



Clooniff Bog

Cutaway Bog Decommissioning and Rehabilitation Plan 2021

This document seeks to address the requirements of Condition 10.2 of IPC Licence Ref. P0502-01:

“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 Clooniff 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.

In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. P0502-01, due regard was also given to the proposed Peatlands Climate Action Scheme (PCAS) announced by the Minister. 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 Clooniff Bog, measures which goes beyond that required by Condition 10 in the Licence, the list of interventions necessary to comply with the ‘standard’ requirement of Condition 10 (in the absence of the proposed Scheme) is also included. 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 measures (and their associated costs) eligible for support under the proposed Scheme.

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

Any consideration of any other future after-uses for Clooniff Bog, such as amenity, are beyond the scope of this document but 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 Clooniff Decommissioning and Rehabilitation Plan – Addendum 1 for more details.

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SUMMARY

Name of bog: Clooniff **Area:** 530.3 ha

Site description:

- Clooniff Bog was drained and developed for industrial peat production in the 1970s and has been in active peat production since the 1975. Peat production ceased in 2019.
- Clooniff Bog comprises four separate bog sub-units which have been managed differently over the course of production and development at the site.
- Much of the former peat production footprint is bare peat and contains active drainage channels; other areas are cutaway and some wetland vegetation has developed.
- Clooniff has a pumped hydrological regime. It is expected that when pumping is reduced or stopped that water levels will rise significantly across parts of the site. This has already occurred across a portion of the site.
- Where deep peat remains at Clooniff Bog, depths are up to 2.5m, although some parts the peat has been removed entirely to expose mineral deposits underlying the peat.
- The site is located adjacent to the River Shannon Callows and several designated conservation sites. In winter, the site can be inundated with water corresponding to winter flood levels on the River Shannon (the site forms part of the River Shannon floodplain).

Rehabilitation goals and outcomes

Bord na Móna is committed to discharging the obligations arising from Condition 10 of the IPC licence.

- Meeting conditions of the IPC licence;
- Stabilisation or improvement in water quality parameters;
- Optimising hydrological conditions for **climate action benefits as part of PCAS**. This will be achieved via intensive **re-wetting**.
- Optimising hydrological conditions for the development of wetlands, Reed swamp and fen on shallow cutaway peat, and eventually naturally functioning wetland and 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 Clooniff Bog.
- EPA IPC Licence - Ref. P0502-01. 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 as defined by the IPC Licence and to enhance the ecosystem services of Clooniff Bog, in particular, optimising **climate action benefits**.

- The local environmental conditions of this bog.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- To minimise potential impacts on neighbouring land, some boundary drains around Clooniff Bog will be left unblocked as blocking boundary drains could affect adjacent land.

Criteria for successful rehabilitation:

The Criteria for successful rehabilitation for IPC Licence validation and for climate action verification have been defined as:

- Rewetting of peat in the former area of industrial peat production to slow water movement across the site to retain silt, accelerating the development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat (IPC Licence validation) through the creation of compatible wetlands, Reed swamp, fen, embryonic *Sphagnum*-rich habitats and other wetland and peatland habitats.
- Stabilising or reducing potential emissions to water (IPC Licence validation).
- Reducing pressure from peat production on the local river catchment (WFD).
- 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 fen, Reed swamp, heath, scrub, Birch woodland and peatland communities, where conditions are suitable, and eventually towards a carbon sink (Climate action verification). These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning habitats to fully develop at Clooniff Bog.
- Improvement in biodiversity and ecosystem services. (Climate action verification).

Meeting climate action verification criteria and monitoring of these criteria 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 hydrological 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 pump management, outfall adjustment, drain blocking, peat field re-profiling, cell-bunding and fertiliser applications targeting headlands, high fields and other areas (where needed).
- Initial hydrological modelling indicates that a significant part of the site will develop a mosaic of wetland habitats with deeper water, when pumping is reduced or stopped. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (< 0.5 m where possible). Water-levels will be adjusted at outfalls.
- Phase 2 measures may include seeding of targeted vegetation and inoculation of *Sphagnum*, and further water level management
- Silt ponds will continue to be maintained during rehabilitation and decommissioning.
- 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.
- 2020: 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 Clooniff 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, assess 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 for additional rehabilitation, if needed.
- **Water quality monitoring** will be established. Monitoring of key water quality parameters will include: pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour & COD

Additional Monitoring:

- The monitoring and validation of re-vegetation via natural colonisation and changes in bog condition will be carried out using an aerial 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 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. Reduction in carbon emissions will be modelled by 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.
- Monitoring as part of Climate Action Verification is dependent on support from the Climate Action Fund or other external funding.

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.

1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Blackwater bog group (Ref. P0502-01). 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 Blackwater bog group (see Appendix I for details of the bog areas within the Blackwater Bog Group). Clooniff Bog is located in Co. Roscommon.

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 its peatlands. 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 this scheme. 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. Improvements 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.

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 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 improvements will accelerate the trajectory towards a naturally functioning peatland ecosystem.

It is envisaged that the proposed Scheme will support a combination of activities, interventions, or measures which accelerate the original timelines including:

- more intensive management of water levels through 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, which will develop other habitats. Other areas will naturally have deeper water). 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 peat-forming 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. The measures will also accelerate the development of new habitats for a range of species under pressure in the wider landscape and will have the potential to develop habitats (e.g. Annex I raised bog, wetlands that support wader water birds of conservation interest) that will contribute towards the delivery of national biodiversity objectives.

Clooniff Bog is proposed to be part of this proposed Scheme and this rehabilitation plan outlines the approach taken.

1.1 Constraints and Limitations

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0502-01:

“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.”

It also seeks to outline measures to optimise climate action and other ecosystem services benefits, mainly through hydrological management.

This document covers the area of **Clooniff Bog**.

Biodiversity and ecosystem services have been identified as the current primary land-use at Clooniff Bog. The future use of Clooniff Bog has not been defined by Bord na Móna. Bord na Móna will continue to review the future after-use of its land-bank. Any consideration of any other future after-uses for Clooniff 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 Clooniff Bog ceased in 2019. Bord na Móna do not intend to carry out any industrial peat production at this site in the future, so industrial peat extraction is permanently ceased. Currently the majority of the former peat production area is bare peat. The combination of active enhanced rehabilitation measures and natural colonisation will quickly establish pioneer vegetation and will be planned to accelerate environmental stabilisation. Nevertheless, it will take some time (30-50 years) for naturally functioning peatland ecosystems to fully re-establish.

Parts of Clooniff 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 Clooniff 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.

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 rehabilitation plan 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 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 the 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.
- Barry, T.A. *et al.* (1973). A survey of cutover peats and underlying mineral soils. Soil Survey Bulletin No. 30. Dublin, Bord na Móna and An Foras Taluntais.
- 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:

- Blackwater Integrated Pollution Control Licence;
- Blackwater Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database (www.epa.ie);
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity
- BirdWatch Ireland online data (including I-WeBS and CBS datasets; www.birdwatchireland.ie);
- Geological Survey of Ireland - National Draft Bedrock Aquifer map;
- Geological Survey of Ireland - Groundwater Database (www.gsi.ie);
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (www.catchments.ie);
- OPW Indicative Flood Maps (www.floodmaps.ie),
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (www.cfram.ie),
- 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-and-data/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, Clooniff Bog was surveyed in March 2012. The site was re-surveyed in 2016. The latest confirmatory visit took place in September 2020. This rehabilitation plan is informed by the original baseline survey as well as subsequent 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 Clooniff Bog is contained in Appendix II.

3. SITE DESCRIPTION

Clooniff Bog is located approximately 4 km to the north of Shannonbridge in Co. Roscommon, on the western banks of the River Shannon (see Figure 3.1). The surrounding landscape is a mosaic primarily consist of low-lying agricultural land (pasture) interspersed with other raised bogs, many of which have also been managed by Bord na Móna for peat production with some areas utilised for domestic turf-cutting. The River Shannon is immediately adjacent to the east and south corner of the site and parts of Clooniff form part of the flood plain of the River Shannon, regularly flooding during winter and at other times when the water levels on the river are high.

A rail line connects Clooniff bog with Cornafulla Bog to the north and to Cornaveagh Bog to the south. There is also road access to the site, with the several small public roads adjacent to the south, west and north of Clooniff Bog. The only infrastructure on-site, apart from the rail links and associated machinery access roads and tracks, is a small tea centre.

The bog comprises four distinct areas: southern, central, north-western and north eastern (See Figure 3.1 & 8.1). The north-western area is also called Cloonbeggane Bog (sub-site) and north-eastern area is also known as Coolumber Bog (sub-site).

3.1 Status and Situation

3.1.1 Site history

Clooniff Bog was drained and developed for industrial peat production in the 1970s and has been in active peat production since the 1975. Industrial peat production ceased in 2019. The peat was harvested from this site was used for fuel peat for West Offaly Power (WOP) in Shannonbridge.

3.1.2 Current land-use

Industrial peat production has now permanently ceased at this bog. Biodiversity and ecosystem services have been identified as the primary land use at Clooniff Bog by Bord na Móna. The entire bog is not within the ownership of Bord na Móna and domestic turf cutting is having an impact on the bog, both within and outside the BnM boundary. A bog railway crosses through this site (Figure 3.5).

The River Shannon flows within close proximity to the eastern boundary of the site and two narrow strips of land (under BnM ownership) extend from the site to the River Shannon.

There are several known right of ways (ROWs) on this bog. These are generally located along the margin of the site and will not be impacted by rehabilitation.

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.

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 Clooniff 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).

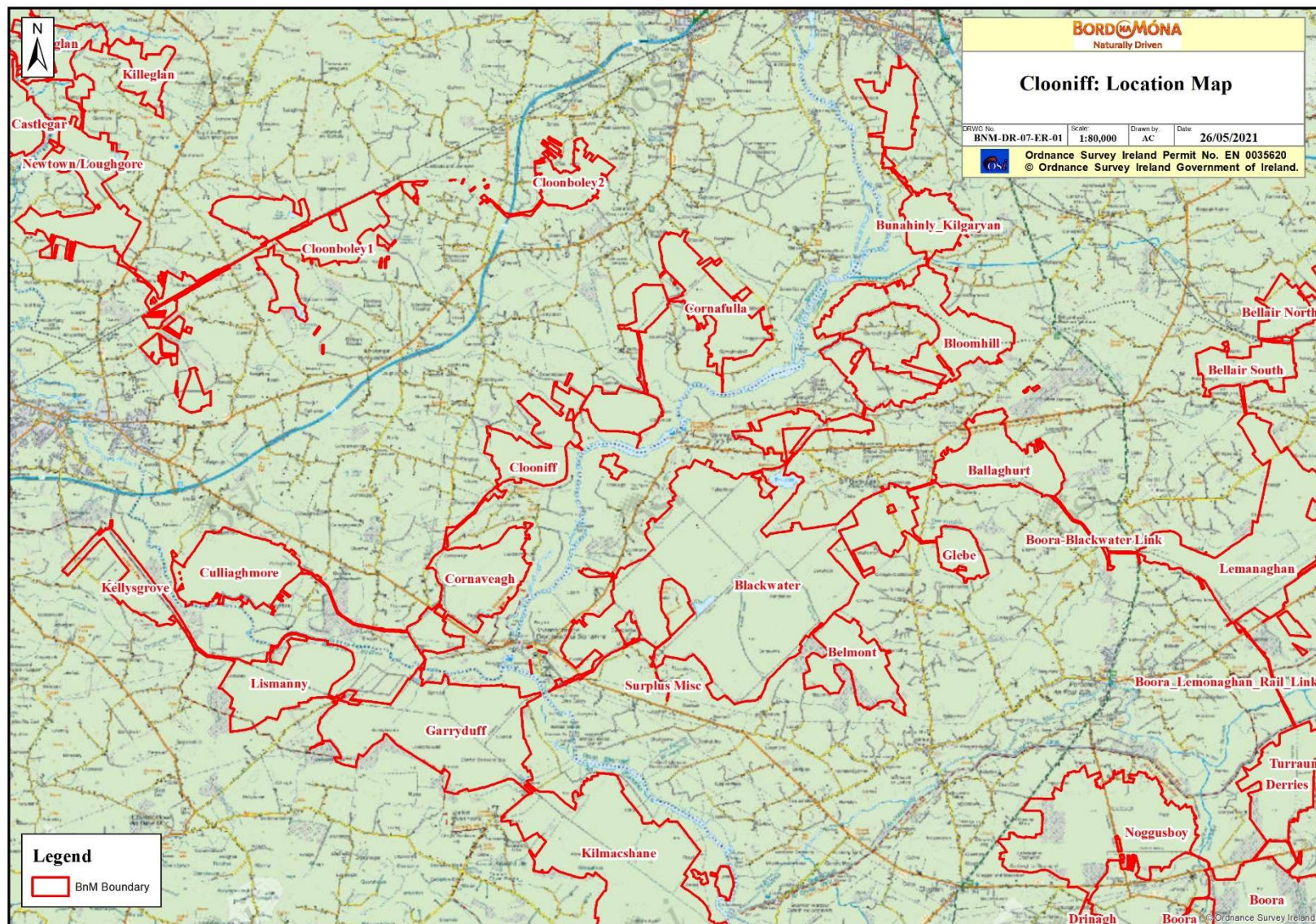


Figure 3.1 Location of Clooniff Bog in context to other Bord na Móna bogs and surrounding area



Figure 3.2 Aerial photo of Clooniff Bog (2020).

3.2 Geology and Peat Depths

3.2.1 Sub-soil geology

The majority of the underlying geology at Clooniff Bog is massive unbedded lime-mudstone, with a small area on the eastern site of dark muddy limestone and shale¹. The underlying soils and sub-soils are classed as 'Raised Bog Cutover Peat'. 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. Some lacustrine deposits (lake-deposits) are also present under peat (lacustrine shell marl).

3.2.2 Peat type and depths

Although Clooniff Bog has been in commercial peat production for over 40 years, different parts of the bog have been developed at different times. The central and north-eastern sections are predominantly cutaway, with only small pockets of residual peat depth in excess of 2m. By contrast, the southern and north-western section have relatively larger deposits of residual peat, with large parts of the peat in these areas in excess of 2.5m deep (Figure 8.2).

3.3 Key Biodiversity Features of Interest

The majority of Clooniff Bog within the Bord na Móna boundary is bare peat as this site was in production until 2019 (see Figure 3.2). The River Shannon flows within close proximity to the eastern boundary of the site and two small streams flow through the site with a third stream flowing along the southern boundary of the site.

3.3.1 Current habitats

Although the majority of the site is classified as bare peat, many of the field drains support wetland plants such as Common Reed (*Phragmites australis*) as the dominant vegetation type. Marginal habitats include Birch woodland (WN7), remnant sections of raised bog (PB1), scrub (WS1) and cutaway bog (PB4). The remnant sections are generally small and are dry with a dominance of Ling Heather *Calluna vulgaris*. Coolumber Bog has been out of peat production for a longer period and has already developed pioneer cutaway vegetation dominated by Bog Cotton and Sedges, with Reeds.

The streams that flow through the site have been canalised and supports a small number of aquatic plant species. Riparian vegetation was mainly composed of Willow (*Salix* sp.), Common Reed and Reed Canary Grass (*Phalaris arundinacea*). A number of silt ponds are located adjacent to the streams.

A habitat map of the site is shown in Figure 3.4.

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



Figure 3.3. View of the typical milled peat surface with existing drainage across Clooniff Bog

3.3.2 Species of conservation interest

Otter activity is high along the streams on-site and there is frequent evidence of Otter tracks, spraint and fish remains. It is likely that an Otter “couch” is situated on the site. Evidence of Badger and Pine Marten using the site have also been noted, and coarse fish including Bream and Roach have been observed in waterbodies on site.

Curlew, Lapwing, Redshank, Common Sandpiper, Ringed Plover and Snipe have all been recorded on Coolumber Bog during the summer. Given the habitat availability, it is likely that Lapwing, Ringed Plover and Snipe all breed on this site, and possible that both Redshank and Common Sandpiper also breed at Coolumber Bog. The Curlew (and possibly Redshank) records are more likely to relate to breeding birds from the adjacent Shannon Callows using this site for roosting, foraging or loafing if disturbed off the callows grassland where they more typically nest. Black-headed Gull have also been recorded on Coolumber Bog, but do not currently appear to be nesting on this site.

In winter, large numbers of wildfowl, particularly Mallard and Teal have been recorded on-site. Coolumber Bog is inundated during the winter from the River Shannon, and it is possible that wintering waterfowl associated with this site will use Clooniff Bog, and particularly Coolumber Bog, during the winter if the site is inundated.

3.3.3 Invasive species

Invasive alien species known to occur at the subject bog (or desktop review suggests presence is likely), and for which reasonably foreseeable source impact pathways for dispersal may result from the proposed PCAS are described here.

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

There are records of Rhododendron (*Rhododendron ponticom*) present in amongst the marginal habitats of the site. This species is listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011). Rhododendron has the potential to colonise portions of the site following the cessation of peat harvesting activities.

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 Clooniff Bog.

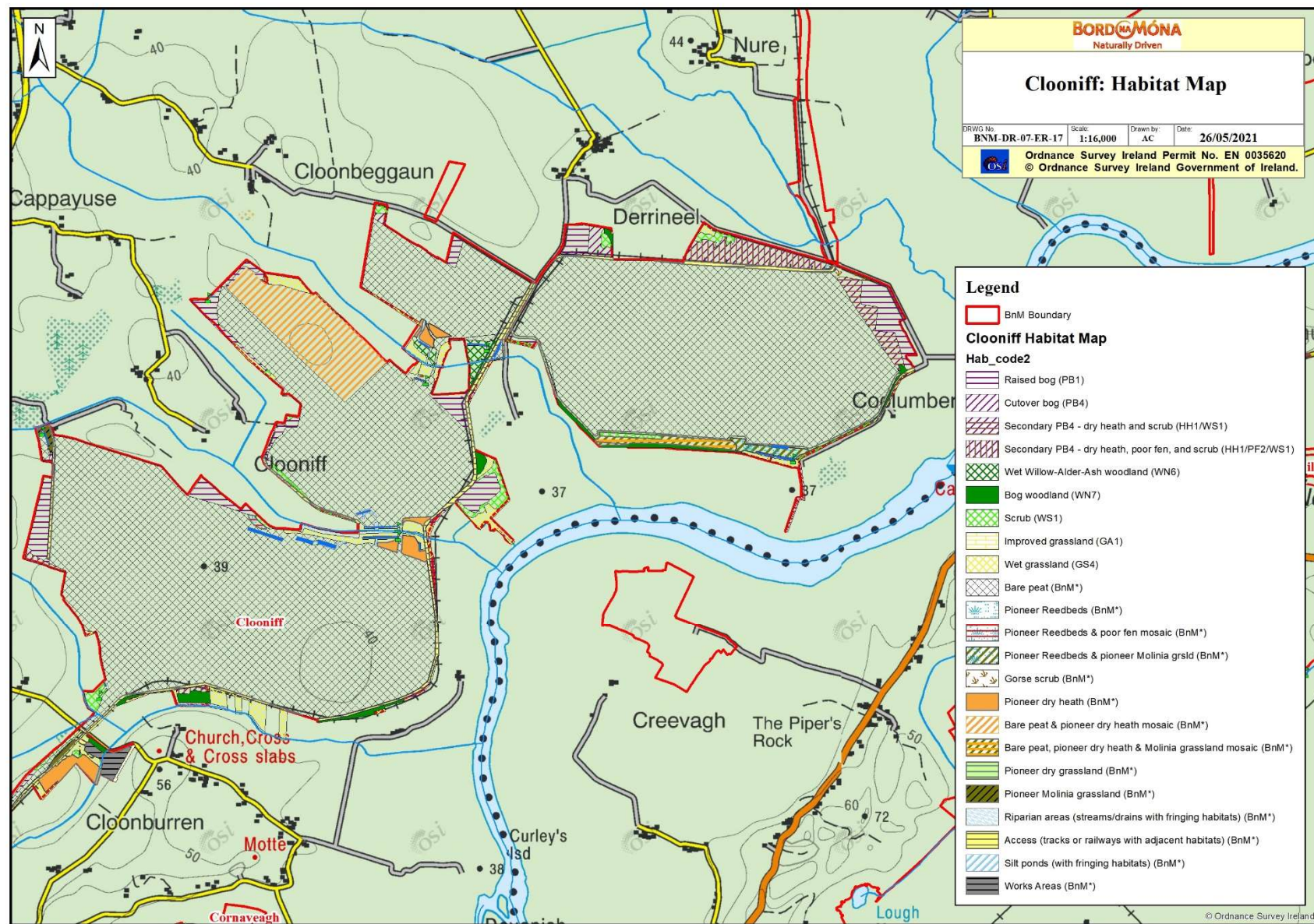


Figure 3.4. Habitat map of Clooniff Bog showing Bord na Móna habitat categorisation

3.4 Statutory Nature Conservation Designations

Clooniff Bog partially overlaps with the River Shannon Callows SAC and pNHA (NPWS Site Code: 000216) and Middle Shannon Callows SPA (NPWS Site Code: 004096) on the western periphery of the site as a whole and along the southern edge of Coolumber Bog (Figure 3.5). The River Shannon Callows SAC (and pNHA) is designated for grasslands (Molinia and Lowland Hay Meadows) as well as alluvial woodland and Otter. The Middle Shannon Callows SPA is designated for the assemblage of wintering wildfowl, many species of which occur in internationally and nationally important numbers as well, in addition to breeding Corncrake. It is also noted as being important for breeding waders and a range of other nationally scarce species such as breeding Shoveler, Quail and Whinchat.

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 Clooniff Bog (i.e. within 3km) The closest Ramsar Sites to Clooniff Bog include Mongan Bog and Clara Bog.

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

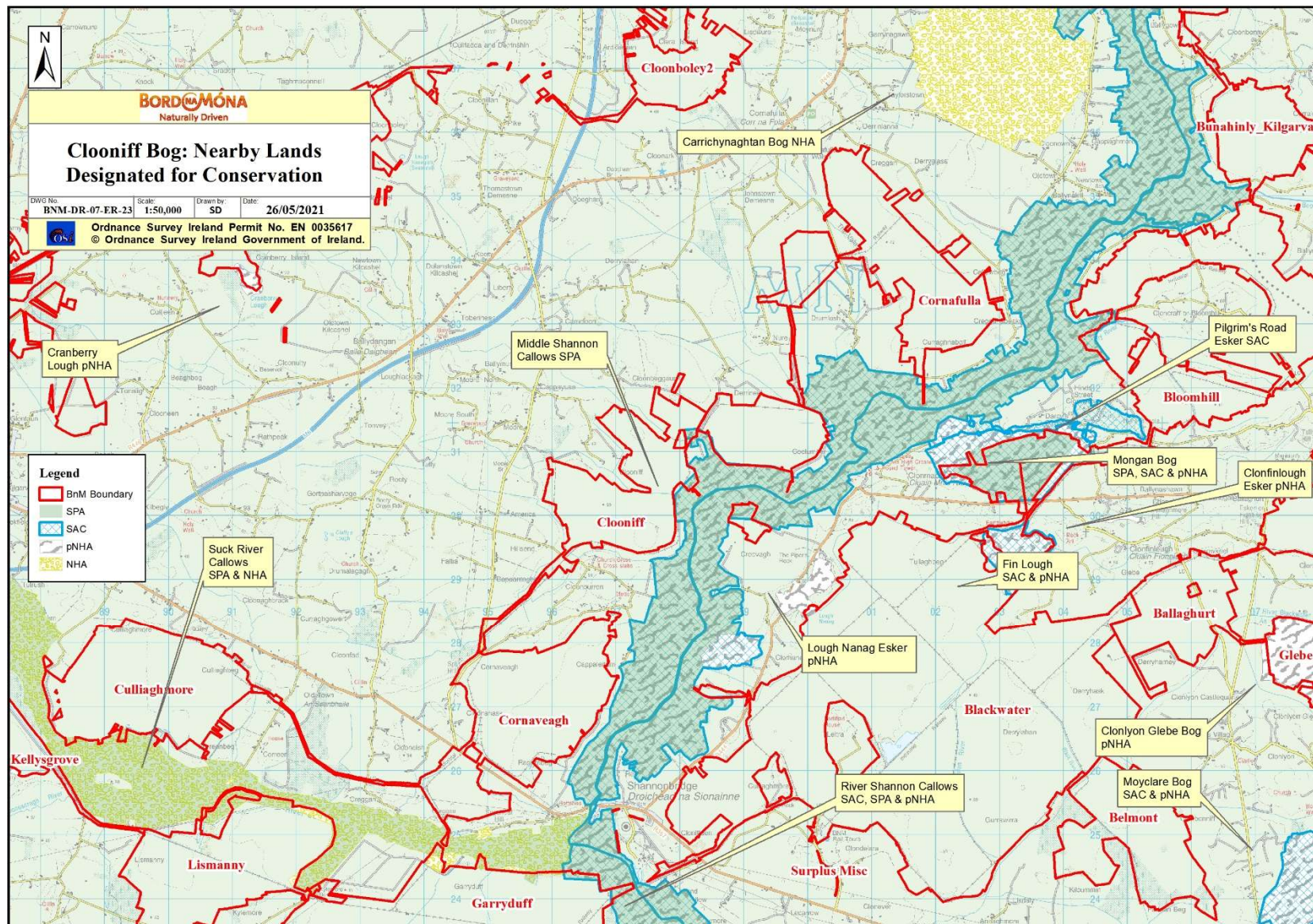


Figure 3.5 Location of Clooniff in context to other Bord na Móna bogs and designated lands in the surrounding area.

3.5 Hydrology and Hydrogeology

Clooniff Bog is located in the Upper River Shannon catchment. The majority of the bog is drained by four watercourses that flow west to east in the vicinity of the bog. To the south, the southern side of the southern bog sub-site drains into the Rooty (and subsequently the Hillsend) streams; between the southern and central section, the bog drains in to the Moore North stream and the central and two northern bog sections drain in to the Ballydangan stream which flows between the north-west and central bog sub-sections and to the south-west of Coolumber Bog. Coolumber Bog also drains directly into the River Shannon. There is another watercourse on the northern edge of Coolumber Bog, the Derinneel stream, but this does not appear to be linked to any of the drainage systems on this bog. All the streams flow into the River Shannon.

Clooniff Bog currently has a pumped drainage regime. It is expected that when pumping is reduced or stopped that water levels will increase across a significant portion of the site. Initial hydrological modelling indicates that the 4 sub-sites all have basins that will develop a mosaic of wetland habitats when pumping is reduced or stopped. Coolumber Bog is expected to revert to a mosaic of wetland habitat with deeper water (> 2 m).

Six silt ponds are present at the edges of the various bog sub-sections where they drain in to the respective watercourses:

- On the southern edge of the southern section where it drains in to the Rooty stream;
- On the northern edge of the southern section and southern and western edge of the central section where they drain into the Moore North stream;
- On the northern edge of the central section, southern edge of the north-western section and south-west corner of Coolumber Bog where they drain in to the Ballydangan stream; and
- On the southern edge of Coolumber Bog where it drains in to the River Shannon.

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). This data gives 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 largely located in an area mapped by GSI as of low groundwater vulnerability, although parts of the periphery of Clooniff are mapped as being of moderate 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, although care must be taken if working at the site periphery.

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. The bog water table across the site is expected to be

high when bog drains are locked, 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. As such the potential for bog restoration to interact or impact on underlying groundwater is very low.

3.6 Emissions to surface-water and water-courses

3.6.1 Clooniff Bog Drainage

Clooniff bog surface water outlets discharge to the Upper Shannon water body IE_SH_26 S021800, via a number of feeder streams, including the Hillsend, Ballydangan and Moore streams, and also direct to the Shannon.

Peat extraction was identified as pressure in the second cycle of the river basin management plan in some of these feeder stream, but are not indicated as remaining so in the third cycle, currently under preparation, however the main receiving water body, the Shannon upper 120, is highlighted 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 Fig 3.8.

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 4.27mg/l and COD 100mg/l.

Initial monthly ammonia concentrations from November 2020 to August 2021 have a range of 0.0212 to 2.33mg/l with an average of 0.414mg/l.

Suspended solids monitoring for the same period ranges from 1 to 27mg/l with an average of 5.107mg/l.

From an analysis of any monitoring over the past 3 yrs. of the IPC licence environmental monitoring of some of the discharges from this bog, indicate that results were under the ELV for SS and trigger level for ammonia. In some incidents, there have been COD results of above 100 mg/l, more related to natural sub-soil/surface water interactions.

Bog	SW	Monitoring	pH	SS mg/l	TS mg/l	Ammonia mg/l	TP mg/l	COD mg/l	Colour
Clooniff	SW-58	Q1 19	6.5	12	222	<0.02	0.11	138	264
Clooniff	SW-54	Q2 19	6.2	<5	150	<0.02	0.06	57	353
Clooniff	SW-54	Q1 18	6.2	5	136	0.56	0.05	79	253
Clooniff	SW-54	Q1 17	6.5	5	106	0.43	0.05	89	279
Clooniff	SW-58	Q1 17	6.7	5	70	0.07	0.05	65	285
Clooniff	SW-51	Q2 17	7.4	17	174	2.5	0.05	110	252
Clooniff	SW-52	Q2 17	7.4	10	230	1.2	0.05	106	191
Clooniff	SW-53	Q2 17	7.1	5	130	0.02	0.05	97	359
Clooniff	SW-57	Q2 17	8.5	35	196	0.04	0.05	93	96
Clooniff	SW-61	Q2 17	7.9	5	336	0.06	0.05	33	64

Table 3.1. Water quality data at Clooniff Bog.

3.6.2 *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 Moña 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 appendix x

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 bog's 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 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 & 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.

3.6.3 *Success criteria:*

The key water quality success criteria associated with this enhanced rehabilitation are as follow:

- That there is a stabilizing/improving concentration of suspended solids and ammonia in discharges from Bord na Moña 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 Longfordpass bog in Littleton over 3 yrs., post cessation of peat extraction with ongoing rehabilitation, were considered. These are indicating a downward trend in Ammonia concentrations.

Similarly monitoring of surface water ammonia emissions from a Corlea bog in Mountdillon over the past 3 yrs. post cessation of peat extraction with ongoing rehabilitation, indicate downward trends.

As the monthly monitoring program at Cloniff 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.

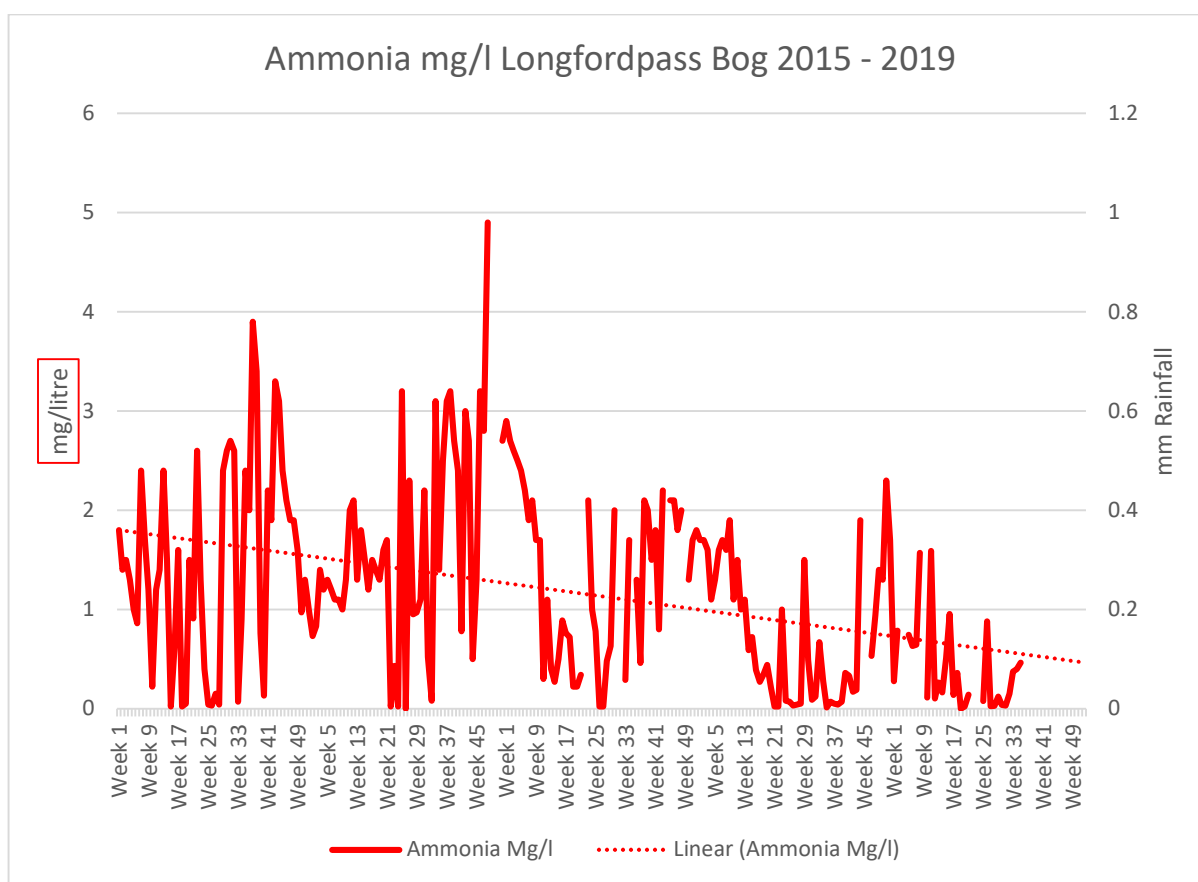
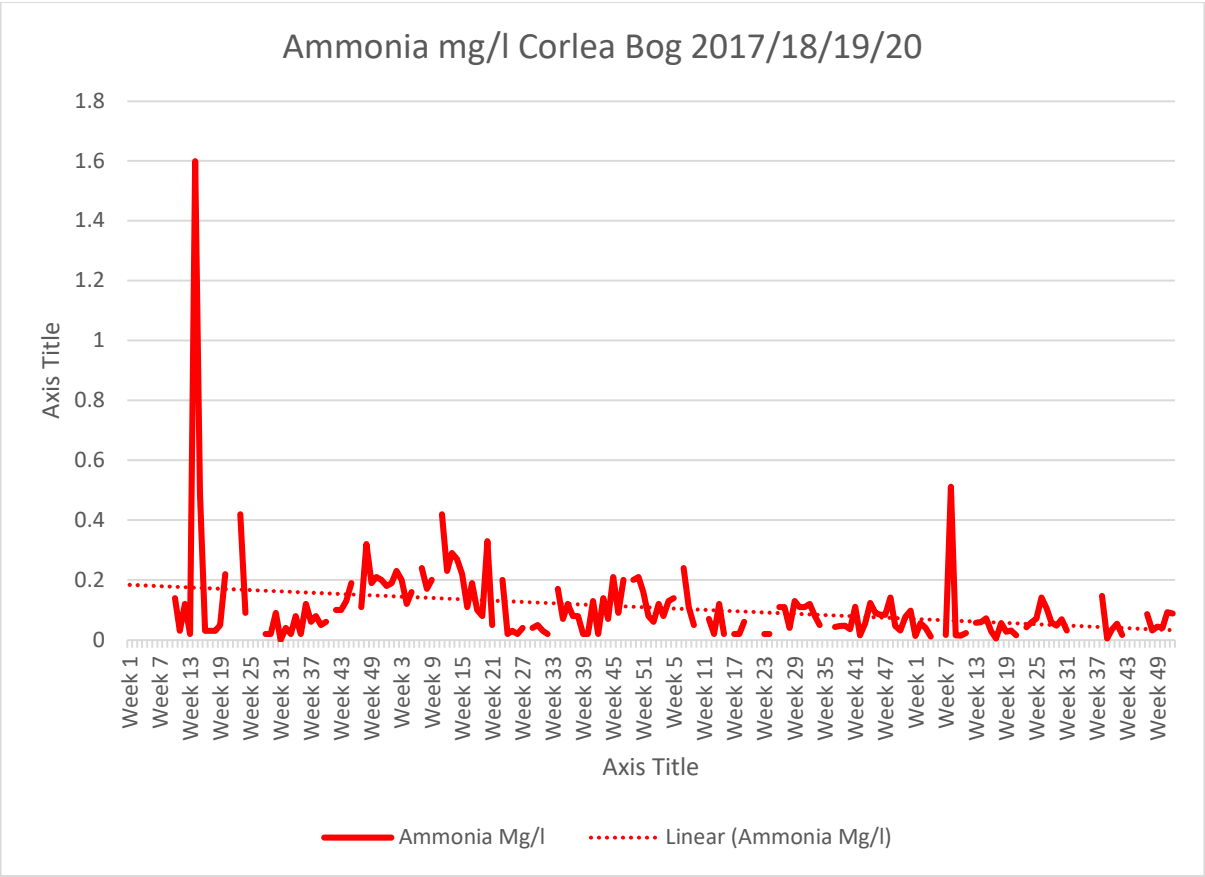


Figure 3.6 Ammonia emissions graph for Longfordpass Bog 2015 – 2019

As the monthly monitoring program at Cloniff 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.



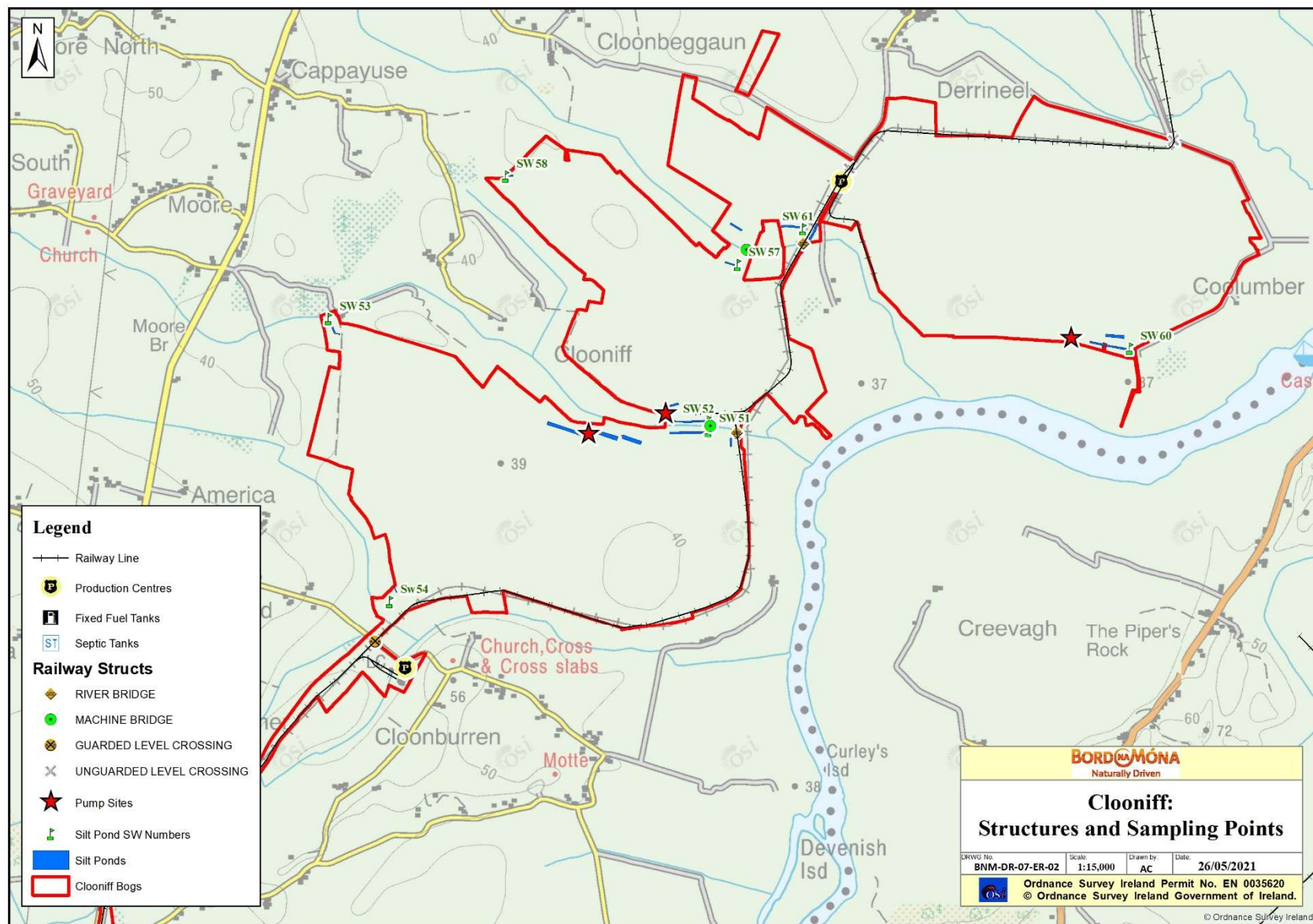


Figure 3.7 Map of Clooniff Bog showing structures and designated emission points

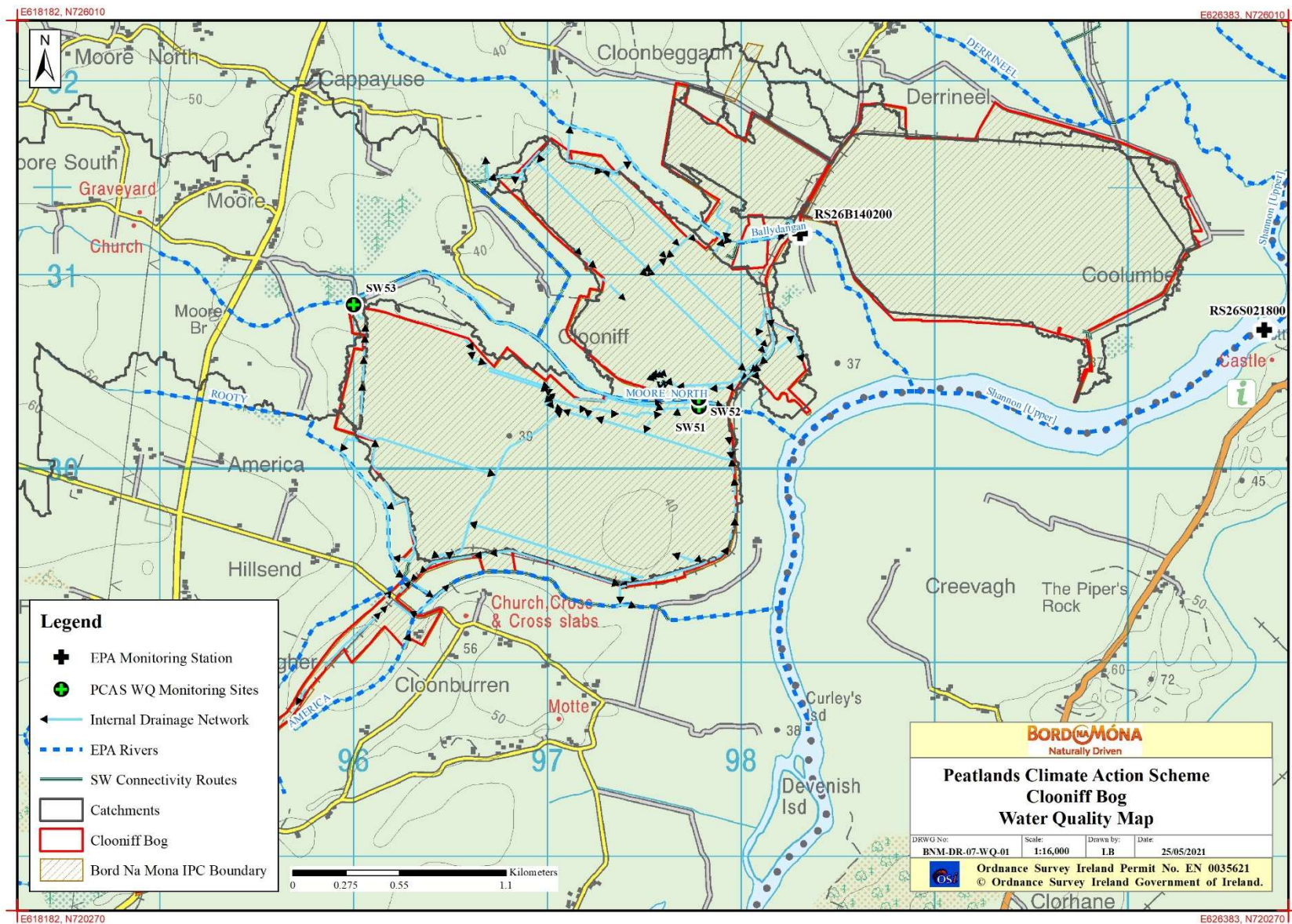


Figure 3.8a Map of Clooniff Bog showing water management features and water quality monitoring points.

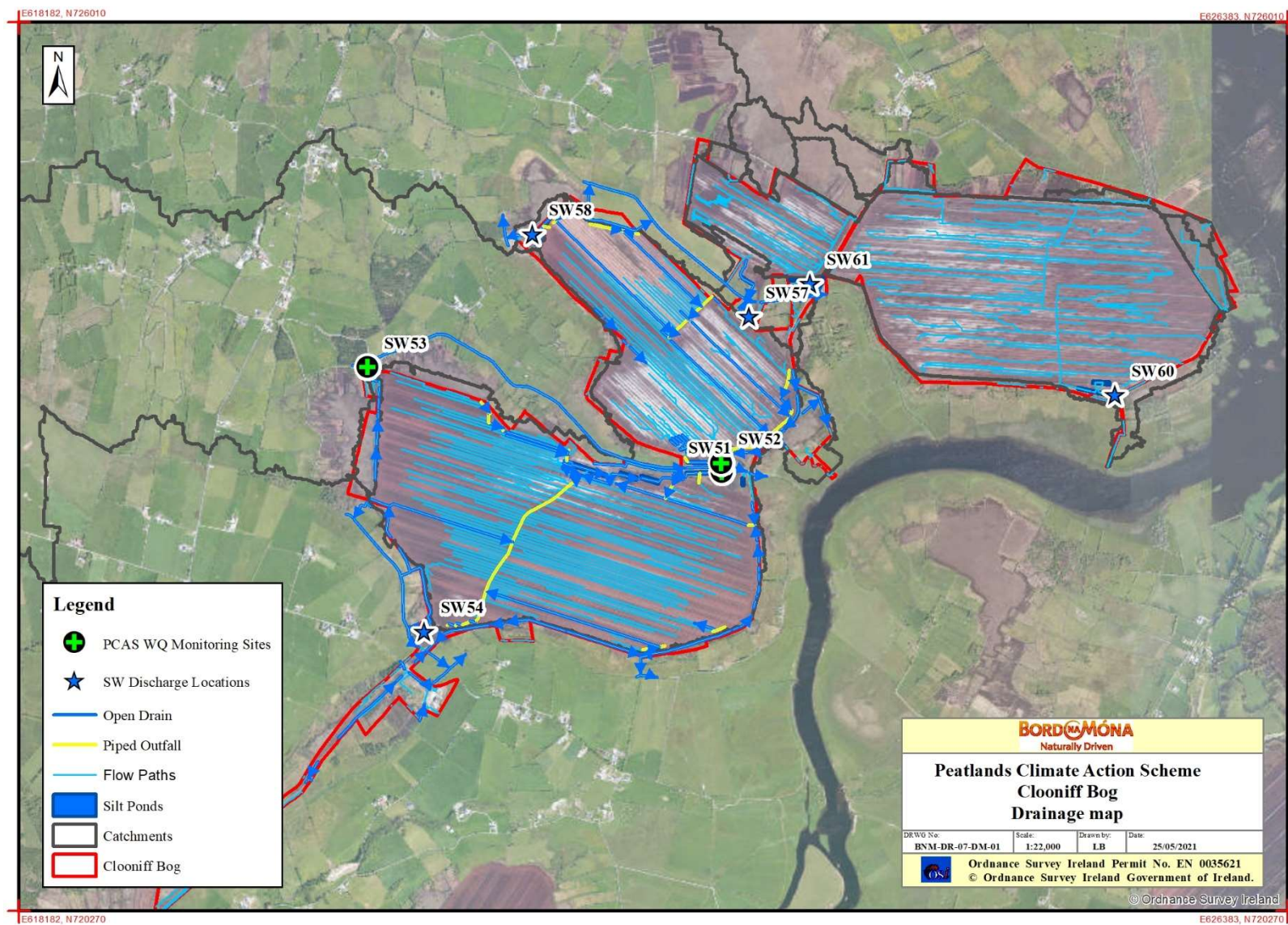


Figure 3.8b Map of Clooniff Bog showing general drainage

3.7 Fugitive Emissions to air

The 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

The bog is likely to be a carbon source as it is a drained (degraded) peatland with currently active drainage, which facilitates the oxidation of peat. Peat extraction generally transforms a natural raised bog 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 Clooniff Bog can become a reduced carbon source with sections having potential to develop as a carbon sink (albeit in the longer term) following rehabilitation. The potential of any cutaway site to develop as a reduced carbon source/carbon sink in the longer-term depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich or other peat-forming habitats, the balance of carbon fluxes from different cutaway habitats and future climatic conditions. This site is expected to develop a mosaic of fen, Reed swamp, wet woodland, scrub. 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 **International** to **Local Importance (lower value)**. The site partially overlaps with the River Shannon Callows SAC & pNHA (NPWS site code: 000216) and the Middle Shannon Callows SPA (NPWS site code: 004096) and this area is deemed to be of **International Importance**.

The majority of the site is rated as **Local importance (lower value)** due to the dominance of bare peat associated with peat extraction operations. Cutaway habitats are generally poorly developed, as are marginal remnant habitats, which have a somewhat higher value and assigned a rating **Local importance (higher value)**. Coolumber Bog is rated as being of **county importance** due to the wetland habitats that have developed there and the species that have been recorded, including breeding waders.

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 habitats such as fen and Reed swamp.

3.10 Clooniff Bog Characterisation Summary

Clooniff Bog is located approximately 4Km to the north of Shannonbridge in Co. Roscommon, on the western banks of the River Shannon. Peat production at Clooniff Bog commenced in the 1970's, with all commercial peat extraction ceasing in 2019. Peat depths vary across the site with part of the site is considered a deep residual peat (>2m depths).

The bog can be broadly divided into three main categories: (1) deep residual peat, (2) shallow cutaway bog prone to winter flooding, (3) marginal and other dry areas of the former production area. (The bog is developed into these three areas to assist rehab planning. In reality, there are natural transitions between these areas where there are ecological and environmental gradients in relation to residual peat, etc.). These are summarised further as follows.

- (1) A significant part of the former production area is residual deep peat. Ground-water is unlikely to have a significant influence on the development of vegetation. If this peat can be re-wetted, and a stable water level developed close to the peat surface, it is expected to develop an embryonic *Sphagnum*-rich vegetation. The topography of this area is variable. Some of this area is modelled as wet and should be relatively straight-forward to re-wet once drains are blocked. Some of this area is modelled as dry and more intensive deep peat measures with bunding, re-profiling and cell berms are proposed to optimise hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation.
- (2) The cutaway bog prone to winter flooding is located on the eastern side of the bog, adjacent to the River Shannon. This area is expected to develop into wetland habitat. In some parts of the site, deeper water wetlands will develop due to local topography and hydrology. However, where possible Rehabilitation measures are proposed to block drains to manage summer water-levels and create a shallow wetland with emergent vegetation.
- (3) Some parts of the former production area will be relatively dry. This includes headlands and high fields. Some separate areas of higher ground have also been identified throughout the site, where there is limited potential to significantly re-wet residual peat. Drain-blocking and some fertiliser application is proposed. Birch woodland and other drier habitats are expected to develop.

4. CONSULTATION

4.1 Consultation to date

Consultation seeks 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.

There has been ongoing consultation about rehabilitation, biodiversity and other general issues over the years about Blackwater group bogs including Clooniff Bog with various stakeholders in relation to:

- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Archaeological Liaison Committee (National Museum of Ireland & Dept. of Culture Heritage and the Gaeltacht).
- There has been ongoing engagement with NPWS regarding issues at Cloonascragh Fen and Blackwood pNHA.
- The old Ballinasloe Canal is also being considered as one of the route options of the proposed Galway-Athlone greenway and Bord na Móna has been in high-level consultation with the relevant bodies regarding the potential development of a greenway on the existing track adjacent to the canal.
- Local community walking group in relation to the amenity use of the site.

To inform the current Plan, both national and local stakeholders, including neighbours whose land adjoins Clooniff 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 Clooniff Bog (see Appendix XI).

In addition, provision for consultation with local residents and landowners in general (including any with turbary rights) has been facilitated by the distribution of letters to all houses within 1km of the boundary of Clooniff Bog. These letters included information about PCAS as well as contact details for further information. An advertisement about PCAS was also printed in the Connaught Tribune and Galway Advertiser in January 2021 (both area local newspapers that covers the Clooniff Bog area).

Further to the above, telephone correspondence was undertaken as either follow up to submissions received, or to instigate consultation. All correspondence received has been acknowledged and evaluated against the rehabilitation work proposed here; these are also summarised in Appendix XI.

4.2 Issues raised by Consultees

To date, a number of issues have been raised by consultees during the consultation process for the current draft of the rehabilitation plan for Clooniff Bog – these are summarised below.

4.2.1 Assessments of rehabilitation

Queries on rehabilitation assessments were raised by NPWS and the National Museum of Ireland in relation to Appropriate Assessment, Environmental Impact Assessment and Strategic Environmental Assessment. The various stakeholders were keen to see these documents were made available for public view.

4.2.2 Restoration scope

Stakeholders including; The Ballydangan Red Grouse Project, Moore Game and Conservation Club and IPCC were keen to see the rehabilitation plan aligned with amenity and after-use of the Clooniff Bog. Restoration/rehabilitation of marginal habitats was raised by BCI as worthy of consideration within the rehabilitation measures to support biodiversity objectives.

4.2.3 Monitoring

Further details on monitoring of ecological metrics, and how and where reporting on this monitoring would take place, was raised in the IPCC submission. Butterfly Conservation Ireland also suggested that monitoring of Large Heath butterfly be considered to assess the success of the proposed rehabilitation actions.

4.2.4 Flooding

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

4.2.5 Turf cutting

Butterfly Conservation Ireland commented that ongoing turf cutting on the margins of the bog (within and outside of the area owned by Bord na Móna) needed to be addressed to maximise the benefits of the rehabilitation work being proposed.

4.2.6 Other issues

Amenity interests and opportunities associated with Clooniff Bog were raised by a number of consultees, including IPCC, Ballydangan Red Grouse Project and Moore Game and Conservation Club.

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

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

Appropriate Assessment (AA) screening will be undertaken on all the bogs as part of PCAS and this is currently being undertaken by external consultants for Clooniff 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) has been 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. 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 (NMI) and National Monuments Unit (NMU) is not part of the current scope of the scheme. Bord na Móna would be happy to assist such a survey, where possible.

NMU have commenced monitoring of a selected number of bogs in this year's programme to identify any unknown archaeology that might arise and to monitor existing protection measures around known archaeology as identified in the AIA.

4.3.2 Restoration scope

As part of the PCAS, all restoration/rehabilitation options have been developed to support climate action and biodiversity objectives. The restoration at Clooniff Bog will enable and support any further amenity development by improving overall environmental and ecological conditions.

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 Clooniff 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 Clooniff Bog. Note that while Large Heath butterfly, a species of high ecological interest has not been recorded on site, there is a strong likelihood that this species is still present as it has been recorded on other Bord na Móna bogs in similar condition in the recent past.

4.3.4 Flooding

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. Where it is deemed that blocking of a shared drain would cause any adjoining lands to flood, this will be avoided and alterations made to the rehabilitation plan. In general, drains around the margins of the bog will not be blocked.

External consultants have been appointed to carry a hydrological assessment to identify any potential impacts to neighbouring lands and to mitigate against any such impacts.

The rehabilitation measures proposed at Clooniff Bog will generally result in reduced runoff and drainage from the existing drains through drain blocking. It is intended that these measures will not significantly alter the existing topographical catchments and that the spine of the drainage networks, those which the upstream catchments drain through, 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 Turf cutting

Those with existing, private turbary rights to cut turf for domestic fuel will be allowed to continue to cut turf as before. As noted above in relation to flooding, any re-wetting of Clooniff Bog will be designed to not impact on existing turf cutting.

4.3.7 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.

Species specific conservation plans and habitat management, as suggested by some stakeholders e.g. IPCC and BRGP have the potential to play a valuable role in achieving important conservation goals. However, while it is envisioned that PCAS will promote biodiversity and conservation of some species through habitat generation, species specific conservation plans are beyond the scope of PCAS.

Amenity such as those suggested or proposed by several consultees can be positively aligned and integrated to after-use plans following the completion of the proposed rehabilitation at Clooniff Bog. Rehabilitation measures proposed for Clooniff Bog do not need to be amended to integrate any currently foreseeable future amenity proposal.

Given the proximity of our peatlands to the Shannon basin, Bord na Móna are positioned to make significant contributions to future amenity and associated green infrastructure initiatives, not least the proposed Dublin to Galway Greenway.

Other issues, including after-use and management issues outside the boundary of Clooniff Bog, are acknowledged but are specifically outside the scope of this rehabilitation plan.

4.3.8 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, rights of way, or turf-banks.

- No changes were required to the rehabilitation plan to enable any potential future amenity.

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 deep peat, and eventually naturally functioning and 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 Clooniff 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, making the overall bog wetter. 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 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 contributory sources of impacts (private peat extraction and Bord na Mona).

- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Kilmacshane) in 2021. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the Philipstown 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 plan is to rehabilitate the bog. This is defined by:

- The area of Clooniff Bog (Figure 3.1).
- EPA IPC Licence - Ref. P0502-01. 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. Clooniff bog is part of the Blackwater Bog group.
- The proposed rehabilitation is designed to exceed the requirements as defined by the IPC Licence. PCAS is designed to enhance the ecosystem services of Clooniff Bog, in particular, optimising **climate action benefits**. The proposed improvements 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 Clooniff Bog identify wetland creation and deep peat re-wetting as the most suitable rehabilitation approach for 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 Clooniff Bog **environmental stabilisation** and **optimising 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 Clooniff Bog will support multiple national strategies of climate action, biodiversity action and other key environmental strategies such as 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.
- No direct rehabilitation measures will be carried out in the small proportion of the margin of Clooniff Bog that overlaps with the protected European sites.

6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, much of the peat mass has been removed at many sites, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland). At Clooniff Bog, only a certain proportion of peat has been removed leaving a largely un-vegetated surface over deep peat deposits. There are local factors that will influence the future trajectory of this site, which need to be considered as part of the wider rehabilitation.
- **Potential Future Land-use.** Potential future uses must undergo the appropriate consenting and development process as required. Any future use at Clooniff Bog would be considered by Bord na Móna in the context of the land bank status. In the event that Bord na Móna make the decision to support any proposed project, it is likely that the rehabilitation measures proposed in this plan will be compatible with the any potential future development of a peatlands park that has key objectives of amenity and biodiversity. Amenity could be integrated with the post-rehabilitated peatland landscape.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care will be taken that no active rehabilitation management

is carried out that could negatively and knowingly impact on surrounding land. This includes the hydrology of neighbouring farmland, neighbouring turbary, as well as potential changes to the hydrology of surrounding designed sites. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land. In general, marginal drains will **not be blocked**.

- **Public Rights of Way.** Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remain intact, where possible. In some instances, depending upon previous land uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. If this occurs, rehabilitation measures will be reviewed and adapted. An archaeological impact assessment of the proposed rehabilitation at Clooniff has been carried out. Rehabilitation around archaeology will be avoided, minimised or amended (peat barriers located to avoid damage to any archaeological features) in response to the AIA (Figure 8.5, Appendix XII).

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 Clooniff 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 Clooniff 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 key criteria/targets will be used to mark the achievement of the rehabilitation goals and outcomes and validate the completion of the rehabilitation.

The key objective of this 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 potential emissions.

In addition, Bord na Móna wish to optimise climate action and other ecosystem service benefits via enhanced rehabilitation measures. This will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other benefits particularly for climate action will be accrued.

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 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 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.
- 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.

(See Table 7.1 for a summary of the criteria for successful rehabilitation and associated monitoring.)

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.

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

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, pH and conductivity	Stabilization Improvement of key water quality parameters	Water quality monitoring. Started in advance of the proposed rehabilitation.	2021-2023
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	EPA WFD monitoring programme Additional BnM water quality monitoring	WFD schedule

		trajectory in the pressure from this peatland		
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 Pollinators – Pollinator walk 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.	2021-2024

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 effective 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 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 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 (Figure 8.3 & 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 Clooniff 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;
- In some areas, a cut-and-fill cell bunding technique is proposed. The cut and fill cell bunding approach aims to create 'saucers' or flat bunded areas (cells) on peat with berms to hold shallow water at appropriate levels;
- Re-wetting some deep peat areas of the bog through regular field drain blocking using a dozer to create three peat barriers every 100 m along each field drain;
- Re-assessment of the pumping regime and turning off pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a significant part of the site will develop a mosaic of wetland habitats with deeper water, when pumping is reduced or stopped. Additional hydrological modelling and hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the variable topography). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. It is expected that a natural seasonal flooding regime will develop, with water-levels fluctuating in association with levels in the adjacent River Shannon and Callows.
- Re-alignment of piped drainage;
- Blocking drains in targeted marginal (degraded) high bog area and re-wetting, where possible, using an excavator to install peat barriers. Some bog remnants are too small to benefit from this approach;
- Targeted fertiliser applications to accelerate vegetation establishment on headlands and high fields. (It is noted that the application of fertiliser may need additional assessment and approval as per the IPC Licence),
- Seeding of vegetation and inoculation of *Sphagnum* in suitable areas; and
- Seeding of vegetation in Coolumber Bog is not required as this bog has already undergone significant natural colonisation and the development of pioneer habitats is already significantly progressed.
- 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).

Table 8.1: *Types of and areas for enhanced rehabilitation measures at Clooniff 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.*

Type	Code	Enhanced Rehabilitation Measure	Extent (Ha)
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	
Dry cutaway	DCT2	Regular drain blocking (max 3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	46.74
Dry cutaway	DCT3	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows + targeted fertiliser treatment	
Deep peat cutaway	DPT2	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows	
Deep peat cutaway	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows	71.28
Deep peat cutaway	DPT4	Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows + drainage channels for excess water + <i>Sphagnum</i> inoculation	33.31
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	
Wetland	WLT2	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	
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	209.26
Wetland	WLT4	More intensive drain blocking (max 7/100 m), + blocking outfalls and managing overflows + transplanting Reeds and other rhizomes	71.21
Marginal land	MLT1	No work required (Marginal land)	70.4
Marginal Land	MLT2	More Intensive drain blocking (max 7/100)	5.3
Constrained areas		Rehabilitation aligned to constraints	16.74
Silt ponds		Silt ponds	3.9
Total			528.14

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

- Seek formal approval of the enhanced plan, noting the alternative adapted standard plan should funding from the proposed Scheme not materialise, 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 Scheme PCAS) will be applied to Clooniff Bog. This will take account of peat depths, topography, drainage and hydrological modelling. (See map for an indicative view of the application of different rehabilitation methodologies);
- A hydrology and drainage management assessment of the proposed enhanced rehabilitation measures was carried out. Issues identified have been integrated into the rehabilitation plan to prevent unintended impacts to adjacent land.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation was carried out. Any results of this assessment have been incorporated into the rehabilitation plan to minimise any archaeological disturbance on any known archaeology, where possible.
- A review of issues that may constrain rehabilitation such as known rights of way, turbary, and existing land agreements was carried out and incorporated in the rehabilitation plan, where required.
- A review of remaining milled peat stocks was carried out. It is expected that all peat stocks will eventually be removed before rehabilitation measures at the site are completed.
- An ecological appraisal of the potential impacts of the planned rehabilitation such as the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) or larval webs of Marsh Fritillary butterfly, etc was carried out. The scheduling of rehabilitation operations was adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- An Appropriate Assessment of the Rehabilitation Plan was carried out. (Note that an AA screening of Clooniff and a subsequent NIS of the rehab plan was carried out).
- See Clooniff Decommissioning and Rehabilitation Plan – Addendum 1 for more details of the NIS conclusion and specific NIS mitigation measures relating to water quality.
- 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 and cell-bunding. All rehabilitation will be carried out with regard to best practice 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 seeding of targeted vegetation and inoculation of *Sphagnum*;
- Silt ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent potential 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 allocated to the site based on the area of different types of cutaway across the site (See Appendix I).



Figure 8.1. Aerial photo of Clooniff Bog. The majority of the bog is bare peat. The northern bog (Coolumber) has already re-wetted and water levels reflect winter conditions.

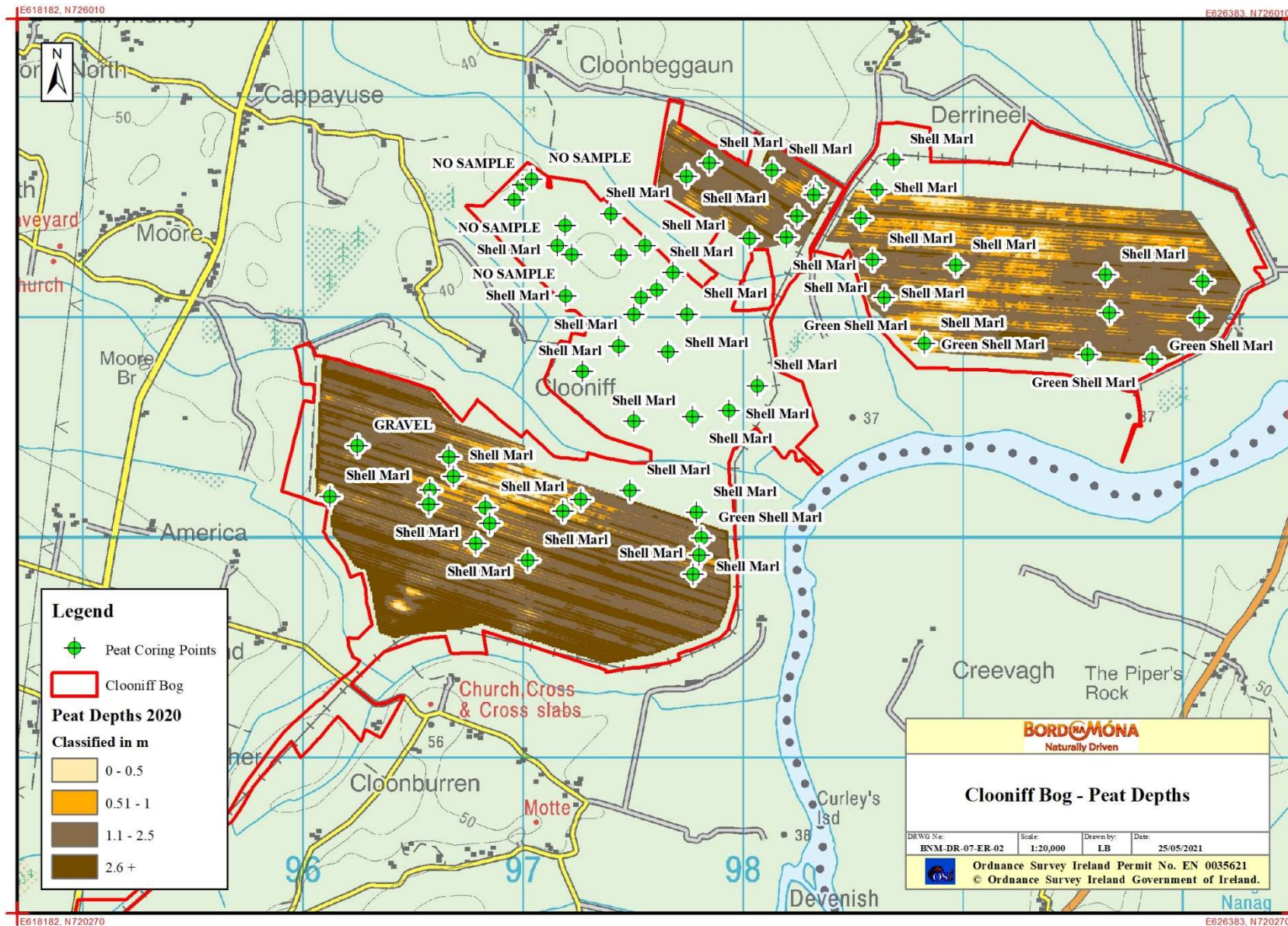


Figure 8.2. Peat depth map for Clooniff Bog. The bog has a mosaic of different peat depths. Peat depth data is not available for the central section.

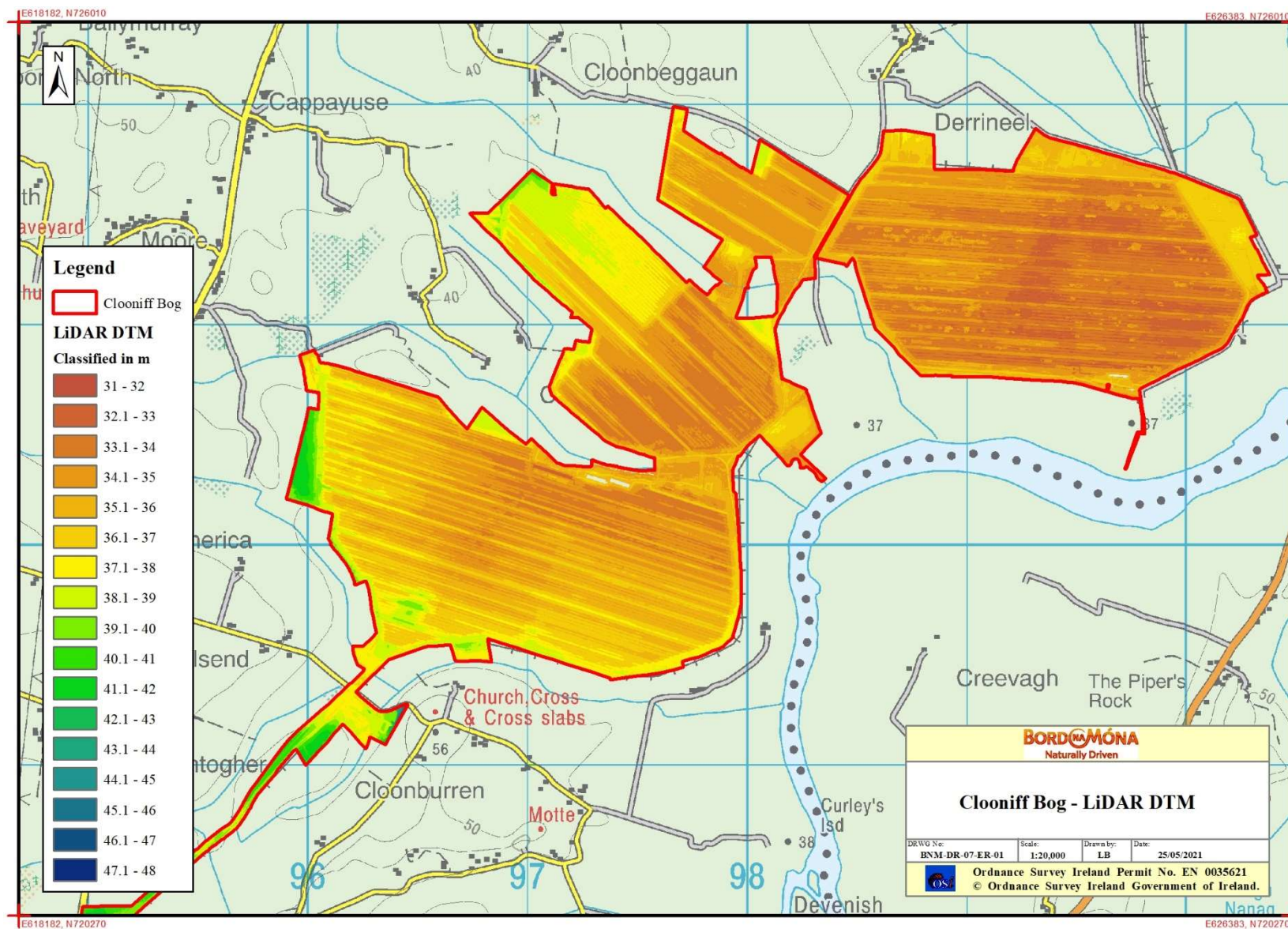


Figure 8.3. LIDAR topography map of Clooniff Bog. Low areas and basins are orange-yellow, more elevated areas are blue-green.

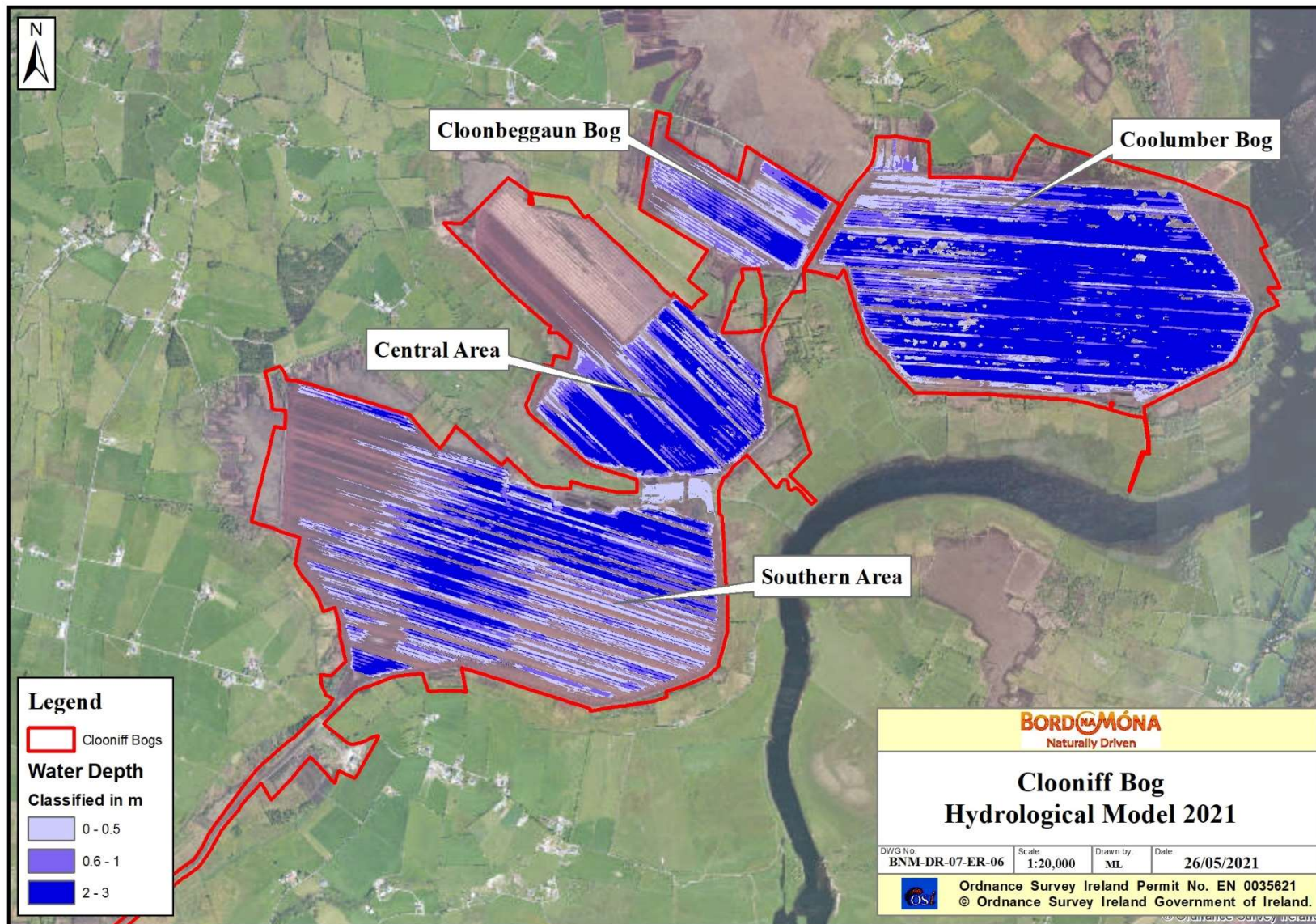


Figure 8.4. Hydrological modelling for Clooniff Bog showing range of expected water depths based on current topography and key flow-paths.

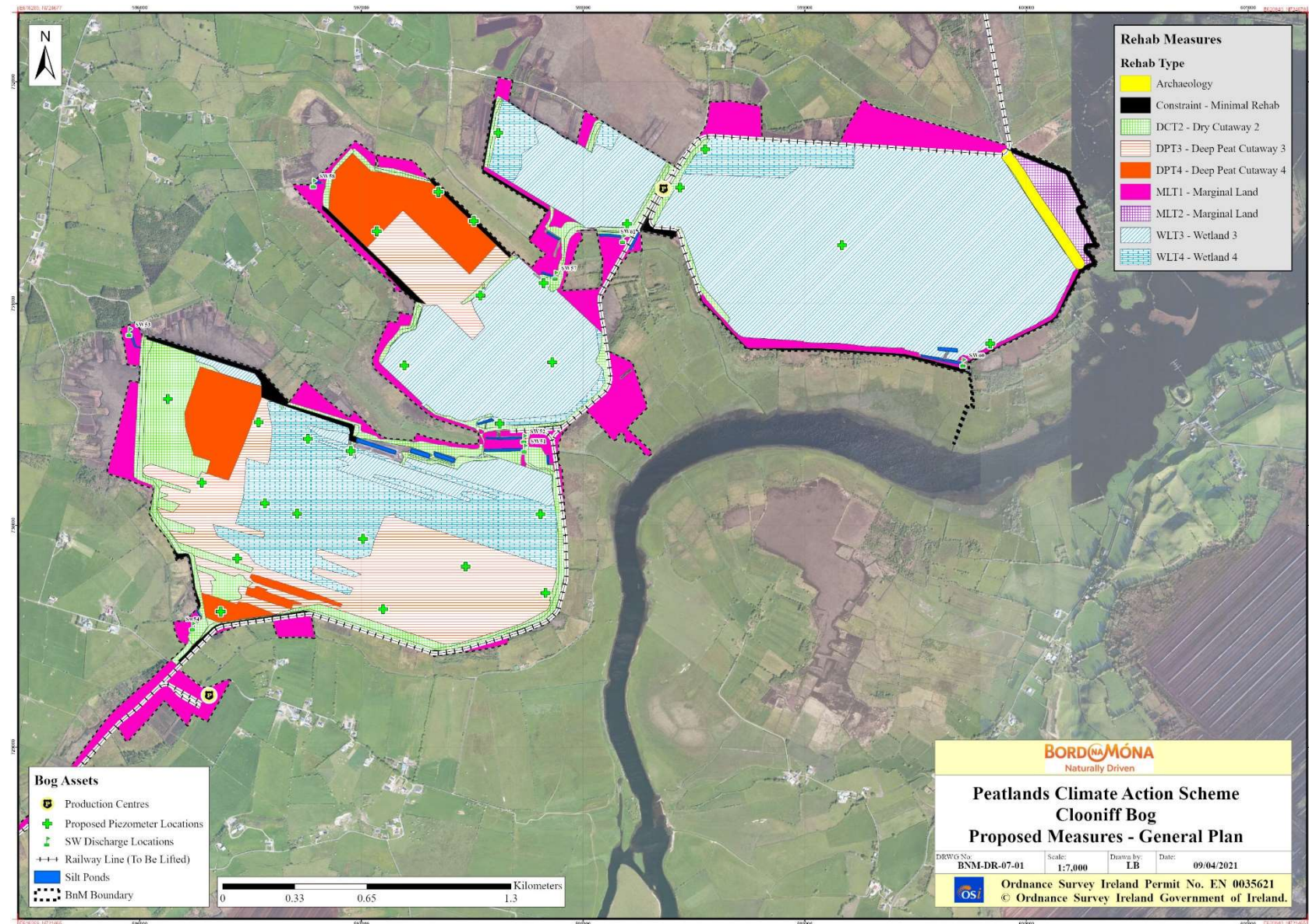


Figure 8.5. Indicative Enhanced Rehabilitation Plan for Clooniff Bog. *Note that the types of rehab and areas of rehab may change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.*

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. The extent of bare peat will be assessed using this baseline data, and habitat maps will be updated.
- **Water quality monitoring** at the bog will be established. This will start in advance of the proposed rehabilitation. 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 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 targets for successful rehabilitation are being achieved and critical success factors are being met, then the 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 targets for successful rehabilitation have **not** been achieved and critical success factors 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, 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 potential GHG emissions can be estimated from the site, 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 (Bee and Butterfly). To be 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 critical success factors 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:

- The area of Clooniff Bog (Figure 3.1).
- EPA IPC Licence - Ref. Ref. P0502-01. 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. Clooniff bog is part of the Blackwater Bog group.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- To minimise potential impacts on neighbouring land. Some boundary drains around Clooniff Bog will be left unblocked as blocking boundary drains could affect adjacent land.

Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Clooniff Bog is environmental stabilisation of the site via wetland creation and deep 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 habitats.

Criteria for successful rehabilitation:

- Rewetting of deep peat and shallow cutaway 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 targets

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat blockages and re-wetting). This will be demonstrated by a post rehab aerial survey.
- Stabilising potential emissions from the site (silt run-off). 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. This will be demonstrated by water quality monitoring results.

Rehabilitation measures: (see Figure Ap-1)

- Blocking field drains in the former industrial production area using a dozer to create regular peat blockages (three barriers per 100 m) along each field drain;
- Re-alignment of piped drainage.
- Realignment of gravity outfalls.
- Fertiliser treatment of high fields and headlands (typically slow to naturally re-colonise) to encourage natural colonisation.
- No measures are planned for the surrounding marginal peatland habitats.
- 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.
- 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 needed. 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, if necessary.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Deep peat cutaway	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	104.59
Dry Cutaway	DCT1	Limited drain blocking, blocking outfalls and managing water levels with overflow pipes	46.74
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	280.47
Marginal land	MLT1	No work required	75.7
Silt ponds		Silt-ponds	3.9
Constraint		Constrained areas	16.74
Total			528.14

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, assess 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.
- 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; and
- The site has been environmentally stabilised.

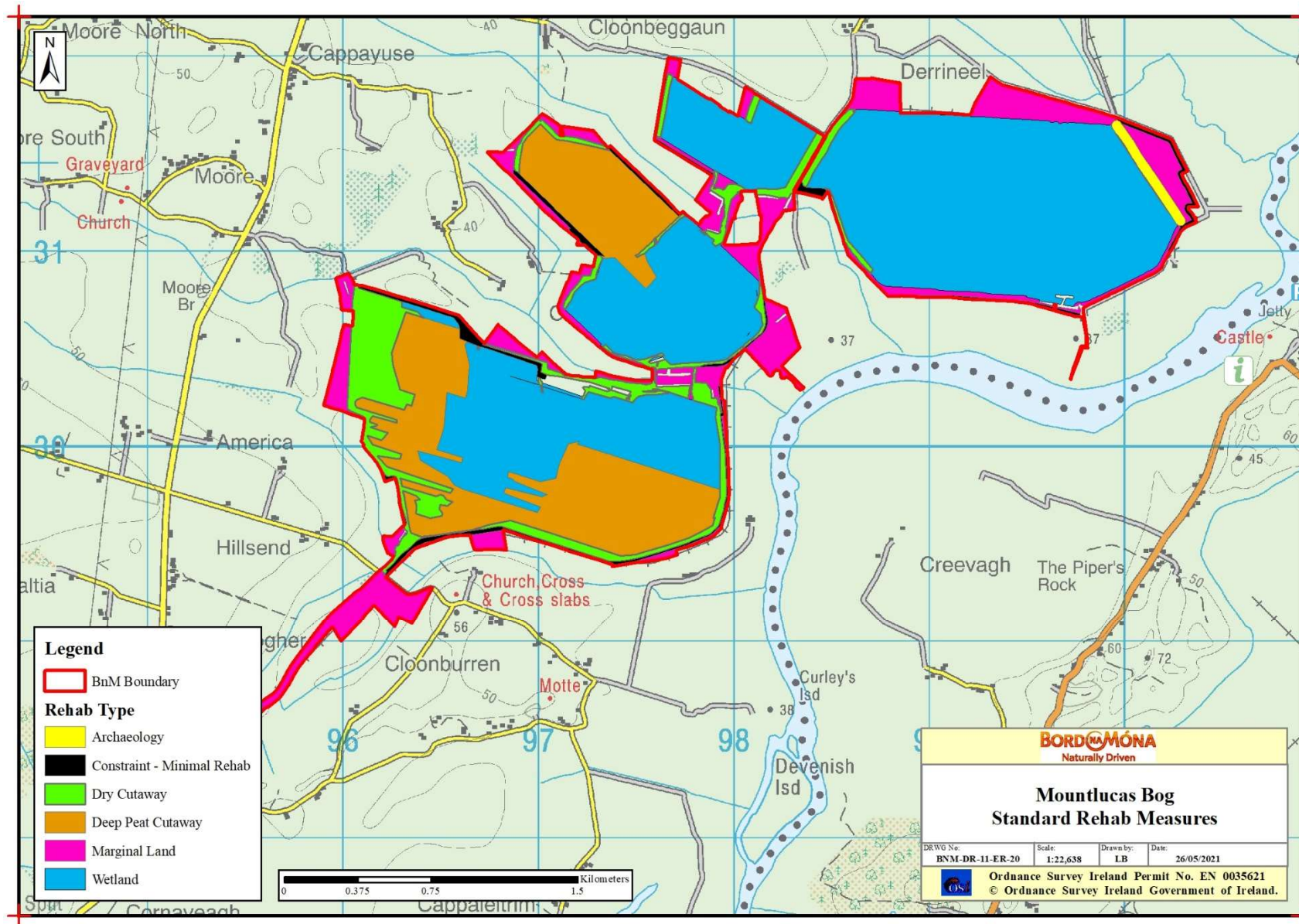


Figure Ap-1. Indicative adapted standard rehabilitation plan for Clooniff Bog.

APPENDIX II: BOG GROUP CONTEXT

The Blackwater Bog Group IPC Licensed area is made up of three sub-groups (Attymon, Blackwater and Derryfadda) and have been in industrial peat production for several decades. The majority of sites are situated alongside the Shannon and Suck Rivers within counties Roscommon, Galway, Westmeath and Offaly and cover an overall area of 15,515 ha. Each bog area further comprises a range of habitats from bare milled peat production areas to re-colonising cutaway to workshops areas and transport infrastructure. Industrial peat extraction from these sites mainly supplied ESB power stations at Shannonbridge (WOP) and Lanesborough (LRP).

Industrial peat extraction in the Blackwater Bog Group has permanently ceased on the majority of sites. It is planned to supply remaining milled peat stocks to Shannonbridge (WOP) and Lanesborough (LRP) during 2020. Both power stations will cease using peat by the end of 2020. Decommissioning and rehabilitation for the Blackwater Bog Group is expected to start in 2020/2021.

A number (6) of bogs were initially drained but have never been used for industrial peat production (three former development bogs (Kellysgrove, Tirrur-Derrymore and Newtown-Loughgore), Clonboley, Killeglan and Derrydoo-Woodlough). The latter three bogs are classed as restored raised bogs, still contain active bog habitat (that qualifies as the Annex I EU Habitats Directive habitat) and now form the core of the Bord na Móna Raised Bog Restoration Project due to their high biodiversity value and bog restoration potential. NPWS have identified the Clonboley bog cluster as having high ecological value within the recent assessment of raised bog SACs, NHAs and non-designated sites (NPWS 2014²).

Several sections of Tirrur-Derrymore bog have been leased to NPWS for domestic turf cutting as part of the SAC turf-cutting compensation scheme. Turf-cutters from neighbouring SACs have been relocated to this site by NPWS. Several other bogs are being assessed for similar use.

The depth of remnant peat within Blackwater bog units will have a very significant impact on the development of these sites, with deeper peat (Derryfadda milled peat production bogs) having potential for the establishment of embryonic peat-forming (*Sphagnum*-rich) vegetation communities. Milled peat cutaway (such as at Blackwater) develops in a somewhat different way as in places the underlying gravel is exposed, there is significant alkaline influence on the water chemistry and in many of these cutaway bogs will develop fen and wetlands due to the local topography, hydrology and water chemistry.

A breakdown of the component bog areas for the Blackwater Bog Group IPC License Ref. PO502-01 is outlined in Table Ap-2.

² <http://www.npws.ie/peatlandsturf-cutting/nationalraisedbogsacmanagementplan/>

Table Ap-2a: Blackwater Bog Group names, area and indicative status (Attymon sub-group)

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Attymon	336	Cutover Bog Industrial peat production commenced at Attymon Bog in 1941 and ceased in 2019. Attymon is a deep peat cutover bog.	Attymon Bog formerly supplied fuel sod peat. Coillte have developed a portion of the former production area for conifer forestry. Some rehabilitation was carried out in 2019/2020.	2109	Finalised 2018
Cloonkeen	252	Cutover Bog Industrial peat production commenced at Cloonkeen Bog in 1953 and ceased in 2019. Cloonkeen Bog is a deep peat cutover bog.	Cloonkeen Bog formerly supplied fuel sod peat. Coillte have developed a portion of the former production area for conifer forestry. Some rehabilitation was carried out in 2019/2020.	2019	Finalised 2018
Derrydoo-Woodlough	452	Development Bog Derrydoo-Woodlough Bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.	Bog restoration was carried out in 2013-2014 Rehabilitation (bog restoration) now complete.	N/A	Finalised 2012
Tirrur-Derrymore	422	Development Bog This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.	This bog has significant raised bog restoration potential. Section leased to NPWS as a SAC turf-cutting relocation site.	N/A	Updated 2020
Newtown-Loughgore	448	Development Bog This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.	Some sod turf production Bog restoration was carried out in 2019-2020 Rehabilitation (bog restoration) nearly complete.	2020	Finalised 2012
Killeglan	581	Development Bog This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.	Bog restoration was carried out in 2013-2014 Rehabilitation (raised bog restoration) complete	N/A	Finalised 2016
Cloonboley 1	675	Development Bog This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place on the main section.	A small sub-section has been used for sod turf production. Bog restoration was carried out in 2013-2014 Rehabilitation (raised bog restoration) complete	2020	Finalised 2014
Cloonboley2	203	Development Bog This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.	Bog restoration was carried out in 2013-2014 Rehabilitation (raised bog restoration) complete	N/A	Finalised 2016

Table Ap-2b: Blackwater Bog Group names, area and indicative status (Blackwater sub-group)

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Ballaghurt	597	Cutaway Bog Industrial peat production commenced at Ballaghurt Bog in 1981. The majority of the site is cutaway with some residual deeper peat	Ballaghurt Bog formerly supplied a range of commercial functions including horticultural peat and fuel peat. Pioneer cutaway vegetation communities are naturally developing on some cutaway areas.	2020	Draft 2017
Belmont	316	Cutaway Bog Industrial peat production commenced at Belmont Bog during the 1950's. The majority of the site is cutaway.	There are some areas of pioneer cutaway vegetation communities naturally colonising cutaway sections. Coilte have developed a portion of the bog for forestry.	2020	Draft 2021
Blackwater	2,303	Cutaway Bog Industrial peat production commenced at Blackwater Bog during the 1950's. The majority of the site is cutaway.	Bloomhill Bog formerly supplied milled horticultural peat and fuel peat. There is extensive development of emergent cutaway vegetation communities across the former production area. The site has been used for experimental forestry (BOGFOR) and other conifer plantations. Part of the site was rehabilitated with lake and wetland creation. An ash facility took ash from Shannonbridge Power station	2020	Draft 2017
Bloomhill	883	Cutover Bog Industrial peat production commenced at Bloomhill Bog during 1981. The majority of the site still has relatively deep residual peat.	Bloomhill Bog formerly supplied milled horticultural peat and fuel peat. Much of the former peat production area is bare peat.	2020	Draft 2017
Bunahinly-Kilgarvan	389	Cutover Bog Industrial peat production commenced at Bunahinly-Kilgarvan Bog during the 1990's. Residual Deep peat remains on these bogs.	Bunahinly-Kilgarvan formerly supplied milled horticultural peat and fuel peat. Much of the former production area is bare peat. Part of Bunahinly has been re-wetted.	2020	Draft 2017
Glebe	132	Cutover Bog Industrial peat production commenced at Glebe Bog during the 1990's. Residual deep peat remains on these bogs.	Glebe Bog formerly supplied milled; horticultural peat and fuel peat. Glebe bog is still listed as a pNHA. Much of the former production area is bare peat.	2020	Draft 2017
Clooniff	523	Cutover & cutaway Bog Industrial peat production commenced at Clooniff Bog during the 1970's. A mosaic of variable peat depths remains on this bog.	Clooniff Bog formerly milled fuel peat. Much of the former production area is bare peat or wetland. Some emergent vegetation communities are naturally colonising cutaway areas. Reduced pumping has created a large wetland in one area.	2020	Draft 2021

Cornafulla	460	Cutover Bog Industrial peat production commenced at Cornafulla Bog in 1987. This bog still retains relatively deep residual peat.	Cornafulla Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area or cutaway is bare peat.	2020	Draft 2017
Cornaveagh	492	Cutover Bog Industrial peat production commenced at Cornaveagh Bog in 1970's and ceased in 2020. This bog still retains relatively deep residual peat.	Cornaveagh Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area footprint or cutaway is bare peat.	2020	Draft 2017
Culliaghmore	442	Cutover Bog Industrial peat production commenced at Culliaghmore Bog in 1960's and ceased in 2020. Much of this bog is cutaway, with some pockets of deeper residual peat.	Culliaghmore Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area footprint or cutaway is bare peat. Some pioneer cutaway vegetation communities are naturally colonising cutaway areas.	2020	Draft 2017
Garryduff	970	Cutaway Bog Industrial peat production commenced at Garryduff Bog in 1960's. The majority of this bog is cutaway.	Much of the former production area footprint or cutaway is bare peat. Extensive natural development of pioneer cutaway vegetation communities is present on cutaway areas.	2020	Draft 2021
Kellysgrove	201	Development Bog Kellysgrove Bog was drained in the 1980s in anticipation of industrial peat production. No peat harvesting ever took place.	The site retains degraded raised bog vegetation. Kellysgrove Bog retains significant raised bog restoration potential. A way-marked walking trail is positioned along the old Ballinasloe Canal.	2020	Draft 2021
Kilmacshane	1,294	Cutaway Bog Industrial peat production commenced at Kilmacshane Bog in 1960's. The majority of this bog is cutaway with some pockets of deeper peat remaining.	Kilmacshane Bog formerly supplied milled horticultural peat and fuel peat. Some pioneer cutaway vegetation communities are naturally colonising cutaway areas and water levels have risen as pumping reduced, creating wetlands.	2014	Draft 2021
Lismanny	449	Cutaway Bog Industrial peat production commenced at Lismanny Bog in 1960's. The majority of this bog is cutaway with some pockets of deeper peat remaining.	Lismanny Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area footprint is bare peat. Some pioneer cutaway vegetation communities are naturally colonising cutaway areas.	2020	Draft 2021

Table Ap-2c: *Blackwater Bog Group names, area and indicative status (Derryfadda sub-group)*

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Derryfadda	610	Cutover bog Industrial peat production commenced at Derryfadda Bog in 1980's. This bog still retains residual deep peat.	Derryfadda Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area is bare peat. Some pioneer cutaway vegetation communities are naturally colonising cutaway areas.	2020	Draft 2017
Boughill	415	Cutover bog Industrial peat production commenced at Boughill Bog in 2008. This bog still retains residual deep peat.	Boughill Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area footprint or cutaway is bare peat.	2020	Draft 2017
Castlegar	517	Cutover bog Industrial peat production commenced at Castlegar Bog in 2001. This bog still retains residual deep peat.	Castlegar Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area is bare peat. The adjacent Annaghbeg Bog NHA is an intact undrained raised bog	2019	Draft 2021
Gowla	650	Cutover bog Industrial peat production by BnM commenced at Gowla Bog in 1970's. Development for sugar production was in place at Gowla since the 1950's. This bog still retains residual deep peat.	Gowla Bog formerly supplied milled horticultural peat and fuel peat. Much of the former production area footprint is bare peat.	2020	Draft 2017

APPENDIX III: ECOLOGICAL SURVEY REPORT

Ecological Survey Report <i>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.</i>			
Bog Name:	<u>Clooniff</u>	Area (ha):	532ha
Works Name:	Blackwater	County:	Roscommon
Recorder(s):	DF	Survey Date(s):	16 th & 20 th March 2012 & November 2016.
Habitats present (in order of dominance) <p>The most common habitats present at this site include:</p> <ul style="list-style-type: none"> • Bare peat (BP) (Codes refer BnM classification of pioneer habitats of production bog. See Appendix II). • Pioneer poor fen communities dominated by Soft Rush (pJeff) • Pioneer dry heath communities (dHeath) • Emerging Birch scrub (eBir) • Silt Ponds (Silt) with associated habitats such as scrub, Bracken, rank grassland (GS2), dry calcareous grassland (gCal) and typical pioneer communities of disturbed areas (disTuss). <p>The most common habitats present around the margins at this site include:</p> <ul style="list-style-type: none"> • Birch woodland (WN7) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II) • Scrub (WS1) (Gorse scrub and Birch scrub developing of dry high bog around margins) • Raised bog (PB1) • Cutover bog (PB4) (several small fragments) • Wet grassland (GS4) along the edges of the site. 			
Description of site <p>Clooniff Bog is located approximately 6km to the north of Shannonbridge in Co Roscommon. The bog is divided into four individual units with a long rail link that connects it with Cornaveagh Bog located ca. 1km to the south. Access to Clooniff Bog can be gained from public roads located to the north and to the south of the site respectively.</p> <p>The majority of Clooniff contains in excess of 2m of peat remaining on the site. The north western corner of the site contains an area of high bog that has recently been re-developed for milled peat production. This area was previously in milled peat production for a short period and it had re-vegetated with Heather.</p> <p>Clooniff is mainly composed of bare peat as the entire bog was in active peat production until recently. Marginal habitats include Birch woodland (WN7), remnant sections of raised bog (PB1), scrub (WS1) and cutaway bog (PB4). The remnant sections are generally small and are dry with a dominance of Ling Heather.</p> <p>The River Shannon flows within close proximity to the eastern boundary of the site and two narrow strips of land (under BnM ownership) extend from the site to the River Shannon. A number of long peat berms have been constructed on the site between 2010 and 2012. These berms have an average height of 0.6 m and are designed</p>			

to prevent flooding from the Shannon and other smaller streams that flow through the site. A water pump is operational close to the centre of the site.

Two small streams flow through the site with a third stream flowing along the southern boundary of the site. These streams have been canalised and supports a small number of aquatic plant species. Riparian vegetation was mainly composed of Willow (*Salix* sp.), Common Reed (*Phragmites australis*) and Reed Canary Grass (*Phalaris arundinacea*). A number of silt ponds, some of which were newly constructed, are located adjacent to the streams. Otter activity is high along these streams and there is frequent evidence of Otter tracks, spraint and fish remains. It is likely that an Otter “couch” is situated on the site. Coarse fish including Bream and Roach were also observed in these streams.

There are records of Rhododendron (*Rhododendron ponticom*) present in amongst the marginal habitats of the site. This invasive species has the potential to colonise portions of the site once production ceases and outcompete native plant species.

Although the majority of the site is classified as bare peat, many of the field drains support wetland plants such as Common Reed (as the dominant vegetation type). The presence of a drainage ditch that runs along most northerly section of the site supports Black Bog Rush (*Schoenus nigricans*), a species found on cutaway when the peat layer (acid base) meets the marl layer (base rich).

A rehabilitation trial was carried out in November 2016 on a small section of the cutaway (ca. 1.5 ha) concentrated in the northern part of the site at the location of the main outfall. The trial involved re-profiling and landscaping of berms, drain blocking and sourcing donor plant material from a donor site to enhance the establishment of wetland vegetation. Following reconfiguration of the constructed wetland, Common Reed (*Phragmites australis*) was sourced locally from within Clooniff and stands were translocated and planted within the rehab area. Drainage from the production bog was directed towards the main outfall location at the constructed wetland rehabilitation area. In addition to the silt ponds present at the main outfall location, the constructed wetland will serve to alleviate and attenuate suspended solids and ammonia concentrations from industrial peat production areas and provide a wetland refuge for species of wild flora and fauna.

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

A small section of the site partially overlaps with the the River Shannon SAC & pNHA (000216) and the Middle Shannon Callows SPA (004096)

Adjacent habitats and land-use

Adjacent habitats include lowland depositing river (FW2), wet grassland (GS4), improved agricultural grassland (GA1), cutaway bog (PB4) and raised bog (PB1).

Watercourses (major water features on/off site)

- The River Shannon flows along the eastern edge of the site.
- Two streams flow through the site, with a third stream flowing along the southern boundary of the site. These streams flow into the River Shannon.

Peat type and sub-soils

The depth of peat remaining in Clooniff ranges in depth between 1m to over 2.6m. The majority of the peat remaining on the site is fen peat. The peat is underlain with gravel.

Fauna biodiversity**Birds**

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

- Mallard
- Teal
- Snipe
- Other more common species include Heron, Blackbird, Robin, Wren, Blue Tit and Wood Pigeon.

Mammals

Signs of several mammal species were noted on the site during the survey.

- Otter
- Badger
- Pine Marten
- Fox
- Mink

Other species

- Frog
- Roach
- Bream

References

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Fossitt, J. (2000). A guide to habitats in Ireland. Kilkenny. The Heritage Council.

NRA (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes (Revision 2). National Roads Authority.

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 bowzers. Only dedicated trained and competent personnel will carry out refuelling operations.
- Mobile storage such as fuel bowzers will be bunded to 110% capacity to prevent spills. Tanks for bowzers 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

There are records of *Rhododendron* (*Rhododendron ponticom*) present in amongst the marginal habitats of the site. This species is listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011). *Rhododendron* has the potential to colonise portions of the cutaway following the cessation of peat harvesting activities.

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 washing vehicles prior to entering the site.

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 plague³ and Zebra Mussel will be adhered with throughout all rehabilitation measures and activities.

³ <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 Blackwater Bog Group (Ref. P0502-01). 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 Mount Dillon 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 proposed Scheme includes lands previously used to supply peat for electricity generation within the State. 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 scheme, (PCAS), 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 costs associated with the additional and enhanced measures, i.e., those which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10, will be eligible for support under the proposed Scheme.*

The proposed enhanced rehabilitation measures detailed in this document, are predicated on the understanding that the element of the rehabilitation, over and above the ‘standard’ measures necessary to comply with pre-existing Condition 10 IPC Licence requirements, will be deemed eligible costs for the Scheme regulator.

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 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.

Clooniff Bog is situated in close proximity to, or overlaps a number of lands designated for conservation. Clooniff Bog partially overlaps with the River Shannon Callows SAC and pNHA (NPWS Site Code: 000216) and Middle Shannon Callows SPA (NPWS Site Code: 004096) on the western periphery of the site as a whole and along the southern edge of Coolumber Bog (Figure 3.5). The River Shannon Callows SAC (and pNHA) is designated for grasslands (*Molinia* and Lowland Hay Meadows) as well as alluvial woodland and Otter. The Middle Shannon Callows SPA is designated for the assemblage of wintering wildfowl, many species of which occur in internationally and nationally important numbers as well, in addition to breeding Corncrake. It is also noted as being important for breeding waders and a range of other nationally scarce species such as breeding Shoveler, Quail and Whinchat.

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 after-use 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.

Clooniff Bog is located in an area zoned by Roscommon 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 Clooniff 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 policies.

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. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021). 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 2020

The general after-use strategy of Bord na Móna is outlined in the Bord na Móna Strategic Framework for Future-Use of Cutaway Bogs 2020. 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

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 licence 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.

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

Item	Description	Clooniff 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	Not relevant
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 addition, condition 7 of the licence 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.

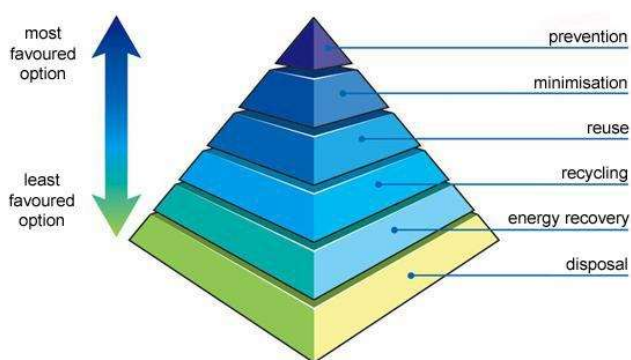
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

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 an 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 licence. 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:

Item	Enhanced Decommissioning Type	Clooniff Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Not Applicable
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	Not Applicable

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 sub-soils 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 development may also serve to act as rehabilitation.

Restoration: Ecological restoration is 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 is 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 P0502-01, Blackwater Group of Bogs in Counties Roscommon, Galway, Offaly and Westmeath,

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 Blackwater 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 or is 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 than 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 bog 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 P0502-01 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 31st December 2012. 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 our 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	Classification	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 Mountdillon 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 their 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 Blackwater IPPC Licence P0502-01.

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 APXI -1 Consultees contacted

Bog Name	Contact Organisation	Contact Name	Date of Issue	Communication Format	Date Response Received	Response format
Clooniff	Roscommon County Council - Director of Services (Planning, Environment and Emergency Services)	Liam Bergin	04/01/2021	E-mail		
Clooniff	Roscommon County Council - Heritage Officer	Nollaig Feeney	04/01/2021	E-mail		
Clooniff	Northern and Western Regional Assembly	info@nwra.ie	04/01/2021	E-mail		
Clooniff	Chairperson of Roscommon County Council	Laurence Fallon	04/01/2021	E-mail		
Clooniff	Roscommon County Councillors - Athlone Electoral Area	Cllr. Donal Kilduff	04/01/2021	E-mail		
Clooniff	Roscommon County Councillors - Athlone Electoral Area	Cllr. Ivan Connaughton	04/01/2021	E-mail		
Clooniff	Roscommon County Councillors - Athlone Electoral Area	Cllr. John Naughton	04/01/2021	E-mail		
Clooniff	Roscommon County Councillors - Athlone Electoral Area	Cllr. John Keogh	04/01/2021	E-mail		
Clooniff	Roscommon County Councillors - Athlone Electoral Area	Cllr. Tony Ward	04/01/2021	E-mail		

Clooniff	TD Roscommon - Galway	Michael Fitzmaurice	04/01/2021	E-mail		
Clooniff	TD Roscommon - Galway	Claire Kerrane	04/01/2021	E-mail		
Clooniff	TD Roscommon - Galway	Denis Naughten	04/01/2021	E-mail		
Clooniff	Senator Roscommon Mayo	Aisling Dolan	04/01/2021	E-mail		
Clooniff	Environmental Protection Agency	Brian Meeney	04/01/2021	E-mail		
Clooniff	National Parks and Wildlife Service	Brian Lucas, Deirdre Lynn, Ciaran O Keefe and Adele Shelton	04/01/2021	E-mail		
Clooniff	NPWS Regional Network	District Conservation Officer (Galway East)	12/01/2021	E-mail	03-07/12/2020	E-mail
Clooniff	Dept of the Housing Local Government and Heritage	Malcom Noonan (Minister of State at the Department of Housing, Local Government and Heritage)	06/02/2021	E-mail		
Clooniff	National Monuments Service	Margaret Keane	04/01/2021	E-mail		
Clooniff	National Museum of Ireland (Irish Antiquities Division)	Isabella Mulhall	04/01/2021	E-mail	28/12/2020	E-mail
Clooniff	Minister for Environment, Climate and Communications	Minister - Eamon Ryan	06/01/2021	E-mail		
Clooniff	Dept of Environment, Climate and Communications	noel.regan@decc.gov.ie	04/01/2021	E-mail		
Clooniff	Minister for Rural and Community Development	Minister - Heather Humpreys	06/01/2021	E-mail		
Clooniff	Minister - Office of Public Works	Minister of State - Patrick O Donovan	06/01/2021	E-mail		
Clooniff	Office of Public Works	General e-mail contact	12/01/2021	E-mail	11/12/2020	E-mail
Clooniff	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Pippa Hackett Minister of State for Land Use and Biodiversity)	06/01/2021	E-mail		
Clooniff	Inland Fisheries Ireland	General E-mail contact	04/01/2021	E-mail		

Clooniff	Waterways Ireland	head office - info email	04/01/2021	E-mail		
Clooniff	The Heritage Council	Lorcan Scott	04/01/2021	E-mail		
Clooniff	Western Development Commission	info@wdc.ie	04/01/2021	E-mail		
Clooniff	An Forum Uisce (The Water Forum)	General e-mail contact	04/01/2021	E-mail		
Clooniff	Local Authority Waters Programme Clár Uiscí na nÚdarás Áitiúil Mayo County Council, Aras an Chontae, The Mall, Castlebar, Co. Mayo	Noreen Shryane Catchment Scientist Western Region	04/01/2021	E-mail		
Clooniff	An Taisce	General e-mail contact	04/01/2021	E-mail		
Clooniff	Friends of the Earth	Oisin Coughlan	04/01/2021	E-mail		
Clooniff	Friends of the Irish Environment		04/01/2021	E-mail		
Clooniff	Birdwatch Ireland	General e-mail contact	04/01/2021	E-mail		
Clooniff	Irish Peatlands Conservation Council	General e-mail contact	04/01/2021	E-mail	21/01/2021	E-mail
Clooniff	Irish Wildlife Trust	General e-mail contact	04/01/2021	E-mail		
Clooniff	Bat Conservation Ireland	General e-mail contact	04/01/2021	E-mail		
Clooniff	Woodlands of Ireland	General e-mail contact	04/01/2021	E-mail		
Clooniff	Butterfly Conservation Ireland	Jesmond Harding/info email	04/01/2021	E-mail	13/01/2021	E-mail
Clooniff	Community Wetlands Forum (part of Irish Rurallink)	General e-mail contact	04/01/2021	E-mail		
Clooniff	Turf Cutters and Contractors Association		10/12/2020	Post		
Clooniff	Roscommon Public Participation Network (PPN)	General e-mail contact	04/01/2021	E-mail		

Clooniff	Sustainable Water Action Network (SWAN)	http://www.swanireland.ie/	04/01/2021	E-mail		
Clooniff	Irish Farmers Association (Leitrim, Logford, Roscommon, Sligo)	John O Hanlon	04/01/2021	E-mail	25/01/2021	E-mail
Clooniff	Irish Farmers Association (Head Office)	Tim Cullinan (President)	04/01/2021	E-mail		
Clooniff	National Association of Regional Game Councils	Email - nargc@nargc.ie	04/01/2021	E-mail		
Clooniff	ICMSA (Irish Creamery Milk Suppliers Association)	General e-mail contact	04/01/2021	E-mail		
Clooniff	ICSA (Irish Cattle and Sheep Farmers Association)	General e-mail contact	04/01/2021	E-mail		
Clooniff	Midlands & East Regional WFD Operational Committee	Ray Spain Co-ordinator Local Authority Water Programme	04/01/2021	E-mail		
Clooniff	Shannon Flood Risk State Agency Co-ordination Working Group	Jackie Stewart - Flood Risk Management Policy	04/01/2021	E-mail		
Clooniff	CARO (Climate Action Regional Office) Atlantic and Seaboard North	David Mellet	04/01/2021	E-mail		
Clooniff	Galway Athlone Cycleway Project team	info@galwaytoathlonecycleway.com	04/01/2021	E-mail		
Clooniff	Moore Game and Conservation Club	Patrick Kelly			09/02/2021	E-mail
Clooniff	Ballydangan Red Grouse Project	Patrick Dunning				E-mail

Table APXI -2 Response summary from Consultees contacted

Organisation	Summary of Response by Stakeholder	BnM Response
NPWS Regional Network	Responded through e-mail thread on the 02, 03,07,09/12/2020. Points discussed were; 1) To advise of the requirement to investigate if assessment under the SEA and birds directives for each site.	BnM acknowledged via e-mail; Also, phone conversation with local NPWS Conservation Ranger Laura Connolly.
National Museum of Ireland (Irish Antiquities Division)	Responded through e-mail 28/12/2020, 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 will give due cognisance to all points within the rehabilitation plan for A virtual meeting/PCAS presentation was held for NMI on 18/01/2021
Office of Public Works	Responded via e-mail 01/12/2020 querying the reason for inclusion of OPW in the stakeholders list.	BnM responded with and explanation via e-mail on 01/12/2020.
Dept. of Agriculture, Food & the Marine (DAFM)	Submission by e-mail to express support for PCAS. 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 to assure BnM will give due cognisance to all points within the rehabilitation plan for Clooniff Bog. A virtual meeting/PCAS presentation was held for DAFM on 11/12/2020

Irish Peatlands Conservation Council	<p>Responded to consultation through e-mail on 21/01/2021. Among issues raised were;</p> <ol style="list-style-type: none"> 1. Water quality issues including dissolved organic content and the monitoring of water quality measures post PCAS works. 2. Request for species specific conservation initiatives to be considered as part of PCAS. 3. Encouraged the integration of local stakeholders into the consultation process. 	BnM acknowledged and will give due cognisance to all points within the rehabilitation plan for Clooniff Bog. BnM raised responded via e-mail.
Butterfly Conservation Ireland	<p>Responded to consultation via e-mail with submission on Clooniff. Concerns raised were:</p> <ol style="list-style-type: none"> 1) Alterations to the text of the rehab plan. 2) Request for all turf cutting on BnM land to end. 4) Suggest monitoring for Large Heath Butterfly or food plant Hare's-tail Cottongrass. 5) Suggested alterations to habitat design in rehab plan to further connect regional high bog habitats. 6) Advised BnM to ensure that quality habitats already found on site are not damaged by PCAs activities. 	BnM acknowledged via e-mail; Phone conversation with Jesmond Harding 19/01/2021.
Irish Farmers Association	<p>Responded to consultation regarding Clooniff and the PCAS project at large on multiple dates throughout ongoing discourse. Concerns raised were:</p> <ol style="list-style-type: none"> 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 meeting was held by BnM on 18/02/2021 the to present details on PCAS to the IFA and members. Dialogue is ongoing.
ICMSA (Irish Creamery Milk Suppliers Association)	Virtual meeting/PCAS presentation organised for 03/03/2021.	A meeting was held by BnM on 03/03/2021 to present details on PCAS to the ICMSA and members. Dialogue is ongoing.

Moore Game and Conservation Club	<p>Submission on PCAS from Moore Game and Conservation Club. A summary of concerns raised in the submission includes;</p> <ol style="list-style-type: none"> 1) A list of activities carried out by the club members on the club lands adjoining Clooniff Bog was provided. 2) A request to include rear and release pens for game in the PCAS project works at Clooniff Bog. 3) Suggestion as to how best to promote biodiversity on bogs through PCAS. 4) A request for consultation to involve local stakeholders. 5) A request that predator control be considered as a measure to promote biodiversity across the PCAS bogs. 6) Suggested BnM utilise PCAS as an opportunity to engage in conservation projects at Clooniff Bog. 	<p>BnM acknowledged and will give due cognisance to all points within the rehabilitation plan for Clooniff Bog. BnM raised responded via e-mail.</p> <p>BnM responded via phone call on 21/01/2021. Advised that conservation projects were outside the scope of PCAS.</p>
Ballydangan Red Grouse Project	<p>Concerns raised were;</p> <ol style="list-style-type: none"> 1) Any loose peat removal from site must ensure that local water bodies are not contaminated. 2) Trout and native crayfish species use the river between Coolumper and Clooniff. 3) Archaeological interests on site. 4) Encouraged the planting of heath species 5) Red grouse and Curlew habitat management is encouraged. 6) Water body management where appropriate is encouraged. 7) A list of breeding bird species that use the water bodies was provided. 8) Suggested BnM utilise PCAS as an opportunity to engage in conservation projects at Clooniff Bog. 	<p>BnM acknowledged and will give due cognisance to all points within the rehabilitation plan for Clooniff Bog. BnM raised responded via e-mail.</p> <p>BnM responded via phone call on 21/01/2021. Advised that conservation projects were outside the scope of PCAS.</p>

APPENDIX IX. ARCHAEOLOGY

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



Archaeological Impact Assessment of Proposed Bog Decommissioning and Rehabilitation at Clooniff Bog, Co. Roscommon

Report For

Bord Na Móna Energy Ltd.

Author

Dr. Charles Mount

Bord Na Móna Project Archaeologist



Introduction

The EPA (2002) *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 on c.531 hectares at Clooniff, Co. Roscommon 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 Clooniff Bog will include:

- Blocking field drains in the former industrial production area using a dozer to create regular peat blockages (three barriers per 100 m) along each field drain;
- Re-alignment of piped drainage.
- Realignment of gravity outfalls.
- Fertiliser treatment of high fields and headlands (typically slow to naturally re-colonise) to encourage natural colonisation.
- No measures are planned for the surrounding marginal peatland habitats.
- 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.

Clooniff Bog is located c.2.9km south-east of Ballydangan and east of the L2039 road. The bog occupies the townlands of America, Cappayuse, Clooniff, Cloonbeggaun, Cloonburren, Coolumber, Derrineel and Moore South, on OS 6 inch sheets Roscommon 54, 55 and 56.

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 Clooniff Bog. The extent of the rehabilitation area is indicated in Fig. 1. This area was examined using information from:

- The IAWU Peatland Survey
- Re-assessment Peatland Survey 2009
- The Bord na Móna excavation programme
- 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. Roscommon which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1998). This record was published by the Minister in 1998 and includes sites and monuments that were known in Clooniff Bog before that date. This review established that there is one RMP situated in the proposed rehabilitation area, a gravel road RO055-005---- that extends through the bog in Coolumber townland for a distance of c.1km along the line of the early medieval bridge that crosses the River Shannon at Clonmacnoise (see Table 1 and Fig. 1). The road was briefly uncovered in two places by Bord na Mona staff in 1983 and subsequently inspected by National Monuments Staff and then recovered. This is described in the RMP as:

RO055-005---- Coolumber Road - gravel/stone trackway – peatland

In a low-lying bog running NW from the River Shannon. A section of road (L c. 1 km; Wth 2.5-3m; T 0.3m) just opposite the bridge of Clonmacnoise (RO055-008----) was revealed in 1983 at two points as a layer of gravel (Wth 2.5-3m; T. 0.3m) at a depth of 0.6-1m in the bog. The modern NNW-SSE road (L c. 3km) through Nure village continues along the line of the routeway and may have been built on the gravel road. Part of the road is preserved in a section of uncut peat.

RMP_NO	Site type	Townland	N.G.R. E	N.G.R. N
RO055-005---	Road - gravel/stone trackway - peatland	Coolumber	20018	23140

Table 1. List of RMP sites in Clooniff Bog.

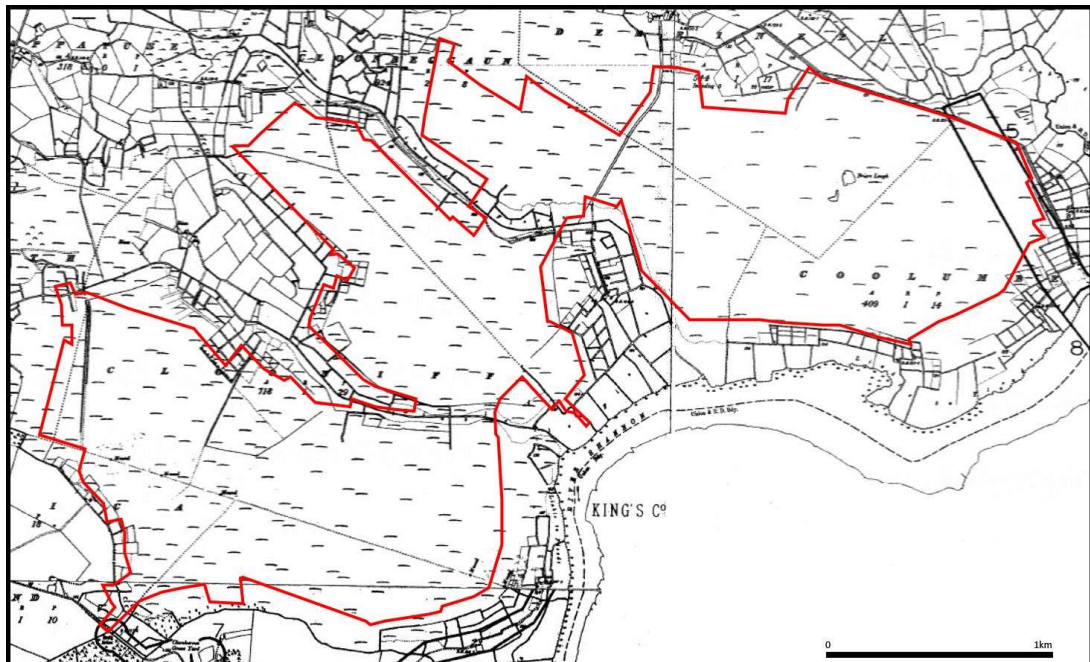


Fig. 1. Clooniff Bog, Co. Roscommon, detail of the Record of Monuments and Places map sheet Nos. 54, 55 and 56. The proposed rehabilitation area is outlined with the red line. There is one Recorded Monument in the area.



Peatland survey

Clooniff Bog was surveyed by the Irish Archaeological Wetland Unit in 1992 as part of the Archaeological Survey of Ireland Peatland Survey (unlicensed). A total of 10 sightings were identified and recorded and subsequently lodged in the records of the Archaeological Survey of Ireland (see Table 1). These consisted of six sightings of toghers and 4 sightings of worked and unworked wood. The sightings were mainly concentrated in one group in Clooniff townland.

Catalogue Code	Townland	Site Type	D below surface	N.G.R. E	N.G.R. N	Status 2012
RO-CIF 0001	Clooniff	Togher	0.35	197330	230260	Gone
RO-CIF 0002	Clooniff	Togher	0.60	197345	230300	Gone
RO-CIF 0003	Clooniff	Togher	0.60	197359	230300	Gone
RO-CIF 0004	Clooniff	Togher	0.50	197375	230291	Gone
RO-CIF 0005	Clooniff	Togher	0.71	197385	230275	Gone
RO-CIF 0006	Clooniff	Togher	0.69	197378	230280	Gone
RO-CIF 0007	Clooniff	Worked wood	0.00	197341	230275	Gone
RO-CIF 0008	Clooniff	Worked wood	0.10	197900	230340	Gone
RO-CIF 0009	Clooniff	Unworked wood	0.60	197351	230300	Gone
RO-CIF 0010	Clooniff	Unworked wood	0.60	197375	230262	Gone
RO-CLN 0001	Cloonburren	Togher	-	196990	229030	Survives

Table 1. List of sites recorded by the IAWU in Clooniff 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 11th 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 are 14 monuments entered in the SMR in the proposed rehabilitation area. The monuments are indicated in Table 2 and Fig. 2 below. These include the sightings identified by the Irish Archaeological Wetland Unit survey in 1992 that were notified to the Archaeological Survey of Ireland (without any concordance) with the addition of four boundary mounds.

SMR No.	Townland	Site Type	N.G.R. E	N.G.R. N	Status
RO054-045----	Clooniff	Boundary mound	596113	730169	Gone
RO054-046----	Clooniff	Boundary mound	596348	730089	Gone
RO054-047----	Clooniff	Boundary mound	596605	730010	Gone
RO054-047----	Clooniff	Boundary mound	597733	729662	Gone
RO054-051----	Clooniff	Road - unclassified togher	597282	730295	Gone
RO054-052----	Clooniff	Road - unclassified togher	597295	730339	Gone
RO054-053----	Clooniff	Road - unclassified togher	597309	730331	Gone
RO054-054----	Clooniff	Road - unclassified togher	596979	730212	Gone
RO055-055----	Coolumber	Road - gravel/stone trackway - peatland	600091	731417	Survives
RO054-056----	Clooniff	Road - unclassified togher	597324	730310	Gone
RO054-057----	Clooniff	Redundant Record	597219	730302	Gone
RO054-058----	Clooniff	Structure - peatland	596926	731335	Gone
RO054-059----	Clooniff	Structure - peatland	597302	730330	Gone
RO054-060----	Clooniff	Structure - peatland	597326	730290	Gone

Table 2. List of SMRs in Clooniff Bog.

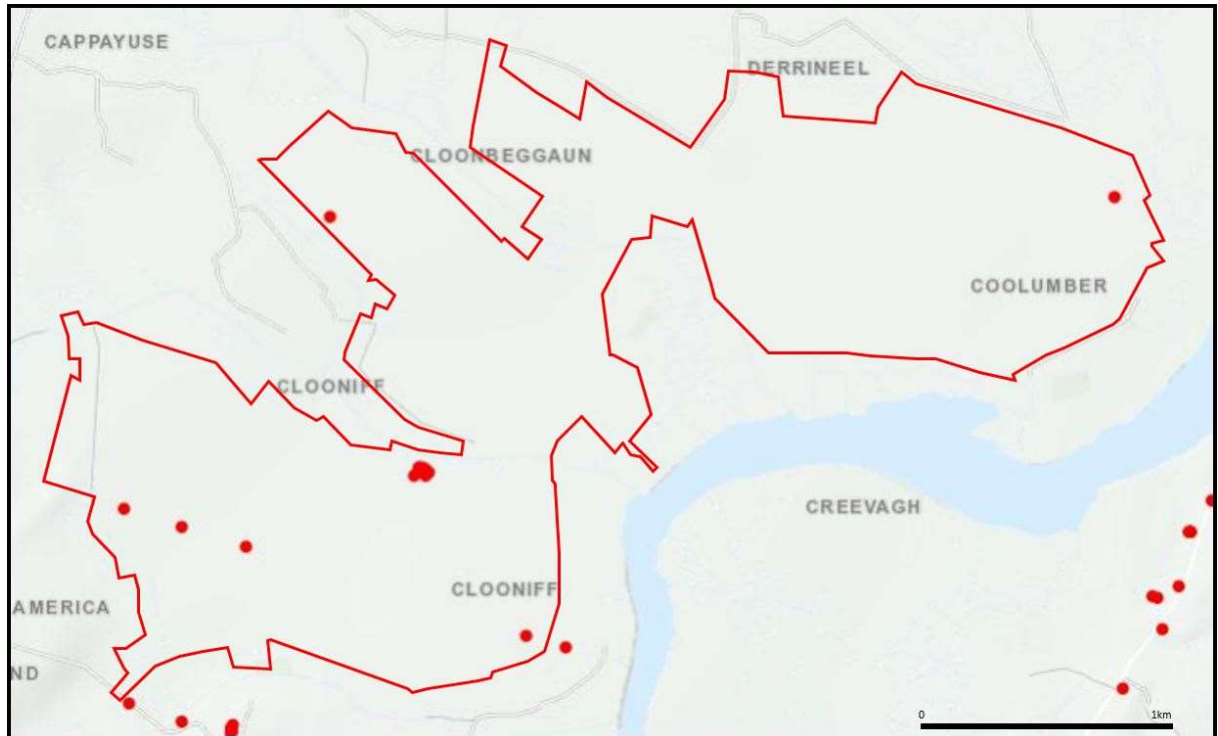


Fig. 2. Clooniff Bog, Co. Roscommon, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line. There are a 14 SMRs in the area.

Re-assessment Peatland Survey 2009

The Re-assessment Survey of Clooniff Bog was carried out in 2009 under licence No. 09E0405 (Rohan 2009). All of the sighting reported by the IAWU in 1992 and all the remaining sightings included in the SMR in the rehabilitation area, except RO055-005----, were found to have been removed. There were no new sightings of archaeological material.

Archaeological investigations

Reports of archaeological excavations and licensed monitoring in the study area listed in the excavations database at excavations.ie were examined as part of the assessment. There have been no licensed archaeological excavations carried out in Clooniff Bog.

Reported finds

There is one reported find recorded in the Topographical Files of the National Museum that can be attributed to Clooniff Bog, a mudstone axehead (2004:1) recovered from the surface of the bog in Clooniff townland. There are three iron finds from Cloonburren townland; an iron tool (1955:90), an iron hook (1955:91) and a second iron tool (1955:92) with a recorded find spot of 'Castle Acre' which is to the east of the bog.

Previous assessments

Clooniff Bog has been the subject of an Environmental Impact Assessment Report carried 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 monuments identified in the IAWU 1992 survey and the Re-assessment



Peatland 2009 and noted that there was a moderate potential for archaeological features to be uncovered during the course of any future development works in Clooniff Bog.

Impact assessment

There are 14 known sightings of archaeology in the rehabilitation area. The Re-assessment Survey of Clooniff Bog carried out in 2009 found that 13 of the sightings had been removed. One site survives RO055-005---- a gravel road in Coolumber townland (see Table 3).

SMR No.	Townland	Catalogue Code	Site Type	N.G.R. E	N.G.R. N	Status
RO055-055----	Coolumber	-	Road - gravel/stone trackway - peatland	600091	731417	Survives

Table 3. All surviving sightings in the rehabilitation area.

Recommendations

There is one surviving archaeological site in Clooniff Bog RMP RO055-005---- which should be avoided by the rehabilitation works (see Table 3). A complete set of grid references for the monument are not available so the whole zone of notification (indicated in Fig 1 with a dark black outline and numbered 5) should be avoided. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should also 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. There are 14 known known sightings of archaeological heritage in the rehabilitation area of which one RMP RO055-005---- survives and should be avoided by the rehabilitation works. 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 1998. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Roscommon.

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

Rohan, N. 2009. Report on 2009 Re-assessment Field Survey 2013. Blackwater and Boora Group of Bogs Counties Offaly, Galway, Westmeath and Roscommon. Unpublished report commissioned Bord na Móna.

Dr. Charles Mount
15 March 2021

Role of the Archaeological Liaison Officer

1. To communicate this Code of Practice and the *Archaeological Protection Procedures* (Appendix IV) to all personnel operating on the bog.
2. To ensure that all notices relating to the *Archaeological Protection Procedures* are posted and maintained at appropriate locations on the bog.
3. 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.
4. 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.



Code of Practice

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Code of Practice

5. To arrange for the delivery or collection of the stray find, as directed by the Duty Officer of the National Museum of Ireland.
6. 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.
7. To maintain a file of all stray finds and associated documentation and provide copies to the Project Archaeologist.
8. To provide assistance, where required, to the Department during archaeological surveys.
9. To provide assistance, where required, to Bord na Móna's Consultant Archaeologists, during investigation and mitigation of monuments.
10. 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.



	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			
Revision	Date	Description of change	Approved

1	13/09/2020	First release	EMcD
2			