the Planning, Heritage and Broadcasting (amendment) Act 2021 (No. 11 of 2021), Chapter 4.

Article 12 of the Habitats Directive is transposed into Irish law by Regulation 51 of the EC (Birds and Natural Habitats) Regulations of 2011 and Article 16 by Regulation 54.

Articles 12 and 16 of the Habitats Directive which require member states to establish a system of strict protection for the animal species listed in Annex IV(a) and allow derogation from these provisions under strictly defined conditions. Annex IV in particular protects the species from disturbance and habitat destruction. The animal species listed in Annex IV(a) which occur in Ireland are the otter, all bats, all cetaceans (whales and dolphins), marine turtles, the natterjack toad and the Kerry slug

1.2

Guidance

This supporting document for a derogation licence has been prepared in line with NPWS *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland - National Parks and Wildlife Service Guidance Series 1* (NPWS, 2021).

1.3

Background

Kerry slug is protected by the Wildlife (Amendment) Act 2000 and listed on Annex II and Annex IV(a) of the Habitats Directive. Therefore, it is strictly protected from injury or disturbance /damage to their breeding or resting place wherever it occurs. The overall conservation status of this species has been reported as favourable, and it is not currently considered threatened within its Irish range (NPWS, 2019). This report sets out the results of previous dedicated Kerry slug surveys undertaken at the proposed development site in 2020 and 2024/ 2025.

The proposed development, to which this derogation licence pertains, will comprise of 3 no. wind turbines, new and upgraded access roads and entrance(s), borrow pit and spoil management areas, internal electrical cabling, temporary construction compounds and a permanent meteorological mast. All wind farm site cabling will be laid underground. It is proposed to utilise the existing wind farm infrastructure at the site, including the existing on-site substation. Much of the proposed infrastructure will be located within existing hardstand and roads which were constructed in 2005 for the original wind farm.

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Kerry slug records are known within the site, from surveys undertaken in 2020 which are further detailed in Section 2-2 and 2-3. As the proposed development will result in the loss of suitable Kerry slug habitat, disturbance to Kerry slug, and potential mortality, a derogation licence is required in support of the planning application. Mitigations are proposed as part of the application to mitigate and minimise impacts on Kerry slug.

The proposed development is not within any European site, the population of this species within the proposed development site is considered as *County Importance*.

The site location of the proposed development is shown in Figure 1-1 below. The layout of the proposed development is shown in Figure 1-2 below.

1.4

Description of the Proposed Development

Construction phase

The development will consist of the provision of the following:

1. Up to 3 no. wind turbines and all associated foundations and hard-standing areas;
2. 1 No. borrow pit;
3. 1 No. permanent meteorological mast with a maximum height of up to 112 metres;
4. Upgrade of existing and provision of new site access roads;
5. Upgrade to existing access junction;
6. 4 no. battery storage containers, 1 no. control building with welfare facilities, associated electrical plant and equipment, security fencing, wastewater holding tank,
7. Forestry Felling;
8. A temporary construction compound;
9. Site Drainage;
10. All associated internal underground cabling, including underground grid connection cabling to the existing overhead line; and
11. All associated site development and ancillary works.

Operational phase

The proposed development is expected to have a lifespan of approximately 30 years. During the operational period, on a day-to-day basis the wind turbines will operate automatically, responding by means of meteorological equipment and control systems to changes in wind speed and direction. All operating systems will be managed from an off-site facility. Maintenance will be undertaken on the development but all envisioned works will be undertaken on infrastructure, using the established road system. No potential for significant impacts on Kerry slug are anticipated during operation.

Decommissioning phase

There will be no requirement for additional habitat loss during any decommission of the development. Should the wind farm be decommissioned and removed at the end of its operational life, established roads will be utilised to remove the infrastructure. No potential for significant impacts on Kerry slug are anticipated during decommissioning.

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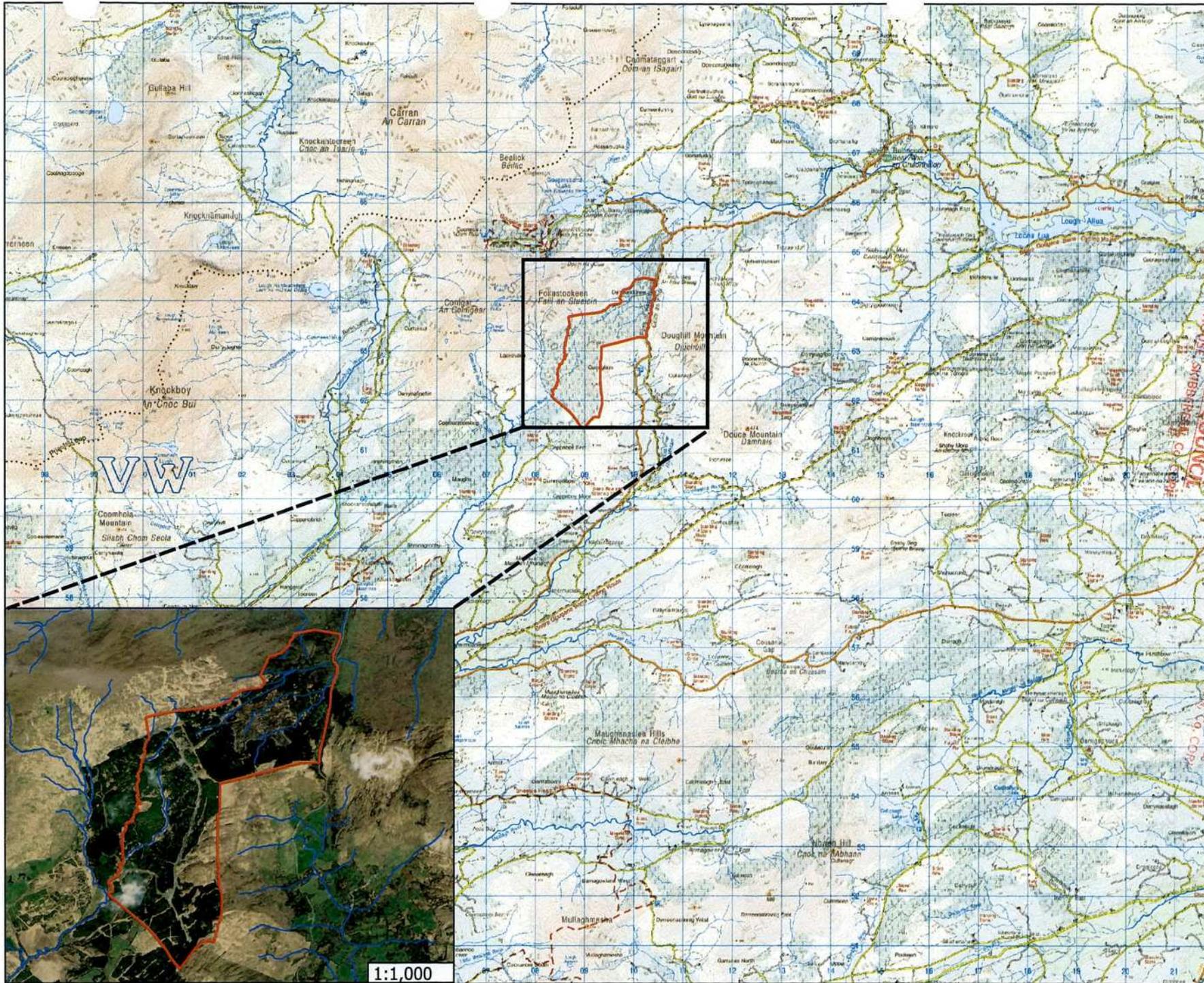
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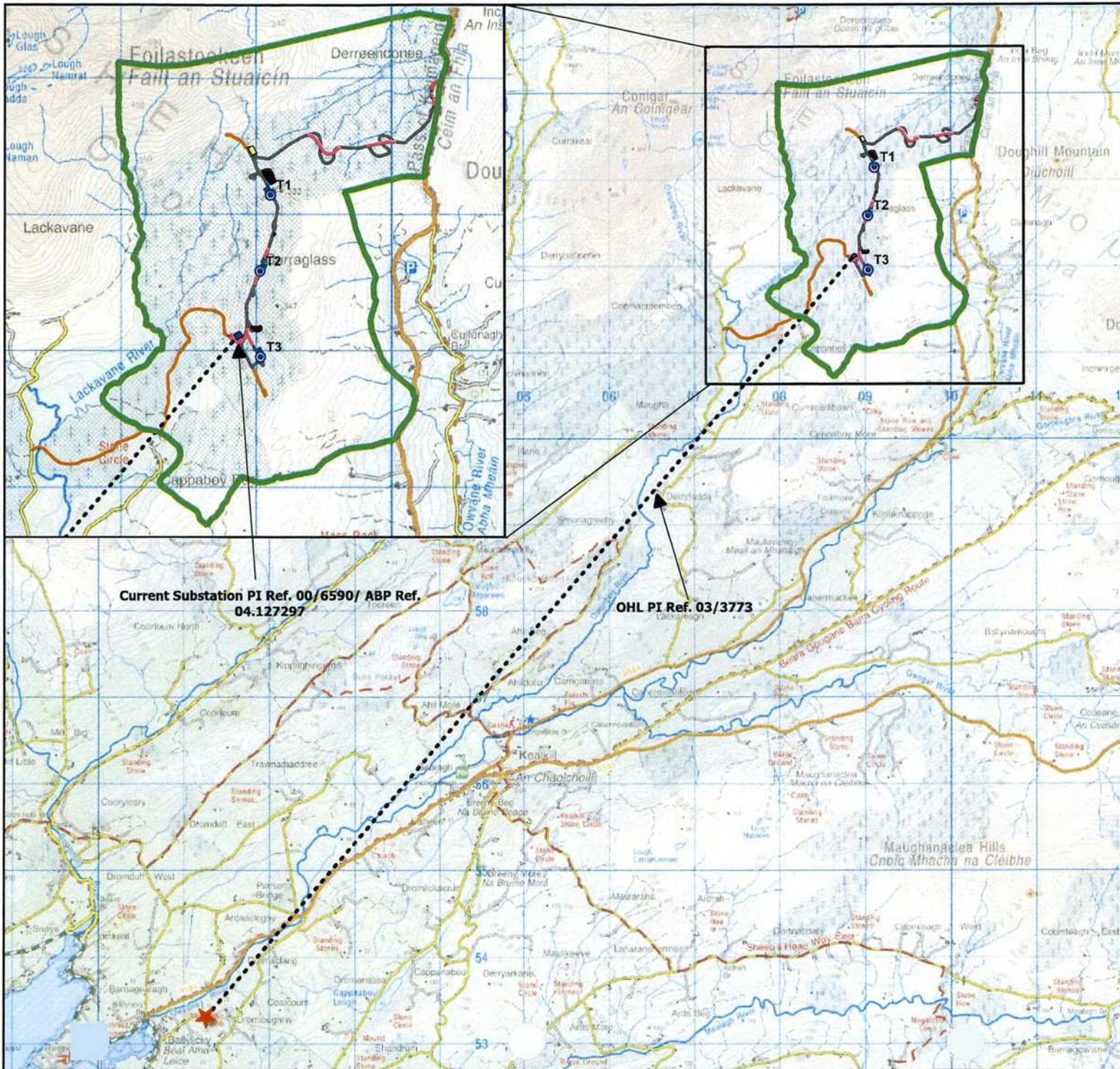


Map Legend

EIAR Site Boundary

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Drawing Title Site Location	
Project Title Curraglass Wind Farm - Derogation licence application	
Drawn By PD	Checked By PD
Project No. 230614-a	Drawing No. Figure 1-1
Scale 70,000	Date 2025-03-27
<p>MKO Planning and Environmental Consultants Tuam Road, Galway Ireland, H91 VW84 +353 (0) 91 735611 email: info@mkofireland.ie Website: www.mkofireland.ie</p>	



Current Substation PI Ref. 00/6590/ ABP Ref. 04.127297

OHL PI Ref. 03/3773

Map Legend

- ▭ Site Boundary
- Turbine Location
- Proposed Hardstanding
- ▬ Existing Road to Upgrade
- ▬ New Road
- ▬ Existing Roads
- ▬ Temporary Compound Locations
- Proposed Borrow Pits
- Met Mast
- Current Substation Location_V1_2024.10.08 - 24
- ★ Ballylickey Substation
- - - OHL Ballylickey

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Drawing Title
Curraglass Wind Farm Layout

Project Title
Curraglass Wind Farm

Drawn By	NM	Checked By	OM
Project No.	240614	Drawing No.	1-2
Scale	1:43,076	Date	2024-11-07


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2.

POTENTIAL IMPACTS ON KERRY SLUG

No impacts on Kerry slug are anticipated during operational or decommissioning phase of the proposed development.

The proposed development has been designed to minimise the loss of any habitat of ecological importance by utilising existing hard surfaces, such as previous hard stands and existing roads. The total approximate footprint of the proposed development is 2.55 ha, within a study area of approximately 267 ha. However, there will be a requirement for the removal of habitats such as conifer plantation, recently felled woodland, mixed broad-leaved woodland, degraded wet heath, and scrub. As these habitats provide supporting habitat for Kerry slug, and given these species' known presence within the site, there is potential for direct disturbance or mortality of this species, as a result of excavations, machinery movement, and vegetation clearance.

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2.1

Kerry Slug Records

The proposed development site is within the range of the Kerry slug distribution in Ireland (Reich et al. 2012) and is situated within a larger landscape which contains suitable habitat for the species. There is no Special Area of Conservation (SAC) in the vicinity of the site designated for Kerry slug. The population found within the study site is not associated with any European Site, given the distance to the closest SACs (Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC which is approx. 16km north and Glengarriff Harbour and Woodland SAC which is approx. 17km west southwest). This is due to the slow rate of dispersal shown by Kerry slugs (average mobility of 1m per day) and their strong affinity for the microhabitats with which they are associated (McDonnell & Gormally 2011). Further, the study site is isolated from any Kerry slug designated SAC by aquatic barriers from a network of rivers to the north and west of the site. Therefore, actions permitted by a derogation licence will not affect the Kerry slug populations in any surrounding SAC's.

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The methodologies and results of Kerry slug surveys undertaken in 2020 are provided in the below sections, which were submitted as a Licence Return Report (C71/2020) in 2021 and included in Appendix 1 of this report. These results are further presented in Figure 2-2.

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2.2

Survey Methodology 2020

Given that the proposed development was identified are being within the known range for Kerry slug, as highlighted by NPWS data provided in the desk study, a general survey for Kerry slug was carried out within areas of suitable supporting habitat within the site on the 25th of March 2020. In addition, a designated survey was carried out within the study area by means of trapping. A licence was obtained from NPWS (Licence No.: C71/2020) and metric traps were placed within areas of the proposed development footprint and other habitat areas within the study site.

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Surveys for this species comprised a combined methodology based on most recent studies and guidelines. Hard searching is the first stage in determining presence/absence. If no evidence is found, then metric traps should be deployed for a 4-6 week period to confirm absence of the species (McDonnell, 2011). As the purpose of this survey was to determine presence/absence of Kerry slug within the study area a combined approach was used. Trapping should take place during wet weather on blanket bogs and heaths, and during spells of dry weather in woodlands (O'Donnell 2011). Hand searching was carried out in appropriate weather conditions (damp weather, according to Platts & Speight, 1988 (Reich 2012)) with temperatures at a minimum of 8 degrees celsius on the 25th of March 2020. This comprised searching the surface of rocky outcrops and tree trunks as well as peeling back moss from the tree base to confirm if individuals were present. De Sangosse traps were used which comprised a square of absorbent material with reflective upper surface and perforated dark lower



surface measuring 50cm x 50cm. The traps were baited with a piece of carrot approx. 2.5cm in size, moistened with water and placed within conifer plantation, rocky outcrops and other suitable habitat within and adjacent to the proposed development footprint. Areas of newly proposed infrastructure such as turbine bases, borrow pits, substation and construction compound were targeted for placement of traps. The traps were secured with string and/or rocks and pegs where placed on the ground. Band traps were also erected around tree trunks. These were placed approximately 1.5m from the ground and secured with string.

A map showing the location of the 20 Kerry Slug traps deployed on the 25th March 2020 is shown on Figure 2-1.

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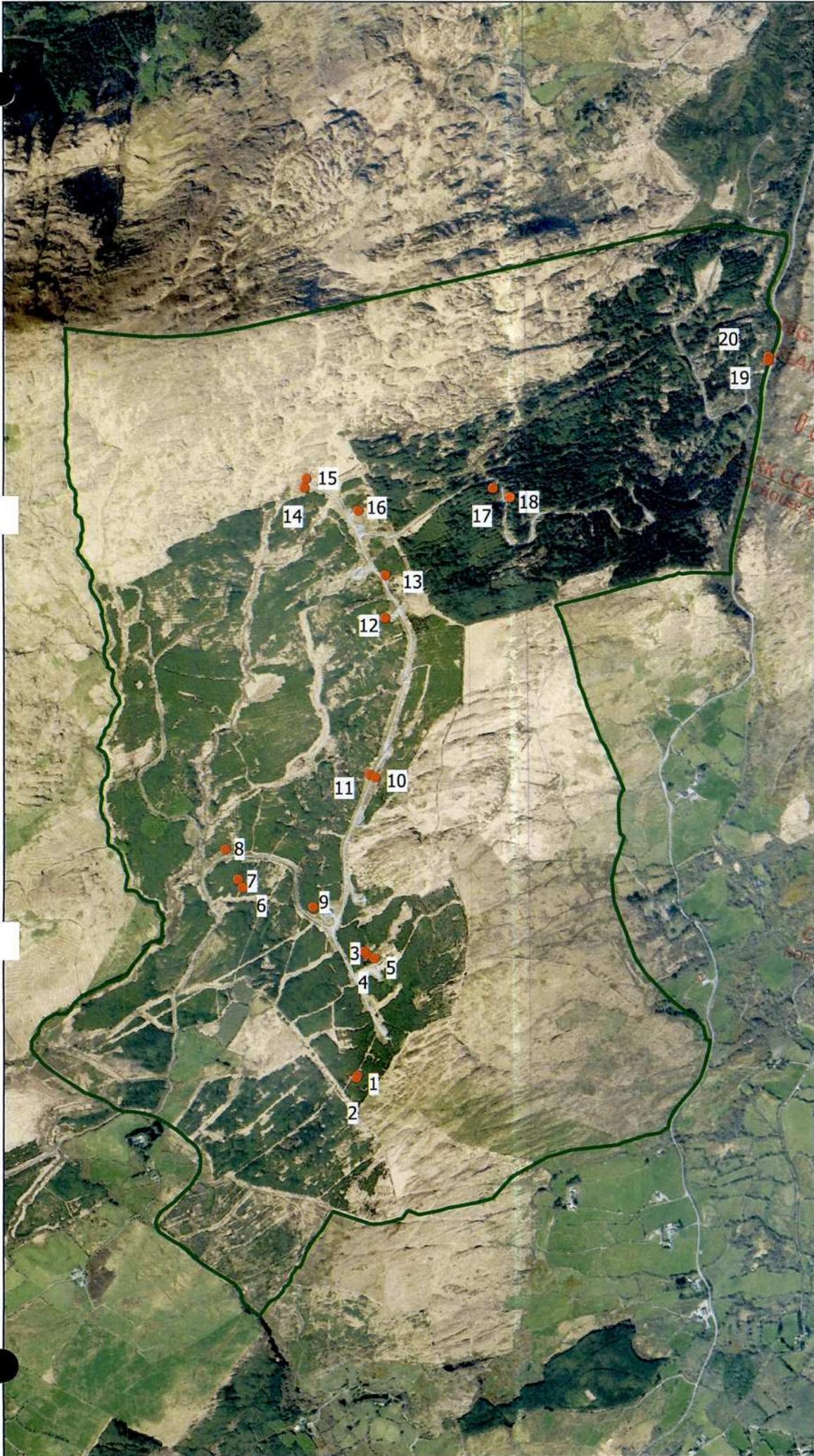
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Map Legend

- ETAR Site Boundary
- Kerry Slug Trap Locations

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Drawing Title	
Kerry Slug Trap Locations Curraglass	
Project Title	
Proposed Renewable Energy Development	
Drawn By	Checked By
Laoise Kelly	John Hynes
Project No.	Figure
190301	Figure 2-1
Scale	Date
1:175000	17.06.2020

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2.3

Survey results 2020

Hand searches confirmed the presence of Kerry slug within the study area and a total of 19 observations were recorded in a range of habitats through the study area (see Table 2-1 below).

Seventeen records of Kerry slug were obtained on collection of the metric traps on 26th May 2020 the results of which are shown in Table 2-2. The overall locations of Kerry slug recorded in the site are shown in Figure 2-2.

Table 2-1 Incidental records of Kerry Slug recorded within the study area 25.03.2020

Habitat	No. Kerry Slug Recorded	Grid reference/Location
Rocky outcrop, boulder	3	E108796; N063602
Felled conifer plantation	N/A	N/A
Boulders at existing turbine base	3	E109091; N063144
Rocky outcrop/boulder	1	E109035; N062576
Conifer tree near proposed hardstanding area	1	E108589; N062175
Individual boulders	3	E109007; N061959, E109017;
	3	N061968
	3	E109031; N061952
Boulder	1	E109006; N061619
Conifer tree	1	E108970; N061536
Incidental Records TOTAL	19	

Table 2-2 Kerry Slug recorded in metric traps 26.05.2020

Habitat	No. Kerry Slug Recorded	Grid reference/Location	Metric Trap No.
Tree in Conifer Plantation (WD4)	3	E108976 N061533	1
Tree in Conifer Plantation (WD4)	1	E108988 N061873	3
Individual boulder	2	E109007 N 061964	4
Tree in Conifer Plantation (WD4)	1	E108583 N062193	6
Tree in Conifer Plantation (WD4)	5	E108526 N062327	8
Recolonising Bare Ground (ED3) adjacent to Conifer Plantation (WD4)	1	E109071 N063121	12
Rocky outcrop, boulder adjacent to Conifer Plantation (WD4)	2	E109072 N063267	13
Oak-Birch-Holly Woodland	1	E110385 N064022	20
Metric Trap Records TOTAL	16		

Given the widespread records of Kerry slug recorded, the above results indicate that this species is utilising most habitats within the site and therefore, Kerry slug are assumed to be present in suitable supporting habitat throughout the site. Such supporting habitats including conifer plantation, recently



felled woodland and scrub mosaic, rocky outcrops, and woodland will remain in abundance post construction.

2.4

Survey Results 2024 & 2025

Additional surveys of the proposed development site have been undertaken in 2024 and 2025. The aim of these surveys was to identify any significant changes in the ecological baseline since the previous surveys in 2020. There appears to be no active forestry operations in place at the site, which remains dominated by conifer plantation and recently felled woodland with self-establishing sitka spruce and other conifer species. As such, the extent of supporting habitat for Kerry slug remains the same as identified in 2020, with no significant changes to the habitats within the site.

Figure 2-3 below provides the 2020 habitat map of the site, which remains valid today.

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Map Legend

- EIAR Site Boundary
- ▲ Incidental Ker Slug Records 25.03.2020
- ▲ Kerry Slug Metric Trap Records 26.05.2020

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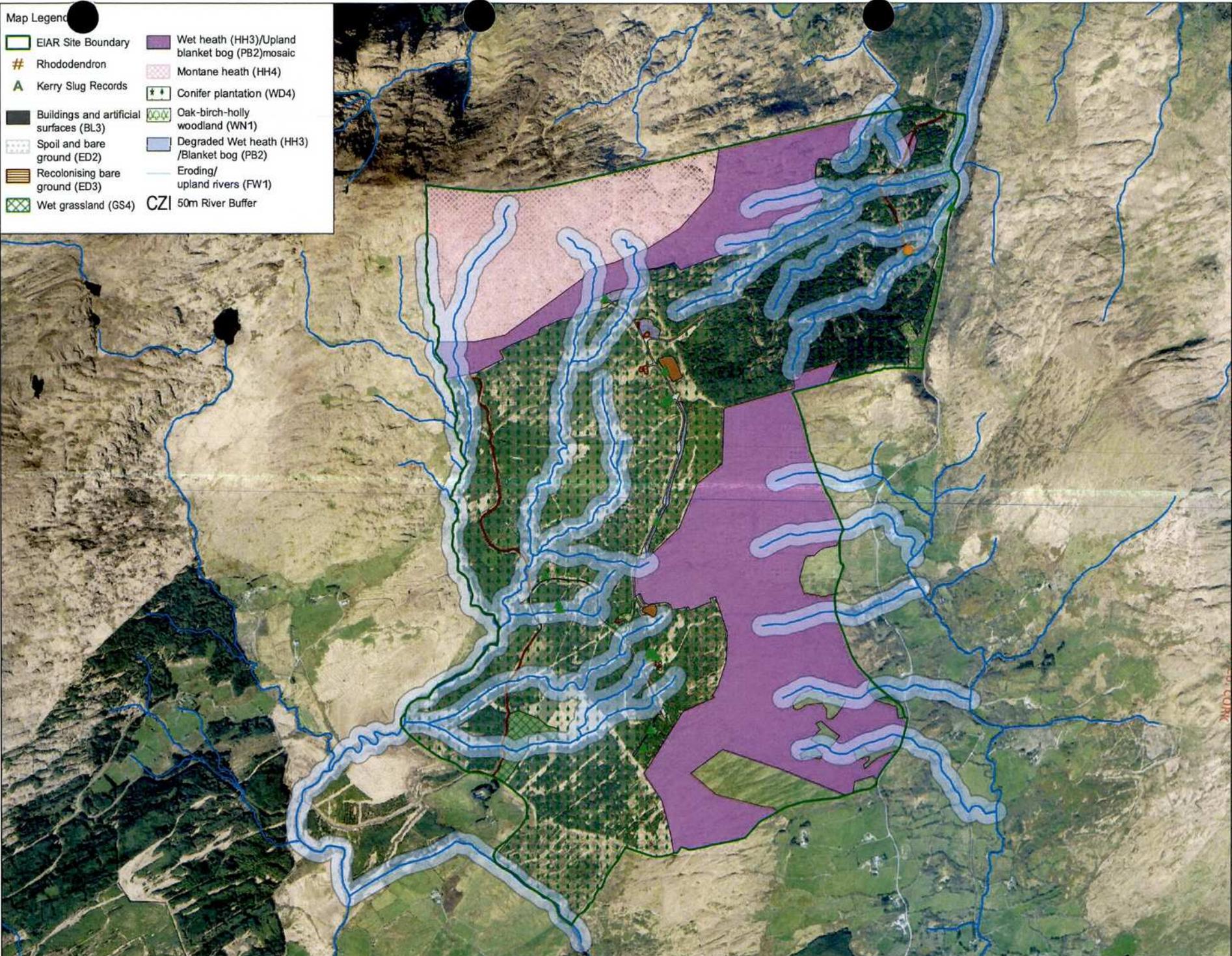
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Drawing Title	
Kerry Slug - Incidental and Metric Trap Records	
Project Title	
Proposed Renewable Energy Development Curraglass	
Drawn By	Checked By
LK	PR
Project No.	Drawing No.
190301	Figure 2-2
Scale	Date
1:17500	30-06-2021

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Map Legend

EIA/R Site Boundary	Wet heath (HH3)/Upland blanket bog (PB2) mosaic
Rhododendron	Montane heath (HH4)
Kerry Slug Records	Conifer plantation (WD4)
Buildings and artificial surfaces (BL3)	Oak-birch-holly woodland (WN1)
Spoil and bare ground (ED2)	Degraded Wet heath (HH3) / Blanket bog (PB2)
Recolonising bare ground (ED3)	Eroding/upland rivers (FW1)
Wet grassland (GS4)	CZI 50m River Buffer



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Habitat Map Curraglass

Prepared for:
Curraglass Renewable Energy Development Co. Cork

Drawn by: Laiose Kelly	Checked by: John Hynes
Project No: 190301	Drawing No: Figure 2-3
Scale: 1:15315	Date: 06.05.2020

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3. MITIGATION STRATEGY

3.1 Translocation

During the construction phase of the proposed development, including any felling works, the construction corridor will be kept to a minimum to avoid direct habitat loss for Kerry slug. Individual slugs within the footprint of the works will be translocated. Translocation will be to adjacent suitable habitats (outside of other construction works area). This is to ensure that suitable habitat remains and food sources for the Kerry slugs following their removal from the works area.

Kerry slugs have colour variations which are associated with different habitat types i.e., brown slug with yellow spots in forested habitats, and a black/grey slug with white spots in peatland habitats. This has been identified as a camouflage adaptation, and the translocation will consider this. For example, the translocation of any slugs from forested habitat will be to a suitable forested habitat outside of the impacted area. Any translocation which does not consider this will result in a mismatch of colouration. This in turn has the potential to result in an increase in predation caused by visually-foraging predators (O’Hanlon et al. 2017). This has been taken into consideration in the translocation methodology outlined below.

Translocation Methodology (Pre-Construction)

The surveys for translocation will follow the methodology outlined in Mc Donnell & Gormally (2011), consisting of a hand search and the deployment of metric refuge traps manufactured by De Sangosse (Pont du Casse, France). The surveys will be undertaken in suitable weather conditions where the felling is permitted. Only trained and licensed personnel will carry out the Kerry slug surveys.

The surveys will follow the translocation methodology as set out below:

- Search, trapping, and translocation will only occur during suitable weather conditions (wet/humid weather).
- The identification of suitable receiving habitat is critical. Animals found on sandstone will be translocated to sandstone, those found on oak trees will be located to oak trees, etc.
- Translocate to suitable habitat within 50m of the construction area (or to suitable habitat within a number of monitoring plots: 20x20).
- Prior to the commencement of construction, the location of the proposed development footprint will be surveyed by a suitably qualified professional, under a survey license from NPWS. The results of this survey will be submitted to the NPWS for comment and approval and the survey will identify areas where further surveys or the removal of slugs may be required.
- It is likely that some removal and translocation of slugs will be required. The areas where this will be required will be informed by the initial surveys to be undertaken. The methods by which this will be undertaken will be submitted to the NPWS for approval. Any translocation works will be carried out by suitably qualified professionals under this licence. The removal will be undertaken before the commencement of construction activity.
- Slugs will be translocated to suitable areas of similar habitat within the study area, such as forestry, wet heath, scrub, or woodland. These sites will be approved by the NPWS as part of their approval process for the translocation methodology.
- Slugs collected from forestry will be re-located to a forested habitat and slugs collected from grassland will be relocated to grassland etc.

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Measures during Construction:

- The extent of the development footprint will be clearly marked to prevent any encroachment on Kerry slug habitat located outside the works area.
- Should Kerry slugs be found in the works area during the construction phase the site ECoW will notify the project ecologist and they will be relocated by a licenced and suitably qualified individual to a suitable habitat outside the works area to avoid direct mortality.
- Turves and boulders/exposed rock will be stored adjacent to the infrastructure footprint where practicable before reinstatement to maintain suitable habitat for the species in the vicinity of the works during construction.

There is sufficient evidence that such mitigation measures have been successful elsewhere (O'Hanlon et al. 2017) along with record returns (DER/KERRY SLUG – 2018 – 88).

4.

ENHANCEMENT AND MONITORING

The following enhancements for Kerry slug specifically will be undertaken:

- Tree stumps resulting from the felling of forestry will be left in situ to decay to provide suitable habitat for Kerry slug.
- Rock outcrops, boulders and stonewalls will be retained where possible or, if removal can't be avoided, they will be replaced to enhance the value of the habitat surrounding the windfarm infrastructure.
- Monitoring programme

The Kerry slug population on the site will be monitored to assess the success of the above enhancement measures and provide data on Kerry slug in the area. This will involve conducting surveys on an annual basis for three years post construction, the results of which will be reported to NPWS. These surveys will be carried out during optimal weather conditions (mild, damp, overcast and not excessively windy) by suitably qualified professionals, under survey licence. They will follow Mc Donnell & Gormally (2011) and involve both hand searching and metric refuge trapping and will be carried out in the same locations and roughly around the same time every year to allow a comparison between years. If monitoring demonstrates that the enhancement measures are unsuccessful, the measures will be reviewed and additional methods will be explored.

5.

PRE-CONDITIONS

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

It is believed that the pre-conditions for granting a derogation licence have been met, as follows:

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Test 1 – Reasons for Seeking Derogation Regulation

54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e). We are of the opinion that the following reasons apply:

(c) 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.

The construction of the wind farm will have consequences of primary importance for the environment by producing renewable energy and helping Ireland in the reduction of carbon emissions as part of the Climate Action Plan to halve Ireland's emissions by 2030 and reach net zero by no later than 2050. Whilst the habitats within the construction footprint provide suitable habitat for Kerry slug, they are highly modified, and supporting habitat is widespread in the area. Therefore, the loss of such habitats and the required disturbance to this species, provided that this derogation allows for the appropriate translocation of Kerry slug, to progress the development is considered acceptable in the effort in meeting Ireland's climate action goals.

Test 2 – There is no Satisfactory Alternative

There is no satisfactory alternative to the proposed development.

Do nothing scenario

Should the proposed development not proceed, the opportunity to construct a renewable energy development in a suitable location will be lost.

Disturbance avoidance

Mitigation by avoidance was considered in the project design. The proposed development has been designed to minimise the loss of any habitat of ecological importance, including suitable Kerry slug habitat. Existing infrastructure, such as existing roads and previous turbine hard stands, has been used in the design of the development, and as such, loss of suitable supporting habitat has been kept to a minimum. The overall construction footprint is small (approximately 2.55 ha in a site of 267 ha), and the loss of suitable habitat will not be significant in the context of the wider site.

Given the ecology of Kerry slug, their localised nature and year-round presence, there is no viable alternative regards seasonal works to avoid disturbance to this species.

Viable option

Vegetation removal to accommodate the proposed development will be undertaken in consultation with NPWS, under supervision of an appointed ECoW, and under licence. The translocation and survey methodologies detailed in this report will be fully adhered to, and will allow the progression of the proposed development while not impacting the favourable status of Kerry slug within the site.

There is no satisfactory alternative to the translocation of individuals under licence

Test 3 – Favourable Conservation Status

Annex IV species must be maintained at Favourable Conservation Status or restored to favourable status if this is not the case at present. The net result of granting a derogation licence must be neutral or positive for the species in question.

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Mitigation in the form of translocation is prescribed to ensure that Kerry slugs within the works area are translocated to a suitable similar nearby habitat minimising loss of individual animals during the works. Suitable habitat for the Kerry slugs will be lost due to the construction of the proposed wind farm. However, suitable habitat is abundant in the wider area and habitat enhancement measures will also be provided in line with the EIAR as follows:

- Turves and boulders/exposed rock will be stored adjacent to the infrastructure footprint and reinstated along the construction corridor post construction of the hardstanding areas. The boulders, currently containing lichen growth, will be placed to one side during construction and will be subsequently reinstated along the newly installed infrastructure to facilitate the restoration of this habitat.
- In addition, vegetated turves, stripped to 30cm during initial site preparation, will be temporarily stored to one side and reinstated along the construction corridor following the installation of hardstanding.
- In addition, any forestry felling around the infrastructure will result in tree stumps being left to decay naturally. This will further provide suitable habitat for Kerry slug.

6.

CONCLUSION

In conclusion, this report supports the application for a derogation license for Kerry slug associated with the proposed wind farm development at Curraglass, Co. Cork. As required as part of the application process, the report addresses the following:

- 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.
- Evidence that 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.
- 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.
- As much information as possible to allow a decision to be made on this application.

With the implementation of mitigation and enhancement measures as outline in this report it can be concluded that the granting of the derogation licence would not be detrimental to the maintenance of the Kerry slug populations locally or in the wider County and the favourable conservation status of the species will not be undermined.

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APPENDIX 1

LICENCE RETURN REPORT (C71/2020)

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Licence Returns Report C71/2020

Kerry Slug, Curraglass,
Co. Cork

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DOCUMENT DETAILS

Client: **NPWS**

Project Title: **Kerry Slug, Curraglass, Co. Cork**

Project Number: **190301**

Document Title: **License Returns Report C71/2020**

Document File Name: **LRR F - 2021.09.22 - 190301**

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Rev	Status	Date	Author(s)	Approved By
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<i>Appendix 1</i>	<i>NPWS Licence C71/2020</i>
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1. INTRODUCTION

1.1 Background

As part of a proposed wind farm at Curraglass, Co. Cork a Kerry Slug license was applied for in order to determine the presence of this species with regard to the proposed development footprint. This licence is provided in **Appendix 1** of this report. The location of the site is shown in Figure 1-1.

1.1.1 Kerry Slug Ecology

The Kerry Slug has a very restricted global range and occurs only in Ireland, Spain and Portugal. The species is marked with white or yellow spots and two colour forms exist: a blue/grey slug with white spots and a ginger or brown form with yellow spots. Adults can grow to 80 millimeters in length but may contract into a ball shape when disturbed or may lie flat and elongate themselves to fit into cracks and crevices. Kerry Slugs are capable of self-fertilisation and produce eggs between July and October. The eggs are large, laid in batches of 18 to 30, and will hatch between six and eight weeks. Individuals can live for up to seven years.

The species feeds on lichens, liverworts and mosses on rocky outcrops or on mature trees and timber. The species is largely active at night, throughout the year, and will emerge during the daylight hours during damp or humid conditions. In Ireland, Kerry Slug is largely restricted to west Cork and Kerry from fifty 10km squares. Within its range, it occurs within two broad habitat types:

Oak-dominated or mixed deciduous woodland with a mixture of oak and birch. Woodlands with rocky outcrops or boulders are particularly favoured.

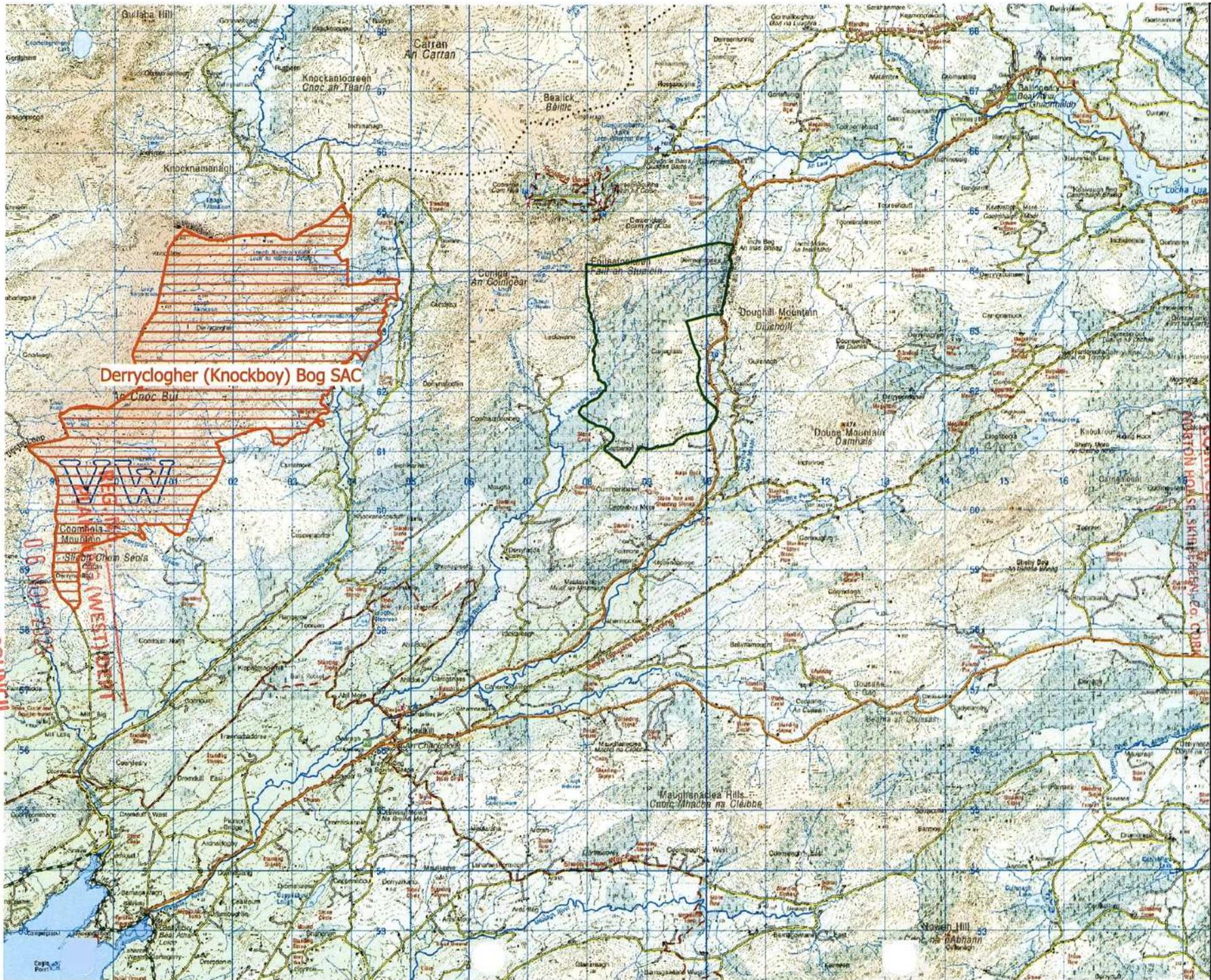
Unimproved oligotrophic open moor or blanket bog with sandstone outcrops or boulders. These areas are largely devoid of vegetation except for lichens and mosses which provide sufficient grazing material for the species.

1.1.2 Legal Protection

Kerry Slug is a protected species under the Wildlife Act, 1976 and Wildlife (Amendment) Act, 2000, in Ireland and is also protected under Annex II and Annex IV of the EU Habitats Directive (Council Directive 92/43/EEC) resulting in the designation of seven Special Areas of Conservation (SACs) for the species protection in Ireland. The nearest European Site designated for Kerry Slug is Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC (000365), located 8.4 kilometres north of the EIAR site boundary.

1.2 Statement of Authority

Kerry Slug surveys were carried out by Laoise Kelly (BSc., MCIEEM) in March and 25th March and 26th May 2020. Laoise has over 6 years ecological consultancy experience. The surveys were carried out under license C71/2020 (see Appendix 1). This report was written by Laoise Kelly and reviewed by Pat Roberts (BSc., MCIEEM). Pat has over 15 years' experience in ecology and environmental management.



Map Legend

- Special Area of Conservation
- EIA Site Boundary

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Drawing Title

Site Location Curraglass

Project Title
Curraglass Renewable Energy Development, Co. Cork

Drawn By Laoise Kelly	Checked By John Hynes
Project No. 190301	Drawing No. Figure 1-1
Scale 1:82500	Date 08.04.2020

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2.

METHODOLOGY

2.1

Desk Study

The following data sources were consulted as part of desk studies:

- > Review of online web-mappers: National Parks and Wildlife Service (NPWS)
- > Review of the publicly available National Biodiversity Data Centre (NBDC) web-mapper
- > Specially requested records from the NPWS Rare and Protected Species Database for the hectads in which the Proposed Development is located.
- > NPWS Article 17 Range and distribution maps
- > NPWS Threat Response Plan for Kerry Slug (*Geomalacus maculosus*).

The desk study revealed that the Proposed Development is located within the known geographical range of the Annex II and IV species Kerry Slug. The species occurs in two main natural habitats in Ireland: woodland, and blanket bog/wet heathland (NPWS 2019). In recent studies by Johnson et al. (2018) it has been shown that Kerry Slug can also be abundant in conifer plantation.

2.2

Field Survey Methodology

Given that the Proposed Development fell within the known range for Kerry Slug as highlighted by NPWS data provided in the desk study, a general survey for Kerry Slug was carried out within areas of suitable supporting habitat within the site on the 25th of March 2020. In addition, a designated survey was carried out within the study area by means of trapping. A licence was obtained from NPWS (Licence No.: C71/2020) and metric traps were placed within areas of the Proposed Development footprint and other habitat areas within the study site. This licence is provided in Appendix 1.

Surveys for this species comprised a combined methodology based on most recent studies and guidelines. Hand searching is the first stage in determining presence/absence. If no evidence is found, then metric traps should be deployed for a 4-6 week period to confirm absence of the species (McDonnell, 2011). As the purpose of this survey was to determine presence/absence of Kerry Slug within the study area a combined approach was used. Trapping should take place during wet weather on blanket bogs and heaths, and during spells of dry weather in woodlands (O'Donnell 2011). Hand searching was carried out in appropriate weather conditions (damp weather, according to Platts & Speight, 1988 (Reich 2012)) with temperatures at a minimum of 8 degrees celsius on the 25th of March 2020. This comprised searching the surface of rocky outcrops and tree trunks as well as peeling back moss from the tree base to confirm if individuals were present. De Sangosse traps were used which comprised a square of absorbent material with reflective upper surface and perforated dark lower surface measuring 50cm x 50cm. The traps were baited with a piece of carrot approx. 2.5cm in size, moistened with water and placed within conifer plantation, rocky outcrops and other suitable habitat within and adjacent to the Proposed Development footprint. Areas of newly proposed infrastructure such as turbine bases, borrow pits, substation and construction compound were targeted for placement of traps. The traps were secured with string and/or rocks and pegs where placed on the ground. Band traps were also erected around tree trunks. These were placed approximately 1.5m from the ground and secured with string. A map showing the location of the 20 Kerry Slug traps deployed on the 25th March 2020 is shown on Figure 2-1. Records of incidental records of Kerry Slug as well as records obtained from the metric traps on the 26th May 2020 are provided in Figure 2-2.

2.3

Limitations and Constraints

As per the NRA (2009) guidelines, surveys for Kerry Slug can be completed all year round. It is recommended to conduct surveys at night during damp or humid conditions. Surveys can also be

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completed during daylight hours on cloudy, damp days, though these surveys are considered to have a lower efficiency. Incidental records of Kerry Slug were noted during general habitat surveys carried out in 2019 and 2020 as part of the overall wind farm assessment. Targeted surveys were completed on the 25th of March 2020. Weather conditions were overcast and damp during daylight hours in the early part of the day with dry periods in the afternoon. Based on the above, it is considered that the Kerry Slug surveys were not subject to constraints or limitations.

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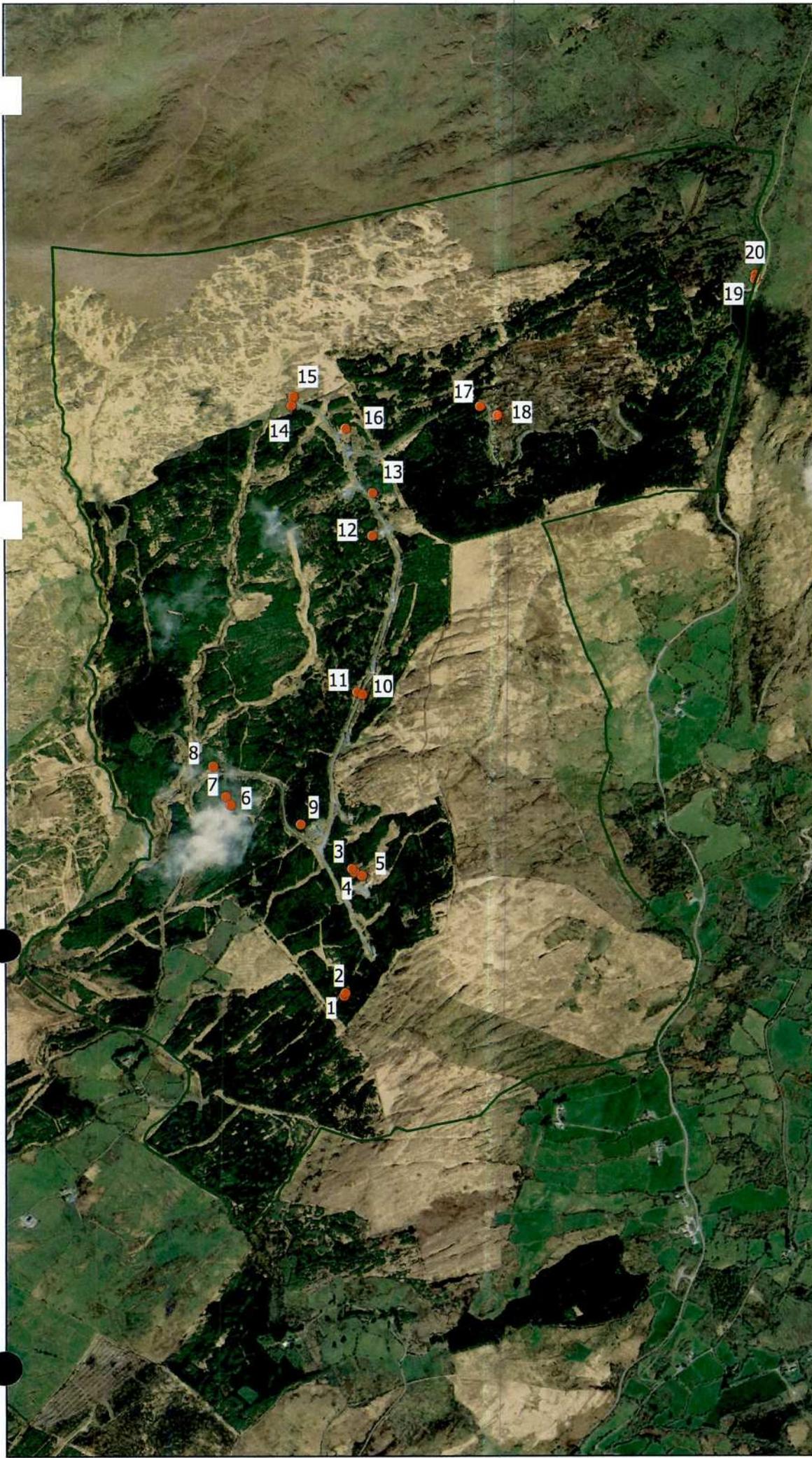
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Map Legend

- EIA Site Boundary
- Kerry Slug Trap Locations

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Drawing Title	
Kerry Slug - Trap Locations	
Project Title	
Proposed Renewable Energy Development Curraglass	
Drawn By	Checked By
LK	PR
Project No.	Drawing No.
190301	Figure 2-1
Scale	Date
1:17500	30-06-2021

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Map Legend

	EIAR Site Boundary
	Incidental Ker Slug Records 25.03.2020
	Kerry Slug Metric Trap Records 26.05.2020

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Drawing Title Kerry Slug - Incidental and Metric Trap Records	
Project Title Proposed Renewable Energy Development, Curraglass	
Drawn By LK	Checked By PR
Project No. 190301	Drawing No. Figure 2-2
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3.

RESULTS

Hand searches were conducted during suitable weather conditions (i.e. damp weather) on the 25th March 2020. The hand searches confirmed the presence of Kerry Slug within the study area and a total of 19 observations were recorded in a range of habitats through the study area (see Table 3-1 below).

Seventeen records of Kerry Slug were obtained on collection of the metric traps on 26th May 2020 the results of which are shown in Table 3-2. The overall locations of Kerry Slug recorded in the site are shown in Figure 2-2. Photographic records of Kerry Slug recorded in the metric traps on the 26th May 2020 are provided in **Appendix 2**.

Table 3-1 Incidental records of Kerry Slug recorded within the study area 25.03.2020

Habitat	No. Kerry Slug Recorded	Grid reference/Location
Rocky outcrop, boulder	3	E108796; N063602
Felled conifer plantation	N/A	N/A
Boulders at existing turbine base	3	E109091; N063144
Rocky outcrop/boulder	1	E109035; N062576
Conifer tree near proposed hardstanding area at T5	1	E108589; N062175
Individual boulders near T6	3	E109007; N061959, E109017;
	3	N061968
	3	E109031; N061952
Boulder (proposed road to T7)	1	E109006; N061619
Conifer tree	1	E108970; N061536
Incidental Records TOTAL	19	

Table 3-2 Kerry Slug recorded in metric traps 26.05.2020

Habitat	No. Kerry Slug Recorded	Grid reference/Location	Metric Trap No.
Tree in Conifer Plantation (WD4)	3	E108976 N061533	1
Tree in Conifer Plantation (WD4)	1	E108988 N061873	3
Individual boulder	2	E109007 N 061964	4
Tree in Conifer Plantation (WD4)	1	E108583 N062193	6
Tree in Conifer Plantation (WD4)	5	E108526 N062327	8
Recolonising Bare Ground (ED3) adjacent to Conifer Plantation (WD4)	1	E109071 N063121	12
Rocky outcrop, boulder adjacent to Conifer Plantation (WD4)	2	E109072 N063267	13
Oak-Birch-Holly Woodland	1	E110385 N064022	20
Metric Trap Records TOTAL	16		

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4.

CONCLUSION

The survey was carried out in accordance with current best practice and guidance in relation to Kerry Slug. Kerry Slug occurred in various locations throughout this site on habitats including rocky outcrop, conifer plantation and Oak-Birch-Holly woodland. The survey was carried out in accordance with the licence provided in Appendix 1.

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06 NOV 2025

CORK COUNTY COUNCIL
NORTON HOUSE, SKIBBEREEN, Co. CORK



**An Roinn Cultúir,
Oidhreacht agus Gaeltachta**
Department of Culture,
Heritage and the Gaeltacht

Licence No. C71/2020

NATIONAL PARKS & WILDLIFE SERVICE

Wildlife Acts 1976 to 2018 – Sections 23 and 34

**LICENCE TO CAPTURE PROTECTED WILD ANIMALS FOR EDUCATIONAL, SCIENTIFIC
OR OTHER PURPOSES**

The Minister for Culture, Heritage and the Gaeltacht in exercise of the powers conferred on her by Sections 9, 23 and 34 of the Wildlife Acts 1976 to 2018 authorises:

Laoise Kelly
MKO, Tuam Road, Galway, H91 VW84

To disturb specimens of the species specified in Column 1 of the Schedule hereunder in the area specified in Column 2 by the means specified in column 3 for scientific, educational or other purposes during the period beginning **12th March 2020** and ending on **31st December 2020**, subject to the conditions listed overleaf.

SCHEDULE

1	2	3
Species	Area	Means of capture
Kerry Slug (<i>Geomalacus maculosus</i>)	Curraglass Wind Farm, Co. Cork	Metric traps

Dated 12th March 2020

For the Minister for Culture, Heritage and the Gaeltacht

REG. No. _____
PLANNING (WEST) DEPT

15 SEP 2025

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Laoise Kelly
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Conditions

1. This licence shall be produced for inspection on a request being made on that behalf by a member of An Garda Síochána or any person appointed by the Minister for Culture, Heritage and the Gaeltacht under Section 72 of the Wildlife Acts 1976 to 2018, to be an authorised person for the purposes of the Acts.
2. The local NPWS District Conservation Officer or Conservation Ranger must be contacted during business hours prior to the activity commencing under the terms of this licence.
3. This licence permits the capture of Kerry Slug using baited refuge traps of the type described in Irish Wildlife Manuals, No. 54 (Distribution and population dynamics of the Kerry Slug, *Geomalacus maculosus* (Arionidae)).
4. Traps must be removed after the survey is completed.
5. This licence does not permit the taking or killing of specimens. All slugs found under the traps must be released where they are found.
6. **A full report must be submitted no later than 3 months after the end of the licence giving full details (location, date, Irish grid reference, surveyor) of the survey methodology and, if any, all records of Kerry Slug. Future licence applications will be refused in the event of a report not being submitted.**
7. Photographs of a sample (minimum of one per trap locality) of the slugs encountered should be included as proof of identification.
8. On expiry of this licence a return stating the work carried out must be provided to
 - Dr Brian Nelson, Invertebrate Ecologist, Science Unit, National Parks and Wildlife Service, 90 North King Street, Dublin 7, D07 N7CV,
9. Any query in relation to this licence should be addressed to National Parks and Wildlife Service, 90 North King Street, Dublin 7, D07 N7CV. Telephone: (01) 888 3287.

Note: This licence does not confer right of entry onto any lands.





APPENDIX 2

PHOTOGRAPHIC RECORDS - KERRY SLUG

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Plate 1-1 Metric Trap 1 (E108976 N061533) 3 no. Kerry Slug



Plate 1-2 Metric Trap 3 (E108988 N061873) 1 no. Kerry Slug



Plate 1-3 Metric Trap 4 (E109007 N 061964) 1/2 no. Kerry Slug



Plate 1-4 Metric Trap 4 (E109007 N 061964) 2/2 no. Kerry Slug



Plate 1-5 Metric Trap 6 (E108583 N062193) 1 no. Kerry Slug



Plate 1-6 Metric Trap 8 (E108526 N062327) 3/5 no. Kerry Slug

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Plate 1-7 Metric Trap 8 (E108526 N062327) 2/5 no. Kerry Slug



Plate 1-8 Metric Trap 12 (E109071 N063121) 1 no. Kerry Slug



Plate 1-9 Metric Trap 13 (E109072 N063267) 1/2 no. Kerry Slug



Plate 1-10 Metric Trap 13 (E109072 N063267) 2/2 no. Kerry Slug



Plate 1-11 Metric Trap 20 (E110385 N064022) 1 no. Kerry Slug

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