

Esker Bog

Cutaway Bog Decommissioning and Rehabilitation Plan 2021

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0503-01:

"The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands within the licensed area."

This licence condition requires Bord na Móna agree with the EPA the measures that will provide for rehabilitation, i.e. stabilisation of Esker Bog upon cessation of peat production and compliments the licence requirement to decommission the site.

Rehabilitation generally comprises site stabilisation with natural colonisation with or without targeted management.

Industrial peat production has now fully ceased at Esker Bog. Bord na Móna have now announced the complete cessation of industrial peat production.

In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. PO503-01, due regard was also given to the proposed 'Peatlands Climate Action Scheme' (PCAS) announced by the Minster. This Scheme will see the Minister support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support. The additional costs of the proposed Scheme will be supported by Government through the Climate Action Fund, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

While this document outlines the enhanced rehabilitation measures planned for the Esker bog, activities which go beyond that required by Condition 10 in the Licence, rehabilitation necessary to comply with the 'standard' requirement of Condition 10 (in the absence of the proposed Scheme) are also included, to estimate costs. The inclusion of the 'standard' rehabilitation together with the enhanced rehabilitation in this document allows the Scheme Regulator to distinguish and objectively determine the specific activities (and their associated costs) eligible for support under the proposed Scheme.

Bord na Móna have defined the key rehabilitation outcome at Esker Bog as environmental stabilisation, re-wetting and setting the bog on a trajectory towards development of naturally functioning peatland and wetland habitats.

Any consideration of any other future after-uses for Esker Bog, such as amenity, will be conducted in adherence to the relevant planning guidelines and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

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Note: This finalised version of the Rehabilitation Plan has been updated to take account that several planning actions listed in Section 8.1 have been completed and have been incorporated into the plan. This includes an Appropriate Assessment of the rehabilitation plan. See Esker Decommissioning and Rehabilitation Plan – Addendum 1 for more details of the NIS conclusion and the NIS mitigation measures.

Table of Contents

Sι	mmar	y		7
1.	Intr	oduct	ion	11
	1.1	Con	straints and Limitations	12
2.	Me	thodo	logy	14
	2.1	Desl	k Study	14
	2.2	Con	sultation	16
	2.3	Field	d Surveys	16
3.	Site	Desc	ription	17
	3.1	Stat	us and Situation	17
	3.1.	1	Site history	17
	3.1.	2	Current land-use	17
	3.1.	3.	Socio-Economic conditions	17
	3.2	Geo	logy and Peat Depths	19
	3.2.	1	Sub-soil geology	19
	3.2.	2	Peat type and depths	19
	3.3	Кеу	Biodiversity Features of Interest	19
	3.3.	1	Current habitats	20
	3.3.	2	Species of conservation interest	21
	3.3.	3	Invasive species	23
	3.4	Stat	utory Nature Conservation Designations	23
	3.4.	1	Other Nature Conservation Designations	23
	3.5	Hyd	rology and Hydrogeology	23
	3.6	Emis	ssions to surface-water and water-courses	24
	3.5.	1	Decommissioning and Rehabilitation Programme Water Quality Monitoring.	27
	3.7	Fugi	tive Emissions to air	29
	3.8	Carb	oon emissions	29
	3.9	Curr	ent ecological rating	29
	3.10	Es	sker Bog Characterisation Summary	30
4.	Con	sulta	tion	31
	4.1	Con	sultation to date	31
	4.2	Issu	es raised by Consultees	31
	4.2.	1	Assessments of rehabilitation	31

	4.2	2.2	Restoration scope	. 32		
	4.2	2.3	Monitoring	. 32		
	4.2	2.4	Flooding of adjacent land	32		
	4.2	2.5	Land Management	. 32		
	4.2	2.6	Other issues (including amenity)	32		
4	4.3	Bord	d na Móna response to issues raised during consultation	. 33		
	4.3	3.1	Assessments of rehabilitation	33		
	4.3	3.2	Restoration scope	33		
	4.3	3.3	Monitoring	33		
	4.3	3.4	Flooding of adjacent land	33		
	4.3	3.5	Land Management	. 34		
	4.3	3.6	Other issues (including amenity)	34		
	4.3	3.7	Concluding statement.	35		
5.	Re	habilit	ation Goals and Outcomes	36		
6.	Sco	ope of	Rehabilitation	38		
(5.1	Кеу	constraints	. 38		
(5.2	Кеу	Assumptions	39		
(5.3	Кеу	Exclusions	39		
7.	Cri	iteria fo	or successful rehabilitation	40		
-	7.1.0	Criteria	a for successful rehabilitation to meet EPA IPC licence conditions:	. 40		
-	7.2.0	Critical	success factors needed to achieve successful rehabilitation as outlined in the plan	. 44		
8.	Re	habilit	ation Actions and Time Frame	46		
8	8.1	Shoi	rt-term planning actions (0-1 years)	52		
8	3.2	Shoi	rt-term practical actions (0-2 years)	53		
8	8.3	Lon	g-term (>3 years)	53		
8	8.5	Bud	get and costing	55		
9.	Aft	tercare	and Maintenance	56		
ģ	9 .1	Prog	gramme for monitoring, aftercare and maintenance	56		
ç	Э.2	Reha	abilitation plan validation and licence surrender – report as required under condition 10/4	57		
10.		Refere	nces	. 58		
APPENDIX I: A standard peatland rehabilitation Plan to meet conditions of the IPC Licence						
API	APPENDIX II: Bog Group Context					
API	PEND	DIX III:	Ecological Survey Report	. 70		
API	PEND	DIX IV:	Environmental Control Measures to be applied to bog rehabilitation	73		

APPENDIX V: Biosecurity	. 74
Appendix VI: Policy and Regulatory Framework	. 75
APPENDIX VII: Decommissioning	. 82
APPENDIX VIII: Glossary	. 85
APPENDIX IX. Extractive Waste Management Plan	. 87
APPENDIX X. Mitigation Measures for the Application of Fertiliser	. 91
APPENDIX XI. Consultation Summaries	. 92
APPENDIX XII. Archaeology	. 97

SUMMARY

Name of bog: Esker Area: 568 ha

Site description:

- Esker Bog is located in Co. Offaly, approximately 3.5km south-southeast of Rhode and c.6km east of Daingean.
- Esker Bog was in industrial peat production since the early 1970s until 2019. The peat was formerly used as fuel peat to supply Edenderry Power.
- Esker Bog has a gravity drainage regime.
- The majority of the former peat production footprint is bare peat and contains active drainage channels.
- A part of the site has been developing a mosaic of cutaway habitats.
- The western section of the bog contains the deepest residual peat with over 2.6m of peat remaining. The eastern area has shallower remaining peat and is now considered to be cutaway.
- The Esker Stream flows along the southern boundary of the western part, and the Dogen River, a tributary of the Esker Stream, flows north to south and separates the eastern from the western side of the site.

Rehabilitation goals and outcomes

Bord na Móna is committed to discharging the obligations arising from Condition 10 of the IPC licence. The primary goals and outcomes of this plan are:

- Meeting conditions of the IPC License;
- Stabilisation or improvement in water quality parameters (e.g. suspended solids);
- Environmental stabilisation.
- Optimising hydrological conditions for climate action benefits as part of PCAS. This will be achieved via deep peat re-wetting and the development of wetlands, fen, Reed Swamp and wet woodland on shallow cutaway peat, and eventually naturally functioning wetland/peatland habitats.
- Optimising hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation communities in suitable deep residual peat areas.
- Rehabilitation will support the National Policies on Climate Action and GHG mitigation by maintaining and enhancing the current condition peat storage capacity of the bog (locking the carbon into the ground). In time, it is expected that the bog will develop its carbon sink function, in part, as *Sphagnum* communities develop across the bog. It will also support Ireland's commitments towards Water Framework Directive and the National River Basin Management Plan 2018-2021 and future National River Basin Management Plans.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.

Scope of rehabilitation

The principal scope of this rehabilitation plan is defined by:

- The area of Esker Bog.
- EPA IPC Licence Ref. P0503-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The key objective of 'rehabilitation', as required by this licence, is achieved by the **environmental stabilisation** of the bog.
- **The proposed Scheme (PCAS)** includes enhanced measures which are designed to exceed/meet the standard stabilisation requirements and optimising **climate action benefits**.

- The local environmental conditions of this bog; Esker Bog has variable environmental characteristics with a range of residual peat depths, hydrology and topography.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- To minimise potential impacts on neighbouring land, some boundary drains around Esker Bog will be left unblocked, as blocking boundary drains could affect adjacent land.
- Other constraints including the proposed Water Supply Project- Eastern and Midlands Region route.

Criteria for successful rehabilitation:

The Criteria for successful rehabilitation to meet Condition 10 of the IPC Licence have been defined as:

- Rewetting of residual deep peat in the former area of industrial peat production to slow water movement across the site to retain silt, encouraging development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat (IPC Licence validation). The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed. (IPC Licence validation).
- Stabilising or reducing key emissions to water (e.g. silt-run-off) (IPC Licence validation).
- Reducing pressure from peat production on the local river catchment (WFD) (IPC Licence validation).
- Optimising the extent of suitable hydrological conditions to optimise climate action (Climate action verification).
- Reduction in carbon emissions (Climate action verification).
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including wetland, fen, Reed swamp, wet woodland, heath, embryonic *Sphagnum*-rich peat forming communities, scrub and Birch woodland communities, where conditions are suitable, and eventually towards a reduced Carbon source/partial carbon sink (Climate action verification). Some areas will naturally be dry and develop Birch woodland and other drier habitats. It will take some time for stable naturally functioning habitats to fully develop at Esker Bog.
- Improvement in biodiversity and ecosystem services. (Climate action verification).

Monitoring climate action verification criteria after the Scheme is completed is dependent on support from the Climate Action Fund or other sources of funding.

Summary of measures:

The below section is a summary of measures proposed for rehabilitation.

- Planning actions, including developing a detailed site plan and carrying out a hydrology and drainage assessment.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation.
- Carry out proposed measures, which will be a combination of drain blocking, peat field re-profiling, cellbunding, wetland creation and fertiliser applications targeting headlands, high fields and other areas.
- Phase 2 measures may include seeding of targeted vegetation and inoculation of *Sphagnum*.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning phase.
- Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

Timeframe:

- 2020-2021: Short-term planning actions.
- 2021: Short-term practical actions.
- 2021-2024: Any Long term practical actions; Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.

• 2024. Decommission silt-ponds, if necessary.

Budget and Costing

- The rehabilitation plan outlined in this document is predicated on the understanding that it is the Minister's intention to support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support.
- In relation to the pre-existing Condition 10 IPC Licence requirement to carry out what can be termed the 'standard' decommissioning and rehabilitation, Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. This is updated every year. For more information see the Bord na Móna Annual Report (Bord na Móna, 2020). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

Monitoring, after-care and maintenance

The monitoring, after-care and maintenance programme for Esker Bog, as required to meet Condition 10 of the IPC Licence, is defined as:

- Quarterly monitoring assessments of the site to determine the general status of the site, assess the condition of the rehabilitation work, asses the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to additional rehabilitation, if needed.
- Water quality monitoring will be established. Monitoring of key water quality parameters for 2 years after rehabilitation will include: Ammonia, Phosphorous, Suspended solids, pH and conductivity.
- Where other uses are proposed for the site, these will be assessed by Bord na Móna in consultation with interested parties. Other after-uses can be proposed for licensed areas and must go through the appropriate assessment and planning procedures.

Additional Monitoring:

- The monitoring and validation of re-vegetation via natural colonisation and changes in bog condition will be carried out using an aerial remote sensing survey, after rehabilitation measures are implemented. It is proposed that sites can be monitored against this baseline in the future.
- Biodiversity Ecosystem services will be monitored using specific indicators.
- Carbon emissions monitoring can only be carried out on a small proportion of BnM sites to develop better understanding of carbon emissions and GHG emission factors from different types of BnM sites and will be developed on association with other established research programmes. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that Esker Bog can be monitored against this baseline in the future.

Validation and IPC Licence surrender

Reporting to the EPA will continue until the IPC License is surrendered. The bog will be included in the full licence surrender process as per the Guidance to Licensees on Surrender, Cessation and Closure of Licensed Sites EPA, 2012, when:

- The planned rehabilitation has been completed.
- Water quality monitoring demonstrates that water quality indicators are stabilising/improving.
- The site has been environmentally stabilised.

1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Allen bog group (Ref. P0503-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Allen bog group (see Appendix II for details of the bog areas within the Allen-Clonsast Bog Group). Esker Bog is located in Co. Offaly.

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0503-01:

"The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands within the licensed area."

This plan is a specific rehabilitation plan for the bog and outlines:

- Description of site management and status;
- Main issues and approaches to rehabilitation;
- Consultation to date with interested parties;
- Interaction with other policy and legislative frameworks (Appendix VI);
- The planned rehabilitation goals and outcomes:
- The scope of the rehabilitation plan;
- Criteria which define the successful rehabilitation and critical success factors required for successful rehabilitation;
- Proposed rehabilitation actions;
- Proposed timeframe to implement these actions;
- Budget and Costings; and
- Associated aftercare, maintenance and monitoring.

It is proposed by Government that Bord na Móna carry out a Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme on peatlands previously used for energy production. Note this proposal is also known colloquially as the 'Peatlands Climate Action Scheme' (PCAS). The additional costs of the proposed Scheme will be supported by Government through the Climate Action Fund, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

Bord na Móna have identified a footprint of 33,000 ha as peatlands suitable for enhanced rehabilitation. This proposed Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations (Appendix VII & IX) under existing EPA IPC licence conditions. Interventions supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met) and, importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. However, it is important for all stakeholders to understand that only the costs associated with the additional, enhanced and accelerated rehabilitation, i.e. those measures which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10, will be eligible for support under the proposed Scheme. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021).

It is expected that the proposed Scheme (PCAS) will have benefits accruing from biodiversity provision, water quality and storage attenuation as well as increased carbon storage, reduced carbon emissions and acceleration towards carbon sequestration. The Scheme will also facilitate monitoring of carbon fluxes (Greenhouse Gases

and fluvial carbon) in selected areas (in addition to other established Research programmes), to monitor changes in where the interventions will accelerate the trajectory towards a naturally functioning peatland ecosystem.

It is envisaged that the PCAS will support activities, interventions, or measures across the Bord na Móna cutaway peatlands which accelerate the original timelines. Selected rehabilitation measures will take account of site environmental conditions, which can vary significantly. These measures potentially include:

- more intensive management of water levels through pump management, drain-blocking and cell bunding;
- re-profiling that will deliver suitable conditions for development of wetlands, fens and bog habitats;
- targeted fertiliser applications,
- seeding of targeted vegetation; and
- proactive inoculation of suitable peatland areas with Sphagnum.

These are collectively designed to optimise hydrological conditions (ideally and where possible water-levels <10 cm) for climate action benefits and to accelerate the trajectory of the site towards a naturally functioning ecosystem, and eventually a reduced carbon source/carbon sink again. In some areas of dry cutaway this trajectory will be significantly longer and it is not feasible in the short-term to re-wet some areas. These will develop other habitats. The key to optimising climate action benefits is the restoration of suitable hydrological conditions and more intensive intervention means that the extent of suitable hydrological conditions can be optimised. These measures are designed to encourage the development of embryonic bog habitats, where possible. They are also designed to further slow the movement of water across the site (with the site acting similarly to a constructed wetland), slowing the release of water (improving local water attenuation) and water quality is also expected to improve as the site returns to a naturally functioning peatland ecosystem.

1.1 Constraints and Limitations

This document covers the area of Esker Bog.

Bord na Móna will continue to review the future after-use of its land-bank. Any consideration of any other future after-uses for Esker Bog will be conducted in adherence to the relevant planning legislation and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

Industrial peat extraction at Esker Bog ceased completely in 2019. Currently the former peat production area is bare peat although a mosaic of pioneer habitats has been developing towards the eastern side of the ste where production ceased a number of years ago. The combination of active enhanced rehabilitation measures and natural colonisation will quickly establish further pioneer vegetation and more mature habitats and will be planned to accelerate environmental stabilisation Nevertheless, it will take some time (30-50 years) for naturally functioning wetland and peatland ecosystems to fully re-establish.

Parts of Esker Bog (outside the areas owned and under the control of Bord na Móna) are currently used by domestic turf cutters to harvest peat. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. It is beyond the scope of this rehabilitation plan to address turf cutting issues on Esker Bog that are outside of the control of Bord na Móna. Nevertheless, Bord na Móna are aware of such issues which may constrain the proposed rehabilitation actions, and this rehabilitation plan considered potential impacts of these on the delivery of the stated objectives.

Rehabilitation in other areas of the bog may also be constrained due to other property issues or issues such as rights of way. The proposed Water Supply Project- Eastern and Midlands Region route is indicated to run along the southern side of the site; this development is at pre-planning stage.

2. METHODOLOGY

This rehabilitation plan was developed with a combination of desktop and field surveys, consultations with internal and external stakeholders and cognisance of the proposed Scheme (PCAS). The development of this enhanced rehabilitation plan also considered **recently published** guidance issued by the EPA in 2020 – **Guidance on the process of preparing and implementing a bog rehabilitation plan**.

The ecological information and site information collected during the Bord na Móna ecological baseline survey, additional confirmatory site visits and monitoring and desktop analysis forms the basis for the development of the rehabilitation plan for the bog, along with:

- Experience of 40 years of research on the after-use development and rehabilitation of the Bord na Móna cutaway bogs (Clarke, 2010; Bord na Móna, 2016);
- Significant international engagement during this period with other counties in relation to best-practise regarding peatland rehabilitation and after-use through the International Peat Society and the Society for Ecological Restoration (Joosten & Clarke, 2002; Clarke & Rieley, 2010; Gann *et al.*, 2019);
- Consultation and engagement with internal and external stakeholders;
- GIS Mapping;
- BNM drainage surveys;
- Bog topography and LIDAR data:
- Hydrological modelling; and
- The development of a **Methodology Paper (draft) outlining the proposed Scheme (PCAS)**. This rehabilitation includes enhanced measures defined in the Methodology Paper which are designed to exceed the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Esker Bog, in particular, optimising climate action benefits.

2.1 Desk Study

The desk study involved collecting all relevant environmental and ecological data for the study area. The development of the rehabilitation plan also takes account of research, experience and engagement with other peatland restoration and rehabilitation projects and peatland research including Irish, UK, European and International best-practise guidance (full citations are in the References Section):

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- Bonn et al. (2017). Peatland restoration and ecosystem services- science, policy and practice.
- Carroll *et al.* (2009). *Sphagnum* in the Peak District. Current Status and Potential for Restoration. Moors for the Future Report No 16.
- Clark & Rieley (2010). Strategy for responsible peatland management.
- Eades *et al.* (2003). The Wetland Restoration Manual.
- Farrell & Doyle (2003). Rehabilitation of Industrial Cutaway Atlantic Blanket Bog, NW Mayo, Ireland.
- Gann et al. (2019). International Principles and Standards for the practice of Ecological Restoration.
- Hinde *et al.* (2010). *Sphagnum* re-introduction project: A report on research into the re-introduction of *Sphagnum* mosses to degraded moorland. Moors for the Future Research Report 18.
- Joosten & Clarke (2002). Wise Use of mires and peatlands Background and Principles including a framework for Decision-making.

- Lindsay (2010). Peatbogs and Carbon: a Critical Synthesis to Inform Policy Development in Oceanic Peat Bog Conservation and Restoration in the Context of Climate Change.
- Mackin *et al.* (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service,
- McBride *et al.* (2011). The Fen Management Handbook (2011), Scottish Natural Heritage.
- McDonagh (1996). Drain blocking by machines on Raised Bogs. Unpublished report for National Parks and Wildlife Service.
- NPWS (2017a). National Raised Bog Special Areas of Conservation management plan. Department of Arts, Heritage and the Gaeltacht.
- Quinty & Rochefort (2003). Peatland Restoration Guide, second edition. Canadian *Sphagnum* Peat Moss Association and New Brunswick Department of Natural Resources and Energy.
- Regan *et al.* (2020). Ecohydrology, Greenhouse Gas Dynamics and Restoration Guidelines for Degraded Raised Bogs. EPA Research Report. Prepared for the Environmental Protection Agency by Trinity College Dublin.
- Renou-Wilson *et al.* (2011). BOGLAND Sustainable Management of Peatlands in Ireland. STRIVE Report No 75 prepared for the Environmental Protection Agency.
- Schouten (2002). Conservation and Restoration of Raised Bogs: Geological, Hydrological and Ecological Studies. Dúchas The Heritage Service of the Department of the Environment and Local Government, Ireland;
- Thom (2019). Conserving Bogs Management Handbook.
- Wheeler & Shaw (1995). Restoration of Damaged Peatlands with Particular Reference to Lowland Raised Bogs Affected by Peat Extraction.
- Wittram *et al.* (2015). A Practitioners Guide to Sphagnum Reintroduction. Moors for the Future Partnership.

Additional on-line resources were also incorporated into the desk study, including:

- Allen Integrated Pollution Control Licence;
- Allen Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database (<u>www.epa.ie</u>);
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity;
- BirdWatch Ireland online data (including I-WeBS and CBS datasets; <u>www.birdwatchireland.ie</u>);
- Geological Survey of Ireland National Draft Bedrock Aquifer map;
- Geological Survey of Ireland Groundwater Database (<u>www.gsi.ie</u>);
- Historic Environment Viewer at https://webgis.archaeology.ie/historicenvironment/
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (<u>www.catchments.ie</u>);
- OPW Indicative Flood Maps (<u>www.floodmaps.ie</u>);
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (<u>www.cfram.ie</u>);
- River Basin Management Plan for Ireland 2018 2021;
- Bord na Móna Annual Report 2020.
- Spatial data in respect of Article 17 reporting, available online at https://www.npws.ie/maps-anddata/habitat-and-species-data/article-17.

2.2 Consultation

A number of stakeholders have been identified during the course of Bord na Móna's rehabilitation and Biodiversity Action Plan activities and are contacted during the rehabilitation planning process for their views. See Section 4.

2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this exercise, Esker Bog was surveyed in August 2010. Additional ecological walk-over surveys and visits have taken place at Esker Bog between 2012-2020 to inform rehabilitation planning and habitat maps have been updated, where required- the latest site visit took place in November 2020. This rehabilitation plan is informed by the original baseline survey as well as subsequent confirmatory site walk-over surveys and visits, and updates to baseline data.

Habitat mapping followed best-practise guidance from Smith *et al.* (2011). Map outputs including all habitat maps and target notes were produced using GIS software application packages (ArcGIS). General marginal habitats and other habitats that had not been modified significantly by industrial peat extraction were classified using Fossitt *et al.* (2000). Plant nomenclature for vascular plants follows Stace (2010), while mosses and liverworts nomenclature follows identification keys published by the British Bryological Society (2010). A more detailed Bord na Móna classification system was developed for classifying pioneer cutaway habitats as Fossitt categories were deemed not to be detailed enough for cutaway bog (much of cutaway bog could be classified as Cutover Bog -PB4). Much of the pioneer cutaway vegetation is still at an early stage of its development and cannot be assigned to Fossitt Level 3 categories yet.

A detailed ecological survey report for Esker Bog is contained in Appendix III.

3. SITE DESCRIPTION

Esker Bog is located in Co. Offaly, approximately 3.5km south-southeast of Rhode and c.6km east of Daingean. Esker Bog comprises two main sections, a larger area in the west and a smaller section in the east, that are divided by a stream (the Dogen River). A third, small, separate area is also included as part of Esker Bog. This is located to the south-west of the other two bog areas (See Figure 3.1). The surrounding landscape is dominated by a mosaic of farmland, largely consisting of improved grassland, and other bogs, many owned and managed by Bord na Móna (See Figure 8.1). The Esker Stream flows along the southern boundary of the western side, with the Dogen River, a tributary of the Esker Stream, flowing north to south and separating the eastern from the western side of Esker Bog.

Esker Bog is connected via a Bord na Móna rail link to Cavemount Bog, which lies 1.3km to the west-northwest. Ballycon Bog is 700m south of esker Bog, although the two bogs are not connected, being separated by farmland, the R402 road and the Esker Stream. Cloncreen Bog is located c.200m immediately south of the small section of Esker Bog. Again, these two bogs are separated by some farmland and the R402 road with no direct links (road or rail) between the two Bord na Móna properties.

3.1 Status and Situation

3.1.1 Site history

Esker Bog was in industrial peat production since the early 1970s. The peat was formerly used as fuel peat in Edenderry Power. Industrial peat extraction completely ceased at Esker Bog in 2019.

The small, discrete bog section in the south-east of Esker Bog has never been in production.

3.1.2 Current land-use

Industrial peat production has now completely ceased at Esker Bog. However, some stockpiles of peat remain on the site following harvesting; these are being transported to Edenderry Power Station and Derrinlough Briquette Factory. There is a small length of bog railway and some other infrastructure on this site (Figure 3.6).

The proposed Water Supply Project- Eastern and Midlands Region, will connect Parteen basin Co. Tipperary to a Termination Point Reservoir at Peamount, Co. Dublin. The pipeline corridor for the proposed project intersects Esker Bog. This project is in its pre-planning stage.

There are some turbary plots overlapping the bog boundary.

3.1.3. Socio-Economic conditions

Bord na Móna has historically been a vital employer for the rural community of the Midlands of Ireland. Bord na Móna compiled a report on the role of peat extraction in the midlands historically in which they report that in 1986, by the end of Bord na Móna's Third Development Programme, a total of twenty-three work locations had been established around the country. The company had an average employment of approximately 4,688 in the mid 1980's, with a peak employment of 6,100 during the production season, which placed it among the country's largest commercial employers. The importance of such levels of employment were largely due to its regional concentration in the Midlands and the lack of alternative employment opportunities at the time.



Figure 3.1. Location of Esker Bog, nearby designated sites and other Bord na Móna bogs in the surrounding area.

According to the Energy Crop Socio-Economic Study undertaken by Fitzpatrick Associates in 2011, there were an estimated 1,443 jobs supported by the peat-to-power industry in Ireland at the time, some 81% of which were located in the catchment areas of the three peat-fired generating stations (Lough Ree, West Offaly, and Edenderry Power Stations). These constituted jobs in the plants and in peat extraction, jobs indirectly supported in upstream supply industries and jobs induced through the trickle-down effects of the wages and salaries of those supported directly or indirectly.

In respect of Esker Bog, jobs included in the above study would have included those to facilitate extraction of peat at this site, and associated processing and transfer to the relevant power station.

As the primary employer in many Midland counties, Bord na Móna played a central role in building communities through several initiatives, including Education bursaries, support of local sporting clubs, the provision of community gain funds, charity programmes and the provision and building of amenity areas."

These job numbers have now declined with the cessation of peat extraction at this bog. It is anticipated that the proposed scheme (PCAS) will provide some employment for a team of workers at this site for a period of time (> 1 year).

3.2 Geology and Peat Depths

3.2.1 Sub-soil geology

According to GSI, the underlying geology at Esker Bog comprises oolitic limestones ¹. The underlying soils and sub-soils are classed as 'Raised Bog Cutover Peat' The peat soils are likely to be underlain with limestone tills, as these sub-soils are exposed around the margins of the site. The sub-soils along the southern margin are limestone-based sands and gravels lain down by the river. Grey Marl was exposed in some of the spoil taken from the silt ponds at the southern end of the site.

3.2.2 Peat type and depths

A significant portion of the residual peat on Esker Bog is mostly "red" or "*Sphagnum* peat" (Figure 8.2). The western section of the bog contains the deepest peat reserves with over 2.6m of peat remaining in some areas. The eastern section has rather shallower peat depths remaining, with some fen peats exposed. Some of this area is also cutaway, with underlying sub-soils now exposed.

3.3 Key Biodiversity Features of Interest

The majority of the large area in the west of Esker Bog within the Bord na Móna boundary is dominated by bare peat (Figure 3.2) and the eastern section is largely cutaway (Figure 3.3). The Esker Stream flows along the southern side of the bog and forms a natural boundary. The Dogen River, a tributary of the Esker River, flows north to south and separates the eastern from the western side of the site. A third watercourse flows along the western boundary of the site and is also a tributary of the Esker Stream.

¹ <u>https://www.gsi.ie/en-ie/data-and-maps/Pages/Bedrock.aspx</u>



Figure 3.2 Bare peat of former production area at Esker Bog (western end)



Figure 3.3 Area of cutaway peatlands at Esker Bog (eastern end).

3.3.1 Current habitats

There are some remnant habitats around the margins of Esker Bog. A narrow band of Birch woodland (WN7) and scrub (WS1) dominated by Birch are the most prominent habitats around the periphery of both the western and eastern sections. In some places, there are patches of remnant raised bog vegetation (PB1), generally dominated by Heather and being invaded by scrub, as they have largely dried out. Other parts of the margins are covered in a mosaic of Bracken and Birch scrub.

Although the western block of Esker bog is largely bare peat, the smaller eastern area is largely cutaway, and pioneer cutaway habitats have been developing here in recent years. On the higher and drier areas Birch

woodland is developing, with a mosaic of rush-dominated poor fen and bare peat over much of the remainder of this area (see Figure 3.4). The drainage system in this area has been maintained so it has remained relatively dry.

The small area of Esker Bog in the south-east of the area (Figure 3.4) that has never been in production is dominated by mature Birch woodland (WN7) and also contains small patches of active and old cutover bog (PB4), wet grassland (GS4) that has developed on cutover peat and Bracken (HD1).



Figure 3.4 Area of bog woodland in the south east of the site.

The Esker Stream, that flows along the southern boundary, is typical of a lowland depositing river and is infilled with emergent riparian vegetation such as Reed Canarygrass and Bulrush.

A habitat map of Esker Bog is shown in Figure 3.5.

3.3.2 Species of conservation interest

Esker Bog is used occasionally by several species of conservation interest including Peregrine, Merlin, Snipe and small flocks of wintering Golden Plover.

The Esker Stream along the southern boundary and the Dogen River that runs between the western and eastern areas of Esker Bog have the potential for Otter and Kingfisher.



Figure 3.5 Habitat map of Esker Bog showing Bord na Móna habitat categorisation

3.3.3 Invasive species

A broad range of common garden escapees/Invasive Alien Species are occasionally detected on or close to former peat production sites. All invasive alien species detected will be treated in line with Best Practice during PCAS activities, where necessary.

No other invasive alien species, as listed under Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive alien species, likely to be further dispersed during or as a result of PCAS activities has been recorded at Esker Bog.

3.4 Statutory Nature Conservation Designations

There are no sites designated for nature conservation objectives on or immediately adjacent to Esker Bog. The Grand Canal pNHA (NPWS site code 002104) lies c.2km north of Esker Bog (Figure 3.1).

3.4.1 Other Nature Conservation Designations

The Ramsar Convention entered into force in Ireland on 15th March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha. There are no Ramsar Sites in the local vicinity of Esker Bog (i.e. within 3km). The closest Ramsar Sites to Esker Bog include Pollardstown Fen (Kildare) and Raheenmore Bog (Offaly).

https://www.arcgis.com/apps/MapTour/index.html?appid=cd6e1a247bdc4179b9dfc0461e950f1e#

3.5 Hydrology and Hydrogeology

Esker Bog has a gravity drainage regime. The majority of the bog is currently relatively dry with active functioning drains. Initial hydrological modelling indicates the bog has topographical basins with high potential for re-wetting and developing a mosaic of re-wetted peatland habitats when rehabilitation is carried out and drains are blocked. A significant part of the site is also modelled as being relatively dry (Figure 8.4).

Esker Bog is located in the Barrow catchment and is drained by three watercourses that all meet just south of the Bord na Móna property. The main watercourse draining Esker Bog is the Esker Stream which flows along the southern boundary of the property. To the east, the bog is drained by the Rathcobican stream (a tributary of the Esker Stream). The Dogen River, also a tributary of the Esker Stream flows through the centre of Esker Bog, separating the large western and eastern sections. The small, separate section of Esker Bog in the south-east corner is drained by the Rathlumber stream.

Field drains on both the western and eastern sections of Esker Bog run north-east to south west. There are seven outlets for water draining off Esker bog, all of which pass through silt ponds. One exception is the flow to the Dogen River, the course of which has been modified and managed as a silt pond.

The bog is located in an area with a locally important bedrock aquifer (Li) with Bedrock that is moderately productive only in local zones (EPA map-viewer). An aquifer is an underground body of water-bearing rock or unconsolidated materials (gravel or sand) from which groundwater can be extracted in useful amounts. GSIs Aquifer classes are divided into three main groups based on their resource potential, and further subdivided based on the type of openings through which groundwater flows. There are nine aquifer categories in total. Locally important aquifers are capable of supplying locally important abstractions (e.g. smaller public water supplies, group schemes), or good yields (100-400 m³/d). These data give an indication of sub-surface deposits

(bedrock and unconsolidated materials) in terms of their groundwater resource potential and dominant groundwater flow type.

The bog is located in an area mapped by GSI as of low groundwater vulnerability (GSI Mapviewer). Groundwater Vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated by human activities. Groundwater vulnerability maps are based on the type and thicknesses of subsoils (sands, gravels, glacial tills (or boulder clays), peat, lake and alluvial silts and clays), and the presence of karst features. Groundwater is most at risk where the subsoils are absent or thin and, in areas of karstic limestone, where surface streams sink underground at swallow holes. These data indicate there is generally low risk of any groundwater contamination occurring at this site.

The peat is underlain by glacial deposits interbedded with glacio-fluvial deposits over limestone bedrock. The glacial deposits generally consist of grey gravelly clay/silt (present on an adjacent cutaway site). The bog water table across the site is expected to be high when bog drains are blocked, and perched above the underlying regional groundwater table. The ability of the shallow peat water to interact with the underlying regional groundwater flows is limited by the permeability of the underlying glacial deposits.

3.6 Emissions to surface-water and water-courses

Esker bog has 7 treated surface water outlets to the Esker Stream IE_SE_14E010200 and eventually the Figile River IE_SE_14F010300. Peat extraction was identified as a pressure in both rivers in the second cycle of the river basin management plan and is indicated as remaining so in the Figile in the third cycle, currently under preparation. However the Figile river is indicated as remaining under pressure from peat extraction.

Details of silt ponds, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed on the attached water quality map in Figure 3.7.

There is a robust monitoring program to track and verify any changes in baseline water quality conditions pre and post decommissioning and rehabilitation so that the success or otherwise can be tracked and verified for the National Parks & Wildlife Service, Environmental Protection Agency and Local Authority Water Program, amongst a range of stakeholders.

The main emission limit value associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 3.0mg/l and COD 100mg/l.

Initial monthly ammonia concentrations from August to January 2021 have a range of 0.036 to 1.96mg/l with an average of 0.700mg/l.

From an analysis if any monitoring over the past 5 yrs. of the IPC licence environmental monitoring programme, indicate that results were under the ELV for SS and the trigger level for Ammonia, and with the majority of the trigger level for COD (Table 3.1).



Figure 3.6. Map of Esker Bog showing structures and designated emission points.



Figure 3.7. Water Quality map.

Bog	SW	Monitoring	Sample Date	рН	SS	TS	Ammonia	ТР	COD	Colour
Esker	SW-24	Q2 2020	09/06/2020	8.3	3	257	0.013	0.05	45	113
Esker	SW-25	Q2 2020	09/06/2020	8	21	412	0.026	0.31	88	202
Esker	SW-26	Q2 2020	09/06/2020	8.4	9	364	0.141	0.05	16	82.7
Esker	SW-27	Q2 2020	09/06/2020	8.6	10	212	1.44	0.05	41	177
Esker	SW-28	Q2 2020	09/06/2020	7.9	3	410	0.032	0.05	41	107
Esker	SW-29	Q2 2020	09/06/2020	8.5	5	569	0.06	0.05	66	109
Esker	SW29-A	Q2 2020	09/06/2020	7.9	9	651	0.396	0.05	60	124
Esker	SW-24	Q3 18	12/09/2018	7.6	52	276	0.02	0.05	49	86
Esker	SW-25	Q3 18	12/09/2018	7.1	5	222	0.83	0.11	87	164
Esker	SW-26	Q3 18	12/09/2018	7.3	5	166	4.6	0.06	86	351
Esker	SW-27	Q3 18	12/09/2018	7.5	6	296	0.53	0.06	37	76
Esker	SW-28	Q3 18	12/09/2018	7.6	5	316	0.1	0.05	39	100
Esker	SW-29	Q3 18	12/09/2018	6.2	5	231	5.6	0.05	159	446
Esker	SW29-A	Q3 18	12/09/2018	7.6	5	242	5	0.1	116	355
Esker	SW-24	Q1 17	02/03/2017	7.4	6	130	0.47	0.05	79	242
Esker	SW-25	Q1 17	02/03/2017	6.6	8	84	0.49	0.05	81	244
Esker	SW-26	Q2 17	28/06/2017	7.2	5	172	4.3	0.05	112	325
Esker	SW-27	Q2 17	28/06/2017	7.6	5	298	0.9	0.05	59	131
Esker	SW-28	Q2 17	28/06/2017	7.5	5	306	1.6	0.05	81	160
Esker	SW-29	Q2 17	28/06/2017	7.2	15	230	2.3	0.05	126	338
Esker	SW29-A	Q2 17	28/06/2017	7.1	10	135	3.1	0.05	113	367

 Table 3.1.
 Water quality monitoring results associated with Esker Bog, 2017-2020

3.5.1 Decommissioning and Rehabilitation Programme Water Quality Monitoring.

The licence obligation of quarterly sampling regime on a selected number of ponds to be sampled over a 3 year cycle will not be sufficient to be able to appropriately track the changing water chemistry that will occur as part of this enhanced rehabilitation programme, so this sampling regime will occur on a monthly basis.

In order to assist in monitoring surface water quality from this bog, it was agreed to increase the existing licence monitoring requirements of the IPC Licence, to sampling for the same parameters every month.

This new sampling programme commenced in November 2020 and is enabling a baseline to be established, with sampling to progress during the scheduled works, and for a period of up to 2 years post rehabilitation. Depending on the period required to confirm that the main two parameters, suspended solids and ammonia as remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration, the monitoring programme and intensity will be periodically reviewed and amended.

In the preparation of this monitoring programme, Bord na Mona have been providing the Local Authority Water Programme (LAWPRO) with details of the surface water emissions points associated with this bog and will be amending some of the proposed monitoring locations on foot of this engagement. LAWPRO have in turn provided details of their 2021 monitoring programme and these are included in the WQ map in Figure 3.7.

This is necessary to ensure that there is alignment with the WFD monitoring programme and that where possible, the monitoring programme will enable any improvements in water quality or establishing trends to be quantified against any available WFD monitoring data. It will also enable the periodic sharing of data which will inform the monitoring reports, success criteria and enable LAWPRO under the Water Framework Directive to track any changes in pressures and be aware of changes in water chemistry.

This enhanced monitoring programme will aim to include a minimum of 70% of a bogs drainage catchments, whatever number of surface water outlets these include.

Monitoring results will be maintained, trended every six months and reported on each year and as required, as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, and will be provided to LAWPRO and the EPA as required to inform progress and national monitoring requirements under the WFD. These results will also be available in April each year as a requirement of the Annual Environmental Report at <u>www.epa.ie</u>.

The parameters to be included as per condition 6.2 of the IPC Licence include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour & COD. In addition, DOC has been included as a parameter to try and identify any changes in carbon in the surface water, and where required by LAWPRO, to assist in investigating other changes in water chemistry, the series of parameters can be reviewed and amended.

3.7 Fugitive Emissions to air

Esker Bog is no longer in industrial peat production. Rehabilitation of the cutaway peatland will seek to re-wet the dry peat where possible, and re-vegetate all areas (whether wet or dry). Collectively, ceasing industrial peat production, re-wetting and re-vegetating will minimise any risk of emission to air from dust.

3.8 Carbon emissions

Esker Bog is likely to be currently a carbon source as it is a drained (degraded) peatland with some active drainage, which facilitates the oxidation of peat. Peat extraction generally transforms a natural peatland which acts as a modest carbon sink into a cutaway ecosystem which is a large source of carbon dioxide (2–5 t C/ha/year) (Waddington & McNeil, 2002; Alm *et al.*, 2007; Wilson *et al.*, 2007, Wilson *et al.*, 2015). Furthermore, they are also a significant source of methane (Huttunen *et al.*, 2003; Laine *et al.*, 2007a) as a consequence of the conditions within the peat body that provide a suitable environment for the microbial breakdown of plant litter and root exudates. Degraded peatlands also release carbon/GHG emissions via the fluvial/aquatic pathway (Dissolved Organic Carbon – DOC, Suspended Solids/Particulate Matter, degassing of GHGs from water).

The EPA-funded CarbonRestore Project (Renou-Wilson et. al. 2012) found that rewetting of drained peatlands can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the carbon sink function. The EPA NEROS project carried out GHG flux research at Moyarwood Bog and found that Moyarwood Bog was overall a Carbon sink (sink for CO₂ and a source for Methane) 6 years after bog restoration was carried out (Renou-Wilson et al. 2018).

It is expected that Esker Bog will become a reduced Carbon source following rehabilitation. The site does have potential to become a carbon sink in part, in the longer-term. This depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich habitats, the balance of carbon fluxes from different cutaway habitats (some of the cutaway is expected to develop Reed Swamp and fen habitats with alkaline emission factors) and future climatic conditions. This site is expected to develop embryonic *Sphagnum*-rich peatforming habitats along with scrub, some fen and some wetland habitats such as Reed Swamp. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

Current ecological rating (ranges from Local Importance (lower and higher value) to National Importance; following NRA (2009) Evaluation Criteria)

The majority of Esker Bog is deemed to be of **Local Importance (lower value)** due to the dominance of bare peat managed for industrial peat production. Some pioneer and semi-natural habitats such as birch woodland are rated higher and are deemed to be of **Local Importance (higher value)**.

It is expected that the overall ecological value of this site will increase in the future as the site re-vegetates, matures and forms semi-natural naturally functioning peatland habitats.

3.10 Esker Bog Characterisation Summary

Esker Bog is located approximately 3.5km south-southeast of Rhode and c.6km east of Daingean in Co. Offaly. Esker Bog comprises two main sections, a larger area in the west and a smaller section in the east, that are divided by a stream (the Dogen River). A third, small, separate area is also included as part of Esker Bog which is located to the south-west of the other two bog areas

Peat production permanently ceased at Esker Bog in 2019. Esker Bog had a gravity drainage system.

The western section is predominantly bare peat with active field drains running in a northeast to south west direction. The eastern section is largely cutaway, and pioneer cutaway habitats have started to develop on this area in recent years, including Birch woodland on the higher (and drier) area with a mosaic of rush-dominated poor fen and bare peat over much of the remainder of this area. The small area of Esker Bog to the south- that has never been in production is dominated by mature Birch woodland with some small patches of old cutover bog wet grassland and Bracken.

The western section has deeper peats towards the western side, with shallower peats in the south-east corner and along the northern and eastern boundary. This area also slopes from north to south. The eastern section has shallow peats through the centre and north. The deeper peats in the western area lends itself towards development of embryonic peat forming habitats, although the lower parts of this area towards the southern boundary are likely to develop extensive wetland habitats. The shallower peat areas in the north-east parts of the western section and much of the eastern section are more suitable to the development of wetlands and fen, as they now naturally contains a basin which will hold water with significant ground-water/more alkaline influence.

There are areas of former production area that are constrained from rehabilitation due to the proposed Water Supply Project- Eastern and Midlands Region route. This is indicated to run along the southern side of the site and this development footprint, which is at pre-planning stage, is constrained out from rehabilitation.

4. CONSULTATION

4.1 Consultation to date

Consultation will seek to engage an audience of relevant stakeholders at both a national and local level. National stakeholders have been identified from varied bog restoration and rehabilitation efforts undertaken by Bord na Móna over the past 40 years, with particular emphasis on engagement with stakeholders during their Biodiversity Action Plan programme since 2010. National Stakeholders includes relevant government departments and agencies, relevant semi-state bodies, NGOs and other environmentally-focused groups with a national remit. All national stakeholders can be emailed a copy of this draft plan when it has been finalised internally by Bord na Móna, and invited to make submissions on the objectives and content of this plan in relation to Esker Bog.

There has been ongoing general consultation about peatland rehabilitation, biodiversity, research and other issues over the years about Esker Bog with various stakeholders in relation to:

- Breeding and wintering bird usage of the site through surveys (commissioned by BnM).
- General consultation with range of stakeholders at annual Bord na Mona Biodiversity Action Plan review days 2010-2018.
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).
- Proposed WaterSupply Project Eastern and Midlands Region pipeline (Irish Water).

To inform the current Plan, both national and local stakeholders, including neighbours whose land adjoins Esker Bog and local representatives of national bodies (such as Regional National Parks and Wildlife Service staff) and relevant offices in County Councils (such as the Heritage or Environmental Offices) have been contacted. Any identified local interest groups have been sought and informed of the opportunity to engage with this rehabilitation plan, and when identified have been invited to submit their comments or observations in relation to the proposed rehabilitation at Esker Bog (see Appendix XI).

All correspondence received will be acknowledged and evaluated against the rehabilitation work proposed here, and the final draft of the Esker Bog Rehabilitation Plan will contain a review of the consultation.

4.2 Issues raised by Consultees

To date, a number of issues have been raised by consultees during the consultation process for both the current and previous drafts of the rehabilitation plan for Esker Bog – these are summarised below.

4.2.1 Assessments of rehabilitation

Queries on pre-rehabilitation assessments were raised by NPWS, Offaly County Council and the National Museum of Ireland in relation to Appropriate Assessment, Environmental Impact Assessment and Strategic Environmental Assessment.

4.2.2 Restoration scope

Restoration/rehabilitation of marginal habitats was raised by IPCC, Irish Wildlife Trust and BCI as worthy of consideration within the rehabilitation measures to support carbon sequestration and biodiversity objectives.

4.2.3 Monitoring

Further details on monitoring of ecological metrics, including water quality, carbon sequestration and biodiversity, and how and where reporting on this monitoring would take place, was raised by the IPCC, Irish Wildlife Trust, Offaly County Council and Trinity College.

The ICMSA queried if a hydrological baseline was being established on surrounding private land in relation to assessing ex-situ impacts arising from re-wetting. Michael Fitzmaurice TD queried what monitoring was being undertaken to assess carbon emission reductions and storage within the bogs as part of PCAS.

4.2.4 Flooding of adjacent land

Michael Fitzmaurice TD, IFA and ICMSA queried likely impacts arising from the proposed re-wetting associated with the rehabilitation in general, in relation to flooding on adjoining lands and, specifically, with regards to the maintenance of drains. The IFA also raised the general issue of Health and Safety in relation to raising water levels as well as possible impacts on land and property prices.

4.2.5 Land Management

The ICMSA queried the long-term management of the Bord na Móna's estate, particularly in relation to maintenance of boundary fencing to exclude livestock from the bogs and maintenance of drainage.

The NARGC suggested that heather be established on large area of the cutaways as this is beneficial from biodiversity and pollinators. NARGC were also keen to minimise the spread of scrub and woodland habitats to reduce habitats from predators (such as foxes) and were keen to seek control of so-called "vermin" species on the rehabilitated bogs.

4.2.6 Other issues (including amenity)

Opportunities to develop amenities on the bog to support local communities was raised by IPCC.

Other issues (raised by IPCC and Irish Wildlife Trust) included after use of the bog and turf cutting on the margins of the bog (outside of the area owned by Bord na Móna).

Archaeological end of life survey of all the bogs were requested by National Museum of Ireland and National Monuments Unit.

The Irish Wildlife Trust also raised the issue of statutory protection for PCAS sites following rehabilitation and the adoption of a re-wilding strategy, including species reintroductions (specifically mentioning Beaver).

For a complete summary of submissions received and replies, see Appendix XI.

4.3 Bord na Móna response to issues raised during consultation

4.3.1 Assessments of rehabilitation

AA screening will be undertaken on all the bogs as part of PCAS and this is currently being undertaken by external consultants for Esker Bog. Where required, Natura Impact Statements shall be completed and submitted to the Minister in accordance with 42(9) and 42(10) of the Habitats Regulation, noting that Bord na Móna is prescribed as a 'public authority' under this legislation. In relation to the SEA Directive and EIAR Directive, this has been considered and the legal advice to date is that the scheme does not come under these Directives.

An Archaeological Impact Assessment (AIA) is also being undertaken on all the bogs in PCAS. The aim for known archaeology on these bogs is to accomplish preservation in situ and we are taking steps to identify and avoid all known archaeology. We are doing this by including all known archaeology on our GIS from the AIA process, and either excluding or defining a buffer zone around these features, which will then be excluded from any ground works in these areas in the final plan. Currently there are no known archaeological sites within Esker Bog. Nevertheless, it is anticipated that any archaeology will benefit hugely from the ultimate remit of the rehabilitation, in that water tables will be raised thereby preserving in-situ. There is also an identified procedure for managing reports of stray finds that may arise during rehabilitation works.

An archaeological end of life survey of all the bogs as requested by National Museum of Ireland and National Monuments Unit is not part of the current scope of the scheme. Bord na Móna would be happy to assist such a survey, where possible.

4.3.2 Restoration scope

The scope of this rehabilitation plan covers the former Esker Bog industrial peat production area. As part of the PCAS, all restoration/rehabilitation options have been developed to support climate action and biodiversity objectives.

4.3.3 Monitoring

As part of the PCAS, a monitoring and verification plan has been developed to support climate action and biodiversity objectives. This will include stratified monitoring of bog condition, habitats and biodiversity at several different scales. Some fauna monitoring (pollinator transect) is proposed as part of the monitoring and verification at Esker Bog during the period of the scheme (2021-2025). However, note that fauna typically take longer to respond to the changes in vegetation colonisation and habitats arising from the proposed rehabilitation measures identified for Esker Bog

Water monitoring is undertaken as part of Bord na Móna's IPC licence obligations, and this will continue until such a time as the licence can be surrendered.

4.3.4 Flooding of adjacent land

It is the intention of Bord na Móna that the re-wetting of the bogs will be carried out in such a manner that does not impact on third party lands including adjoining private turf banks.

External consultants have been appointed to carry out a hydrological assessment, to identify any potential impacts to neighbouring lands and, where required, the rehab design will be amended to prevent any identified impact. Please note that climate change is considered in the hydrological assessment. Information on these hydrological assessments will be made available through our website.

The rehabilitation measures will generally result in reduced runoff and drainage from the existing peat fields through a mixture of techniques including, drain blocking, cell bunding and re-profiling. It is intended that these measures will not significantly alter the existing topographical catchments and that the spine of the drainage networks will be retained by Bord na Móna. Based on evidence from other bogs, rehabilitation measures will reduce the run-off from the bog by returning the peatlands towards its natural water retention function

Bord na Móna will continue to manage their land bank into the future. As peat production has now ceased on Bord na Móna lands and rehabilitation measures will be carried out, a regular drainage maintenance programme will not be required or carried out as would have been the case in the past. However, if issues arise with the Bord na Móna internal drainage system that affects upstream or downstream landowners, then these issues will be addressed by Bord na Móna.

4.3.5 Land Management

Bord na Móna will continue to have responsibilities for managing the land in their ownership as any landowner would. In addition, land still under an IPC licence will need to be managed in accordance with that licence.

It is expected that re-wetting will reduce area being colonised by Birch and other scrub species as conditions will be more suitable for wetter species. However, in drier areas that cannot be re-wetted, particularly where there is shallow (or no) residual peat, it is inevitable that drier vegetation communities, including Birch woodland will develop. Heather is not expected to be an important part of the vegetation at Esker as site environmental conditions (wetland conditions, alkaline/ground-water influence) do not suit this species.

However, it is expected that as some naturally functioning peatland ecosystems develop that are analogous to embryonic raised bog (SW corner of the western side), these will colonise with Heather and other ericoid species in time and typical raised bog hummocks will re-develop.

4.3.6 Other issues (including amenity)

Creating amenity such as walking tracks is not part of the direct scope of PCAS. However, PCAS will enable and support future amenity development. Future amenity proposals can be positively aligned and integrated to afteruse plans following the completion of the proposed rehabilitation at Esker Bog. Rehabilitation measures proposed for Esker Bog do not need to be amended to integrate any future amenity track positioned along the margin of the former production bog or along the former bog railway.

Other issues, including after-use and management issues outside the boundary of Esker Bog, are acknowledged but are specifically outside the scope of this rehabilitation plan. This includes reference to the cessation of turfcutting on private lands. Bord na Móna rehabilitation proposals will not impact on private turf-cutting and will have no impact on private turf-cutting outside Bord na Móna boundaries.

It is not possible to confirm whether or not Esker Bog (or any other PCAS site) will become a designated area in the future, however this is unlikely given the current status of the bog. It should be noted that such a designation is purely a decision for the Government and not Bord na Móna.

4.3.7 Concluding statement.

- No specific issues were raised during consultation that required significant changes to the substance of the rehabilitation plan.
- Issues raised by several consultees in relation to potential impacts on adjacent land had already been accounted for during the hydrological analysis. Several marginal drains will not be blocked to avoid impacts on adjacent lands or turf-banks.
- A small portion of cutaway bog (10 ha) will be constrained from re-wetting as it is part of the Proposed WaterSupply Project – Eastern and Midlands Region pipeline (Irish Water) route. It is anticipated that rehabilitation across the site will occur in advance of the construction of this pipeline. Constraining this area from re-wetting does not alter the overall substance of the rehabilitation plan (key goals and outcomes). There is expected to be ongoing consultation to further minimise the footprint of the constrained Irish Water footprint. This area will be allowed to colonise naturally in advance of the pipeline project.
- Bord na Móna do not propose to carry out any re-wetting within the footprint of the proposed Water Supply Project – Eastern and Midlands Region until a decision has been made by the relevant authorities in relation to the statutory consent applications for the project. It is expected that the footprint of the corridor will be rehabilitated post the construction of the proposed Water Supply Project – Eastern and Midlands Region.

5. REHABILITATION GOALS AND OUTCOMES

The rehabilitation goals and outcomes outline what Bord na Móna want to achieve by implementing the rehabilitation. These include:

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving water-bodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Optimising hydrological conditions for climate action benefits as part of PCAS.
- Optimising hydrology for the development of embryonic *Sphagnum*-rich vegetation communities on the **areas of residual deep peat**, and eventually naturally functioning peatland habitats.
- Optimising hydrological conditions for the development of Reed Swamp and fen on shallow more alkaline peat and other subsoils.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, where possible.
- The main goal and outcome of this plan is the successful rehabilitation (environmental stabilisation) of peatlands used for industrial peat production at the bog in a manner that is acceptable to both external stakeholders and to Bord na Móna and which optimise climate action and other ecosystem service benefits.

The rehabilitation goals and outcomes take account of the following issues.

- It will take some time for stable naturally functioning habitats to fully develop at Esker Bog. This will happen over a longer time-frame than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There
 is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water
 storage and attenuation and help support biodiversity both on the site and in the catchment (See Section
 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon
 source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver
 significant contributions to Ireland's climate action.
- It is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). Furthermore, only a proportion of the bog has potential to develop *Sphagnum*-rich habitats in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.
- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as such the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction, but is also
 affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At
 Risk from peatlands and from peat extraction are likely to have several contributary sources of impacts
 (private peat extraction and Bord na Mona).
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Cavemount) in 2021. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the Bilberry River from rehabilitation more than one bog in the same catchment.
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features.

6. SCOPE OF REHABILITATION

The principal scope of this enhanced rehabilitation plan is to rehabilitate the bog. This is defined by:

- The area of Esker Bog (Figure 3.1);
- EPA IPC Licence Ref. P0503-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Esker Bog is part of the Allen Bog group (Clonsast sub-group).
- The proposed Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence.
 PCAS is designed to enhance the ecosystem services of Esker Bog, in particular, optimising climate action benefits. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits will be accrued.
- The local environmental conditions of Esker Bog identify wetland rehabilitation as the most suitable rehabilitation approach for the majority of this site.
- The key objective of rehabilitation, as defined by this licence, is environmental stabilisation of the bog. Bord na Móna have defined the key goal and outcome of rehabilitation at Esker Bog as environmental stabilisation and deep peat re-wetting, and setting the site on a trajectory towards the development of embryonic peat-forming (*Sphagnum*-rich) vegetation communities on deep peat, and the development of Reed Swamp and fen on shallow more alkaline peat and other subsoils.
- Rehabilitation of Esker Bog will support multiple National strategies of climate action, biodiversity action and other key environmental strategies such was the Water Framework Directive.
- **Time frame.** Rehabilitation measures will be carried out during the period of PCAS (2020-2025). The surrender of the licence is likely to extend beyond the PCAS timeframe.
- It is not proposed to carry out any rehabilitation in the narrow marginal raised bog remnants around the margins. Generally, these bog remnants are narrow, or are subject to turbary, and do not have positive bog restoration prospects.

6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status), and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- At Esker Bog, remnant peat depths are in excess of 2.5m in the western section. By contrast, the smaller
 eastern section contains shallower residual peat and is partly cutaway. These two areas will therefore
 require different approaches to rehabilitation. There are local factors that will influence the future
 trajectory of this site (hydrological and underlying geological conditions) which need to be considered as
 part of the wider rehabilitation work.
- Surrounding landscape and neighbours. Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care has to be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland, as well as potential changes to the hydrology

of surrounding designated sites. It is anticipated that the work proposed here (blocking drains and rewetting cutaway peatlands) will not have any adverse flooding impacts on adjacent land.

- Archaeology. The discovery of monuments or archaeological objects during peatland rehabilitation may
 potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation
 will optimise hydrological conditions for the protection of exposed archaeological structures, their
 retention in situ and preservation into the future, any new archaeology may require rehabilitation
 measures will be reviewed and adapted. If this occurs, rehabilitation measures will be reviewed and
 adapted. An Archaeological Impact Assessment (Appendix XII) was carried out to mitigate against any
 impact on found archaeology at Esker Bog. The proposed rehabilitation will have no impact on any known
 archaeological material in the application area or the vicinity. In the worst-case scenario works affecting
 the surface and sub-surface of the bog might disturb previously unknown archaeological deposits or
 artefacts without preservation by record taking place. Should any previously unknown archaeological
 material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na
 Móna Archaeological Liaison Officer and the National Museum of Ireland.
- Proposed Water Supply Project Eastern and Midlands Region (Irish Water). This proposed Irish Water
 Project that is currently in the pre-planning stage also traverses the southern headland of Esker Bog. It is
 expected that the enhanced rehabilitation measures planned for Esker will be carried out in advance of
 the construction of the pipeline, which is still subject to planning consent. Bord na Móna do not propose
 to carry out any rehabilitation works within the footprint of the proposed Water Supply Project Eastern
 and Midlands Region until a decision has been made by the relevant authorities in relation to the
 statutory consent applications for the proposed Water Supply Project Eastern and Midlands Region.
 The route of the proposed Water Supply Project Eastern and Midlands Region.
 The route of the proposed Water Supply Project Eastern and Midlands Region crosses the southern
 headland of the main part of Esker Bog. This area of cutaway is at a relatively high elevation close to the
 edge of the bog and the footprint also takes part of the low-lying basin. This route will not significantly
 alter any re-wetting objectives or outcomes at a site scale as it is located close the margin of the site.

6.2 Key Assumptions

- It is assumed that Bord na Móna will have all resources required to deliver this project.
- It is expected that weather conditions will be within normal limits over the rehabilitation plan timeframe. Long periods of wet weather have the capacity to significantly affect ground conditions and constrain drain blocking and other ground activities.

6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- The longer-term development of stable naturally functioning habitats to fully develop at Esker Bog. The plan covers the short-term rehabilitation **actions** and **an additional monitoring and after-care programme** to monitor the rehabilitation and to respond to any needs.
- This plan is not intended to be an after-use or future land-use plan for Esker Bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future.

7. CRITERIA FOR SUCCESSFUL REHABILITATION

This section outlines what criteria will be used to indicate successful rehabilitation and what critical success factors are needed to achieve successful rehabilitation. All criteria used to indicate successful rehabilitation will be measured to validate the achievement of the rehabilitation goals and outcomes and validate the completion of the rehabilitation.

The key objective of this enhanced rehabilitation plan is **environmental stabilisation** and the stabilisation of any emissions from the site that related to the former industrial peat extraction activities.

Rehabilitation is generally defined by Bord na Móna as

- stabilisation of bare peat areas via targeted active management (e.g. drain-blocking/re-wetting) slowing movement of water across the site and encouraging natural colonisation; and
- mitigation of key emissions (e.g. potential silt run-off).

In addition, Bord na Móna wish to optimise climate action and other ecosystem service benefits via enhanced rehabilitation measures.

7.1. Criteria for successful rehabilitation to meet EPA IPC licence conditions:

- Rewetting of residual peat in the former area of industrial peat production to offset potential silt run off and to encourage/accelerate development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat. See Table 7.1 for a summary of the criteria for successful rehabilitation and associated monitoring. The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed.
- That there is a stabilizing/improving concentration of suspended solids and ammonia in discharges from Bord na Móna sites, associated with the measures undertaken to stabilize the peat surface by the blocking of the internal drainage system and the maximized rewetting of the peat surface.
- Receiving water bodies have been classified under the River Basin Management Plan and this classification includes waters that are At Risk from peatlands and peat extraction. The success criteria will be that the At Risk classification will see improvements in the associated pressures from this peatland or if remaining At Risk, that there is an improving trajectory in the pressure from this peatland.

With regard to predicting and estimating likely trends that might materialize or could be considered as a target, monitoring of surface water ammonia emissions from an adjoining Corlea bog in Mountdillon over the past 3 yrs., post cessation of peat extraction with ongoing rehabilitation, were considered. These are indicating a downward trend in Ammonia concentrations. As the monthly monitoring program at Derrycolumb continues in 2021 during the rehabilitation works, and data from the 2020 monitoring program is compiled, further trending will be produced to verify any ongoing trends (Figure 7.1).



Figure 7.1. Ammonia levels over the period 2015-2019 at Longfordpass and Corlea.

Additional criteria for successful rehabilitation to optimise climate action and other ecosystem service benefits:

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising and maximising deep peat re-wetting). This will be measured by an aerial survey after rehabilitation has been completed.
- Accelerating the trajectory of the site towards becoming a reduced carbon source/carbon sink and eventually naturally functioning peatland habitats (heath, scrub, poor fen and embryonic *Sphagnum*-rich raised bog peatland communities, where conditions are suitable). These habitats will generally establish initially as pioneer vegetation. This will be measured through habitat mapping and the development of cutaway bog condition assessment. This cutaway bog condition assessment will include assessment of environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Reduction in carbon emissions. This will be estimated via a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future.
- Improvement in biodiversity and ecosystem services. This will be demonstrated by metrics outlined in Section 9.1 that can be used to measure changes in ecosystem services (e.g. water quality parameters, development of pioneer habitats, breeding bird monitoring). This will be measured by collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.

Criteria type	Criteria	Target	Measured by	Expected Time-frame
IPC validation	Rewetting of the drained high bog area	Delivery of planned rehabilitation measures. This will be a combination of drain blocking, bunding and re-profiling	Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking)	2021-2024
IPC validation	Key water quality parameters Ammonia, Phosphorous, Suspended solids,	Stabilization Improvement of key water quality parameters	Water quality monitoring. Started in advance of the proposed rehabilitation.	2021-2023

Table 7.1.	Summary of Success criteria, targets, how various success criteria will be measured and expected
	time-frames.

	pH and conductivity			
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	At Risk classification will see improvements in the associated pressures from this peatland or if remaining At Risk, that there is an improving trajectory in the pressure from this peatland	EPA WFD monitoring programme	WFD schedule
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action and setting the site on a trajectory towards establishment of a mosaic of compatible peatland habitats	Optimal extent of suitable hydrological conditions Indicators of establishment of compatible cutaway habitats	Aerial photography, Cutaway bog condition map and Habitat mapping to map extent of suitable hydrological conditions. Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025
Climate action verification	Biodiversity and ecosystem services. Habitat establishment Presence of key species – Sphagnum Breeding and wintering birds Pollinators	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services Presence of key species – Sphagnum – Walkover survey Breeding birds – Breeding bird survey Wintering birds – survey of wintering waterbirds Pollinators – Pollinator walk Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored	2021-2024

compared against this		in the future and	
		compared against this	
baseline.		baseline.	

Meeting climate action verification criteria and monitoring of these criteria after the Scheme has been completed is dependent on support from the Climate Action Fund or other sources of funding. Note that monitoring and verification of the overall scheme will be stratified – not all these criteria will be measured at each individual site.

7.2. Critical success factors needed to achieve successful rehabilitation as outlined in the plan

The achievement of successful rehabilitation as outlined in the plan requires:

- Funding to pay for resources required to deliver the planned rehabilitation (Bord na Móna and external). Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund.
- Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.
- Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.
- Weather conditions to be within normal limits over the rehabilitation plan timeframe. Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.
- Rehabilitation measures to be effective. The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practise applied internationally in peatland management. Measures proposed in this plan have already been shown to be affective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.
- Natural colonisation of vegetation to develop semi-natural habitats at a rate within the normal limits.
 The development of naturally functioning semi-natural habitats on cutaway peatland takes time. Pioneer vegetation can develop relatively quickly (3-10 years) and wetland habitats can develop relatively quickly.
 Birch woodland make take 20-30 years to develop. However, it may take 50 years for active raised bog vegetation to re-develop on suitable ground that was previously cutaway. Different environmental conditions will have a significant impact on the rate of natural colonisation, and as a result of the combination of different environmental conditions and the application of different rehabilitation measures, there will be a variety of habitat outcomes.
- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of

areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).

• Monitoring to be robust and effective. Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed enhanced measures to optimise climate action. This will focus on a collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services.

8. REHABILITATION ACTIONS AND TIME FRAME

Peatland rehabilitation requires detailed planning and the use of data from desktop surveys and field surveys. This data in association with topographical and hydrological modelling (Figures 8.1 & 8.4) will be important in planning the future peatland landscapes and planning the use of the most appropriate rehabilitation methodologies to maximise climate action benefits. Hydrological modelling (Figure 8.4) indicates those areas that are likely to re-wet when drains are blocked, based on the current topography, and areas where water levels may have to be modified, where needed. Enhanced rehabilitation measures will look to optimise hydrological conditions for re-wetting peat in other areas. This planning is also essential for matching the most sustainable rehabilitation methodology to the most suitable cutaway environment to maximise the benefits of the resource outlay (maximising cost/benefit).

The rehabilitation actions will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in Figure 8.5. (Note that the actual distribution of these measures may be subject to change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.)

These enhanced measures for Esker Bog will include:

- Re-wetting the deep peat areas of the bog using berms and field re-profiling. This enhanced measure seeks to create large (c. 45m x 60m) flat areas or cells of shallow (< 10 cm) water conditions on bare peat, across multiple fields that are enclosed by shallow berms to retain shallow surface water;
- Inoculation of *Sphagnum* on suitable deep residual peat.
- Re-wetting some deep peat areas and some of the drier parts of the bog through more intensive field drain blocking using a dozer or excavator to create up to seven peat blockages every 100 m along each field drain
- Optimise water retention in wetland areas, including placement of berms where required and the introduction of Reeds and other Rhizomes, where needed.
- Re-wetting some areas of the bog through regular field drain blocking using a dozer to create three peat blockages every 100 m along each field drain;
- Blocking drains in targeted existing pioneering vegetation mosaics, to accelerate re-wetting, and/or manage water levels to the correct height to accelerate the current trajectory towards Reed swamp and fen, using a dozer/excavator.
- Targeted fertiliser applications to accelerate vegetation establishment on headlands and high fields.
- Modifying water levels at outfalls, as it may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated. This will further slow the movement of water through and out of Esker Bog. It may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated.

Silt ponds will be retained and maintained during the rehabilitation phase. During the monitoring and verification phase silt ponds will be continually inspected and maintained, where appropriate. When it is deemed that silt ponds are not required, as the bog has been successfully stabilised and there is no silt run-off, the condition of the silt ponds will be reviewed. Silt ponds will either be de-watered (water levels lowered to a level where the silt pond will naturally develop as a small wetland feature), left in situ, or infilled (where discharges do not require silt control).

An indication of the areas for these various measures is shown in Table 8.1 and in Figure 8.5.



Figure 8.1. Aerial photo of Esker Bog. The majority of the bog is bare peat, with areas of vegetation at the northern end of the eastern side.



Figure 8.2. Peat Depth Map for Esker Bog (2020). There are pockets of deep residual peat (western area); the remainder is shallow cutaway.



Figure 8.3. LIDAR topography map of Esker Bog. Low areas and basins are orange-yellow; more elevated areas are blue-green.



Figure 8.4. Hydrological modelling for Esker Bog showing range of expected water depths based on current topography. Small areas of both Esker East and West are modelled as basins that have the potential to develop wetland habitats.



Figure 8.5 Indicative Enhanced Rehabilitation Plan. Note that the types of rehab and areas of rehab may change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.

Table 8.1:	Types of and areas for enhanced rehabilitation measures at Esker Bog. Note that the types of rehab
	and areas of rehab may change in response to stakeholder consultation and refinement of the
	enhanced rehabilitation measures.

Туре		Enhanced Rehabilitation Measure	Extent (Ha)
Deep peat	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows	161.2
Deep peat	DPT4	Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows + drainage channels for excess water + <i>Sphagnum</i> inoculation	112.1
Deep peat	DPT5	Cut and Fill cell bunding (30m x 30m cell) + blocking outfalls and managing overflows + drainage channels for excess water + <i>Sphagnum</i> inoculation	45.0
Wetland	WLT3	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes	35
Wetland	WLT4	More intensive drain blocking (max 7/100 m), + blocking outfalls and managing overflows + transplanting Reeds and other rhizomes	51.72
Dry Cutaway	DCT2	Regular drain blocking (max 3/100m) +blocking outfalls and managing water levels with overflow pipes+ targeted fertiliser treatment	70.4
Marginal land	MLT1	No work required	43.6
Marginal land	MLT2	More intensive drain blocking (max 7/100 m)	3.3
Silt ponds		Silt ponds	2.4
Constraint	Constraint	Other Constraints (Pipeline)	13.8
Minimal Rehab	Constraint	IW Pipeline Corridor	29.6
Total			568.3

8.1 Short-term planning actions (0-1 years)

- Seek formal approval of the enhanced plan from the EPA.
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with detailed site drawings outlining how the various rehabilitation methodologies (the proposed PCAS) will be applied to Esker Bog. This will take account of peat depths, topography, drainage and hydrological modelling. (See Figure 8.5 for an indicative view of the application of different rehabilitation methodologies).
- A hydrology and drainage management assessment of the proposed enhanced rehabilitation measures has now been carried out and any required measures to prevent unintended impacts have been incorporated into the rehabilitation plan.
- A review of known archaeology and an archaeological impact assessment of the proposed rehabilitation has been completed. The results of this assessment have been incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.

- A review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements (including the proposed Water Supply Project- Eastern and Midlands Region route) has been completed.
- An ecological appraisal of the potential impacts of the planned rehabilitation, if needed, such as the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) or larval webs of Marsh Fritillary butterfly, etc has been completed. The scheduling of rehabilitation operations will be adapted, as mitigation, where needed.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- An Appropriate Assessment of the Rehabilitation Plan has been carried out. Any required mitigation measures from the AA have been incorporated into the plan for the delivery of rehabilitation and decommissioning across the site.
- See Esker Decommissioning and Rehabilitation Plan Addendum 1 for more details of the NIS conclusion and the NIS mitigation measures.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implantation of the rehabilitation plan.

8.2 Short-term practical actions (0-2 years)

- Carry out proposed measures as per the detailed site plan. This will include a combination of drain blocking, peat field re-profiling, cell-bunding and fertiliser applications targeting headlands, high fields and other areas (where required). All rehabilitation will be carried out with regard to environmental control measures (Appendix IV);
- Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions;
- Carry out the proposed monitoring, as outlined.
- While natural colonisation is expected to commence almost immediately once peat production ceases, Phase 2 actions will be carried out in targeted areas to accelerate re-vegetation and colonisation of target species. Phase 2 actions may include inoculation of *Sphagnum*;
- Silt ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent silt run-off from the site during the rehabilitation phase; and
- Submit an *ex post* report to the Scheme regulator to verify the eligible works to be carried out in year 1 of the Scheme, and an *ex ante* estimate for year 2 of the Scheme; and so on for each year of the proposed Scheme.

8.3 Long-term (>3 years)

- Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary;
- Delivery of a monitoring, aftercare and maintenance programme (See section 10.2 below);
- Decommissioning of silt-ponds will be assessed and carried out, where required; and
- Reporting to the EPA will continue until the IPC License is surrendered.

8.4 Timeframe

- 2020-2021: Short-term planning actions.
- **2021**: Short-term practical actions.
- **2021-2024**: Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024: Decommission silt-ponds, if necessary

8.5 Budget and costing

Bord na Móna (BnM) appreciates the Minister's intention to support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. *However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support.*

The enhanced decommissioning, rehabilitation and restoration of the peatlands funded by the proposed Scheme will deliver benefits across climate action (GHG mitigation through reduced carbon emissions and acceleration towards carbon sequestration), enrich the State's natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation as well as developing the amenity potential of the peatlands.

Bord na Móna maintains a provision on its balance sheet to pay for the future licence compliance costs of mandatory standard rehabilitation and decommissioning when industrial peat extraction ceases. This is updated every year - for more information see the Bord na Móna Annual Report (Bord na Móna 2020). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

At this time, a 'mandatory' rehabilitation provision (sufficient to discharge the requirement of Condition 10 in the licence) has been be allocated to the site based on the area of different types of cutaway across the site (See Appendix I).

9. AFTERCARE AND MAINTENANCE

9.1 Programme for monitoring, aftercare and maintenance

This programme for monitoring, aftercare and maintenance has been designed to meet the Conditions of the IPC Licence. This is defined as:

- There will be **initial quarterly monitoring assessments** of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbours land, general land security, boundary management, dumping and littering.
- The number of these site visits will reduce after 2 years to bi-annually and then after 5 years to annual visits.
- These monitoring visits will also consider any requirements for further practical rehabilitation measures.
- The **baseline condition of the site will be established** post-rehabilitation implementation by using an aerial survey to take an up to date aerial photo, when rehabilitation is completed. This will be used to verify completion of rehabilitation measures. The extent of bare peat will be assessed using this baseline data, and habitat maps will be updated, if needed.
- Water quality monitoring at the bog will be established. The main objective of this water quality monitoring will be to establish a baseline and then monitor the impact of peatland rehabilitation on water quality from the bog.
- In order to assist in monitoring surface water quality from this bog, it is planned to increase the existing
 licence monitoring requirements to sampling for the same parameters to every month during the
 scheduled activities and for a period up to two years. post rehabilitation, depending on the period
 required to confirm that the main two parameters, suspended solids and ammonia are remaining
 compliant with the licence emission and trigger limit values and there is an improving trajectory in these
 two parameters i.e. reduction in concentration.
- Enhanced water quality monitoring will aim to include up to 70% of a bogs drainage catchments.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at www.epa.ie.
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, and COD.
- This monthly sampling regime on a selected number of silt ponds will be carried out over a two-year cycle. The original (licence) requirement was for a quarterly sampling regime but this has been increased to a monthly regime to appropriately track the changing water chemistry that will occur as part of this enhanced rehabilitation. In addition, DOC will be included as a parameter to try and identify any changes in carbon in the surface water.
- If, after two years, key criteria for successful rehabilitation are being achieved and key targets are being met, then water quality monitoring will be reviewed, with consideration of potential ongoing research on site. The water quality data, the aerial surveys and the habitat mapping will be collated and will be submitted to the EPA as part of the final validation report.
- If, after two years, key criteria for successful rehabilitation have **not** been achieved and key targets have
 not been met, then the rehabilitation measures and status of the site will be evaluated and enhanced,
 where required. This evaluation may indicate no requirement for additional enhancement of
 rehabilitation measures, but may demonstrate that more time is required before key criteria for

rehabilitation has been achieved. Monitoring of water quality will then also continue for another period to be defined.

• Where other uses are proposed for the site that are compatible the provision of biodiversity and ecosystem services, these will be assessed by Bord na Móna in consultation with interested parties. Other after-uses can be proposed for licensed areas and must go through the appropriate assessment process and planning procedures.

Additional monitoring measures are also proposed to monitor ecosystem service benefits that have been derived by rehabilitation. These proposed monitoring measures will be funded by the proposed Scheme or additional other funding. Monitoring of climate action and other ecosystem service benefits will be designed to take account of the requirements of monitoring benefits of the overall Scheme and will be stratified; that is not all monitoring will be carried out in each site. These are defined as:

- Vegetation and habitat monitoring after rehabilitation is completed using a cutaway bog condition assessment (Similar to ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated peatland habitats. This means that GHG emissions can be determined from the site, identifying carbon savings as the site continues along its trajectory towards a naturally functioning peatland ecosystem.
- It is proposed to monitor the improvement of some biodiversity ecosystem services. A breeding bird and Pollinator monitoring programme will be established. Specific pollinator indicators will be monitored (bees and butterflies). This will be further defined in relation to monitoring of the overall proposed Scheme and after consultation with stakeholders.

9.2 Rehabilitation plan validation and licence surrender – report as required under condition 10/4

IPC License Condition 10.4. A final validation report to include a certificate of completion for the Rehabilitation Plan, for all or part of the site as necessary, shall be submitted to the Agency within six months of execution of the plan. The licensee shall carry out such tests, investigations or submit certification, as requested by the Agency, to confirm that there is no continuing risk to the environment.

Reporting to the EPA will continue until the IPC License is surrendered. The bog will be included in the full licence surrender process as per the Guidance to Licensees on Surrender, Cessation and Closure of Licensed Sites EPA, 2012, when:

- The planned rehabilitation has been completed.
- The key criteria for successful rehabilitation has been achieved and key targets have been met;
- Water quality monitoring demonstrates that water quality of discharge is stabilising or improving; and
- The site has been environmentally stabilised.

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APPENDIX I: A STANDARD PEATLAND REHABILITATION PLAN TO MEET CONDITIONS OF THE IPC LICENCE

In the event that the proposed Scheme (PCAS) is not supported by additional funding, Bord na Móna is still obligated to carry out peatland rehabilitation to meet the conditions of the IPC Licence. Under its EPA licences and following cessation of peat extraction, BnM is mandated to 'decommission' its operations by removing materials 'that may result in environmental pollution' and establish that 'rehabilitation' measures have environmentally stabilised peat production areas.

This proposed standard peatland rehabilitation plan is outlined here to **estimate potential costs**. Bord na Móna will still be expected to cover the costs that would have accrued from standard decommissioning and rehabilitation activities, as part of its original obligations. The existing costs associated with both the removal of potentially polluting materials and the environmental stabilisation of the peatlands resides with Bord na Móna. However, the expenditure necessary to deliver the additional and enhanced decommissioning, rehabilitation and restoration and the benefits that flow from these measures and interventions/improvements will be eligible for funding by government through the Climate Action Fund.

The same process as outlined in Section 2 will be followed.

Scope of rehabilitation

The principal scope of this rehabilitation plan is to rehabilitate the bog. This is defined by:

- EPA IPC Licence Ref. P0503-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Esker bog is part of the Allen Bog group.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- The area of former industrial peat production at Esker Bog as defined by Figure 3.1.
- Minimising potential impacts on neighbouring land. Some boundary drains around Esker Bog will be left unblocked as blocking boundary drains could affect adjacent land.

Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Esker Bog is environmental stabilisation of the site via wetland creation and residual peat re-wetting. This is defined as:

- Carrying out drain blocking to re-wet peat and slow runoff.
- Stabilising potential emissions from the site (e.g. suspended solids).
- Environmental stabilisation.

The outcome is setting the site on a trajectory towards establishment of natural wetland/peatland habitats.

Criteria for successful rehabilitation:

- Rewetting of residual peat in the former area of industrial peat production to offset potential silt run off and to encourage development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat.
- That there is a stabilising/improving concentration of suspended solids and ammonia associated with the measures undertaken to stabilise the peat surface by the blocking of the internal drainage system

and the maximised rewetting of the peat surface. This will be demonstrated by developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be measured via water quality monitoring (suspended solids and ammonia).

• That the main water body associated with surface water from this bog continues to be excluded in the EPA's list of peat pressure water bodies as reported in the River Basin Management Plans. Where the water body has been identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body shows positive improvements in water quality impacts that were attributable to the original peat extraction activity.

Rehabilitation indicators

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat barriers, elevated water levels and re-wetting).
- Stabilising potential emissions from the site (e.g. silt). The key target will be developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog.

Rehabilitation measures: (see Figure Ap-1)

- Blocking field drains in parts of the former industrial production area using a dozer/excavator to create regular peat blockages (three barriers per 100 m) along each field drain.
- Re-alignment of piped drainage to manage water levels across the site.
- Realignment of gravity outfalls (where needed).
- Fertiliser treatment of high fields and headlands (typically slow to naturally re-colonise) to encourage natural colonisation, if needed. (It is noted that the application of fertiliser may need additional assessment and approval as per the IPC Licence).
- No measures are planned for the surrounding marginal peatland habitats.
- No measures are proposed for areas that have already stabilised.
- Silt ponds will continue to be maintained during rehabilitation and decommissioning.
- Evaluate success of short-term rehabilitation measures and enhance where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

Timeframe:

- 2021. 1st phase of rehabilitation. Field drain blocking with dozer/excavator.
- 2021. 2nd phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1st phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if required. These will be determined by ongoing monitoring.
- 2023-2024. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2023-2024. Decommission silt-ponds.

Туре	Code	Description	Area (Ha)
Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	70.4
Deep peat cutaway	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	318.3
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	86.8
Marginal land	MLT1	No work required	46.9
Silt ponds		Silt-ponds	2.4
Constraints		Other constraints	13.8
Minimal Rehab		IW Pipeline-Minimal Rehab	29.6
Total			568.3

Table AP-1. Rehabilitation measures and target areas.

Monitoring, after-care and maintenance

- There will be initial quarterly monitoring assessments of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, asses the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to any additional rehabilitation.
- Water quality monitoring will be established.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at www.epa.ie.
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, and COD.
- This sampling regime on a selected number of silt ponds will be carried out over a two-year cycle. The original (licence) requirement was for a quarterly sampling regime.
- Where other uses are proposed for the site, these will be assessed by Bord na Móna in consultation with interested parties. Other after-uses can be proposed for licensed areas and must go through the appropriate assessment and planning procedures.

Validation and IPC Licence surrender

Reporting to the EPA will continue until the IPC License is surrendered. The bog will be included in the full licence surrender process as per the Guidance to Licensees on Surrender, Cessation and Closure of Licensed Sites EPA, 2012, when:

- The planned rehabilitation has been completed.
- Water quality monitoring demonstrates that water quality of discharge is stabilising or improving.
- The site has been environmentally stabilised.



Figure Ap-1. Indicative Standard rehabilitation plan for Esker Bog.

APPENDIX II: BOG GROUP CONTEXT

The Allen -Clonsast Bog Group is located mainly in counties Offaly and Westmeath. Garrymore Bog is located in Co. Laois. All the associated bogs are located in the River Barrow Catchment area except Clonad Bog which is located in the Lower Shannon River Catchment.

The Allen- Clonsast Bog Group is one of the first developed bog groups in Ireland. Bord na Móna was set up in 1946 and it commenced the development of bogs to fuel power station and supply peat for the horticultural industry. The Allen - Clonsast bogs were developed for the supply of milled peat to the Edenderry Power Station, Croghan Power Station (now decommissioned) and the Croghan Briquette factory (now decommissioned).

Much of the Allen -Clonsast Bog complex became cutaway as long term peat production activity reduced the peat reserves on individual bogs. Rehabilitation measures comprising naturalisation and development of alternative after-uses have been already explored at the Allen -Clonsast Bog Group, including coniferous forestry, biomass, agricultural grassland, amenity use, rare species conservation management and wetland creation. Some of this was carried out in the 1980s While agricultural fields and coniferous forestry have been developed successfully on the cutaway bogs at Allen - Clonsast, it was found that these require financial investment that exceeds any potential commercial output value. A windfarm has been constructed at Mountlucas Bog and another windfarm project is currently in development at Cloncreen.

The Long Derries SAC is located south of Ticknevin Bog. Ticknevin also contains a relatively large area of remnant raised bog that was never developed by Bord na Móna. This area, called Cloncannon bog, was assessed by consultants for NPWS as part of the review of the raised bog Natural Heritage Area network (NPWS 2014).

A breakdown of the component bog areas for the Allen - Clonsast Bog Group IPC License Ref. P0503-01, and current, indicative Peat Production Status, is outlined in Table Ap-2.

Bog	Area (Ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Ballycon	281	Cutaway Bog Ballycon was first developed for industrial peat harvesting in the 1960's and the majority of peat has been removed. Ballycon is considered a shallow peat cutaway bog.	Rehabilitation works were carried out in 2006 that consisted of drain blocking and bund construction. Some headlands were fertilised in 2015 to encourage the development of pioneer dry cutaway habitats and there was follow-up drain blocking in 2018. The site is now a mosaic of cutaway wetland and woodland habitats and is a Biodiversity Area. BnM has also operated a workshop on site. Part of the site was developed for conifer forestry in the 1980s and is leased to Coillte. There is a rail transport link along the southern boundary of the site.	2001	Draft 2020
Ballykeane	451	Cutaway Bog Ballykeane Bog was developed for industrial peat production in the 1970's. Ballykeane is a shallow peat cutaway bog.	Part of the site is cutaway and has started to develop pioneer vegetation. The majority of the bog is still bare peat. Part of Ballykeane Bog is being used as a herb production trial.	2020	Draft 2017

 Table Ap-2:
 Allen- Clonsast Bog Group names, area and indicative status

Cavemount	499	Cutaway Bog Cavemount Bog was first developed for industrial peat production in the 1970's. Peat production ceased in 2015. Cavemount is a shallow peat cutaway bog.	Ongoing rehabilitation has been carried out across the site which is now developing as a wetland, holding nationally important numbers of wintering and breeding wetland birds. A portion of the site still has bare peat but is vegetating. Part of the site was developed for conifer forestry in the 1980s and is leased to Coillte. Flux tower and GHG monitoring onsite as part of the SmartBOG project. The site is a location for the CarePeat InterReg Project, of which BnM is an associated partner. There is a rail transport link through the site.	2015	Draft 2020
Clonad	447	Cutaway Bog Clonad Bog was first developed for industrial peat production in the 1970's.	The majority of the former production area is bare peat with some establishing cutaway habitats at various stages of development. There is a rail transport link through the site. The proposed Irish Water pipeline crosses this bog.	2020	Draft 2017
Cloncreen	1,009	Cutaway Bog Cloncreen Bog was first developed for industrial peat production in the 1970's. Peat production ceased in 2018 and the majority of peat has been cutaway. Cloncreen Bog is a shallow peat cutaway bog.	The site has developed a mosaic of pioneer cutaway habitats with some bare peat mosaics. Planning Permissions was granted in 2016 for Cloncreen Windfarm. Construction has started (summer 2020) on 22 turbines (Approx. 75 MW) at various locations around the site in association with linking road infrastructure, a sub-station and power-lines. There is a rail transport link through the site. The proposed Irish Water pipeline crosses this bog.	2018	Draft 2017
Clonsast	1,534	Cutover Bog Clonsast Bog was first developed for industrial peat production in the 1950's and was used for sod peat. Peat production ceased in 1980's. The majority of the bog was never converted to milled peat production and some relatively deep peat remains. Clonsast Bog is considered a deep peat cutover bog.	Clonsast has now established a mosaic of mature cutaway habitats. BnM formerly operated a farm at Clonsast. Farmland was developed on rehabilitated cutaway bog. The farm venture ceased in the 1980's and the farmland was sold. A significant portion of the site has been leased to Coillte and planted with conifer forestry in the 1980s. Some of the original research on establishing forestry on cutaway was established at Clonsast (Trench 14). BnM carried out a re-wetting trial in 2018. This site is largely stabilised. There is a rail transport link through the site.	1980's	Draft 2017
Clonsast Bulge	379	Cutover Bog Clonsast Bulge was first developed by BnM in the 1950's.	The majority of Clonsast Bulge used for peat extraction has been developed by Coillte for conifer forestry in the 1980's. Part of the site is undeveloped (Clonavoe Bog remnant). This site is largely stabilised.	1960's	Draft 2017

Clonsast North	191	Cutaway Bog Clonsast North was first developed by BnM in the 1930's. The remaining peat deposits at Clonsast North are generally shallow and so the bog is considered a shallow peat cutaway bog.	The cutaway is naturally colonising with a mosaic of Birch woodland and wetland. The site was partially re-wetted in 2018. There is a rail transport link through the site.	2000's	Draft 2017
Daingean Derries	277	Cutover Bog Daingean Derries was first developed in the late 1980's. Deep peat reserves remain. Daingean Derries is considered a deep peat cutover bog.	Daingean Derries Bog formerly supplied both horticultural peat and fuel peat. The majority of former production area is bare peat. Some bog restoration on part of the site completed in 2017-2018. There is a rail transport link through the site.	2020	Draft 2017
Daingean Rathdrum	367	Cutover Bog Daingean Rathdrum was first developed in the late 1980's. Deep peat reserves remain. Daingean Rathdrum is considered a deep peat cutover bog.	Daingean Rathdrum Bog formerly supplied both horticultural peat and fuel peat. The majority of former production area is bare peat. There is a rail transport link through the site. A small area of development bog (32 ha) has been restored.	2020	Draft 2017
Daingean Townparks	90	This bog was never drained or developed but there is a transport link along the margin of the site	Daingean Bog NHA (intact raised bog) There is a rail transport link through the site. No rehabilitation required.	N/A	N/A
Daingean Raillink	5	N/A	N/A	N/A	N/A
Derrycricket	190	Derrycricket was originally developed for peat production in the 1950's-1960's. Peat production at Derrycricket ceased in the 1980's.	Coilte developed approximately 80% of the former production area for conifer forestry in the 1980's. This site is largely stabilised. Transport link.	N/A	N/A
Derrylea	665	Cutover Bog Derrylea bog was first developed for commercial peat production in the 1940's. However, peat production at Derrylea predates BnM and is believed to have commenced in the 19 th century. Despite a long history of production, deep peat reserves on much of the site with some shallow pockets of peat on the western half of the former production area. Derrylea Bog is considered a deep peat cutover bog.	Some rehabilitation has been completed around the margins of the bog. There is a rail transport link through the site.	2020	Draft 2017
Derryounce	389	Cutover Bog Derryounce Bog was first developed prior to 1975. Derryounce is considered a deep peat cutover bog. Peat production at Derrycricket ceased in the 1980's.	Coilte have developed 80% of the former production area as conifer forestry. Rehabilitation was carried out to create a lake and wetland habitats in the 1990s. Derryounce Lake Amenity area is leased to Portarlington Community Development Association. This site is now largely stabilised. There is a rail transport link through the site.	1980's	Draft 2017
Esker	567	Cutover Bog Esker Bog was first developed in 1975. Peat production at Esker ceased in the 2020. There is deep peat remaining on the	The majority of the site is bare peat. The eastern portion is establishing cutaway habitats. There is a rail transport link through the site.	2020	Draft 2021

		western side of the former production	The proposed Irish Water pipeline crosses		
		area but the eastern area is considered	this bog.		
		cutaway. Esker Bog is a deep peat cutover			
		bog.			
		Cutover Bog	The majority of the site is revegetated with	2020	Draft
		Garryhinch Bog was first developed in	a range of wetland and woodland habitats		2017
	814	1950's Peat production ceased at	Extensive sed post production (private and		
Garryhinch		Garryhinch in 2020 There is some deen	licenced by BnM) has occurred across the		
		neat remaining on much of the former	site in the past few years and these areas		
		production area. Garryhinch Bog is	are bare peat.		
		considered a deep peat cutover bog.			
		Cutover Bog		2020	Draft
			Garnymore Bog formerly supplied		2017
		Garrymore Bog was first developed in the	horticultural peat. Part of the site is used		
Garrymore	307	1980's. Peat production at Garrymore	for sod turf.		
		ceased in the 2020. There is deep peat	The former production area is bare peat.		
		deen neat cutover hog			
		Cutover Bog	Peat production ceased across a significant	2020	Draft
		Peat Production at Mount Lucas	part of the site before 2005 with ongoing		2021
		commenced in the mid-1970's and ceased	peat extraction in the western side up to		
		in 2020. Most of Mount Lucas is cutaway	2020. The cutaway area has developed a		
		with shallow residual peat depths. The	mosaic of cutaway habitats with Birch		
		north-west corner of the former	woodland dominant. The recently ceased		
		production area retains some pockets of	production area is bare peat.		
		deep peat. Mount Lucas is considered a	Mountlucas windfarm is now operational		
		shallow peat cutover bog.	(since 2014).		
			some renabilitation was carried out in		
			association with windrami construction,		
Mount Lucas	1225		features		
			A public amenity walking route was		
			developed on the existing windfarm. This		
			was opened in 2015.		
			BnM have developed an aquaculture project		
			in partnership with Bord Jascaigh Mhara and		
			have developed herb production trials on		
			site.		
			There is a rail transport link through the site.		
			The proposed Irish Water pipeline crosses		
			this bog.		
Total	9697				
illai	5007				

APPENDIX III: ECOLOGICAL SURVEY REPORT

Ecological Survey Report

Note: This report outlines an ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.

Bog Name:	<u>Esker</u>	Area (ha):	567 ha (1,401 acres)
Works Name:	Derrygreenagh	County:	Offaly
Recorder(s):	MMC & DF	Survey Date(s):	11 & 13 th August 2010

Habitats present (in order of dominance)

The most common habitats present on production bog and cutaway at this site include:

- Bare peat;
- Pioneer poor fen communities dominated by Soft Rush and Bog Cotton (in eastern section);
- Emerging Birch scrub (eastern section);
- Small patches of closed Birch scrub eastern section; and
- Silt Ponds with associated habitats such as scrub, Bracken, rank grassland, dry calcareous grassland and typical pioneer communities of disturbed areas.

The most common habitats present around the margins at this site include:

- Birch woodland;
- Gorse scrub and Birch scrub developing of dry high bog around margins;
- Raised bog (several fragments);
- Dense Bracken;
- Conifer plantation (part of adjacent Coillte conifer plantation);
- Cutover bog (several small fragments);
- Improved grassland (grazed zone between silt ponds and river at southern boundary); and
- Depositing (Esker) river.

Description of site

Esker is located in Co. Offaly 4 km south of Rhode. The bog is linked to Cavemount Bog to the west and Ballycon Bog is situated to the south of this site. The landscape in this area is generally flat with Croghan Hill to the west. The Esker River flows along the southern side of the bog and forms a natural boundary. The majority of the bog is owned by Bord na Móna with a small section of high bog to the north-east being cut as turbary.

The bog can be divided into three main areas due to the natural topography. The main part of the bog is the western section and this is bisected by a BnM railway line. This part of the site is almost completely in full production and the main habitat is bare peat. This bog is at a relatively young stage and red/brown *Sphagnum* peat is still being harvested from most of the bog. It was noticeable that the only minor vegetation developing at the ends of some fields and in the drains was a mixture of Birch scrub (eBir), dry grassland dominated by Purple

Moorgrass (gMol) and dry heath with Heather (dHeath). These are all pioneer communities associated with more acidic peat.

The only features of particular interest in the main section of the bog were the remnant habitats around the margins that are generally found on remnant high bog. A narrow band of Birch woodland (WN7) and scrub (WS1) dominated by Birch were the most prominent habitats. In some places, there was still some patches of remnant raised bog vegetation, generally dominated by Heather and being invaded by scrub, as they were quite dried out. Other parts of the margins are covered in a mosaic of Bracken and Birch scrub Located along the north-east margin was the largest section of remnant raised bog. The boundary with the production bog is a high vertical bank and it is also being cut for turbary from the outer margin by private individuals. This section contains typical degraded raised bog plant communities with Heather, Hare's-tail Bog-cotton and White Beak-sedge prominent in the vegetation. There are frequent signs of drying out and degradation with old pools having been infilled. Hummocks of *S. capillifolium* and *S. papillosum* are occasionally frequent. The *Sphagnum* cover is high in sections but these seems to be a thin layer that is drying out and was dominated by species indicating disturbance such as *S. subnitens*. There are very poor prospects for attempting to restore active raised bog communities to this section of high bog.

The Esker River flows along the southern boundary. The river is typical of a lowland depositing river and is infilled with emergent riparian vegetation such as Reed Canarygrass and Bulrush. There is potential for Otter and Kingfisher along the river, although no signs of either species were noted. Some grassland has developed on mineral soil adjacent to the river and in association with silt ponds that have been constructed in this area. This grassland is grazed by cattle, although it was not fenced off. Further east along the river there is some improved grassland that is mapped as being part of the BnM property but is managed as farmland. The margin of the bog is marked by Gorse scrub.

Further east there is a smaller section of bog that is divided from the main section by a small ridge, although there is some connection via travel paths and the railway. This section of bog is a mixture of production bog and pioneer cutaway vegetation that is developing on some fields that have come out of production. The peat in this section has been extracted to a much greater extent and fen peat is the main peat type that remains in this section. The production bog is mainly surrounded by high bog along the eastern and northern margins. Most of this high bog apart from the most northern part of the site is outside the BnM property boundary. The zone between the two sections of bog is occupied by silt ponds and associated habitats such as disturbed vegetation (ED3), scrub and rank grassland (GS2) on the soil heaps and dry calcareous grassland (gCal) developing along the travel paths.

Towards the south-east part of the site there is another section that has never been in production. This area is dominated by mature Birch woodland (WN7) and also contains small patches of active and old cutover bog (PB4), wet grassland (GS4) that has developed on cutover peat and Bracken (HD1). There is likely to be ownership/boundary issues with this area as it was being grazed by cattle and had been fenced off.

Designated areas on site (cSAC, NHA, pNHA, SPA other)

None

Adjacent habitats and land-use

The surrounding landscape is typically low-lying and is dominated by farmland with improved grassland. Adjacent habitats include those of reclaimed cutover bog such as conifer plantation and wet grassland. The margins are typically dominated by scrub and Birch woodland developing on peat remnants.

Watercourses (major water features on/off site)

- The Esker Stream (river) flows along the southern boundary of the site.
- The bog and this river are within the River Barrow catchment.
- The Dogen River, a tributary of the Esker River, flows north to south and separates the eastern from the western side of the site.
- A third watercourse flows along the western boundary of the site and is also a tributary of the Esker Stream.

Peat type and sub-soils

The peat is mainly a brown/red *Sphagnum*-peat in the west side of the site. The eastern side is shallower and fen peats are exposed. The site is likely to be underlain with limestone tills, as these sub-soils are exposed around the margins of the site. The sub-soils along the southern margin are limestone-based sands and gravels lain down by the river. Grey Marl was exposed in some of the spoil taken from the silt ponds at the southern end of the site.

Fauna biodiversity

Birds

Several bird species were noted on the site during the survey.

- Heron
- Mallard (nesting in drains on site during spring)
- Relatively large flock of Mistle Thrush (>30) in area of bare peat to the east of the site.
- Other more common species included Swallow, Pheasant, Blackbird, Finches, Wren, Wood Pigeon and Magpie.
- There is potential for Kingfisher along the Esker River.

Mammals

- Signs of Fox, Badger and Deer were noted around the margins of the site.
- Signs of Pine Marten noted on the site
- Potential for Otter along the Esker River

Other species

• Large White Butterfly

References

European Commission (1996). Interpretation manual of European Union habitats. Brussels. European Commission, DGXI.

Fossitt, J. (2000). A guide to habitats in Ireland. Kilkenny. The Heritage Council.
APPENDIX IV: ENVIRONMENTAL CONTROL MEASURES TO BE APPLIED TO BOG REHABILITATION

- Bog restoration/rehabilitation measures will be restricted to within the footprint of the proposed rehabilitation area.
- The proposed rehabilitation will have due regard to noise limits and hours of operation (i.e. dusk and dawn) to minimise any potential disturbance on resident and local fauna that utilise the site and immediate environs.
- All plant and equipment for use will comply with the Construction Plant and Equipment Permissible Noise Levels Regulations (SI 359/1996).
- The proposed activities will be restricted to daylight hours and there will be no requirement for artificial lighting.
- Silt ponds will be inspected and maintained as per the IPC Licence.
- During periods of heavy precipitation and run-off increasing risks of siltation, activities will be halted.
- Measures will be carried out using a suitably sized machine and in all circumstances, excavation depths and volumes will be minimised where possible.
- All machines will be regularly checked and maintained prior to arrival at the site to prevent hydrocarbon leakage.
- Hoses and valves will be checked regularly for signs of wear and will be closed and securely locked when not in use.
- Fuelling and lubrication of equipment shall only be carried out in designated areas away from surface water drainage features and ecologically sensitive areas.
- Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the site for disposal or re-cycling.
- Vehicles will never be left unattended during refuelling.
- No direct discharges to waters will be made. No washings from vehicles, plant or equipment will be carried out on site.
- All plant refuelling will take place using mobile fuel bowsers. Only dedicated trained and competent personnel will carry out refuelling operations.
- Mobile storage such as fuel bowsers will be bunded to 110% capacity to prevent spills. Tanks for bowsers and generators shall be double skinned. When not in use, all valves and fuel trigger guns from fuel storage containers will be locked. All pumps using fuel or containing oil will be locally and securely bunded where there is the possibility of discharge to waters.
- Potential impacts caused by spillages etc. during rehabilitation will be reduced by keeping spill kits and other appropriate equipment on-site.
- Site activities will be carried out in accordance with 'best practice'. In order to ensure compliance and implementation of 'best practice', these measures will be communicated to relevant Bord na Móna staff and updated as required.

APPENDIX V: BIOSECURITY

No invasive plant species likely to be spread by PCAS activities have been recorded at Esker Bog.

The potential for importation or introduction of non-native plant species (such as Japanese Knotweed, Himalayan Balsam, etc.) during future rehabilitation management, such as drain-blocking using excavators, has the potential to result in the establishment of invasive species within the site. Section 49 of the European Communities (Birds and Natural Habitats) Regulations 2011 prohibits the introduction and dispersal of invasive alien species (particularly plant species) listed on Part 1 (third column) of the 'Third Schedule'.

This section aims to reduce the risk from, and impacts of, invasive species and protecting biodiversity on lands under Bord na Móna ownership. Rehabilitation and decommissioning in the bog will have due regard to the relevant biosecurity measures outlined below:

- Records of problematic invasive species within the various bog units will be marked out with signs to highlight areas of infestation to personnel.
- All plant machinery will be restricted from disturbing known colonies of invasive species.
- All plant machinery will avoid unnecessary crossings to adjoining lands.
- Good site hygiene will be employed to prevent the introduction and spread of problematic invasive alien plant species (i.e. Japanese Knotweed (*Fallopia japonica*), Himalayan Balsam (*Impatiens glandulifera*), Himalayan Knotweed (*Persicaria wallichii*), etc.) by thoroughly inspecting and washing vehicles prior to entering sites.

The biosecurity measures outlined above are in line with best practice guidelines issued by the National Roads Authority (NRA, 2010) – The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads and broadly based on the Environment Agency's (2013) – The Knotweed Code of Practice: Managing Japanese Knotweed on Development Sites (Version 3, amended in 2013, accessed on the Environment Agency's website on the 11th of July 2016).

In addition to the above, Best Practise measures around the prevention and spread of Crayfish plague² and Zebra Mussel will be adhered with throughout all rehabilitation activities.

² https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/

APPENDIX VI: POLICY AND REGULATORY FRAMEWORK

Bord na Móna Plc is a publicly owned company, originally established in 1934 to develop some of Ireland's extensive peat resources for the purposes of economic development and to support energy security. In the decades since its establishment the company has employed tens of thousands of people in its fuel, energy, and horticultural growing media businesses. For much of its history the company's support of important national policy aims has been enabled and encouraged in a variety of ways by Government.

Today, Bord na Móna is undertaking a number of highly significant actions in support of climate policy. These actions involve a radical transformation and decarbonisation of nearly the entire Bord na Móna business. This transformation will be driven by unlocking the full potential of our land and creating significant value for Ireland and the Midlands in particular. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021).

Bord na Móna is an integral part of the economic, social, and environmental fabric of Ireland and Irish life. As a key employer in the Midlands, the company is conscious that its obligations go beyond purely commercial and environmental – there is also a social responsibility to employees and the communities served by Bord na Móna. It is the company's role and absolute priority to ensure that its long-term strategy delivers on all of these important areas in a robust and balanced way.

There are a wide range of policies, plans, legislation and land designations that inform the development of this Bord na Móna peatland rehabilitation plan. Bord na Móna have also developed and operate various policies and strategies that also inform the development of this rehabilitation plan.

1 EPA IPC Licence

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Allen/Clonsast bog group (Ref. PO-503 SB). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Allen/Clonsast Bog group. This regulatory requirement is the main driver of the development of this rehabilitation plan.

2 The Peatlands Climate Action Scheme (PCAS)

Bord na Móna (BnM) appreciates the Minister's intention to support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed Scheme', for the enhanced decommissioning, rehabilitation and restoration of cutaway peatlands, referred to as the 'Peatlands Climate Action Scheme'. The enhanced decommissioning, rehabilitation and restoration of the peatlands funded by the proposed Scheme will deliver benefits across climate action (GHG mitigation through reduced carbon emissions and acceleration towards carbon sequestration), enrich the State's natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation as well as developing the amenity potential of the peatlands.

It is envisaged that Bord na Móna carry out an enhanced decommissioning, rehabilitation and restoration, under the proposed Scheme, and supported by the Climate Action Fund across a footprint of 33,000 ha. This proposed scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. Interventions and measures supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., those activities which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support under the proposed Scheme.

3 National Climate Policy

The National Policy Position establishes the fundamental national objective of achieving a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. It sets out:

- the context for the objective;
- clarifies the level of GHG mitigation ambition envisaged; and
- establishes the process to pursue and achieve the overall objective.

The evolution of climate policy in Ireland will be an iterative process based on the adoption by government of a series of national plans over the period to 2050. GHG mitigation and adaptation to the impacts of climate change are to be addressed in parallel national plans – respectively through the National Climate Action Plan. The plans will be continually updated, as well as being reviewed on a structured basis at appropriate intervals and, at a minimum, every five years. This will include early identification and ongoing updating of possible transition pathways to 2050 to inform sectoral strategic choices.

Bord na Móna is following a decarbonisation programme aimed at reducing the carbon emissions from its activities. The company aims to further develop renewable energy and resource recovery markets with a key objective of reducing the carbon intensity of all products. In addition, the carbon emission mitigation benefits associated with the post-peat extraction rehabilitated peatland following re-wetting, revegetation and colonisation of significant areas with native woodland will make a significant contribution to achieving the State's carbon emission reduction targets.

4 National Peatlands Strategy

The National Peatlands Strategy (2015) contains a comprehensive list of actions, necessary to ensure that Ireland's peatlands are preserved, nurtured and become living assets within the communities that live beside them. It sets out a cross-governmental approach to managing issues that relate to peatlands, including compliance with EU environmental law, climate change, forestry, flood control, energy, nature conservation, planning, and agriculture. The Strategy has been developed in partnership between relevant Government Departments/State bodies and key stakeholders through the Peatlands Council.

The strategy recognises that Ireland's peatlands will continue to contribute to a wide variety of human needs and to be put to many uses. It aims to ensure that Ireland's peatlands are sustainably managed so that their benefits can be enjoyed responsibly. It aims to inform appropriate regulatory systems to facilitate good decision making in support of responsible use. It also aims to inform the provision of appropriate incentives, financial supports and disincentives where required. The strategy attempts to strike an appropriate balance between different needs, including local stakeholders like turf-cutters and semi-state bodies such as Bord na Móna.

In line with a National Peatlands Strategy recommendation, a Peatlands Strategy Implementation Group (PSIG), was established, assisted in the finalisation of the Strategy, is overseeing subsequent implementation and will

report to Government on an annual basis on the implementation of the actions and principles contained within the Strategy.

Bord na Móna is a key stakeholder in the National Peatlands Strategy and the Peatlands Strategy Implementation Group. The strategy recognises the potential for some Bord na Móna sites to be restored and to contribute to the national SAC and NHA network of protected raised bog sites. The strategy also recognises the various different values of cutaway bog and developed six key principles (with Bord na Móna) for the after-use of cutaway bog.

- Bord na Móna will continue to assess and evaluate the potential of the company's land bank, using a land use review system. The assessment will help prepare a set of evidence based management plans for the various areas of peatland. These plans will also inform its cutaway bog rehabilitation.
- The policy of Bord na Móna is not to open up any undrained new bogs for peat production.
- Lands identified by Bord na Móna as having high biodiversity value and/or priority habitats will be reserved for these purposes as the principal future land use.
- Generally, Bord na Móna cutaway bogs that flood naturally will be permitted to flood unless there is a clear environmental and/or economic case to maintain pumped drainage.
- In deciding on the most appropriate afteruse of cutaway peatlands, consideration shall be given to encouraging, where possible, the return to a natural functioning peatland ecosystem.
- This will require re-wetting of the cutaway peatlands which may lead in time to the restoration of the peatland ecosystem.
- Environmentally, socially and economically viable options should be analysed to plan the future use of industrial cutaway peatlands, in conjunction with limiting factors as outlined in Bord na Móna's Strategic Framework for the Future Use of Peatlands.

The National Peatlands Strategy highlights the importance and value of developing peatland rehabilitation plans for Bord na Móna cutaway sites and implementing this peatland rehabilitation.

5 National River Basin Management Plan 2018-2021 (Water Framework Directive)

The National River Basin Management Plan (2018-2021) (Department of Housing, Planning, Community and Local Government 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). In broad terms, the objectives of the WFD are (1) to prevent the deterioration of water bodies and to protect, enhance and restore them with the aim of achieving at least good status and (2) to achieve compliance with the requirements for designated protected areas.

The NRBMP outlines how peat extraction can be a potentially significant pressure on various water quality parameters. Peatland rehabilitation of Bord na Móna cutaway (in addition to other measures) is part of the WFD (2018-2021) programme of measures. The NRBMP takes account of the fact that Bord na Móna is in the process of phasing out the extraction of peat for energy production, that it set a target to rehabilitate 9,000 ha of cutaway bogs (covering 25 peatlands) by 2021 (in 2018) and will look to implement best-available mitigation measures to further reduce water quality impacts caused by peat extraction while the phasing-out process is taking place. This NRBMP rehabilitation target is set to be superseded by the acceleration of the Bord na Móna de-carbonisation programme and the proposed **Scheme (PCAS)**.

The development of site rehabilitation plans and the delivery of peatland rehabilitation by Bord na Móna is expected to have a positive impact on water quality and will help the NWBMP deliver its objectives in relation to the Water Framework Directive and is one of the five key principle actions.

6 National Biodiversity Action Plan 2016-2021

The National Biodiversity Action Plan 2016-2022 has a vision that biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally. Ireland's 2nd National Biodiversity Action Plan outlines the main policies, strategies, actions and targets in relation to biodiversity. This plan has several Bord na Móna specific objectives and actions including implementing the BnM Biodiversity Action Plan 2016-2021 and overlaps with both the National Peatlands Strategy and the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.

7 National conservation designations

Bord na Móna operates in a wider landscape that also includes a network of European and National nature conservation sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), National Heritage Areas (NHAs, cNHAs) and National Nature Reserves). Bord na Móna will take account of this network of conservation objectives and their conservation objectives when developing these rehabilitation plans. It is expected that peatland rehabilitation will, in general, benefit the conservation objectives of this network of nature conservation sites.

8 National Raised Bog Special Area of Conservation Management Plan 2017-2022.

The National Raised Bog Special Area of Conservation Management Plan 2017-2022 sets out a roadmap for the long-term management, restoration and conservation of protected raised bogs in Ireland. The Plan strikes an appropriate balance between the need to conserve and restore Ireland's raised bog network as part of Ireland's commitments towards the EU Habitats Directive, and the needs of stakeholders and gives recognition to the important role that communities have to play in the conservation and restoration of raised bogs. The National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022 is part of the measures being implemented in response to the on-going infringement action against Ireland in relation to the implementation of the EU Habitats Directive, with regard to the regulation of turf cutting on the Special Areas of Conservation (SACs). The then Minister for Arts, Heritage and the Gaeltacht, also published a **Review of Raised Bog Natural Heritage Area Network** in 2014.

Bord na Móna has played a key role in the development of the National Raised Bog Special Area of Conservation Management Plan 2017-2022 and the Review of the Raised Bog Natural Heritage Area Network. Several Bord na Móna sites were assessed by the National Parks and Wildlife Service as part of the above Plan and Review and there is an expectation that several Bord na Móna sites will be designated as SACs and NHAs in the future. This will reinforce the network of protected raised bog sites and replace in part sites that will be de-designated as they have been deemed to be significantly damaged and are deemed to have no raised bog restoration prospects.

Bord na Móna has also responded to the needs of the NRBMP and provided several sites to the government for the relocation of turf-cutters from SACs. This is part of a suite of ongoing bog conservation measures in the

NRBMP to manage turf-cutting in protected sites. Bord na Móna and the National Parks and Wildlife Service continues to engage regarding the ongoing relocation of turf-cutters from protected raised bog sites.

9 All-Ireland Pollinator Plan 2015-2020

The All-Ireland Pollinator Plan 2015-2020 outlines key objectives and actions to protect and support pollinating insects and the habitats they rely on. There are several Bord na Móna specific actions in this plan including the adoption of pollinator-friendly management within the Bord na Móna network of sites. One action to help achieve this objective is habitat rehabilitation and restoration, where possible, of pollinator-friendly habitats, including peatland habitats.

10 Land-use planning policies

As Bord na Móna operates in many counties across Ireland, it is important to note the respective development plans in these counties. Many of the existing development plans recognise the potential that exists in the afteruse of cutover/cutaway peatlands. Bord na Móna seeks to work with all of the relevant local authorities to ensure that the most appropriate after-uses are reflected in local planning policy. The following areas of consistent importance are of both direct and indirect relevance to Bord na Móna: heritage, tourism, biodiversity/conservation, landscape, wind energy, and economy/enterprise.

Esker Bog is located in an area zoned by Offaly County Council as open countryside.

11 National Archaeology Code of Practise

Bord na Móna operates under an agreed Code of Practice regarding archaeology with the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland which provides a framework to enable the Company to progress peat extraction whilst carrying out archaeological mitigation. The Code replaced a set of Principles agreed with the Department of Arts, Heritage and the Gaeltacht in the 1990s. Under the Code Bord na Móna, the Minister and Director work together to ensure that appropriate archaeological mitigation is carried out in advance of peat extraction.

- BNM must ensure that any monuments or archaeological objects discovered during peat extraction are protected in an appropriate manner by following the Archaeological Protection Procedures.
- BNM must ensure that any newly discovered monuments on Bord na Móna lands are reported in a timely manner to the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht.
- BNM must ensure that any archaeological objects discovered on Bord na Móna lands are reported immediately to the Duty Officer of the National Museum of Ireland.
- Bord na Móna will endeavour to adhere to this code of practise during the peatland rehabilitation phase and appropriate archaeology mitigation is carried out before and during cutaway peatland rehabilitation. An Archaeological Impact Assessment is being carried out for the proposed rehabilitation at this site (Appendix XII). The recommendations of this assessment will be incorporated into the rehabilitation plan to minimise impacts on known archaeology. In addition, Bord na Móna will adhere to the Archaeology Code of Practise relating to management of stray archaeological finds that may arise during cutaway peatland rehabilitation and decommissioning.

12 Bord na Móna Biodiversity Action Plan 2016-2021

Rehabilitation of industrial peatlands is a key objective of the Bord na Móna Biodiversity Action Plan 2016-2021. This action plan outlines the main objectives and actions around biodiversity on Bord na Móna lands. The Bord na Móna Biodiversity Action Plan also outlines key International and European policy in relation to biodiversity. This includes the **United Nations Convention on Biodiversity 2011-2020 (CBD)** and **European Biodiversity Strategy to 2020**. Further details of these policies and Bord na Móna s responses can be found in the Bord na Móna Biodiversity Action Plan (Bord na Móna 2016). Both policy documents highlight targets such as reducing pressure on biodiversity, promoting sustainability, habitat restoration and benefits of ecosystem services.

One example of a key CBD target is:

• "Restore at least 15% of degraded areas through conservation and restoration activities."

The EUs headline target for progress by 2020 is to:

• *"halt the loss of biodiversity and the degradation of ecosystems in the EU by 2020, restore them as far as feasible, while stepping up the EU contribution to averting global biodiversity loss."*

The Esker Bog Rehabilitation Plan is aligned to the CBD target and the EU Biodiversity Strategy target and will help Ireland meet its commitment to these international Biodiversity polices.

13 Bord na Móna commitments

Bord na Móna made the commitment in 2009 not to develop any new peatland sites for industrial peat production. The company has continued to work with different stakeholders.

The company announced that peat production would be cut by over 50 percent in 2019 and would entirely cease over most of its lands by the mid-2020s. Rehabilitation measures will continue to be carried out with the focus on re-wetting and rehabilitation of cutover and cutaway areas in line with national policies (such as the National Peatland Strategy, the National Biodiversity Action Plan, the Climate Action Plan 2019, the Water Framework Directive, etc.) and rehabilitation guidelines set down by the Environmental Protection Agency. To date, 15,000 hectares of cutaway and cutover bog have been rehabilitated using this approach with 5,000 hectares in active rehabilitation.

In line with Bord na Móna's accelerated decarbonisation programme, the company has also committed to a significantly larger rehabilitation target. This is reflected in our plans to rehabilitate a further 20,000 hectares of cutaway and cutover bog to wetland and woodland mosaics by 2025. In addition, we plan to restore a further 1,000 hectares of raised bog habitat by 2025. These targets are significant in both timing and scale and are indicative of Bord na Móna's increased new ambition in this area.

These commitments outline the importance of peatland rehabilitation to Bord na Móna. The company will continue to demonstrate environmental responsibility and continue to deliver on these commitments in relation to peatland rehabilitation and in relation to the future management of these lands to maximise their benefits, particularly their ecosystem service benefits, along with the sustainable development of a portion of the land bank for other uses.

14 Bord na Móna Strategic Framework for the future use of cutaway peatlands 2021 (Draft)

The general after-use strategy of Bord na Móna is outlined in the Bord na Móna Strategic Framework for Future-Use of Cutaway Bogs 2021 (Draft). This document outlines how Bord na Móna's cutover peatland estate is complex in nature with great variability in terms of peat depths, peat types, drainage, subsoil condition and environmental value. Thus, future options require consideration on a site-specific basis, also bearing in mind the considerable internal variation within bogs. The development of the land-bank will also take account of national needs, while also taking account of the various national legislation, policies and plans related to the management of peatlands. In general, Bord na Móna will seek to balance and optimise commercial, social, and environmental value of these sites, while taking account of the need for sustainability and their biodiversity value.

Any consideration of other future after-uses for Bord na Móna land such as development or other mixed uses will be conducted following the relevant planning guidelines and consultation with relevant authorities and will be considered within the framework of this peatland rehabilitation plan.

APPENDIX VII: DECOMMISSIONING

1. Condition 10 Decommissioning

This is a requirement of the applicable Integrated Pollution Control Licence issued by the Environmental Protection Agency. This condition 10.1 requires the following:

10.1 Following termination of use or involvement of all or part of the site in the licensed activity, the licensee shall:

10.1.1 Decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.

The main success criteria pertaining to successfully complying with this condition is ensuring that no environmental liability remains from this infrastructure and material and that the bog can be deemed suitable for surrender of the license under section 95 of the EPA Acts. This is achieved by Bord na Móna identifying and quantifying any mechanical and infrastructural resources that were installed in the bog to enable the development and production operation at the site. This list is then refined to identify any items that would be deemed as possibly resulting in environmental pollution, should they not be removed.

Typically, these items/infrastructures would be any remaining, unconsolidated plant, equipment and attachments, waste materials, unused raw materials such as land drainage pipes, remaining peat stockpiles, stock pile covering, pumps, septic tanks and fuel tanks.

ltem	Description	Esker Decommissioning Plan
1	Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices	Clean-up of Bog
2	Cleaning Silt Ponds	Cleaning Silt Ponds
3	Decommissioning Peat Stockpiles	Peat Stockpile Management via Levelling
4	Decommissioning or Removal of Buildings and Compounds	Decommission and Removal of Porto-cabin tea centre and materials store
5	Decommissioning Fuel Tanks and associated facilities	Decommissioning and De-Gassing Mobile Fuel Tanks
6	Decommissioning and Removal of Bog Pump Sites	Not Applicable
7	Decommissioning or Removal of Septic Tanks	De-sludge Septic Tank

In relation to this bog, the list and tasks would be as follows:

In addition, condition 7 of the license requires these now defined waste items to be disposed of or recovered as follows:

7.1 Disposal or recovery of waste shall take place only as specified in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* of this licence and in accordance with the appropriate National and European legislation and protocols. No other waste shall be disposed of/recovered either on-site or off-site without prior notice to, and prior written agreement of, the Agency.

7.2 Waste sent off-site for recovery or disposal shall only be conveyed to a waste contractor, as agreed by the Agency, and only transported from the site of the activity to the site of recovery/disposal in a manner which will not adversely affect the environment.

7.3 A full record, which shall be open to inspection by authorized persons of the Agency at all times, shall be kept by the licensee on matters relating to the waste management operations and practices at this site. This record shall as a minimum contain details of the following:

7.3.1 The names of the agent and transporter of the waste.

7.3.2 The name of the persons responsible for the ultimate disposal/recovery of the

waste.

7.3.3 The ultimate destination of the waste.

7.3.4 Written confirmation of the acceptance and disposal/recovery of any hazardous waste consignments sent off-site.

7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

A copy of this Waste Management record shall be submitted to the Agency as part of the AER for the site.

As required by the licence, these waste items will be removed for recycling or disposal, using external contractors with the required waste collection permits, approved under 7.2, with waste records maintained as required under 7.3.

Where possible, Bord na Móna will utilize the appropriate waste hierarchy to identify waste that can reused or recycled ahead of disposal.



The validation of the success of condition 10.1 is carried out through an Independent Closure Audit (ICA), followed by and EPA Exit Audit (EA) and the eventual partial or full surrender of the licence.

2. Enhanced Decommissioning.

The remaining infrastructure does not constitute a risk to the environment and would not be a requirement of condition 10 of the license. The removal of these are deemed as enhanced measures. These may enhance the future afteruse of the bog for amenity value, security against access for illegal and unsocial activities and general State and community benefit. In relation to this bog, this would include the infrastructure defined below:

ltem	Enhanced Decommissioning Type	Esker Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Where feasible
3	Decommissioning Railway Level Crossing	Decommissioning Railway Level Crossing
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog.
5	Removal of High Voltage Power Lines	Where feasible

APPENDIX VIII: GLOSSARY

Cutaway Bog: A Bord na Móna site generally becomes cutaway when it is economically unviable to continue industrial peat extraction or when the majority of peat has been removed.

Deep peat cutover bog. Deep peat cutaway bog is defined as former raised bogs that have been in industrial peat production, where production has ceased but the residual peat depth is typically in excess of 2m. *Sphagnum* mosses are key species of raised bogs and the majority of the peat mass is formed from these mosses. *Sphagnum* species and other raised bog species are a key part of raised bog habitat function and prefer more acidic, nutrient poor, water-logged conditions. Typical raised bog *Sphagnum* mosses and other bog species do not thrive with the more typical alkaline water chemistry of cutaway bog but do grow well in these more acidic conditions where peat has been re-wetted. There is potential to re-develop *Sphagnum*-rich plant communities in these conditions if the peat can be re-wetted. This brings the opportunity of re-developing *Sphagnum*-rich vegetation communities that are considered Carbon sinks or peat-forming habitats and restoring the carbon sequestration function of these sites.

Dry cutaway bog: Cutaway bog is categorised as dry cutaway where it is not practical or feasible to re-wet these areas completely. It is inevitable that some areas of cutaway will remain relatively dry due to the heterogenous topography of the cutaway, as well as requirements for continued drainage on site for identified after-uses, or off site in relation to neighbouring lands or other infrastructure. Ridges and mounds of glacial deposits can become exposed during peat extraction and form a heterogenous topographical mosaic separated by basins. Dry cutaway may have very thin or no residual peat where ridges and mounds have been exposed. The exposed subsoils are a mix of glacial gravels, muds and tills that can be quite free-draining. Dry cutaway may also have deeper residual peat but in a location (ie. at the margin) where the peat can not be re-wetted due to boundary constraints. Dry cutaway may also develop in situations where there a relatively steep slope that inhibits re-wetting. The majority of dry cutaway will develop towards grassland, heath, scrub and dry woodland habitats.

Enhanced decommissioning: This is defined as decommissioning carried out under proposed Scheme, which is proposed to externally funded.

Enhanced rehabilitation: This is defined as rehabilitation carried out under proposed Scheme, which is proposed to be externally funded. It is proposed by Government that Bord na Móna be obligated to carry out enhanced decommissioning, rehabilitation and restoration on peatlands. This proposed Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. Interventions and activities supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. *However, only the costs associated with the additional, enhanced and accelerated measures, i.e., those interventions which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support under the proposed Scheme.*

Environmental stabilisation: The key objective of peatland rehabilitation is **environmental stabilisation** of the former industrial peat production areas and the stabilisation of any potential emissions from the bog that related to the former industrial peat extraction activities.

Environmental stabilisation is defined as:

• Carrying out planned peatland rehabilitation.

- Setting former bare peat industrial peat production areas on a trajectory towards naturally functioning peatland habitats, via planned peatland rehabilitation, the restoration of wetter hydrological conditions and encouragement of natural colonisation.
- Stabilisation or downward trajectory of key water quality parameters (e.g. suspended solids, ammonia),
- Meeting IPC Licence conditions.

Marginal land. Marginal land is defined as land around the margin of the industrial peat production area. This margin generally contains a range of habitats including scrub, Birch woodland, cutover bog and raised bog remnants. It has a variety of land-uses including turf-cutting (private turbary). The Scheme will consider potential rehabilitation and restoration actions (e.g. drain blocking) within marginal land zones, where appropriate.

Rehabilitation: Rehabilitation is defined in general by Bord na Móna as environmental stabilisation of the former cutaway. This is generally achieved via re-wetting, where possible, and natural colonisation of the former cutaway, with or without intervention. It is not possible to restore raised bog habitats on BnM cutaway in general in the short-term. In general, most of the peat mass has been removed from many BnM cutaway sites and the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status. This means there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland). Other after-use may also act as rehabilitation.

Restoration: Ecological restoration to defined as the process of re-establishing to the extent possible the structure, function and integrity of indigenous ecosystems and the sustaining habitats they provide" (SER 2004). Defined in this way, restoration encompasses the repair of ecosystems (Whisenant 1999) and the **improvement of ecological conditions in damaged wildlands** through the **reinstatement of ecological processes**. In general, Bord na Móna cutaway peatlands cannot be restored back to raised bog in a reasonable timeframe as their environmental conditions has changed so radically (with the removal of the acrotelem – the living layer and much of the peat mass). However, they can be returned to a **trajectory** towards a naturally functioning peatland system (Renou-Wilson 2012). **Raised bog restoration** is an objective of some BnM sites where there is residual natural raised bog vegetation and where the majority of the peat is still intact.

Standard rehabilitation: This is defined as rehabilitation that is designed to meet the conditions of the EPA IPC Licence. The key objective of rehabilitation is environmental stabilisation. This is achieved by a combination of re-wetting, where possible, and natural colonisation of the former cutaway, with or without intervention. Other after-use development may also serve to act as rehabilitation.

Standard decommissioning: This is defined as decommissioning that is designed to meet the conditions of the EPA IPC Licence. This is defined as to render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.

Wetland cutaway bog. Wetland cutaway bog is defined as former raised bogs that have been in industrial peat production, where production has ceased and the majority of peat has been cutaway, and where this cutaway has the potential to be re-wetted. A significant number of Bord na Móna sites have pumped drainage and these sites are likely to develop a mosaic of wetland habitats when pumping in reduced or stopped. The water chemistry of wetland cutaway frequently is strongly influenced by the more alkaline sub-soils that have been exposed during peat production. This means that pioneer vegetation is more typical of fen and wetland, rather than raised bog. Wetland cutaway will have a broad range of hydrological conditions depending on the local topography. In some cases, these wetlands may form deep water (> 0.5 m) whilst other areas may have the water table at or just below the surface of the ground.

APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

(Minimisation, treatment, recovery and disposal)

Objective:

The objective of this generic plan is to comply with the requirements of regulation 5 of the Waste Management (Management of Waste from Extractive Industries) Regulations, and to prevent or reduce waste production and its harmfulness.

Scope:

This plan covers IPPC Licence's Ref. P0503-01, Clonsast Group of Bogs in Counties Offaly and Kildare.

1.0 Extractive Waste:

Waste classified as extractive waste from peat extraction operations arise from three operations associated with this activity.

1.1 Silt Pond excavations and maintenance.

All peat extraction activities in Clonsast serviced by a silt lagoons/ponds. During the excavation of these silt ponds, pre IPPC Licensing in 1999 and since licensing, the excavated material is stored adjacent to the silt pond, where it either remains in situ ores levelled out. As required by condition 6.6, these silt lagoons are cleaned twice per annum or more often if inspections dictate. These silt cleanings are also deposited on the same location, adjacent to the silt pond, where they may be levelled periodically to allow room for subsequent cleanings. These mounds of silt pond excavation material and cleanings are generally no higher that 2-3 metres.

1.2 Power Station screenings:

Lough Ree Power Ltd screens the peat from the bogs prior to processing. This screening removes oversized peat, stones and bogs timbers. Schedule 3 (ii) of the IPPC licence permits disposal of these peat screenings back to the bog, where it is levelled and graded into the surrounding peat landscape. These locations have been agreed with the Agency as per condition 7.4 of the IPPC Licence, and as per the attached locations.

1.3 Bog Timbers:

During peat extraction operations, bog timbers often arise in the bog surface and are required to be cleared. These timbers consist of bog pine, oak and some yew. Some of these timbers, such as the oak and yew are removed for use in the wood craft industry, with the remaining bog pine stockpiled in locations at the opposite end of each bog, where it generally becomes a habitat for flora and fauna. These piles of timber are generally no higher than 1-2 metres.

2.0 P0503-01 IPPC Licence Extractive Waste Conditions

2.1 Condition 7.5 Extractive Waste Management

The licensee shall draw up a Waste Management Plan (to be known as an Extractive Waste Management Plan) for the minimisation, treatment, recovery and disposal of extractive waste. This Plan shall meet the requirements of regulation 5 of the Waste Management (Management of Waste from the Extractive Industries) Regulations,2009. The Plan shall be submitted for agreement by the Agency by the 31' December2012. The Plan shall be reviewed at least once every five years thereafter in a manner agreeable to the Agency and amended in the event of substantial changes to the operation of a waste facility or to the waste deposited. Any amendments shall be notified to the Agency.

All extractive waste shall be managed in accordance with the Extractive Waste Management Plan. A report on the implementation of the Extractive Waste Management Plan shall be provided in the AER.

2.2 Condition 7.6 Waste Facility

(i) No new waste facility may be developed or an existing waste facility modified unless agreed by the Agency.

(ii) The licensee shall ensure that all existing waste facilities are managed and maintained to ensure their physical stability and to prevent pollution or contamination of soil, air, surface water or groundwater.

(iii) The licensee shall ensure that all new waste facilities are constructed, managed and maintained to ensure their physical stability and to prevent pollution or contamination of soil, air, surface water or groundwater.

(iv) Operational measures shall be continuously employed to prevent damage to waste facilities from personnel, plant or equipment.

(v) The licensee shall establish and maintain a system for regular monitoring and inspection of waste facilities.

(vi) All records of monitoring and inspection of waste facilities, as required under the licence, shall be maintained on-site in order to ensure the appropriate handover of information in the event of a change of operator or relevant personnel.

2.3 Condition 7.7 Excavation Voids

7.7.1 Unless otherwise agreed by the Agency, only extractive waste shall be placed in excavation voids.

7.7.2 When placing extractive waste into excavation voids for rehabilitation and construction purposes, the licensee shall, in accordance with regulation 10 of the Waste Management (Management of Waste from the Extractive Industries) Regulations, 2009, and the Extractive Waste Management Plan:

- Secure the stability of the waste
- Put in place measures to prevent pollution of soil, surface water and ground water.
- Carry out monitoring of the extractive waste and excavation void.

Condition 7.5. Extractive Waste Management Plan. 5 (1)

3.0 Minimisation.

3.1 Silt pond excavation material and cleanings.

IPPC Licence conditions require all production areas to be serviced by an appropriately designed silt pond based on storage volume and retention time. Condition 6.6 requires all ponds to be cleaned bi-annually and more often if inspections dictate, so the only opportunity for minimisation of same is through Standard Operating Procedures. These are required under condition 2.2.2 (i) regarding minimisation of suspended solids, and are in-place to minimise the generation of silt, which in-turn will minimise the generation of silt pond waste.

3.2 Power Station Screenings.

These screenings cannot be minimised as they are a consequence of peat production, stones, timbers and oversize peat materials are naturally occurring on the bog, and are required to be removed prior to processing.

3.3 Bog Timbers.

Bog timbers are also naturally occurring materials within a bog and are required to be removed prior for production. The volume of these bog timbers varies from bog to bog and as such their minimisation is not controllable or quantifiable.

4.0 Treatment

4.1 Silt pond excavation material and cleanings.

The silt pond excavation material and silt cleanings do not require any treatment for its end use which will be either backfilling these silt pond voids as per condition 7.7.1 above as part of the Bog Rehabilitation Plan, or reincorporated into the surrounding peatlands.

4.2 Power Station Screenings.

The factory screenings are permitted to be returned to the bog as they were naturally occurring materials from the bog, and as such do not require any treatment to serve this purpose.

4.3 Bog Timbers

As per 1.3 above, these timbers are stockpiled at two locations in each bog, as per the attached list of sites and become habitats for various flora and fauna.

5.0 Recovery

5.1 Silt pond excavation material and cleanings.

Condition 2.2.2 (vi) requires the reuse of silt pond waste to be examined. This was undertaken in 2006, the outcome of which was that this waste peat silt material, as a fuel, was contaminated with sub-soils, rendering it unsuitable for combustion. In addition, volumes are small compared to overall peat production volumes.

5.2 Power Station Screenings.

Given the nature of these screenings as outlined in 1.2 above, there is no further use identified and they are permitted to be disposed of back to the bog.

5.3 Bog Timbers

Investigations into processing these materials into smaller fractions for potential heating purposes did not yield any viable results. In addition, these older stockpiles are now classified as habitats and as such would not be considered for reuse as a fuel.

6.0 Disposal

6.1 Silt pond excavation material and cleanings.

Schedule 3 (ii) permits the disposal of silt pond cleanings (Lagoon Sediments) to the bog and these locations, adjacent to the silt pond site, are presented in the attached spreadsheet, with associated grid coordinates.

6.2 Power Station Screenings.

Schedule 3 (ii) permits the disposal of screenings (Peat Screenings) to the bog at designated locations agreed under Condition 7.4, and these locations, are presented in the attached spreadsheet, with associated grid coordinates.

6.3 Bog Timbers

These naturally occurring bog timbers are stockpiled at locations in each bog, grid coordinates attached.

7.0 Extractive Waste Management Plan

5 (2a)(i)

The vast majority of peat extraction bogs were all designed and drained for production prior to the 1960's and as such the production fields layout cannot' be altered. Under our Cleaner Reduction Procedures, various design changes have been implemented to the production machines and process to reduce lost peat which eventually is captured in the silt ponds and requires removal as waste peat silt. This along with training and ongoing research and development will continuously reduce waste peat and subsequently waste silt pond cleanings. Bog timbers are present naturally in various volumes and quantities in different bogs and as peat production involves stripping peat in layers, the exposure, generation and removal of these timbers is unavoidable. Work has been undertaken recently into project looking at grinding of these bog timbers in situ using a timber miller, and if this project becomes viable it will contribute to the reduction of bog timbers.

5 (2a)(ii)

Given the nature and expanse of peat bogs, the stockpiling and storage of these waste materials do not present a visual, storage or stability problem. As required under Condition 10 of the IPPC Licence, the silt pond excavations and screenings will be utilised to backfill the silt pond voids once the bogs have finished and stabilised in accordance with out Bog Rehabilitation Plan. Storage of these wastes in the interim, open to the elements does not present a change on the nature of these wastes that will threaten the environment or prevent their reuse during the bog rehabilitation process.

5 (2a)(iii)

Under Condition 10 of the IPPC Licence, all silt ponds will be decommissioned once the bog surface has stabilised, in agreement with the Agency. This will involve the removal of weirs and flow controls, returning the silt pond back to its original drain or removing the silt pond from the drainage system. Both of these activities will involve placing the silt pond extraction and cleaning material back into the excavation void.

5 (2a)(iv)

The peat bogs do not contain any topsoil, so this is not required.

5 (2a)(v)

Peat mineral resources do not undergo any treatment.

5 (2b)

These three extractive waste are all being reused and recovered back to their original extraction points and have not undergone any physical, chemical, or biological change.

5 (2c)(i, ii & iii)

These three extractive wastes, stored on the bog for reuse or recovery during the bog rehabilitation phase, do not require any management or monitoring during the operation of these bogs. Silt pond excavations and cleanings are stored adjacent to the silt pond and quickly revegetated and stabilise, the screenings are graded back into the bog at the agreed locations upon disposal and the bog timbers do not prevent any water or airborne danger to the environment.

5 (3)

The three extractive wastes arising from peat extraction operations at this site are classified wastes from mineral non-metalliferous excavation, with an EWC code of 0101 02. The materials are not classified as hazardous under Directive 91/689/EEC20, and do not contain substances or preparations classified as dangerous under Directives 67/548/EEC5 or 1999/45/EC6 above a certain threshold.

The peat excavations and cleanings are stored in locations and in a manner that they could not collapse, and are remote in their nature. The stockpiles are located adjacent to silt ponds that are cleaned regularly and as such these stockpiles are managed and levelled to facilitate further cleanings. Therefore the material stored at these waste facilities would not be considered to be a Category A waste facility.

Classification in accordance Annex II.

Waste Material	Description	C lassification	Chemical Process treatment	Deposition description	Transport System
Silt Pond Excavations and cleanings	Peat and mineral soils associated with peatlands. Stored for reuse during bog rehabilitation, with no displacement of overburden	01 01 02	None	Excavated from silt ponds by excavator and deposited adjacent to the silt pond.	Excavator
Peat Screenings	Stones, timbers and oversized peat particles, reincorporated into low areas, agreed with the Agency, and stabilized under normal natural bog conditions	01 01 02	None	Removed by screen at the factory and transported by tractor and trailer to the designated and agreed locations	Tractor and trailer.
Bog Timbers	Pine, Oak and Yew species, stored at locations in each bog. Not subject to any stability issues due to exposure to atmospheric/meteorological conditions.	01 01 02	None	Removed from the bog surface by excavator and transported by tractor and trailer to the agreed locations	Tractor and Trailer

Description of operations.

Silt pond excavations arise from the requirement to have silt ponds treating all peat extraction sites. Silt pond cleanings arise from the removal of peat silt from silt ponds as required under IPPC Licence. Bog timbers arise from preparation of the bogs surface for peat production. Estimated quantities of materials are below:

Closure plan. (Bog Rehabilitation Plan).

Condition 10.1 – 10.3 of the IPPC Licence requires the following:

- 10.1 Following termination of use or involvement of all or part of the site in the licensed activity, the licensee shall:
- 10.1.1 Decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.
- 10.1.2 Implement the agreed cutaway bog rehabilitation plan (refer Condition 10.2).

10.2 Cutaway Bog Rehabilitation Plan:

- 10.2.1 The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands within the licensed area. This plan shall be submitted to the Agency for agreement within eighteen months of the date of grant of this licence.
- 10.2.2 The plan shall be reviewed every two years and proposed amendments thereto notified to the Agency for agreement as part of the AER. No amendments may be implemented without the written agreement of the Agency.

10.3 The Rehabilitation Plan shall include as a minimum, the following:

- 10.3.1 A scope statement for the plan; to include outcome of consultations with relevant Agencies, Authorities and affected parties (to be identified by the licensee).
- 10.3.2 The criteria which define the successful rehabilitation of the activity or part thereof, which ensures minimum impact to the environment.
- 10.3.3 A programme to achieve the stated criteria.
- 10.3.4 Where relevant, a test programme to demonstrate the successful implementation of the rehabilitation plan.
- 10.3.5 A programme for aftercare and maintenance.

10.4 A final validation report to include a certificate of completion for the Rehabilitation Plan, for all or part of the site as necessary, shall be submitted to the Agency within six months of execution of the plan. The licensee shall carry out such tests, investigations or submit certification, as requested by the Agency, to confirm that there is no continuing risk to the environment. This plan including maps and ecological classifications are available on file at the Clonsast IPPC Licence Coordinators office.

The location in relation to the silt pond excavations and cleanings are adjacent to the silt ponds, which are considered under the Shannon River Basin Management Plan in accordance with the requirements of Directive 2000/60/EC.

Screenings and bog timbers are all naturally occurring elements of peatland and there placement back to the bog in smaller concentrated designated waste facilities does not constitute a risk to the prevention of water compliance.

The lands under where these materials are deposited are peatlands and are un-effected by the placing of this material.

Review.

This plan will be reviewed every five years, the first review to take place in September 2017. This review will entail an inspection of these waste facilities to ensure their placing, management, maintenance and stability comply with the requirements of the Extractive Waste Management requirements and condition 7.5, 7.6 and 7.7 of the Clonsast IPPC Licence P0503-01.

APPENDIX X. MITIGATION MEASURES FOR THE APPLICATION OF FERTILISER

- Any fertiliser used will be Rock Phosphate and will not be applied in the following conditions:
 - 1. The land is waterlogged;
 - 2. The land is flooded, or it is likely to flood;
 - 3. The land is frozen, or covered with snow;
 - 4. Heavy rain is forecast within 48 hours (forecasts will be checked from Met Éireann).
 - 5. The ground slopes steeply and there is a risk of water pollution, when factors such as surface run-off pathways, the presence of land drains, the absence of hedgerows to mitigate surface flow, soil condition and ground cover are taken into account.
- No fertiliser will be spread on land within 2 metres of a surface watercourse.
- Buffer zones in respect of waterbodies, as specified on https://www.epa.ie/about/faq/name,57156,en.html, will be adhered with at all times with regard to fertiliser application. Reproduced as follows:

Water body / Feature	Buffer zone
Any water supply source providing 100m ³ or more of water per day, or serving 500 or more people	200 metres (or as little as 30 metres where a local authority allows)
Any water supply source providing 10m ³ or more of water per day, or serving 50 or more people	100 metres (or as little as 30 metres where a local authority allows)
Any other water supply for human consumption	25 metres (or as little as 30 metres where a local authority allows)
Lake shoreline	20 metres
Exposed cavernous or karstified limestone features (such as swallow holes or collapse features)	15 metres
Any surface watercourse where the slope towards the watercourse exceeds 10%	10 metres
Any other surface waters	5 metres*

APPENDIX XI. CONSULTATION SUMMARIES

Table APX -1 Consultees contacted

Bog Name	Contact Organisation	Contact Name	Date of Issue	Communication Format	Date Response Received	Response format
Esker	Offaly County Council - Chief Executive	Anne-Marie Delaney	08/01/2021	E-mail		
Esker	Offaly County Council - Senior Planner	Andrew Murray	08/01/2021	E-mail		
Esker	Offaly County Council - Heritage Officer	Amanda Pedlow	08/01/2021	E-mail		
Esker	Offaly County Council	Mary Hussey	08/01/2021	Email	11/02/2021	Email
Esker	Offaly County Councillors - Edenderry District	Cllr. Mark Hackett	08/01/2021	E-mail		
Esker	Offaly County Councillors - Edenderry District	Cllr. Noel Cribbin	08/01/2021	E-mail		
Esker	Offaly County Councillors - Edenderry District	Cllr. Eddie Fitzpatrick	08/01/2021	E-mail		
Esker	Offaly County Councillors - Edenderry District	Cllr. John Foley	08/01/2021	E-mail		
Esker	Offaly County Councillors - Edenderry District	Cllr. Robert McDermott	08/01/2021	E-mail		
Esker	Offaly County Councillors - Edenderry District	Cllr. Liam Quinn	08/01/2021	E-mail	24/01/2021	E-mail
Esker	TD Laois/Offaly	Barry Cowen	08/01/2021	E-mail		
Esker	TD Laois/Offaly	Charlie Flanagan	08/01/2021	E-mail		
Esker	TD Laois/Offaly	Sean Fleming	08/01/2021	E-mail		
Esker	TD Laois/Offaly	Carol Nolan	08/01/2021	E-mail	25/01/2021	E-mail
Esker	TD Laois/Offaly	Brian Stanley	08/01/2021	E-mail		
Esker	Eastern and Midland Regional Assembly		08/01/2021	E-mail		

Esker	Environmental Protection	Brian Meeney		E-mail		
	Agency		08/01/2021			
Esker	National Parks and Wildlife	Brian Lucas		E-mail		
	Service		08/01/2021			
Esker	NPWS Regional Network	District Conservation Officer	12/01/2021	E-mail		
Esker	Dept of the Housing Local	Malcom Noonan (Minister of State	08/01/2021	E-mail		
	Government and Heritage	at the Department of Housing,				
		Local Government and Heritage)				
Esker	National Monuments Service	Margaret Keane	08/01/2021	E-mail		
Esker	National Museum of Ireland	Isabella Mulhall		E-mail		
	(Irish Antiquities Division)		08/01/2021			
Esker	Minister for Environment,	Minister - Eamon Ryan		E-mail		
	Climate and Communications		08/01/2021			
Esker	Minister of state for Agriculture	Pippa Hackett Minister of State for		E-mail		
	with responsibility for Land use	Land Use and Biodiversity	09/01/2021			
Eckor		Conoral o mail contact	08/01/2021	E mail		
Esker			08/01/2021	E-IIIdii	24/01/2021	E mail
Esker	Waterways Ireland	General e-mail contact	08/01/2021	E-mail	24/01/2021	E-mail
Esker	The Heritage Council	Lorcan Scott	08/01/2021	E-mail	04/01/2021	E-mail
Esker	An Forum Uisce (The Water	General e-mail contact		E-mail		
	Forum)		08/01/2021			
Esker	An Taisce	General e-mail contact	08/01/2021	E-mail		
Esker	Friends of the Earth	Oisin Coughlan	08/01/2021	E-mail		
Esker	Friends of the Irish Environment	General e-mail contact	08/01/2021	E-mail		
Esker	Birdwatch Ireland	General e-mail contact	08/01/2021	E-mail		
Esker	Irish Peatlands Conservation	General e-mail contact		E-mail	25/01/2021	E-mail
	Council		08/01/2021			
Esker	Irish Wildlife Trust	General e-mail contact	08/01/2021	E-mail	23/03/2021	E-mail
Esker	Bat Conservation Ireland	General e-mail contact	08/01/2021	E-mail		
Esker	Woodlands of Ireland	General e-mail contact	08/01/2021	E-mail		
Esker	Butterfly Conservation Ireland	Jesmond Harding/info email	08/01/2021	E-mail		
Esker	Community Wetlands Forum	General e-mail contact		E-mail		
	(part of Irish Rurallink)		08/01/2021			

Esker	Offaly Public Participation	General e-mail contact		E-mail		
	Network (PPN)		08/01/2021			
Esker	Sustainable Water Action	http://www.swanireland.ie/		E-mail		
	Network (SWAN)		08/01/2021			
Esker	Irish Farmers Association (Laois	General e-mail contact		E-mail	23/01/2021	E-mail
	Offaly and Westmeath Office)		08/01/2021			
Esker	Irish Farmers Association (Head	General e-mail contact		E-mail	23/01/2021	E-mail
	Office)		08/01/2021			
Esker	National Association of Regional	Email - nargc@nargc.ie		E-mail		
	Game Councils		08/01/2021			
Esker	Midlands National Shooting	General e-mail contact		E-mail	24/01/2021	E-mail
	centre		08/01/2021			
Esker	ICMSA (Irish Creamery Milk	General e-mail contact		E-mail		
	Suppliers Association)		08/01/2021			
Esker	ICSA (Irish Cattle and Sheep	General e-mail contact		E-mail		
	Farmers Association		08/01/2021			
Esker	Midlands & East Regional WFD	Ray Spain Co-ordinator Local		E-mail		
	Operational Committee	Authority Water Programme	08/01/2021			
Esker	Shannon Flood Risk State	Jackie Stewart - Flood Risk		E-mail		
	Agency Co-ordination Working	management Policy				
	Group		08/01/2021			
Esker	CARO (Climate Action Regional	Alan Dunney		E-mail		
	Office) Eastern and Midlands		08/01/2021			
Esker	Dr. Catherine Farrell Trinity	General e-mail contact	Contact		22/01/2021	E-mail
	College		Initiated by			
			Stakeholder			
Esker	Francis Kenna OPW	General e-mail contact	Contact		22-	E-mail
			Initiated by		23/01/2021	
			Stakeholder			
Esker	Irish Raptor Study Group	General E-mail contact	12/01/2021	E-mail		

Organisation	Summary of Response by Stakeholder	BnM Response
Offaly County Council	Request for all draft rehabilitation plans in Co. Offaly.	BnM provided the requested documents. A virtual meeting, including a general PCAS presentation, was held for Offaly County Council on 10/02/2021
Offaly County Council	Offaly County Council e-mailed a submission to outline potential for integration of PCAS with opportunities regarding the Offaly County Council Inaugural Digital Strategy 2020-2022.	A meeting on Offaly's digital strategy was held between BnM and Offaly County Council on 04/03/2021.
Offaly County Council	 Submission provided on behalf on Offaly County Council on a number of PCAS bogs including Esker on 22/02/2021. Key points raised were; Requested that details of security fencing to be identified and detailed on plans. Long term rehabilitation plan to be provided addressing above areas of consideration post 2024 if required. Public Rights of Way access locations are to be maintained with relevant stakeholders and marked on drawings. A number of technical issues with draft rehabilitation plans. Advised BnM to carefully consider after use of bogs as part of PCAS Request that the impact of PCAS on surrounding roads be considered as part of rehabilitation plans. Advised that long term management (post 2024) is considered by BnM. Advised that Appropriate assessment and the habitats directive are taken into account by BnM. Advised that BnM consider management of flooding & water pollution, fire risk, invasive species and 	A virtual meeting/general presentation on PCAS to between BnM and Offaly Councillors and OCC personnel was conducted on 10/02/2021. BnM provided further PCAS documentation on request, via e-mail on 27/01/2021. Refer to Section 4 for response on issues raised. Dialogue with Offaly County Council is ongoing.
Irish Peatlands	Responded to consultation regarding Esker Bog and	BnM responded 25/01/2021, all issues raised will be
Council	project and list a number of comments on how the project might be improved;	advised that; 1) We have included DOC as an additional
	1) Potential for inclusion of local environmental groups in species specific conservation plans	parameter on our suite of water monitoring analysis.
	2) Requested that a map of potentially suitable areas for such projects should be included in rehab plans	 BnM are working with Lawco and WFD to align the BNM monitoring programme with the EPA's 2021 Monitoring programme
	 3) Promoted the idea of creating a biodiversity action plan that considers the use of site by all relevant stakeholders b) Preserve and of filling in the biotic of the state of the biotic of the	 BnM have an extensive community consultation process ongoing with a dedicated Community Liaison Officer communicating to affected and interested
	4) Recommended following the NPWS community engagement strategy as it was largely successful in	parties

Table APX -2 Response summary from Consultees contacted

	bring local communities along with restoration projects	
NPWS Regional Network	NPWS responded through e-mail thread on the 02, 03,07,09/12/2020 in relation to all PCAS bogs. The main points discussed were to advise of the requirement to investigate if assessment under the SEA and Birds directives for each site.	BnM acknowledged via e-mail to address queries on 09/12/2021. Also, a phone conversation with local NPWS Conservation Ranger on 11/01/2021 discussed biodiversity and rehabilitation measures on PCAS bogs including Esker.
National Museum of Ireland (Irish Antiquities Division)	Responded through e-mail 28/12/2020 in relation to all PCAS bogs. Issues raised were; 1) The request that due diligence be taken during works to protect any archaeologically significant findings or areas 2) The NMI reiterated the importance of peatlands for the preservation of archaeology and requested they be consulted as part of any EIA undertaken	BnM acknowledged and responded via e-mail on 28/12/2020 to assure BnM will give due cognisance to all points within all rehabilitation plans for Esker Bog. A virtual meeting on PCAS between BnM and NMI was held on 18/01/2021
Irish Farmers Association	Responded to consultation regarding Esker and the PCAS project at large on multiple dates throughout ongoing discourse. Specific submission on Esker Bog received from Westmeath, Offaly and Laois IFA Office. Concerns raised were: 1) Potential for flooding on adjacent lands. 2) Health and Safety 3) Perceived potentially detrimental impact of PCAS on property value 4) Reiterated the desire of the IFA that people who have been cutting turf on bogs should retain this right.	A working group has been established at a high level between BnM and IFA on various issues including PCAS. A meeting was held between BnM and IFA representatives on 18/02/2021 to present details on PCAS. Dialogue is ongoing.
The Heritage Council	Responded to consultation via e-mail on 04/01/2021 asking for more information on PCAS in general and looking to be involved in any seminar or information events.	BnM responded via phone conversation on 11/01/2021. Dialogue is ongoing.
Dept. of Agriculture, Food & the Marine (DAFM)	 Submission by e-mail to express support for PCAS in general. Submission recommended; 1) That local landowners and stakeholders be considered as part of the consultation process. 2) EIA assessment be carried out prior to PCAS works. 3) Hydrological assessments are carried out with a view to protecting adjoining lands from adverse impacts. 	BnM acknowledged and responded via e-mail on 02/03/2021to assure that all points raised within the submission will be considered. A virtual meeting/PCAS presentation was held for DAFM on 11/12/2020.
The Irish Wildlife Trust	 Responded to consultation via e-mail on 01/02/2021 to acknowledge receipt of PCAS plans and indicate desire to make a submission. Submission received on 23/03/2021 supporting the PCAS scheme and specifically requesting: 1. Cnosideration of statutory protection for rehabilitated bogs; 2. Consideration fo re-wilding in determining future habitats and species presence, incluing reintroductions; 3. Approporiate monitoring is established. 	BnM responded via email and phone throughout February and March. A virtual meeting/PCAS presentation was held for IWT on 17/02/2021. Dialogue is ongoing.

APPENDIX XII. ARCHAEOLOGY

Role of the Archaeological Liaison Officer

- To communicate this Code of Practice and the Archaeological Protection Procedures (Appendix IV) to all personnel operating on the bog.
- To ensure that all notices relating to the Archaeological Protection Procedures are posted and maintained at appropriate locations on the bog.
- To report any stray finds, presented to the Liaison Officer from his/her group of bogs, to the Duty Officer of the National Museum of Ireland.
- To provide for the appropriate protection of the stray find, whether in-situ or removed from the bog, as directed by the Duty Officer of the National Museum of Ireland.



22

- To arrange for the delivery or collection of the stray find, as directed by the Duty Officer of the National Museum of Ireland.
- To complete the Report of Discovery of Archaeological Object(s) in Bogs (Appendix V), as directed by the Duty Officer of the National Museum of Ireland.
- To maintain a file of all stray finds and associated documentation and provide copies to the Project Archaeologist.
- To provide assistance, where required, to the Department during archaeological surveys.
- To provide assistance, where required, to Bord na Móna's Consultant Archaeologists, during investigation and mitigation of monuments.
- To report to the Bord na Móna members on the Archaeology Management Liaison Committee any planned developments or new activities on cutaway peatland areas within his/her group of bogs.



BORD MÁNA Naturally Driven	Procedure: ENV017	Rev: 1
Title: Archaeological Findings	Approved: EM	Date: 13/10/2020

1) Purpose

The purpose of this procedure is to describe the arrangements in Bord na Móna for findings of Archaeological material (Stray Finds).

All objects, sites or monuments, no matter how fragmentary, are important elements of our heritage.

2) Procedure

- 1. Check whether there are any known archaeological monuments in your area.
- 2. Be vigilant at all times objects or traces of structures can be found on the field surfaces, in the drain faces, on the bog margins or caught within the mechanics of machinery.
- 3. If an object is found leave it in place, if it is safe to do so, note its position and immediately contact your Archaeological Liaison Officer who will assess the situation and contact the Duty Officer of the National Museum of Ireland.
- 4. Resist the temptation to investigate the find spot as this may disturb fragile archaeological deposits.
- 5. If the object is already dislodged or is in imminent danger, remove it carefully, mark its find spot and report it immediately to your Archaeological Liaison Officer.
- 6. Objects made of wood, leather or textile, which are removed from peat should be kept in conditions similar to those in which they are found. This can be done by packing them in peat or, if waterlogged, placing them in a clean basin of water and sealing the container. Resist the temptation to clean or remove peat from the object.
- 7. If timbers or other materials, such as gravel or stones, which could be part of a man-made structure are noted on the bog, mark the location and report it immediately to your Archaeological Liaison Officer. If you suspect the find is of archaeological importance, resist the temptation to expose it any further as this could result in damage to the structure.
- 8. Report anything that looks unnatural in the bog your Archaeological Liaison Officer will decide whether it should be referred to the appropriate authorities.

NOTE: Our archaeological heritage is a finite, non-renewable resource. Once a site is destroyed its information is lost forever and we have lost the chance to understand a little more about our past, where we have come from and perhaps the opportunity to learn for the future.

Your Archaeological Liaison Officer is

3) Records

Revision Index	K		
Revision	Date	Description of change	Approved
1	13/09/2020	First release	EMcD
2			

Archaeological Impact Assessment of Proposed Bog Rehabilitation at Esker Bog, Co. Offaly. Dr. Charles Mount. Nov 2020.



Archaeological Impact Assessment of Proposed Bog Decommissioning and Rehabilitation at Esker Bog, Co. Offaly

Report For

Bord Na Móna Energy Ltd.

Author

Dr. Charles Mount

Bord Na Móna Project Archaeologist



Introduction

The EPA (2020) *Guidance on the process of preparing and implementing a bog rehabilitation plan* notes that the licensee should characterise the bog prior to embarking on detailed planning and implementation. This characterisation should detail how the land is classified in terms of statutory protections, e.g. as European sites, world heritage sites, RAMSAR sites, National Heritage Areas, national monuments, archaeological heritage, etc. This archaeological impact assessment report was prepared by Dr. Charles Mount for Bord na Móna Energy Ltd to fulfil this characterisation in relation to archaeological heritage. It represents the results of a desk-based assessment of the impact of proposed bog rehabilitation of c.567 hectares at Esker Bog, Co. Offaly on the known archaeological heritage of the bog. The proposed rehabilitation actions will be a combination of measures to create wetlands and re-wet deep peat as outlined in the draft Methodology Paper for the proposed Bord na Móna Decommissioning, Rehabilitation and Restoration Scheme. These enhanced measures for Esker Bog will include:

• Blocking field drains in the former industrial production area to create regular peat blockages (three blockages per 100 m) along each field drain;

- Re-alignment of piped drainage; and management of water levels to create wetlands;
- No measures are planned for the other surrounding marginal peatland habitats.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning phase.
- Evaluate success of short-term rehabilitation measures and enhance where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

Esker Bog is located c.3.4km south-west of Rhode, Co. Offaly, and west of the R400 road. The bog occupies the townlands of Ballymoran, Clonmeen, Eskermore, Leitrim, Newtown and Rathlumber on OS 6 inch sheets Offaly Nos. 11 and 19.

Methodology

This is a desk-based archaeological assessment that includes a collation of existing written and graphic information to identify the likely archaeological potential of Esker Bog. The extent of the rehabilitation is indicated in Fig. 1. This area was examined using information from:

- The IAWU Peatland Survey
- The Sites and Monuments Record that is maintained by the Dept of Housing, Local Government and Heritage
- The Excavations database
- Previous assessments

An impact assessment has been prepared and recommendations have been made.

Desktop assessment

Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Offaly which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1995). This record was published by the Minister in 1995 and includes sites and monuments that were known in Esker Bog before that date. This review established that there are no RMPs situated in the proposed



rehabilitation area or vicinity (see Fig. 1). The closest RMP to the rehabilitation area, OF011-053----, is the site of an enclosure located on dryland in Clonmeen townland more than c.36m north-west of the rehabilitation area.



Fig. 1. Esker Bog, Co. Offaly, detail of the Record of Monuments and Places map sheets Nos. 11 and 19. The proposed rehabilitation area is outlined with the red line. There are no Recorded Monuments in the rehabilitation area.

Peatland survey

Esker Bog was surveyed by the Irish Archaeological Wetland Unit (IAWU) in 2001 as part of the Archaeological Survey of Ireland Peatland Survey, Licence number 01E0475. Only a single split timber and piece of brushwood OF -LTM 001 was identified in the bog during the survey (see Table 1). This archaeological sighting was notified to the Archaeological Survey of Ireland.

SMR_NO	IAWU CatNo.	Site type	Townland	N.G.R. E	N.G.R. N	Depth BS m
OF011-062	OF -LTM 001	Redundant record- Worked wood	Leitrim	254972	230311	1.02

Table 1. List of sites recorded by the IAWU in Esker Bog.

Sites and Monuments Record

The Sites and Monuments Record (SMR) which is maintained by the Department of Housing, Local Government and Heritage was examined as part of the assessment on the 22nd of March 2021. The SMR consists of records included in the RMP and sites and monuments notified to the Dept. since the



publication of the RMP. This review established that there is only one entry in the SMR in the proposed rehabilitation area. SMR OF011-062---- is the sighting reported by the IAWU in 2001 as OF -LTM 001 (see Table 1 and Fig. 2). However, the SMR notes that 'The evidence is not sufficient to warrant its acceptance as the remains of an archaeological monument' and it is classed as a redundant record.

Reported finds

A number of archaeological finds from the bog are recorded in the files of the National Museum of Ireland. A bronze axehead (1983:80) from Rathlumber townland, a bog butter (2000:55) from Clonmeen townland and a second bog butter (1998:62) from Eskermore townland.



Fig. 2. Esker Bog, Co. Offaly, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line. There is one SMR redundant record in the rehabilitation area.

Archaeological investigations

Reports of archaeological excavations and licensed monitoring in the study area listed in the excavations database at excvations.ie were examined as part of the assessment. There are no additional reports of any archaeological investigations carried out in the rehabilitation area.

Previous assessments

Esker Bog has been the subject of an Environmental Impact Assessment Report caried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01. The assessment noted the wood identified in the IAWU survey in 2001 and noted that there was a



moderate potential for archaeological features to be uncovered during the course of any future development works in Esker Bog.

Impact assessment

There is one known sighting of worked wood in the rehabilitation area SMR OF011-062---- (see Table 1). This has not been accepted by the Archaeological Survey as the remains of an archaeological monument and has been classed as a redundant record.

Recommendations

The only known sighting of worked wood in the rehabilitation area (SMR OF011-062----) has not been accepted by the Archaeological Survey as the remains of an archaeological monument and has been classed as a redundant record. Therefore, its location does not need to be avoided. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

Conclusion

This is a desk-based archaeological assessment and includes a collation of existing written and graphic information to identify the likely archaeological potential of the proposed rehabilitation area. The only known sighting of worked wood in the rehabilitation area (SMR OF011-062----) has not been accepted by the Archaeological Survey as the remains of an archaeological monument, has been classed as a redundant record, and does not need to be avoided. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

References

DAHGI 1995. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Offaly.

EPA 2020. Guidance on the process of preparing and implementing a bog rehabilitation plan.

Dr. Charles Mount 23 March 2021