

**Bord na Móna**

**Derryfadda Bog**

**Cutaway Bog Draft Decommissioning and Rehabilitation Plan  
2021**

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.”*

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

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

*Industrial peat production has now permanently ceased at Derryfadda Bog.*

*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 and Ireland’s National Recovery and Resilience Plan, Bord na Móna in developing a package of measures, ‘the 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 Scheme will be supported by Government, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.*

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

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

*Any consideration of any other future after-uses for Derryfadda Bog, such as renewable energy, 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.*

### Document Control Sheet

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### Non-technical summary

- Industrial peat harvesting is now finished at Derryfadda Bog, located in Co. Galway. This bog is located approximately 4.5 km northeast of Ahascragh Co. Galway, 0.7 km south of Ballyforan and 2 km southwest of Dysart County Roscommon.
- Bord na Móna is planning to rehabilitate Derryfadda Bog.
- This is happening as Bord na Móna are obliged to carry out peatland rehabilitation via an IPC License issued by the Environmental protection Agency. In addition, the Government has agreed to support peatland rehabilitation via the establishment of the Peatland Climate Action Scheme (PCAS). This is funded via the government and by Bord na Móna.
- The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat, and minimising impacts to downstream. The bog was drained in the past to allow peat production. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain-blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.
- In general, soggy ground conditions are preferred. This means the remaining peat is wet and that plants that prefer wetter conditions, like bog cotton and reeds will thrive.
- Many Bord na Móna bogs can not be restored back to raised bog, as so much peat has been removed and the environmental conditions have been modified. However, other natural habitats will develop like shallow wetlands with reedbeds and birch woodland, and in time a naturalised peatland can be restored.
- Re-wetting peat is also better for climate action. This reduces carbon emissions as re-wetting the remaining peat reduces carbon losses such as the production of Carbon Dioxide, the main Greenhouse Gas. The site is expected to still be a reduced carbon source for some time, but eventually the carbon sink function can re-establish in suitable conditions as peat-forming conditions are restored. This will take some time.
- The development of a range of habitats in Derryfadda Bog will support biodiversity including plants, insects, birds and mammals. This includes some species that are rare and protected in the wider landscape. It will increase the national area of native woodland. Many wetland habitats in the wider landscape have been reclaimed for agriculture and other uses and peatland rehabilitation is an opportunity to create new wetland habitats.
- Derryfadda Bog was drained and developed for industrial peat production in the 1980's. Peat production ceased in 2020. Therefore, much of the site currently comprises of bare peat. A small part of the site has already established pioneer peatland habitats, as well as some surface water.
- Measures proposed for Derryfadda Bog include internal drain blocking and other measures required to raise water levels to the surface of the peat (changing levels of pipes for example). Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth.
- Bord na Mona plan to carry out this work in 2022.
- These rehabilitation measures will be planned by a team consisting of ecologists, hydrologists and engineers. It is a principle of Bord na Móna rehabilitation planning that no actions will be taken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the site via the existing outlets.
- It will take some time for vegetation and habitats to fully develop at Derryfadda, and a peatland ecosystem to be restored. However, it is expected that most of the site will be developing pioneer habitats after 5-10 years.

- This is a peatland rehabilitation plan. Bord na Móna continually reviews its land-bank to consider future commercial or industrial developments, such as renewable energy. Bord na Móna are reviewing the potential to develop a potential renewable energy project at Derryfadda Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is proposed to rehabilitate part of Derryfadda Bog in 2022-2024 that is not constrained (see drawing number BNM-DR-23-12-05: Enhanced Rehab Measures and BNM-DR-23-12-20: Standard Rehab Measures). The remaining area will be rehabilitated after the renewable energy review is complete. Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site.
- A local community group based at Ballyforan have proposed to develop an amenity walkway crossing Derryfadda Bog. This walkway would be based on decommissioned BnM railines and on headlands. Bord na Móna are currently liaising with this group regarding this proposal.
- Bord na Móna continually reviews its land-bank to consider future commercial or industrial developments, such as renewable energy. Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site.
- Peatland rehabilitation of these bogs will bring a range of benefits to the local community via improvements to the local landscape and is also important for supporting national policies and strategies in relation to reduction of carbon emissions from these peatlands, supporting biodiversity and improvements to water quality.

## SUMMARY

**Name of bog:** Derryfadda

**Area:** 610ha

### Site description:

- Derryfadda Bog was drained and developed for industrial peat production in the 1980's. It formerly supplied milled horticultural peat and fuel peat. Industrial peat production ceased in 2020.
- Derryfadda has a pumped drainage regime to support industrial peat extraction.
- The former peat production footprint now comprises bare peat, mosaics of pioneer vegetation and some emergent scrub habitats. Parts of the eastern section has developed areas of open water since the cessation of peat production in 2020. Some active drainage channels are present on site.
- Peat depths are varied across the site. A small area of bog to the north of the site contains peat depths in excess of 2.6 metres. Much of the large northern parcel contains shallow peat, largely between 0 and 1 metre. The southern section of the bog contains large areas of deep peat, with the eastern part containing peat depths of 1-2.5 metres and the central and western section containing peat depths in excess of 2.6 metres.
- Derryfadda bog is drained by the River Suck, located adjacent to the to the east of the site boundary. This river is a tributary of the River Shannon (Upper), with the confluence located at Shannonbridge. The northern part of the site is bisected by the Killaderry stream, a tributary of which also occurring within the cutaway. The most southern parcel of the bog is separated by the Lughanagh stream, which enters the River Suck to the east of the site.

### Rehabilitation goals and outcomes

Bord na Moine is committed to discharging the obligations arising from Condition 10 of the IPC licence. This is defined as:

- Meeting conditions of the IPC licence;
- Stabilisation or improvement in water quality parameters (e.g. suspended solids);
- Environmental stabilisation.
- Optimising hydrological conditions in the former area recently in industrial peat production for the further development of wetland, Reed swamp, wet woodland and fen habitats on shallow cutaway peats, along with management of existing wetlands.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Supporting potential future amenity.
- Rehabilitation will support the National Policies on Climate Action and Green House Gas (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 as a reduced carbon source. The development of carbon sink function is dependent on the restoration of peat-forming conditions. It will also support Ireland's commitments towards Water Framework Directive and the National River Basin Management Plan 2018-2021.

### Scope of rehabilitation

The principal scope of this rehabilitation plan is defined by:

- The area of Derryfadda Bog available for rehabilitation in 2022.
- EPA IPC Licence - Ref. PO-502-01. 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.



- Bord na Móna are reviewing the potential to develop a potential renewable energy project at Derryfadda Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is proposed to rehabilitate **part** of Derryfadda Bog in 2022 that is not constrained (see drawing number BNM-DR-23-12-05: Enhanced Rehab Measures and BNM-DR-23-12-20: Standard Rehab Measures). The remaining area will be rehabilitated after the renewable energy review is complete. The peatland rehabilitation will either be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, or will be completed in the absence of any proposed renewable energy project.
- The enhanced rehabilitation measures defined in the Scheme (PCAS), which are designed to exceed/meet the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Derryfadda Bog, in particular, optimising **climate action benefits**.
- The local environmental conditions of this bog. Derryfadda Bog has variable environmental characteristics with a range of residual peat depths, and variable hydrology and topography. Derryfadda is suited to cutaway wetland development, particularly in the eastern sections in close proximity to the River Suck.
- The key goals and outcomes of rehabilitation at this bog outlined above in the preceding paragraph.
- Minimising potential impacts on neighbouring land. Some boundary drains around Derryfadda Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Some of the callows grassland located at the south-eastern side of the bog are not part of the scope of rehabilitation. These are subject to individual grazing agreements.

#### Criteria for successful rehabilitation:

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

- Rewetting of residual 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 fen, reed swamp, wet woodland and other wetland and peatland habitats.
- Stabilising or reducing key emissions to water (e.g. potential run-off of suspended solids) This will be measured via water quality monitoring (suspended solids and ammonia) for at least 2 years after the rehabilitation has been completed (IPC Licence validation).
- Reducing pressure from peat production on the local river catchment (WFD) (IPC Licence validation). This will be measured by the EPA WFD monitoring programme.
- Optimising the extent of suitable hydrological conditions to optimise climate action (Climate action verification).
- Reduction in carbon emissions (Climate action verification). This will be measured by an aerial survey after rehabilitation has been completed.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including fen, reed swamp, wet woodland, heath, scrub, embryonic *Sphagnum*-rich peat forming communities, birch woodland habitats, where conditions are suitable, and eventually towards a reduced carbon source/carbon sink (Climate action verification). These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning peatland habitats to fully develop at Derryfadda Bog.
- Improvement in biodiversity and ecosystem services. (Climate action verification).

#### 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 drainage management assessment.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation.
- Carry out proposed measures, which will be a combination of targeted drain blocking, peat field re-profiling, modifying outfalls and water level management.
- Phase 2 measures may include fertiliser application targeting bare peat areas on headlands, high fields and other areas, and further water level management.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning schedule.
- 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:**

- 2021-2022. Short-term planning actions.
- 2022. Short-term practical actions.
- 2022-2024. Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- 2024. Decommission silt-ponds, if necessary.

**Monitoring, after-care and maintenance**

The monitoring, after-care and maintenance programme for Derryfadda Bog, as required to meet Condition 10 of the IPC Licence, 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, 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 any additional rehabilitation.
- **Water quality monitoring** will be established. Monitoring of key water quality parameters will include: Ammonia, Phosphorous, Suspended solids (silt), pH and conductivity.
- Where other uses are proposed for the site, these will be assessed by Bord na Moine in consultation with interested parties. Other after-uses can be proposed for licensed areas and must go through the required assessment and planning procedures.

**Additional Monitoring:**

- The monitoring and validation of re-vegetation via natural colonisation and changes in bog condition will be carried out using an aerial 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 PCAS 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.

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## 1. INTRODUCTION

Derryfadda Bog is located in Co. Galway, approximately 4.5km northeast of Ahascragh Co. Galway, 700 metres south of Ballyforan and 2km southwest of Dysart County Roscommon, Drawing no. *BnM\_DR23\_12\_01 'Bog Site Location'*, Appendix XIII. Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Derryfadda bog group, a sub-group of the Blackwater bog group (Ref. PO-502-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the cutaway boglands within the licensed area. The bog is part of the Derryfadda bog group, a sub-group of the Blackwater bog group (see Appendix II for details of the bog areas within the Derryfadda bog group).

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. Ref. PO 502-01:

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

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

- Description of site management and status;
- Main issues and approaches to rehabilitation;
- Consultation to date with interested parties;
- Interaction with other policy and legislative frameworks;
- The planned rehabilitation goals and outcomes;
- The scope of the rehabilitation plan;
- Criteria which define the successful rehabilitation and key targets to validate 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 Scheme will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan, 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 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 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 interventions will accelerate the trajectory towards a naturally functioning peatland ecosystem.

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

- more intensive management of water levels through outfall management, drain-blocking and management of water levels within the bog;
- re-profiling/re-wetting of extant deep peat that will deliver suitable conditions for development of wetlands, fens and bog habitats;
- targeted fertiliser applications,
- seeding of targeted vegetation; and
- proactive inoculation of suitable peatland areas with *Sphagnum*.

These are collectively designed to optimise hydrological conditions (ideally and where possible water-levels <10 cm) for climate action benefits and to accelerate the trajectory of the site towards a naturally functioning ecosystem, and eventually a reduced carbon source/carbon sink again. (In some areas of dry cutaway this trajectory will be significantly longer and it is not feasible in the short-term to re-wet some areas. These areas will develop other habitats. The key to optimising climate action benefits is the restoration of suitable hydrological conditions and more intensive intervention means that the extent of suitable hydrological conditions can be optimised.

These measures are designed to encourage the development of 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.

Derryfadda Bog is proposed to be part of this this Scheme (PCAS) and this rehabilitation plan outlines the approach taken.

## 1.1 Constraints and Limitations

This document only covers the area of Derryfadda Bog, see Drawing no. *BnM\_DR23\_12\_01 'Bog Site Location'*, Appendix XIII.

Industrial peat extraction at Derryfadda Bog permanently ceased in 2020. Currently the former peat production area comprises both bare peat, some re-vegetated areas and open water. The combination of active rehabilitation measures and natural colonisation will quickly establish and/or increase the extent of 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.

Areas of cutover bog, i.e. remnant high bog areas at the site margins have also been identified as constraints, as these will not be subject to rehabilitation measures. This is largely due to the variation in topography (usually

higher in elevation to the remainder of the bog), the small area they cover or the limited effectiveness of rehabilitation measures in these small areas.

Bord na Móna are reviewing the potential to develop a potential renewable energy project at Derryfadda Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is proposed to rehabilitate part of Derryfadda Bog in 2022 that is not constrained (see drawing number BNM-DR-23-12-05: Enhanced Rehab Measures and BNM-DR-23-12-20: Standard Rehab Measures). The remaining area will be rehabilitated after the renewable energy review is complete. The peatland rehabilitation will **either** be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, **or** will be completed in the absence of any proposed renewable energy project. It is expected that Bord na Móna will revise and update rehabilitation plan for Derryfadda when this renewable energy review is complete. Bord na Móna remain fully committed to rehabilitating the whole bog and meeting the conditions of the IPC Licence. Any consideration of any other future after-uses for Derryfadda Bog, such as renewable energy, 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.

## 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 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 confirmatory site visits and monitoring and desktop analysis forms the basis for the development of the rehabilitation plan for the bog, along with:

- Experience of 40 years of research on the after-use development and rehabilitation of the Bord na Móna cutaway bogs (Clarke, 2010; Bord na Móna, 2016);
- Significant international engagement during this period with other counties in relation to best-practise regarding peatland rehabilitation and after-use through the International Peat Society and the Society for Ecological Restoration (Joosten & Clarke, 2002; Clarke & Rieley, 2010; Gann *et al.*, 2019);
- Consultation and engagement with internal and external stakeholders;
- GIS Mapping;
- BNM drainage surveys;
- Bog topography and LIDAR data;
- Hydrological modelling; and
- The development of a **Methodology Paper (draft) outlining the 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 Derryfadda Bog, in particular, optimising **climate action benefits**.

### 2.1 Desk Study

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

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- Bonn *et al.* (2017). Peatland restoration and ecosystem services- science, policy and practice.
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Additional on-line resources were also incorporated into the desk study, including:

- Mount Dillon Integrated Pollution Control Licence;
- Mount Dillon Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database ([www.epa.ie](http://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](http://www.birdwatchireland.ie));
- Geological Survey of Ireland - National Draft Bedrock Aquifer map;
- Geological Survey of Ireland - Groundwater Database ([www.gsi.ie](http://www.gsi.ie));
- National Parks & Wildlife Services Public Map Viewer ([www.npws.ie](http://www.npws.ie));
- Water Framework Directive catchments.ie/maps/ Map Viewer ([www.catchments.ie](http://www.catchments.ie));
- OPW Indicative Flood Maps ([www.floodmaps.ie](http://www.floodmaps.ie));
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps ([www.cfram.ie](http://www.cfram.ie));
- River Basin Management Plan for Ireland 2018 – 2021;



- Bord na Móna Annual Report 2021;
- 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 will be 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. Additional ecological walk-over surveys and visits have taken place at Derryfadda Bog in 2021 to inform rehabilitation planning and habitat maps have been updated, where required. 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 baseline survey report for Derryfadda Bog is contained in Appendix II.

### 3. SITE DESCRIPTION

Derryfadda Bog is located south of Ballyforan and southwest of Dysart County Roscommon. The bog is located between the L3406 and the River Suck, Drawing no. *BnM\_DR23\_12\_01 'Bog Site Location'*, Appendix XIII. The location of Derryfadda bog within the Derryfadda bog group is provided in Drawing no. *BnM\_DR23\_12\_24 'Bog group map'*, Appendix XIII.

The surrounding landscape comprises of a mosaic 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. Several sections of remnant raised bog are located along the margins of the site, see Drawing no. *MnM\_DR23\_12\_17 'Current habitat map'*, Appendix XIII. Some areas within and adjacent to the centre of the site (mostly outside of the BnM ownership boundary) are actively used for the production of domestic turf. Some small areas of plantation forestry also occur in the wider area, outside the west of the site.

Derryfadda bog is drained by the River Suck, located adjacent to the east of the site boundary. As such, Derryfadda bog forms part of the flood plain of the River Suck, regularly flooding during winter and occasionally at other times when the water levels on the river are high. This bog is a pumped bog with the water table lower than the surrounding area. The adjacent River Suck is a tributary of the River Shannon (Upper), with the confluence located at Shannonbridge. A narrow band of raised bog remnant and some Birch woodland separates the site from the River Suck to the east. The northern part of the site is bisected by the Killaderry stream, EPA reference code: IE\_SH\_26K050940, a tributary of which also occurring within the cutaway. The most southern parcel of the bog is separated by the Lughanagh stream, which enters the River Suck to the east of the site.

The Lughanagh River flows through the southern section of the site. This river is bounded by wet grassland and riparian woodland, with some small areas of remnant raised bog also located close to the river. A small mineral island is located to the east of the works facility. This area has been used in the past for storing machinery. The main vegetation type consists of calcareous grassland with occasional small trees.

The Killaderry stream separates the southern section of the site from the norther sections of the bog. This river is mainly bounded by remnant sections of raised bog, cutover bog, scrub and wet grassland. Significant areas of cutover bog and remnant raised bog in this area are not in the ownership of Bord na Móna and are used for domestic turf cutting.

The central/northern section of the site is dominated by bare peat. A mineral island is located in the centre of the site and is accessed by way of a bog track; a small works area is also located on this mineral island. This area was previously owned by the Sugar Company, who planted the entire area with conifers. The conifers were removed prior to the commencement of peat production by BnM.

A number of silt ponds occur in close proximity to the north eastern boundary of the site. In addition, two small ponds are also located in close proximity to the northeast boundary of the site and are also shown on the 25 inch OSI map.

A ridge of mineral land separates the large northern section of Derryfadda from a smaller area of cutaway to the extreme north, Drawing no. *BnM\_DR23\_12\_17 'Current habitat map'*, Appendix XIII. A fenced off compound is present in this location. A network of small fields surround the compound and are managed for agriculture.

The most northerly section of the site is the smallest production area within Derryfadda Bog. This area was previously owned by the Irish Sugar Company who produced grass meal and planted the entire area with conifers. These trees were removed by BnM in the early 1980's. This section of bog was used to produce "red" or "*Sphagnum*" peat. A fringe of conifer woodland still exists around much of the boundary of the site. However, it

is severely affected by wind throw. A strip of riparian woodland occurs between the conifer plantation and the River Suck to the north. The riparian woodland is an important biodiversity feature of the area and supports a population of red squirrel.

Derryfadda is linked to Gowla bog to the west and Castlegar bog to the south by an industrial railway line and/or a machinery travel path. The railway line runs in a general northwest to southeast direction, see Drawing number BNM-DR-23-12-02: Structures and Sampling, Appendix XIII. A minor public road runs along much of the western edge of the bog. Two bog tracks cross the bog dividing it into three sections.

### **3.1 Status and Situation**

#### *3.1.1 Site history*

Derryfadda Bog formerly supplied milled horticultural peat and fuel peat. The existing northwest-southeast rail line through Derryfadda is still maintained to facilitate access through Bord na Mona properties.

#### *3.1.2 Current land-use*

Industrial peat production has now permanently ceased at Derryfadda Bog. A large works area is located along the western edge of the site. This area once contained a tippler where peat was loaded onto lorries for transport to Lough Ree Power in Lanesborough, Co. Longford.

Biodiversity and ecosystem services have currently been identified as the primary land-use.

As described above, the River Suck is located in close proximity to the eastern boundary of the site, with a small area of wet grassland (under BnM ownership) extending from the site to the River Suck. The grassland is grazed under agreement.

Some small areas of turbary and former licenced plots also occur within the site boundary, notably within the centre of the site along an existing access road.

### 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 Derryfadda 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 Scheme (PCAS) will provide some employment for a team of workers at this site for a period of time (> 1 year).

## 3.2 Geology and Peat Depths

### 3.2.1 Sub-soil geology

GSI data indicates that Derryfadda is underlain by Visean limestone and the Lucan Formation. The Visean limestone is classified as regionally important aquifer as it is subject to karstification (conduit)..

The underlying soils and sub-soils are classed as 'Raised Bog Cutover Peat'. The peat is underlain by glacial deposits, lacustrine clays and green plastic clay. Coring also suggests that the marl is underlain by lacustrine clay. The glacial deposits generally consist of grey gravelly clay/silt and are exposed as gravel mounds and ridges in places. Coring data indicates that the areas underlain these elevated ridges to contain clayey material, therefore this material has been interpreted as glacial till (based on comparable features present in the surrounding areas). Gravel has also been exposed at several locations through the bog where there are ridges and mounds. These are particularly notable within the centre of the largest northern parcel and along the western boundary of the largest southern parcel. Both of these parcels also contain a gravel island, Drawing reference no. BnM DR23\_12\_04 'Peat depth' in the Map book, Appendix XIII of this report.

### 3.2.2 Peat type and depths

As described above, peat depths have been mapped across the site and are provided in Drawing reference no. BnM DR23\_12\_04 'Peat depth'. Commercial milled peat extraction was undertaken at Derryfadda Bog up until 2020. As a result of the harvesting programme in place at Derryfadda, peat depths are varied across the site. The Derryfadda group of bogs are relatively "young" in terms of peat production (1981-1985) and therefore have a significant depth of peat remaining in most areas. The large southern section contains deeper peat reserves,

particularly within the centre and west. Approximately 80% of the peat reserves in the northern section are in excess of 1-2.5m in depth. The remainder of the southern portion of Derryfadda Bog contains peat reserves of 0-1m in depth, much of which is associated with a gravel ridges that runs southeast to northwest along the bog margin with the Killaderry stream. Much of the large northern section of Derryfadda contains shallow peat reserves. Peat depths of 0-1m occur over approximately 80% of the large northern section. However, some small areas of deeper peat, 1.1-2.6m in depth, still persist. The smallest parcel at the extreme north of the site holds the deepest peat, with consistent peat depths of 2.6 metres + occurring this area.

### 3.3 Key Biodiversity Features of Interest

The majority of the site can be rated as local importance (lower value) (NRA, 2009) as the majority of the site comprises bare peat and was managed primarily for industrial peat production until 2020. Some of the marginal lands within the site boundary, containing remnant bog, cutover bog, woodland or grassland have been assessed as of local importance (higher value) in a local context (NRA, 2009). Some small areas of the Derryfadda cutaway bog are beginning to develop pioneer cutaway wetland habitats (poor fen, reed swamp, birch scrub). Where parts of the east of the site are located within the Suck River Callows NHA and Suck River Callows SPA boundary, these areas have been rated as having an international ecological value, due to their designation. However, the boundaries of the designated sites only overlap with the marginal lands within the Bord na Moña boundary.

Habitats along the margins of the site include bog woodland (WN7), scrub (WS1), remnant sections of raised bog (PB1), lowland depositing river (FW2) and wet grassland (GS4). The areas of Birch woodland and scrub are dominated by birch (*Betula pubescence*), gorse (*Ulex europaeus*), willow (*Salix* sp.), bracken (*Pteridium aquilinum*) and bramble (*Rubus fruticosus* agg.). The sections of remnant raised bog are small and dry and dominated by ling heather (*Calluna vulgaris*). The wet grassland within the mineral ridge to the north, and that adjacent to the River Suck to the southeast, are managed for agriculture by local farmers.

Both the Lughanagh stream to the south and the Killaderry stream in the centre of the site are important wildlife corridors for a variety of flora and fauna in the area. These habitats are ecologically important in a local context and support a wide variety of species, including otter (*Lutra lutra*), white-clawed crayfish (*Austropotamobius pallipes*).

Adjacent habitats include lowland depositing river (FW2) i.e. the River Suck, wet grassland (GS4), improved agricultural grassland (GA1), cutaway bog (PB4), conifer plantation and remnant raised bog (PB1).

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 more extensive areas of fen and reed swamp.

#### 3.3.1 Current habitats

A habitat map of Derryfadda Bog is shown in Drawing reference no. BnM DR23\_12\_17 'Current habitat map' in the Map book, Appendix XIII of this report. The majority of the site is dominated by bare peat, with natural revegetation and areas of remnant raised bog occurring along the bog margins.

#### Central and small Northern sections

The Killaderry stream, see Plate 3.1, separates the southern sections of the site from the central and northern sections. This stream is mainly bounded by remnant sections of raised bog, cutover bog, scrub and wet grassland, see Plate 3.2. Significant areas of cutover bog and remnant raised bog in this area are not in the ownership of Bord na Moña and are used for domestic turf cutting, see Drawing reference no. BnM DR23\_12\_17 'Current habitat map'.



The central section of the site is dominated by bare peat, see Plate 3.3. A mineral island is located in the centre of the site and is accessed by way of a bog track; a small works area is located on the mineral island.



*Plate 3.1 The Killaderry stream separates the southern sections of the site from the central and northern sections.*



*Plate 3.2 Example of remnant sections of raised bog, cutover bog, scrub and birch dominated woodland occurring both north and south of the Killaderry stream*



*Plate 3.3 Example of the central section of the site dominated by bare peat.*



*Plate 3.4 Example of cutover bog with dry heath type vegetation occurring within the north-eastern part of the site.*



*Plate 3.5 Example of dry grassland and scrub occurring on part of the mineral island that separates the central section from the most northern parcel.*



*Plate 3.6 Example of cutaway bare peat occurring within the south of the site. This section contains large areas of deep sphagnum peat.*

An area of cutover bog is located in the north-eastern part of this section, see Plate 3.4. This area consists of dry heath type vegetation with some scrub along the edges. Some areas of the scrub consisted of birch with an understory of bramble, bracken and bluebell. This area had been in peat production in the past.

Two small ponds are located close to the north eastern boundary of the site. These features are unusual in that they were not connected to any other watercourse but contained fish. The small areas of open water were surrounded by a mix of wet grassland and scrub. These features are visible on the 25 inch OSI maps for Galway.

A ridge of mineral land separates the central section from the northern section. The mineral land was the site of the proposed briquette factory and a fenced off compound is present in this location. A network of small fields surround the compound, some of the small fields are actively grazed but a few do not appear to be managed and had encroaching scrub. The small, most northerly section, of the site is the smallest production area within Derryfadda Bog and still contains deep peat.

### Southern Section

The southern section of Derryfadda Bog is mainly comprised of bare peat, see Plate 3.6. The Lughanagh stream flows through this southern section of the site close to the south eastern corner. This river is bounded by wet grassland and riparian woodland, with some small areas of remnant sections of raised bog also located close to the river. The wet grassland consisted of common reed (*Phragmites australis*), lesser tussock sedge (*Carex diandra*) and reed canary grass (*Phalaris arundinaceae*) with occasional willows scattered throughout. The river is important habitat for species such as mallard, otter and mute swan. Evidence that white-clawed crayfish (*Austropotamobius pallipes*) has also previously been recorded at this location.

#### 3.3.2 Species of conservation interest

A number of species of conservation concern utilize the habitats available at Derryfadda Bog. The following is a summary of the records of these species available within BnM records.

Multiple mammal species have been recorded at Derryfadda Bog. Evidence of badger (*Meles meles*), fox (*Vulpes Vulpes*), fallow deer (*Dama dama*), pine marten (*Martes martes*), hare (*Lepus timidus hibernicus*), otter (*Lutra lutra*), red squirrel (*Sciurus vulgaris*) and common frog (*Rana temporaria*) were observed on site during BnM walkover surveys.

Lepidopteran (butterfly) and Odonata (dragonflies and damselflies) species recorded on site included; marsh fritillary butterfly, ringlet (*Aphantopus hyperantus*), green-veined white (*Pieris napi*), meadow brown butterfly (*Maniola jurtina*), orange tip butterfly (*Anthocharis cardamines*), large white butterfly (*Pieris brassicae*), blue tailed damselfly (*Ischnura elegans*), brown hawker (*Aeshna grandis*), common darter (*Sympetrum striolatum*) and four-spotted chaser (*Libellula quadrimaculata*). Buff-tailed bumblebee (*Bombus terrestris*) has also been recorded commonly. During a BnM walkover surveys in August 2021, a marsh fritillary butterfly larval web was recorded in suitable habitat to the northwest of the site, indicating the presence of a population within the site. Additional areas of suitable habitat occur at other locations across the site, primarily along railway verges, remnant high bog at the margins and along site access tracks.

Common frog (*Rana temporaria*) has also been recorded within the site during walkover surveys undertaken in 2201.



Ringed plover (*Charadrius hiaticula*) and snipe (*Gallinago gallinago*) have been recorded during the breeding season on site. It is possible that kestrel could also breed on site, as suitable habitat exists at the margins. Other more common species recorded within the site include buzzard (*Buteo buteo*), willow warbler (*Phylloscopus trochilus*), mallard (*Anas platyrhynchos*), wood pigeon (*Columba palumbus*), swallow (*Hirundo rustica*), long-tailed tit (*Aegithalus caudatus*), green finch (*Carduelis chloris*), hooded crow (*Corvus cornix*), grasshopper warbler (*Locustella naevia*), mute swan (*Cygnus olor*), skylark (*Alauda arvensis*), jay (*Garrulus glandarius*), pheasant (*Phasianus colchicus*), blue tit (*Cyanistes caeruleus*) and grey heron (*Ardea cinerea*).

### 3.3.3 Invasive Alien Species

The only non-native invasive species, listed on the Third Schedule of the EC Birds and Natural Habitats Regulations, identified within the site during Bord na Moña site visits was *Rhododendron ponticum*. A stand of individual plants was located within an area of cutover bog in 2012.

## 3.4 Statutory Nature Conservation Designations

There is regular overlap between Derryfadda and the Suck River Callows NHA (site code 000222) and the Suck River Callows SPA (site code 0004097). Suck River Callows SPA has been designated for its importance for wintering wildfowl and species of conservation importance including; wigeon (*Anas penelope*), golden plover (*Pluvialis apricaria*), lapwing (*Vanellus vanellus*), Greenland white-fronted goose (*Anser albifrons flavirostris*) and whooper swan (*Cygnus cygnus*).

There are Special Areas of Conservation (SAC) located within or adjacent to Derryfadda Bog. The nearest SCA to Derryfadda Bog is Killeglan Grassland SAC, located to the east of the River Suck.

Due to its location within the catchment, Derryfadda is hydrologically connected to the Suck River Callows SPA located to the east of the site. In addition, both the River Shannon Callows SAC and Middle Shannon Callows SPA are located in excess of 30km (surface water distance) downstream of Derryfadda via the River Suck.

This rehabilitation plan has been subject to the Appropriate Assessment process, as per Article 6 of the EU Habitats Directive 92/43/EEC. The Appropriate Assessment has been provided as part of the accompanying documentation. A full list of EU Designated Sites occurring within the likely zone of impact of Derryfadda bog is provided in the accompanying Appropriate Assessment documentation.

No non-statutory designated sites i.e. proposed Natural Heritage Areas (pNHAs) occur in the wider area around Derryfadda bog.



### 3.5 Hydrology and Hydrogeology

Derryfadda bog is drained by the River Suck, located adjacent to the east of the site boundary. As such, Derryfadda bog forms part of the flood plain of the River Suck, regularly flooding during winter and occasionally at other times when the water levels on the river are high. This bog is a pumped bog with the water table lower than the surrounding area. The adjacent River Suck is a tributary of the River Shannon (Upper), with the confluence located at Shannonbridge. A narrow band of raised bog remnant and some Birch woodland separates the site from the River Suck to the east. The northern part of the site is bisected by the Killaderry stream, EPA reference code: IE\_SH\_26K050940, a tributary of which also occurring within the cutaway. The most southern parcel of the bog is separated by the Lughanagh stream, which enters the River Suck to the east of the site.

Derryfadda forms part of the Upper Shannon Catchment (Catchment ID : 26D) as defined by the EPA under the Water Framework Directive (WFD) and is situated within the Suck\_SC\_070 Sub-Catchment. The bog is located along the floodplain of the river Suck north of the town of Ballinasloe. The bog contains several drainage pathways which primarily drain in a south-easterly direction towards the River Suck. Derryfadda is a pumped bog (see Drawing no. MnM\_DR23\_12\_02 '*Structures and sampling*', Appendix XIII).

Regional hydrological data suggest that Derryfadda receives average precipitation of 990mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 513mm/yr, leaving an average effective precipitation of 477mm/yr. Assuming no recharge to groundwater and no groundwater contribution to discharge from the bog, the available precipitation that may become runoff (assuming no change in storage) is 477mm/yr, which equates to an annual runoff rate of c. 4,770m<sup>3</sup>/ha.

GSI data indicates that Derryfadda is underlain by Visean limestone and the Lucan Formation. The Visean limestone is classified as regionally important aquifer as it is subject to karstification (conduit). The Lucan formation is a Locally Important Aquifer as it is Moderately Productive only in Local. There is a mapped karst features on the bog (swallow hole) along with several karst features in the surrounding area including enclosed depressions, turloughs and swallow holes.

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.

Quaternary Sediment maps show Derryfadda underlain by peat, yet surrounded by inorganic deposits, including Till derived chiefly from Limestone and alluvium to the east (along the River Shannon). Lacustrine marl deposits have also been mapped within the bog. GSI groundwater vulnerability mapping indicates that there is generally low vulnerability in the area of the bog however there are areas of high and extreme vulnerability both within and immediately adjacent to the bog, owing to the presence of karstified limestone features, bedrock close to the ground surface and the mapped swallow hole within the bog. While Groundwater Vulnerability is typically used to indicate the susceptibility to groundwater pollution, it can provide a useful proxy indication of likely groundwater flow rates in the surrounding area.

### 3.6 Emissions to surface-water and water-courses

Drainage is an important feature of industrial peat production and there were extensive field drains maintained throughout bog areas to facilitate industrial peat production annually, each of which eventually drains into a

terminal silt pond that allows for settlement of suspended solids before entering the main river systems. In accordance with the existing Integrated Pollution Control licence, all drainage water from boglands in a licensed area is discharged via an appropriately designed silt pond treatment arrangement as required in Condition 6.6. of the licence.

Silt ponds are the key silt control infrastructure to control potential emissions from industrial peat production sites. As required under licence, BNM have a number of procedures for how it manages and maintains its silt pond network. The silt that builds up in silt ponds is excavated on a regular basis by Bord na Móna to facilitate an efficient level of silt control. Silt ponds will continue to be maintained during the rehabilitation and decommissioning period. Silt pond decommissioning will be considered when sites are deemed to be on a trajectory of environmental stability and peatland rehabilitation has been completed.

Derryfadda/Killaderry bog has 16 treated surface water outlets to the River Suck. There are 7 direct to the River Suck (IE\_SH\_26S071200 SUCK\_130), 5 to the Killaderry Stream (IE\_SH\_26K050940) and the balance of 4 to the Lughanagh Stream (IE\_SH\_26L530780).

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 accompanying structures map along with water quality map. See Drawing number BNM-DR-23-12-02 titled **Derryfadda Bog: Structures and Sampling**, along with Drawing number BNM-DR-23-12-WQ01 titled **Derryfadda Bog: Water Quality Map** included in the accompanying Mapbook, which illustrate the various drainage and water quality infrastructure present at Derryfadda.

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

The main emission limit value associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 3.7 mg/l and COD 100mg/l.

Initial monthly ammonia concentrations from August 2020 to September 2021 have a range of .017 to 2.2 mg/l with an average of 0.342mg/l.

Results for suspended solids for the same period indicate a range of >2 to 8mg/l with an average of 4.45mg/l.

From an analysis of any monitoring over the past 5 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 Ammonia and broadly under the trigger levels for COD.

| Bog        | SW     | Monitoring | pH  | SS mg/l | TS mg/l | Ammonia mg/l | TP mg/l | COD mg/l | Colour |
|------------|--------|------------|-----|---------|---------|--------------|---------|----------|--------|
| Derryfadda | SW-107 | Q3 19      | 7   | <5      | 171     | 1.3          | 0.06    | 82       | 337    |
| Killaderry | SW-108 | Q3 19      | 7   | 26      | 258     | 0.28         | <0.05   | 89       | 349    |
| Killaderry | SW-109 | Q3 19      | 6.6 | 5       | 162     | 1.4          | <0.05   | 96       | 319    |
| Killaderry | SW-110 | Q3 19      | 7   | <5      | 186     | 0.27         | 0.06    | 91       | 406    |
| Killaderry | SW-111 | Q3 19      | 6.5 | 8       | 165     | 0.098        | <0.05   | 89       | 387    |
| Killaderry | SW-112 | Q3 19      | 6.5 | 7       | 101     | 0.717        | <0.05   | 77       | 315    |
| Killaderry | SW-113 | Q3 19      | 6.8 | 5       | 289     | 0.572        | <0.05   | 98       | 672    |
| Killaderry | SW-114 | Q3 19      | 6.8 | 5       | 133     | 0.86         | <0.05   | 78       | 296    |
| Killaderry | SW-115 | Q3 19      | 6.7 | <2      | 126     | 0.741        | <0.05   | 64       | 267    |
| Derryfadda | SW-99  | Q4 19      | 6.7 | 7       | 91      | 0.285        | <0.05   | 45       | 229    |
| Derryfadda | SW-100 | Q4 19      | 7.4 | <2      | 343     | 0.009        | <0.05   | 68       | 285    |
| Derryfadda | SW-101 | Q4 19      | 6.4 | <2      | 74      | 0.247        | <0.05   | 47       | 218    |
| Derryfadda | SW-102 | Q4 19      | 6.5 | 3       | 246     | 0.128        | <0.05   | 98       | 397    |
| Derryfadda | SW-103 | Q4 19      | 6.6 | 2       | 109     | 0.281        | <0.05   | 42       | 225    |
| Derryfadda | SW-107 | Q2 18      | 7.6 | 5       | 234     | 2.2          | 0.05    | 56       | 176    |
| Killaderry | SW-108 | Q2 18      | 7.7 | 5       | 252     | 0.27         | 0.05    | 51       | 113    |
| Killaderry | SW-109 | Q2 18      | 7.7 | 5       | 220     | 1.2          | 0.05    | 69       | 197    |
| Killaderry | SW-110 | Q2 18      | 7.8 | 5       | 230     | 0.34         | 0.05    | 60       | 124    |
| Killaderry | SW-114 | Q2 18      | 7.7 | 5       | 214     | 1.7          | 0.05    | 73       | 227    |
| Killaderry | SW-115 | Q2 18      | 7.8 | 5       | 284     | 2.8          | 0.07    | 28       | 124    |
| Killaderry | SW-111 | Q2 18      | 7.5 | 5       | 198     | 0.1          | 0.05    | 71       | 223    |
| Killaderry | SW-112 | Q2 18      | 7.4 | 5       | 190     | 0.78         | 0.05    | 33       | 177    |
| Killaderry | SW-113 | Q2 18      | 7.7 | 6       | 288     | 0.28         | 0.05    | 70       | 210    |
| Derryfadda | SW-99  | Q3 18      | 5.9 | 5       | 104     | 0.79         | 0.05    | 66       | 195    |
| Derryfadda | SW-100 | Q3 18      | 7.1 | 5       | 110     | 0.64         | 0.05    | 62       | 286    |
| Derryfadda | SW-101 | Q3 18      | 7.3 | 5       | 134     | 0.29         | 0.07    | 57       | 165    |
| Derryfadda | SW-102 | Q3 18      | 7.2 | 5       | 156     | 0.02         | 0.05    | 78       | 302    |
| Derryfadda | SW-103 | Q3 18      | 7.3 | 5       | 164     | 0.91         | 0.05    | 62       | 181    |
| Derryfadda | SW-100 | Q1 16      | 6.4 | 5       | 86      | 0.44         | 0.09    | 123      | 139    |
| Derryfadda | SW-101 | Q1 16      | 6.4 | 5       | 116     | 0.43         | 0.05    | 46       | 145    |
| Derryfadda | SW-102 | Q1 16      | 7.6 | 5       | 364     | 0.07         | 0.05    | 41       | 125    |
| Derryfadda | SW-103 | Q1 16      | 7.4 | 5       | 186     | 0.97         | 0.05    | 42       | 126    |
| Derryfadda | SW-104 | Q1 16      | 7.3 | 5       | 174     | 0.86         | 0.06    | 48       | 145    |
| Derryfadda | SW-105 | Q1 16      | 7.4 | 5       | 210     | 1.2          | 0.05    | 49       | 118    |
| Derryfadda | SW-106 | Q1 16      | 7.5 | 5       | 270     | 2.3          | 0.05    | 31       | 98     |
| Derryfadda | SW-107 | Q2 16      | 7.9 | 6       | 178     | 0.02         | 0.05    | 48       | 119    |
| Killaderry | SW-108 | Q2 16      | 7.1 | 16      | 262     | 0.12         | 0.08    | 78       | 174    |
| Killaderry | SW-109 | Q2 16      | 7.5 | 5       | 224     | 1.8          | 0.05    | 47       | 136    |
| Killaderry | SW-110 | Q2 16      | 7.6 | 5       | 170     | 0.44         | 0.05    | 52       | 183    |
| Killaderry | SW-111 | Q2 16      | 7.3 | 10      | 160     | 0.18         | 0.05    | 93       | 238    |
| Killaderry | SW-112 | Q2 16      | 7.1 | 5       | 156     | 0.87         | 0.05    | 82       | 314    |
| Killaderry | SW-113 | Q2 16      | 7.5 | 5       | 132     | 0.41         | 0.05    | 46       | 181    |
| Killaderry | SW-114 | Q3 16      | 6.8 | 5       | 236     | 0.94         | 0.05    | 67       | 178    |
| Killaderry | SW-115 | Q3 16      | 7.2 | 5       | 144     | 1.1          | 0.05    | 65       | 208    |
| Killaderry | SW-99  | Q4 15      | 5.2 | 5       | 50      | 0.53         | 0.05    | 71       | 166    |

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 Water Quality Map.

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](http://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.

Water quality of water discharges from restored/rehabilitated peatlands normally improves as a result of bog rehabilitation and restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Peatland rehabilitation is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Moña Raised Bog Restoration Project and ongoing Bord na Moña rehabilitation is expected to have a positive impact on water quality and help the NRBMP deliver its objectives in relation to the WFD.

Water will still discharge from designated emission points when rehabilitation at Derryfadda Bog has been completed. The existing silt pond will continue to be maintained and operated as long as required, or such point as they can be decommissioned, with no change in outfall type. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of the key downstream water body receptors, and is expected to support the improvement of the current and future status of Silver River, currently assessed as being of Moderate Status.

### 3.7 Fugitive Emissions to air

None

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 C-sink function.

It is expected that Derryfadda Bog can become a reduced carbon source 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. The site is expected to develop Reed Swamp and fen habitats. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

## 4. CONSULTATION

### 4.1 Consultation to date

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

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

- General consultation with range of stakeholders at annual Bord na Mona Biodiversity Action Plan review days 2010-2018.
- Foss, P.J., Crushell, P. & Gallagher, M.C. (2017). Counties Longford & Roscommon Wetland Study. Report prepared for Longford and Roscommon County Councils.
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Sub-committee on Shannon Flooding Work Programme and Measures (OPW, Waterways Ireland, ESB, LA's, Fisheries Ireland, NPWs etc).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).
- Ballyforan local community group – in relation to the development of a walkway amenity across Derryfadda Bog (2020-2021).

Local stakeholders will continue to be identified through ongoing engagement with neighbours whose land adjoins Derryfadda Bog. Additionally, local representatives of national bodies (such as Regional National Parks and Wildlife staff) and relevant offices in County Councils (such as the Heritage or Environmental Offices) will be contacted. Any identified local interest groups will also be sought and informed of the opportunity to engage with this rehabilitation plan, and when identified will be invited to submit their comments or observations in relation to the proposed rehabilitation at Derryfadda Bog.

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

### 4.2 Issues raised by Consultees

N/A. Not issued to consultees yet.

### 4.3 Bord na Móna response to issues raised during consultation

N/A

## 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.
- Supporting ongoing and future amenity land-use planning. Integrating rehabilitation measures with proposed amenity infrastructure on site. It is not proposed to carry out any rehabilitation actions to change or negatively affect any amenity infrastructure.
- Taking account of potential future Bord na Móna land-uses, such as renewable energy.
- 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 Derryfadda 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). However, extensive areas of deep *Sphagnum* peat do remain within the southern and most northern parcels of the bog and do have potential to develop *Sphagnum*-rich habitats in this timeframe. Areas within the centre of the site have been largely cut away with shallow peat. In addition, areas of shell marl and fen peat remain in this area and as such, are likely to develop more fen and reedbed type habitats in the future. 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 Móna).
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features.
- Bord na Móna are also planning rehabilitation measures, in 2021, in Castlegar bog located adjacent to the south of Derryfadda. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the River Suck, associated tributaries and the downstream River Shannon (Upper), from rehabilitation more than one bog in the same catchment.



## 6. SCOPE OF REHABILITATION

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

- The area of Derryfadda Bog targeted for peatland rehabilitation (Drawing reference no. DR23\_12\_01 'Bog site location', Appendix XIII of this report).
- EPA IPC Licence - Ref. PO-502-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the cutaway boglands within the licensed area. Derryfadda bog is part of the Derryfadda bog group, a sub-group of the Blackwater bog group.
- The Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This Scheme is designed to enhance the ecosystem services of Derryfadda Bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilisation is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Derryfadda Bog identify cutaway re-wetting as the most suitable rehabilitation approach for the shallow peat areas within the site. In some central parts of the site, where shallow peat depths remain, there is an alkaline influence on the water chemistry. This means that re-wetting will lead to the development of fen, reed swamp and other associated wetland/peatland habitats.
- Exposed gravel ridges within the site will further benefit from targeted drain blocking and water management measures to facilitate revegetation.
- The BnM review of a potential renewable energy project at Derryfadda Bog is a temporal constraint on the scope of rehabilitation. It is expected that the decision to develop a renewable energy project at Derryfadda Bog will take place within 1-2 years.
- 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 Derryfadda Bog as **environmental stabilisation and optimising suitable hydrological conditions, and setting the site on a trajectory towards the development of naturally functioning peatland habitats (fen, reed swamp and other associated wetland habitats)**.
- Rehabilitation of Derryfadda Bog will support multiple National strategies of climate action, biodiversity action and other key environmental strategies such as the Water Framework Directive.
- The time frame for the delivery of the planned rehabilitation will be undertaken according to available resources and appropriate constraints.
- Some rehabilitation measures are proposed on the marginal cutover bog zone at the peripheries of the bog.

### 6.1 Key constraints

**Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some bogs where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other bogs, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status), and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and birch woodland).

- At Derryfadda Bog, much of the bog has been cutaway, particularly the central section. There are local factors that will influence the future trajectory of this site (it was always a relatively 'wet' bog due to its proximity to the River Suck, and is therefore being pumped to manage water levels) which need to be considered as part of the wider rehabilitation work.
- **Potential land-use.** Bord na Móna are reviewing the potential to develop a potential renewable energy project at Derryfadda Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is proposed to rehabilitate **part** of Derryfadda Bog in 2022 that is not constrained (see drawing number BNM-DR-23-12-05: Enhanced Rehab Measures and BNM-DR-23-12-20: Standard Rehab Measures).
- Bord na Móna remain committed to rehabilitating all of Derryfadda Bog and to meeting IPC Licence conditions for this bog. The remaining area will be rehabilitated after the renewable energy review is complete. The peatland rehabilitation will **either** be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, **or** will be completed in the absence of any proposed renewable energy project. Phasing rehabilitation in way has the potential to support additional climate action measures (integrating renewable energy). At this stage, it is not anticipated that any future potential land-use on the site will impact on the proposed rehabilitation.
- **Potential land-use.** A walkway amenity is being proposed for this site. Re-wetting will be planned as to facilitate potential future amenity. Future amenity does not constrain re-wetting at this site as the walkway is being proposed for decommissioned walkways and headlands, which would not be targeted for re-wetting.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care must be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land. For example, commercial Coillte forestry plantation occurs outside of, but adjacent to, the northeast corner of Derryfadda bog.
- **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 Derryfadda Bog will be carried out (see Appendix XII).
- **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 during the consultation work associated with the decommissioning and rehabilitation work described here.

## 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 practical rehabilitation.

### 6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- The longer-term raised bog restoration trajectory of the site. The plan covers the short-term rehabilitation **actions** and **an additional monitoring and after-care programme** to monitor the rehabilitation during the Scheme and to respond to any needs (failure of environmental stabilisation for example). It is expected that this rehabilitation plan will set the site on an enhanced and accelerated trajectory towards environmental stabilisation and wetland creation. The plan does not set any goals or outcomes, for example, the extent (specific area) of active raised bog habitat (ARB) that may develop at this site in the long-term. This is beyond the scope of this rehabilitation plan.
- This plan is not intended to be an after-use or future land-use plan for Derryfadda Bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future. This will require further engagement with stakeholders.

## 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.

A 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 key emissions (e.g. suspended solids).

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

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

- Rewetting of residual peat in the former area of industrial peat production to offset potential run off of suspended solids and to encourage development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat. Table 7.1 provides a summary of the criteria for successful rehabilitation and associated monitoring. The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed.
- That there is a stabilizing/improving concentration of suspended solids and ammonia in discharges from Bord na Móna sites, associated with the measures undertaken to stabilize the peat surface by the blocking of the internal drainage system and the maximized rewetting of the peat surface. 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) for at least 2 years after the rehabilitation has been completed.
- 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. This will be measured by the EPA Water Framework Directive monitoring programme.

With regard to predicting and estimating likely trends that might materialise 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, see Plate 7.1.

Similarly monitoring of surface water ammonia emissions from a Corlea bog in Mountdillon over 3 yrs. post cessation of peat extraction with ongoing rehabilitation, indicate downward trends, see Plate 7.2.

As the monthly monitoring program at Derryfadda continues in 2022 during the rehabilitation works, and data from the 2021 monitoring program is compiled, further trending will be produced to verify any ongoing trends.

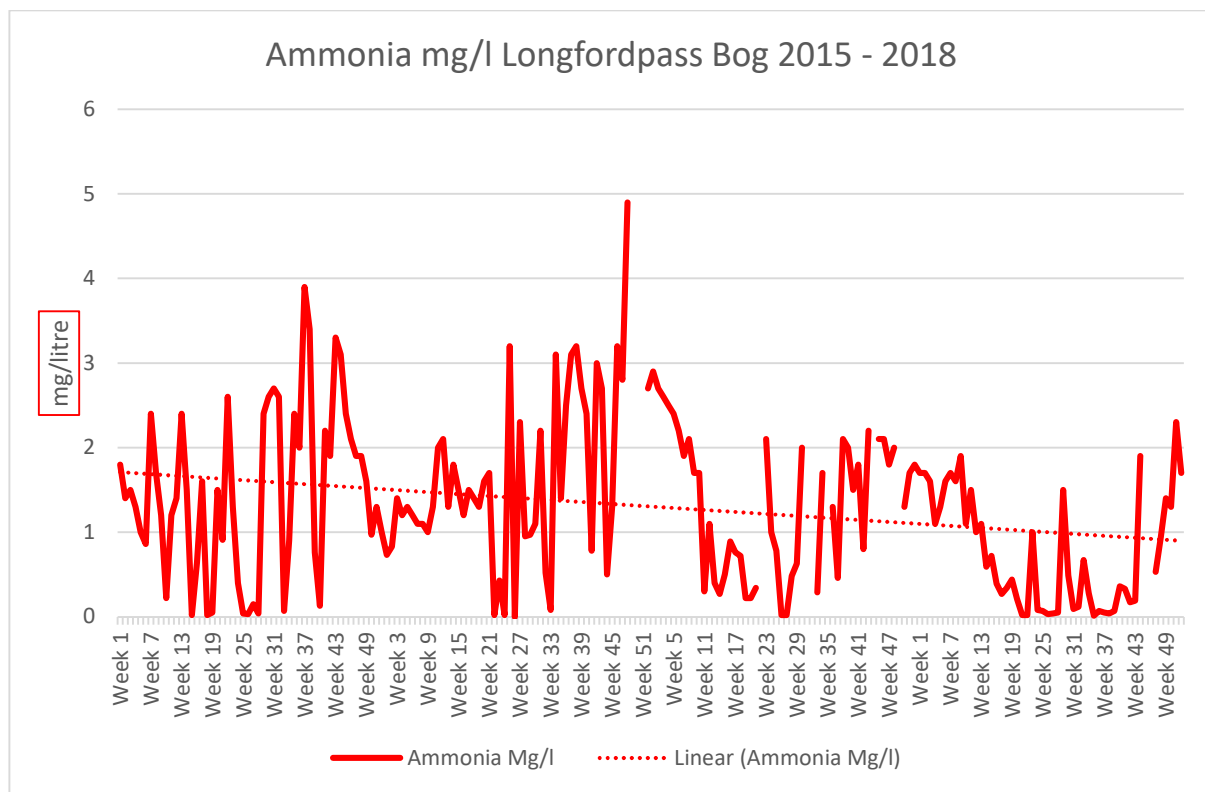


Plate 7.1 Example of decreasing ammonia emissions at Longfordpass bog following cessation of peat extraction and commencement of rehabilitation.

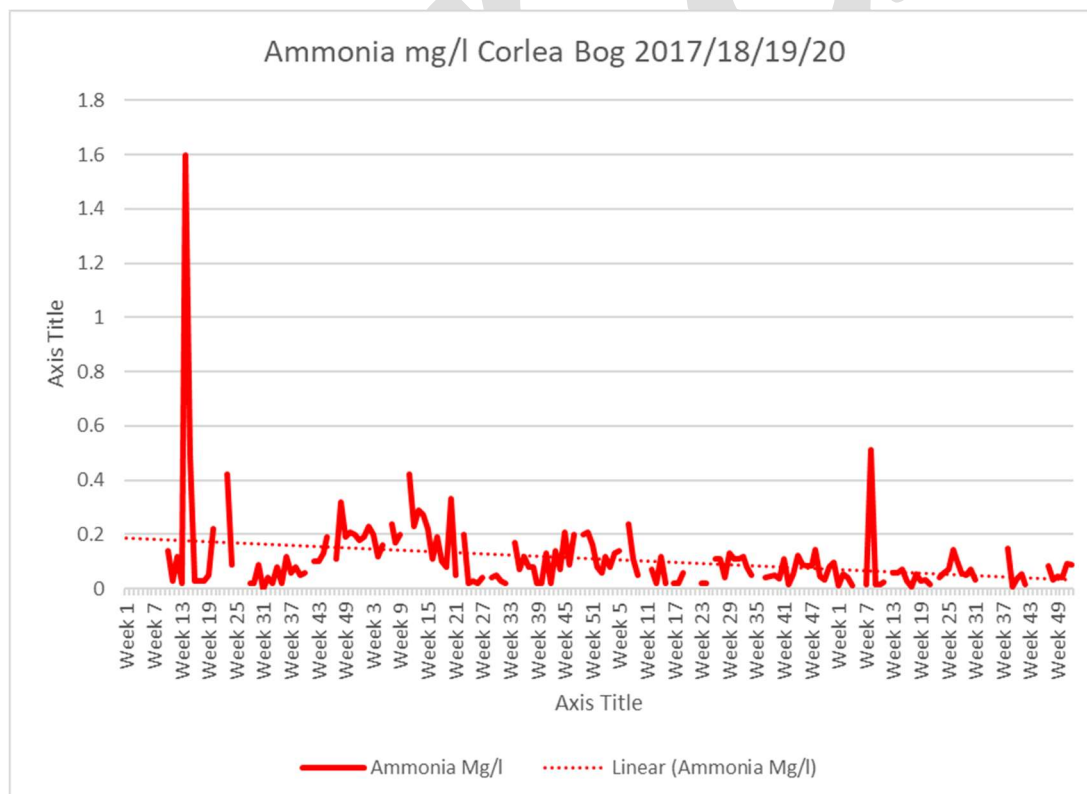


Plate 7.2 Example of decreasing ammonia emissions at Corlea bog following cessation of peat extraction and commencement of rehabilitation.

*7.1.1 Additional criteria for successful rehabilitation for the optimisation of climate action and other ecosystem service benefits:*

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising residual peat re-wetting). This will be measured and demonstrated by site monitoring (updated aerial photography) to measure the extent of suitable hydrological conditions.
- Accelerating the trajectory of the site towards becoming reduced carbon source. 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 (similar to ecotope mapping).
- 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.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including, fen, reed swamp, wet woodland, heath, scrub, birch woodland, and embryonic *Sphagnum*-rich peatland communities, where conditions are suitable. These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning habitats to fully develop at Derryfadda Bog. This will be demonstrated by the reduction in bare peat and the establishment of further pioneering habitats. This will be measured via aerial photography, habitat mapping and cutaway/habitat condition assessment.
- 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 etc). 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. These metrics will be defined in the context of the overall Scheme resources and after consultation with stakeholders.

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

| <b>Criteria type</b>        | <b>Criteria</b>  | <b>Target</b>  | <b>Measured by</b>  | <b>Expected Time-frame</b> |
|-----------------------------|--|--|---|----------------------------|
| IPC validation              | Rewetting in the former area of industrial peat production   | Delivery of rehabilitation measures<br><br>Reduction in bare peat. | Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking)<br><br>Establishment of a baseline for future monitoring of bare peat, vegetation establishment and habitat condition.  | 2022-2025                  |
| IPC validation              | Key water quality parameters<br><br>Ammonia, Phosphorous, Suspended solids (silt), pH and conductivity | Reduction or stabilisation of key water quality parameters         | Water quality monitoring. Started in advance of the proposed rehabilitation.  | 2020-2023                  |
| IPC validation              | Reducing pressure from peat production on the local river catchment (WFD)                              | No decline in the WFD status of the local river catchment          | EPA WFD monitoring programme  | WFD schedule               |
| Climate action verification | Optimising the extent of suitable hydrological conditions to optimise climate action                   | Optimal extent of suitable hydrological conditions                 | Aerial photography and Habitat mapping to map extent of suitable hydrological conditions.<br><br>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. | 2022-2025                  |
| Climate action verification | Reduction in carbon emissions.   | Reduction in carbon emissions                                      | Carbon emissions – estimated using a high bog condition assessment and appropriate carbon emission factors.   | 2022-2025                  |

| Criteria type               | Criteria   | Target  | Measured by  | Expected Time-frame |
|-----------------------------|--|---|--|---------------------|
| Climate action verification | Setting the site on a trajectory towards establishment of a mosaic of compatible habitats  | Establishment of compatible cutaway habitats        | Habitat map, Cutaway bog condition map<br><br>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.   | 2022-2025           |
| Climate action verification | Biodiversity and ecosystem services.<br><br>Habitat establishment<br><br>Presence of key species – Sphagnum<br><br>Wintering birds | Improvement in biodiversity and ecosystem services. | Metrics that relate to selected biodiversity and ecosystem services (to be defined).<br><br>Presence of key species – Sphagnum – Walkover survey<br><br>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. | 2022-2025           |

Meeting climate action verification criteria and monitoring of these criteria after the Scheme has been completed is dependent on support from PCAS 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 and Ireland's National Recovery and Resilience Plan.
- **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 may 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 collecting a range of scientific data that can then quickly be adapted 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 remaining peat depths, topographical and hydrological modelling (see Drawing no's. BnM DR23\_12\_04 '*Peat Depths*', BnM DR23\_12\_03 *LiDAR map and BNM-DR-23-12-09: Depression Analysis*) 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 (BNM-DR-23-12-09: *Depression Analysis, Appendix XIII*) 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 Drawing no. BnM DR23\_12\_05 '*Proposed rehab measures*', *Appendix XIII*. (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 Derryfadda Bog will include:

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a parts of the east of the site, in close proximity to the River Suck, will develop a mosaic of open water and wetland habitats with permanent deeper water. 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 topography at this site. Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent River Ruck.
- Intensive drain blocking around existing wetland or standing water to create/promote the spread of wetland habitats.
- Re-wetting some areas of the bog through regular field drain blocking using a dozer/excavator to create three peat barriers every 100 m along each field drain.
- Peat field re-profiling to reduce the camber of the fields and cell-bunding between high fields to manage/optimize water levels for revegetation.
- Re-alignment of piped drainage.
- Blocking drains in targeted existing pioneering vegetation mosaics, to accelerate re-wetting, and/or manage water levels to the correct height to accelerate the current trajectory towards reed swamp and fen, using a dozer/excavator.
- The creation of berms across some sections of the bog to control/retain water levels. This measure seeks to retain shallow (< 10 cm) water conditions across multiple fields.
- Re-wetting some deep peat areas of the bog through regular more intensive drain blocking using an excavator to create up to a maximum of seven peat dams/blockages every 100 m along each field drain, along with field re-profiling and drain infilling if required;
- Re-wetting the deep peat areas of the bog using berms, drain blocking 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;

- Assessment of potential to remove/prevent the spread of the invasive species *Rhododendron* (*Rhododendron ponticum*) from the cutover bog within the centre of the site and the implementation of relevant control measures.
- Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields as required, see Drawing no. DR23\_12\_28 '*Targeted fertiliser map*', Appendix XIII.
- Modifying water levels at outfalls, as it may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated. This will further slow the movement of water through and out of Derryfadda Bog. There is some blocking of drains in marginal (degraded) remnant raised high bog areas proposed as part of this plan, although they are small in size and degraded nature.
- The existing silt ponds will be retained and maintained during the rehabilitation phase. During the monitoring and verification phase the silt ponds will be continually inspected and maintained, where appropriate. When it is deemed that the silt ponds are not required, as the bog has been successfully stabilised and there is no run-off of suspended solids, the condition of the silt ponds will be reviewed. The 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).
- Seeding of vegetation and inoculation of *Sphagnum* will be undertaken where required. In some areas where vegetation has already established, seeding of vegetation is not required.

Table 8.1: Types of and areas for enhanced rehabilitation measures at Derryfadda Bog.

| Type              | Code | Enhanced Rehabilitation Measure   | Extent (Ha)    |
|-------------------|------|---|----------------|
| Dry cutaway       | DCT2 | Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment  | 7.12           |
| 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  | 11.74          |
| 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 | 3.01           |
| Deep Peat         | DPT4 | Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows with a controlled weir outfall + drainage channels for excess water + Sphagnum inoculation   | 85.96          |
| Marginal land     | MLT1 | No work required (Marginal land including Silt Ponds)   | 62.75          |
| Marginal land     | MLT2 | More intensive drain blocking (7/100 m)   | 9.32           |
| Constrained areas |      | Rehabilitation aligned to constraints   | 932.56         |
| Silt ponds        |      | Silt ponds  | 0.48           |
| Total             |      |   | <b>1112.94</b> |

### 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 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 (with the Scheme) will be applied to Derryfadda Bog. This will take account of peat depths, topography, drainage and hydrological modelling. (See Drawing no. BNM-DR-23-12-05: Enhanced Rehab Measures, Appendix XIII, for an indicative view of the application of different rehabilitation methodologies).
- Carry out a hydrology and drainage management assessment of the proposed enhanced rehabilitation measures;
- An Archaeological Impact Appraisal (AIA) will be undertaken. This will carry out a review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation. Incorporate the results of this appraisal into the rehabilitation plan to minimise known archaeological disturbance, where possible;

- Carry out a review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements. There are no known rights of way at Derryfadda bog.
- Carry out a review of remaining milled peat stocks. It is expected that all peat stocks will eventually be removed or decommissioned.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation, such as the presence of sensitive ground-nesting bird breeding species (e.g. curlew, ringed plover or lapwing) or marsh fritillary butterfly larval webs, etc. The scheduling of rehabilitation operations will be adapted, if needed. Surveys will be scoped and carried out based on the baseline ecological survey and previous knowledge of sites.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- An Appropriate Assessment (AA) of the Rehabilitation Plan will be undertaken. Incorporate any required mitigation measures from the AA in the plan for the delivery of rehabilitation and decommissioning across the site in accordance with the phasing and timeframe of the rehabilitation plan.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implementation 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 hydrological management, 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 in Section 9 of this report and accompanying documents.
- 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 will include fertiliser application on high fields and headlands (where there is bare peat).
- Silt-ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent run-off of suspended solids from the site during the rehabilitation phase.
- Submit an *ex post* report to the Scheme regulator to verify the eligible measures 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 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.
- Reporting to the EPA will continue until the IPC License is surrendered.

## 8.4 Timeframe

- 2021-2022. Short-term planning actions.
- 2022. Short-term practical actions.
- 2022-2025. Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2025. Long term practical actions. Decommission silt-ponds, if necessary.

## 8.5 Budget and costing

Bord na Móna (BnM) appreciates the Minister's intention to support Bord na Móna in developing a package of measures, 'the 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 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 costs of **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 2021). 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 'standard' rehabilitation provision (sufficient to discharge the requirement of Condition 10 in the licence) has been allocated to the site based on the area of deep peat habitats, wetland habitats, shallow cutaway areas, drier areas, and regenerating bog communities across the bog (See Appendix I).

## 9. AFTERCARE AND MAINTENANCE

### 9.1 Programme for monitoring, aftercare and maintenance

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

- There will be **initial quarterly monitoring assessments** of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbours land, general land security, boundary management, dumping and littering.
- The number of these site visits will reduce after 2 years to bi-annually (two per year). This will further reduce to a single visit each year after 5 years.
- These monitoring visits will consider any further requirements for 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.
- Water quality monitoring will aim to include up to 70% of a bog's 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](http://www.epa.ie).
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, COD and DOC.
- This monthly sampling regime on a selected number of silt ponds will be carried out over a three-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, then the water quality monitoring programme will be reviewed, with consideration of potential ongoing scientific 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, then the rehabilitation measures and status of the site will be evaluated and enhanced, where needed. This evaluation may indicate no requirement for additional enhancement of rehabilitation measures, but may demonstrate that more time is required before key targets for successful 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 required 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 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 ecotop 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. It is proposed that sites can be monitored against this baseline in the future.
- 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. To be defined in relation to monitoring of the overall Scheme and after consultation with stakeholders.

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

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

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

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



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

In the event that the 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 and Ireland's National Recovery and Resilience Plan.

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

### Scope of rehabilitation

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

- EPA IPC Licence - Ref. 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. Derryfadda bog is part of the Derryfadda bog group, a sub-group of the Blackwater bog group.
- A key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- The area of former industrial peat production at Derryfadda Bog as defined by Drawing no. BnM\_DR23\_12\_01 '*Bog Site Location*', Appendix XIII. Industrial peat production has now permanently ceased at Derryfadda Bog.
- Minimising potential impacts on neighbouring land. Some boundary drains around Derryfadda Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Future land-use: Bord na Móna are reviewing the potential to develop a potential renewable energy project at Derryfadda Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is proposed to rehabilitate part of Derryfadda Bog in 2022 that is not constrained. The remaining area will be rehabilitated after the renewable energy review is complete. The peatland rehabilitation will **either** be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, **or** will be completed in the absence of any proposed renewable energy project.
- Future land-use. An amenity walkway is proposed for this site. Any amenity will be integrated with peatland rehabilitation.

### Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Derryfadda Bog is environmental stabilisation of the site via 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 peatland habitats.

#### **Criteria for successful rehabilitation:**

- Rewetting of residual peat in the former area of industrial peat production to offset potential run off of suspended solids 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).
- 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.

#### **Rehabilitation targets**

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat barriers, elevated water levels and re-wetting).  
Stabilising potential emissions from the site (run-off of suspended solids). 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 BNM-DR-23-12-20 *Standard Rehab Measures* )**

- Blocking field drains in the former industrial production area and creating regular peat barriers (three barriers per 100 m) along each field drain.
- Re-alignment of piped drainage.
- Realignment of gravity outfalls (where needed).
- Fertiliser treatment of high fields and headlands (typically slow to naturally re-colonise) to encourage natural colonisation, if needed.
- No measures are planned for the surrounding marginal peatland habitats.
- Silt ponds will continue to be maintained during the 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:**

- 2022. 1<sup>st</sup> phase of rehabilitation. Field drain blocking with dozer/excavator.
- 2022. 2<sup>nd</sup> phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1<sup>st</sup> 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.
- 2024-2025. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024-2025. Decommission silt-ponds, if necessary.

### Budget and Costing

- Bord na Móna maintains a Provision on its balance sheet to pay for the future costs of 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, 2021). 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 standard rehabilitation provision has been allocated to the site based on the area of different cutaway types across the bog.

Table AP-1. Rehabilitation measures and target area.

| Type              | Code | Description  | Area (Ha) |
|-------------------|------|--|-----------|
| Dry Cutaway       | DCT1 | Limited drain blocking, Blocking outfalls and managing water levels with overflow pipes                        | 7.1       |
| Deep Peat         | DPT1 | Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes             | 86.0      |
| Wetland           | WLT1 | Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes | 14.8      |
| Marginal land     | MLT1 | No work required   | 72.1      |
| Silt ponds        |      | Silt-ponds   | 0.48      |
| Constrained areas |      | Constrained areas  | 932.56    |
| Total             |      |  | 1112.94   |

### 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 any additional rehabilitation.
- Water quality monitoring will be established.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at [www.epa.ie](http://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 Chemical Oxygen Demand (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 required 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.
- The water quality monitoring demonstrates that water quality of discharge is stabilising or improving.
- The site has been environmentally stabilised.



## 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 ceased in 2019. Remaining milled peat stocks were supplied to Shannonbridge (WOP) and Lanesborough (LRP) during 2020. Both power stations closed at the end of 2020. Decommissioning and rehabilitation for the Blackwater Bog Group at part of PCAS started in 2021. Several bog had been rehabilitated in previous years.

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 2014<sup>1</sup>).

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.

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<br><br>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.<br><br>Coillte have developed a portion of the former production area for conifer forestry.<br><br>Rehabilitation ongoing | 2109                      | Finalised 2018    |

<sup>1</sup> <http://www.npws.ie/peatlandsturf-cutting/nationalraisedbogsacmanagementplan/>

|                    |     |  |  |      |                |
|--------------------|-----|--|--|------|----------------|
| Cloonkeen          | 252 | Cutover Bog<br><br>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.<br><br>Coillte have developed a portion of the former production area for conifer forestry.<br><br>Rehabilitation ongoing | 2019 | Finalised 2018 |
| Derrydoo-Woodlough | 452 | Development Bog<br><br>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<br><br>Rehabilitation (bog restoration) now complete.   | N/A  | Finalised 2012 |
| Tirrur-Derrymore   | 422 | Development Bog<br><br>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.<br><br>Section leased to NPWS as a SAC turf-cutting relocation site.  | N/A  | Updated 2020   |
| Newtown-Loughgore  | 448 | Development Bog<br><br>This bog was drained in the 1980s in anticipation of industrial peat production. No industrial peat harvesting ever took place.                     | Some sod turf production<br><br>Bog restoration was carried out in 2019-2020<br><br>Rehabilitation (bog restoration) nearly complete.                                    | 2020 | Finalised 2018 |
| Killeglan          | 581 | Development Bog<br><br>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<br><br>Rehabilitation (raised bog restoration) complete   | N/A  | Finalised 2016 |
| Cloonboley 1       | 675 | Development Bog<br><br>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.<br><br>Bog restoration was carried out in 2013-2014<br><br>Rehabilitation (raised bog restoration) complete   | 2020 | Finalised 2014 |
| Cloonboley2        | 203 | Development Bog<br><br>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<br><br>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<br><br>Industrial peat production commenced at Ballaghurt Bog in 1981. The majority of the site is | Ballaghurt Bog formerly supplied a range of commercial functions including horticultural peat and fuel peat.<br><br>Pioneer cutaway vegetation communities are naturally developing on some cutaway areas. | 2020                      | Draft 2017        |

|                     |       |   |  |      |                    |
|---------------------|-------|---|--|------|--------------------|
|                     |       | cutaway with some residual deeper peat  |  |      |                    |
| Belmont             | 316   | <p>Cutaway Bog</p> <p>Industrial peat production commenced at Belmont Bog during the 1950's. The majority of the site is cutaway.</p>                                 | <p>There are some areas of pioneer cutaway vegetation communities naturally colonising cutaway sections.</p> <p>Coilte have developed a portion of the bog for forestry.</p>   | 2020 | Finalised 2021     |
| Blackwater          | 2,303 | <p>Cutaway Bog</p> <p>Industrial peat production commenced at Blackwater Bog during the 1950's. The majority of the site is cutaway.</p>                              | <p>Bloomhill Bog formerly supplied milled horticultural peat and fuel peat.</p> <p>There is extensive development of emergent cutaway vegetation communities across the former production area.</p> <p>The site has been used for experimental forestry (BOGFOR) and other conifer plantations.</p> <p>Part of the site was rehabilitated with lake and wetland creation.</p> <p>An ash facility took ash from Shannonbridge Power station</p> | 2020 | To be updated 2021 |
| Bloomhill           | 883   | <p>Cutover Bog</p> <p>Industrial peat production commenced at Bloomhill Bog during 1981. The majority of the site still has relatively deep residual peat.</p>        | <p>Bloomhill Bog formerly supplied milled horticultural peat and fuel peat.</p> <p>Much of the former peat production area is bare peat.</p>   | 2020 | To be updated 2021 |
| Bunahinly-Kilgarvan | 389   | <p>Cutover Bog</p> <p>Industrial peat production commenced at Bunahinly-Kilgarvan Bog during the 1990's. Residual Deep peat remains on these bogs.</p>                | <p>Bunahinly-Kilgarvan formerly supplied milled horticultural peat and fuel peat.</p> <p>Much of the former production area is bare peat.</p> <p>Part of Bunahinly has been re-wetted.</p>   | 2020 | To be updated 2021 |
| Glebe               | 132   | <p>Cutover Bog</p> <p>Industrial peat production commenced at Glebe Bog during the 1990's. Residual deep peat remains on these bogs.</p>                              | <p>Glebe Bog formerly supplied milled; horticultural peat and fuel peat.</p> <p>Glebe bog is still listed as a pNHA.</p> <p>Much of the former production area is bare peat.</p>   | 2020 | Draft 2017         |
| Clooniff            | 523   | <p>Cutover &amp; cutaway Bog</p> <p>Industrial peat production commenced at Clooniff Bog during the 1970's. A mosaic of variable peat depths remains on this bog.</p> | <p>Clooniff Bog formerly milled fuel peat.</p> <p>Much of the former production area is bare peat or wetland.</p> <p>Some emergent vegetation communities are naturally colonising cutaway areas. Reduced pumping has created a large wetland in one area.</p>   | 2020 | Finalised 2021     |
| Cornafulla          | 460   | <p>Cutover Bog</p> <p>Industrial peat production commenced at Cornafulla Bog in 1987. This bog still retains relatively deep residual peat.</p>                       | <p>Cornafulla Bog formerly supplied milled horticultural peat and fuel peat.</p> <p>Much of the former production area or cutaway is bare peat.</p>  | 2020 | Draft 2017         |
| Cornaveagh          | 492   | <p>Cutover Bog</p> <p>Industrial peat production commenced at Cornaveagh Bog in 1970's and ceased in 2020. This</p>   | <p>Cornaveagh Bog formerly supplied milled horticultural peat and fuel peat.</p> <p>Much of the former production area footprint or cutaway is bare peat.</p>  | 2020 | Draft 2017         |

|              |       |   |   |      |                |
|--------------|-------|---|---|------|----------------|
|              |       | bog still retains relatively deep residual peat.  |   |      |                |
| Culliaghmore | 442   | Cutover Bog<br><br>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.<br><br>Much of the former production area footprint or cutaway is bare peat.<br><br>Some pioneer cutaway vegetation communities are naturally colonising cutaway areas.   | 2020 | Draft 2017     |
| Garryduff    | 970   | Cutaway Bog<br><br>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.<br><br>Extensive natural development of pioneer cutaway vegetation communities is present on cutaway areas.<br><br>Rehabilitation measures have commenced at Garryduff in 2021.   | 2020 | Finalised 2021 |
| Kellysgrove  | 201   | Development Bog<br><br>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.<br><br>Kellysgrove Bog retains significant raised bog restoration potential.<br><br>A way-marked walking trail is positioned along the old Ballinasloe Canal.<br><br>Rehabilitation measures have been completed at Kellysgrove in 2021.                     | 2020 | Finalised 2021 |
| Kilmacshane  | 1,294 | Cutaway Bog<br><br>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.<br><br>Some pioneer cutaway vegetation communities are naturally colonising cutaway areas and water levels have risen as pumping reduced, creating wetlands.<br><br>Rehabilitation measures have commenced at Kilmacshane in 2021. | 2014 | Finalised 2021 |
| Lismanny     | 449   | Cutaway Bog<br><br>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.<br><br>Much of the former production area footprint is bare peat.<br><br>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<br>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.<br><br>Much of the former production area is bare peat.<br><br>Some pioneer cutaway vegetation communities are naturally colonising cutaway areas. | 2020                      | To be updated 2021 |
| Boughill   | 415       | Cutover bog<br>Industrial peat production commenced at Boughill Bog in 2008.  | Boughill Bog formerly supplied milled horticultural peat and fuel peat.  | 2020                      | Draft 2017         |

|           |     |  |  |      |                |
|-----------|-----|--|--|------|----------------|
|           |     | This bog still retains residual deep peat.   | Much of the former production area footprint or cutaway is bare peat.  |      |                |
| Castlegar | 517 | Cutover bog<br>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.<br><br>Much of the former production area is bare peat.<br><br>The adjacent Annaghbeg Bog NHA is an intact undrained raised bog<br><br>Rehabilitation measures have commenced at Castlegar in 2021. | 2019 | Finalised 2021 |
| Gowla     | 650 | Cutover bog<br>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.<br><br>Much of the former production area footprint is bare peat.   | 2020 | Draft 2017     |

## APPENDIX III: ECOLOGICAL SURVEY REPORT

|  |                   |                        |  |
|--|-------------------|------------------------|--|
| <b>Ecological Survey Report</b><br><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>  |                   |                        |  |
| <b>Bog Name:</b>   | <u>Derryfadda</u> | <b>Area (ha):</b>      | 1111ha   |
| <b>Works Name:</b>   | Derryfadda        | <b>County:</b>         | Galway   |
| <b>Recorder(s):</b>  | DF                | <b>Survey Date(s):</b> | 10 <sup>th</sup> & 11 <sup>th</sup> April 2012 |
| <b>Habitats present (in order of dominance)</b><br><p>The most common habitats present at this site include:</p> <ol style="list-style-type: none"> <li>1. Bare peat (BP) (Codes refer BnM classification of pioneer habitats of production bog. See Appendix I).</li> <li>2. Riparian zones (RIP)</li> <li>3. Pioneer Purple Moorgrass-dominated grassland (gMol)</li> <li>4. Pioneer Soft Rush-dominated poor fen (pJeff)</li> <li>5. Pioneer dry heath (dHeath)</li> <li>6. Bog timber</li> </ol> <p>The most common habitats found around the margins of the site include:</p> <ol style="list-style-type: none"> <li>7. Marginal raised bog (PB1) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix I.)</li> <li>8. Cutover bog (PB4)</li> <li>9. Scrub (WS1)</li> <li>10. Birch woodland (WN7)</li> <li>11. Wet grassland (callows grassland) (GS4)</li> <li>12. Improved grassland (GA1)</li> <li>13. Riparian woodland (WN5)</li> <li>14. Conifer plantation (WD4)</li> </ol>   |                   |                        |  |
| <b>Description of site</b><br><p>Derryfadda Bog is located approximately three kilometres south west of Ballyforan in Co. Galway (the River Suck forms the county boundary between Roscommon and Galway). The Suck forms a boundary along the north and eastern edge of the bog, with the bog being located on the Galway side of the River. Derryfadda is part of the Derryfadda group of bogs and a rail link connects Derryfadda Bog with Castlegar Bog to the south and Gowla Bog to the west. A minor public road runs along much of the western edge of the bog. Two bog tracks cross the bog dividing it into three sections. Peat production first began on Derryfadda Bog in 1981. Several sections of remnant raised bog are located along the margins of the site; these areas are small and dry and are actively used for the production of domestic turf.</p> <p>The southern section of Derryfadda Bog is mainly comprised of bare peat. A large works area is located along the western edge of the site. This area contains a tippler where peat is loaded onto lorries for transport to Lough Ree</p> |                   |                        |  |

Power in Lanesborough, Co. Longford. The Castlefrench river flows through this section of the site close to the south eastern corner. This river is bounded by wet grassland and riparian woodland, with some small areas of remnant sections of raised bog also located close to the river. The wet grassland consisted of Common Reed, Lesser Tussock Sedge and Reed Canary Grass with occasional Willow scattered throughout. The river has been canalised and had recently been cleaned out, as a result there was no in-stream vegetation. The river is important habitat for species such as Mallard, Otter and Mute Swan. There is some evidence that White-Clawed Crayfish are present also.

A large section of Birch woodland is also located in the south eastern corner of the site and the railway link between Derryfadda and Castlegar bogs passes through this woodland. This woodland, marked on the OS map as Dalysgrove, consists mainly of Birch but also contains Willow, Holly, Scot's Pine, Gorse and Hawthorn with an understory of Bramble and Ivy. Some patches of Laurel have become established within the woodland.

A small mineral island is located to the east of the works. This area has been used in the past for storing machinery. The main vegetation type consists of calcareous grassland with occasional small trees.

The Taghboy River separates the southern section of the site from the central section. This river is mainly bounded by remnant sections of raised bog, cutover bog, scrub and wet grassland. Significant areas of cutover bog and remnant raised bog in this area are not in the ownership of Bord na Móna and are used for domestic turf cutting.

The central section of the site is dominated by bare peat. A mineral island is located in the centre of the site and is accessed by way of a bog track; a small works area is located on the mineral island. This area was previously owned by the Sugar Company, who planted the entire area with conifers. The conifers were removed prior to the commencement of peat production by BnM.

An area of cutover bog is located in the north eastern part of this section. This area consists of dry heath with some scrub along the edges. Some areas of the scrub consisted of Birch with an understory of Bramble, Bracken and Bluebell. This area had been in peat production in the past.

Two small ponds were located close to the north eastern boundary of the site. These features were unusual in that they were not connected to any other watercourse but contained fish. The small areas of open water were surrounded by a mix of wet grassland and scrub. These features are visible on the 25 inch OSI maps for Galway.

A ridge of mineral land separates the central section from the northern section. The mineral land was the site of the proposed briquette factory and a fenced off compound is present in this location. A network of small fields surround the compound, some of the small fields are actively grazed but a few do not appear to be managed and had encroaching scrub.

The northern section of the site is the smallest production area within Derryfadda Bog. This area was previously owned by the Sugar Company, who planted the entire area with conifers. These trees were removed by BnM in the early 1980's. This section of bog is still producing "red" or "Sphagnum" peat. A fringe of conifer woodland still exists around much of the boundary of the site but it is severely affected by wind throw. A strip of riparian woodland runs between the conifer plantation and the River Suck. The riparian woodland is an important biodiversity feature of the area and is home to a population of Red Squirrel. A more detailed account of the riparian woodland is given in the forestry section.

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

There is regular overlap between Derryfadda and the Suck River Callows NHA (NPWS site code 000222) and SPA (NPWS site code 0004097). This site has been designated for its importance for wintering wildfowl and species of conservation importance such as Greenland White-fronted Geese and Whooper Swan.

#### **Adjacent habitats and land-use**

Cutover bog (PB4), Birch woodland (WN7), scrub (WS1), raised bog (PB1), improved agricultural grassland (GA1) and wet grassland (GS4) all border the site. There is a significant amount of callows type wet grassland to the east of the site adjacent to the River Suck. There is private domestic turf cutting at many locations along the site boundary.

#### **Watercourses (major water features on/off site)**

1. The Taghboy and Castlefrench Rivers flow through the site. These rivers are tributaries of the River Suck.

#### **Peat type and sub-soils**

Peat depths vary across the site. The northern and southern sections have in excess of 2m peat remaining while the central section has on average less than 1m of peat remaining.

#### **Fauna biodiversity**

##### **Birds**

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

1. Willow Warbler
2. Swallow
3. Grasshopper Warbler
4. Mute Swan nesting
5. Mallard 15+
6. Skylark
7. Jay
8. Other more common species include Grey Crow, Pheasant, Blue Tit, Wood Pigeon, Raven

##### **Mammals**

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

9. Fallow Deer
10. Pine Marten
11. Otter
12. Badger
13. Fox
14. Hare
15. Red Squirrel

##### **Other species**

Frog

Fish (likely coarse)



**References**

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

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

**HABITAT DESCRIPTIONS**

(See Habitats Description Document for detailed description of each vegetation community not described in this section.)

**HABITAT DESCRIPTIONS**

## **APPENDIX IV: ENVIRONMENTAL CONTROL MEASURES TO BE APPLIED TO BOG REHABILITATION**

1. Bog restoration/rehabilitation measures will be restricted to within the footprint of the proposed rehabilitation area.
2. 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.
3. The proposed activities will be restricted to daylight hours and there will be no requirement for artificial lighting.
4. All plant and equipment for use will comply with the Construction Plant and Equipment Permissible Noise Levels Regulations (SI 359/1996).
5. Silt ponds will be inspected and maintained as per the IPC Licence.
6. During periods of heavy precipitation and run-off, activities will be halted.
7. Measures will be carried out using a suitably sized machine and in all circumstances, excavation depths and volumes will be minimised where possible.
8. All machines will be regularly checked and maintained prior to arrival at the site to prevent hydrocarbon leakage.
9. Hoses and valves will be checked regularly for signs of wear and will be closed and securely locked when not in use.
10. Fuelling and lubrication of equipment shall only be carried out in designated areas away from surface water drainage features and ecologically sensitive areas.
11. Waste oils and hydraulic fluids will be collected in leak-proof containers and removed from the site for disposal or re-cycling.
12. Vehicles will never be left unattended during refuelling.
13. No direct discharges to waters will be made. No washings from vehicles, plant or equipment will be carried out on site.
14. All plant refuelling will take place using mobile fuel bowzers. Only dedicated trained and competent personnel will carry out refuelling operations.
15. 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.
16. Potential impacts caused by spillages etc. during rehabilitation will be reduced by keeping spill kits and other appropriate equipment on-site.
17. 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

The only invasive species recorded at the site was Rhododendron (*Rhododendron ponticum*). This species is listed under Regulations 49 and 50 of the EC Birds and Natural Habitats Regulations which prohibits the introduction, breeding, release or dispersal of the species listed on Part 1 the 'Third Schedule'.

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.

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

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

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

In addition to the above, Best Practise measures around the prevention and spread of Crayfish plague<sup>2</sup> and Zebra Mussel will be adhered with throughout all rehabilitation measures and activities.

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<sup>2</sup> <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 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 Mount Dillon bog group (Ref. PO-504-01). 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 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) understand that it is the Minister's (DECC) intention to impose an obligation on Bord na Móna to develop a programme of measures, 'the Scheme', for the enhanced decommissioning, rehabilitation and restoration of boglands previously used to supply peat for electricity generation within the State. The enhanced decommissioning, rehabilitation and restoration of the peatlands funded by the Scheme (PCAS) will deliver benefits across climate action (GHG mitigation through reduced carbon emissions and acceleration towards carbon sequestration), enrich the State's natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation as well as developing the amenity potential of the peatlands.

It is envisaged that Bord na Móna carry out an enhanced decommissioning, rehabilitation and restoration, under the Scheme (PCAS), and supported by the Climate Action Fund and Ireland's National Recovery and Resilience Plan across a footprint of 33,000 ha. This scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. Interventions and measures supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. However, only the additional costs associated with the additional

and enhanced rehabilitation, i.e., those activities which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support under the Scheme.

The proposed enhanced rehabilitation detailed in this document, are predicated on the understanding that the element of the activities, over and above the 'standard' rehabilitation necessary to comply with pre-existing Condition 10 IPC Licence requirements, will be deemed eligible costs by the Scheme regulator and funded by the Climate Action Fund and Ireland's National Recovery and Resilience Plan.

For the avoidance of doubt, should the Scheme and the associated statutory obligation on Bord na Móna not materialise, Bord na Móna will not carry out the enhanced decommissioning, rehabilitation and restoration measures described in this plan. Bord na Móna will instead plan to complete an adapted standard decommissioning and rehabilitation measures required under Condition 10 and outlined in Appendix I.

### **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. Industrial peat production has now ceased and several other decarbonisation measures are being implemented. 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 (agreed in 2015) 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. Some of these principles have now been superseded by the company's decision to cease industrial peat extraction. The National Peatlands Strategy is currently being reviewed by Government.

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

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

The NRBMP outlines how peat extraction can be a potentially significant pressure on various water quality parameters. Peatland rehabilitation of Bord na Móna cutaway (in addition to other measures) is part of the WFD

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

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

The cessation of industrial peat extraction by Bord na Móna in 2021 is expected to have a significant positive impact on water quality of receiving water courses by reducing the impact of peat extraction as a key pressure on particular water courses.

## **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 2<sup>nd</sup> 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.

The delivery of rehabilitation via PCAS is expected to significantly contribute in the future to actions and targets of the National Biodiversity Action Plan 2016-2021, particularly in relation to peatland restoration and creation of new habitats such as wetlands and woodlands.

## **7 National conservation designations**

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

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

The National Raised Bog Special Area of Conservation Management Plan 2017-2022 sets out a roadmap for the long-term management, restoration and conservation of protected raised bogs in Ireland. The Plan strikes an appropriate balance between the need to conserve and restore Ireland's raised bog network as part of Ireland's commitments towards the EU Habitats Directive, and the needs of stakeholders and gives recognition to the important role that communities have to play in the conservation and restoration of raised bogs. The National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022 is part of the measures being

implemented in response to the on-going infringement action against Ireland in relation to the implementation of the EU Habitats Directive, with regard to the regulation of turf cutting on the Special Areas of Conservation (SACs). The then Minister for Arts, Heritage and the Gaeltacht, also published a **Review of Raised Bog Natural Heritage Area Network** in 2014.

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

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, renewable energy, and economy/enterprise.

Derryfadda Bog is located in an area zoned by Longford 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. (<https://www.archaeology.ie/sites/default/files/media/publications/cop-bord-na-mona-en.pdf>)



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 adhere to the Archaeology Code of Practice relating to management of any 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 EU's 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."*

This 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 industrial peat production would be cut by over 50 percent in 2019 and would entirely cease over most of its lands by the mid-2020s. Rehabilitation measures would 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 made a further commitment to a significantly larger rehabilitation target. This was 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 planned to restore a further 1,000 hectares of raised bog habitat by 2025.

The above commitments have now been followed by the decision by the company to cease industrial peat extraction and rehabilitate a target of 33,000 ha between 2021-2025.

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, such as renewable energy.

#### **14 Bord na Móna Strategic Framework for the future use of cutaway peatlands 2020 (Draft)**

The general after-use strategy of Bord na Móna is outlined in the Bord na Móna Strategic Framework for Future-Use of Cutaway Bogs 2020 (draft document). 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, and develop integrated land-uses, while taking account of the need for sustainability and their biodiversity value.

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

## APPENDIX VII. DECOMMISSIONING

### 1. Condition 10 Decommissioning

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

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

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

The main success criteria pertaining to successfully complying with this condition is ensuring that no environmental liability remains from this infrastructure and material and that the bog can be deemed suitable for surrender of the 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  | Derryfadda Decommissioning Plan  |
|------|--|--|
| 1    | Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices | Clean-up of Bog  |
| 2    | Cleaning Silt Ponds  | Cleaning Silt Ponds  |
| 3    | Decommissioning Peat Stockpiles  | Peat Stockpile Management via Levelling                                |
| 4    | Decommissioning or Removal of Buildings and Compounds  | Decommission and Removal of Porto-cabin tea centre and materials store |
| 5    | Decommissioning Fuel Tanks and associated facilities   | Decommissioning and De-Gassing Mobile Fuel Tanks                       |
| 6    | Decommissioning and Removal of Bog Pump Sites  | Not Applicable   |
| 7    | Decommissioning or Removal of Septic Tanks   | De-sludge Septic Tank  |

In 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.

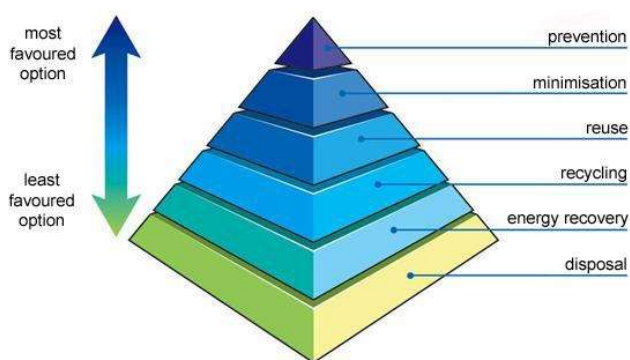
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

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 and EPA Exit Audit (EA) and the eventual partial or full surrender of the licence.

## 2. Enhanced Decommissioning.

The remaining infrastructure does not constitute a risk to the environment and would not be a requirement of condition 10 of the 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            | Derryfadda 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                         |

Railway lines will be removed from the internal Bord na Mona industrial railway network. However, the foundation of the railway (the stone base) will remain unaffected and will be left in place to facilitate potential future amenity development (greenways etc).

## 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 (i.e. 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 Scheme, which is proposed to externally funded.

**Enhanced rehabilitation:** This is defined as rehabilitation carried out under 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 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 Scheme.

**Environmental stabilisation:** The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat, slowing water movement across the bog, minimising effects to downstream waterbodies and meeting the conditions of the IPC Licence. This is achieved by a combination of re-wetting, where possible, and natural colonisation of the former cutaway, with or without intervention. Habitats will develop that reflect the underlying environmental conditions. Other after-use development may also serve to act as environmental stabilisation.

**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 have 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 Ref. P0502 -01, Derryfadda Bog Group in County Galway.

#### 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 Mount Dillon are serviced by 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:

Peat from the bogs is screened 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 31<sup>st</sup> 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:

1. Secure the stability of the waste
2. Put in place measures to prevent pollution of soil, surface water and ground water.
3. 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:

1. 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).
2. 10.3.2 The criteria which define the successful rehabilitation of the activity or part thereof, which ensures minimum impact to the environment.
3. 10.3.3 A programme to achieve the stated criteria.
4. 10.3.4 Where relevant, a test programme to demonstrate the successful implementation of the rehabilitation plan.
5. 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 Mount Dillon 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 Mount Dillon IPPC Licence Ref. PO504 -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:
    - The land is waterlogged;
    - The land is flooded, or it is likely to flood;
    - The land is frozen, or covered with snow;
    - Heavy rain is forecast within 48 hours (forecasts will be checked from Met Éireann).
    - 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.
1. No fertiliser will be spread on land within 2 metres of a surface watercourse.
  2. 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 <sup>3</sup> 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 <sup>3</sup> 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*   |

An map of the areas identified for targeted fertiliser application is provided in the Mapbook (**BNM-DR-23-12-28: Fertiliser Application Map**).

## 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 |
|----------|----------------------|--------------|---------------|----------------------|------------------------|-----------------|
|----------|----------------------|--------------|---------------|----------------------|------------------------|-----------------|

Draft

## APPENDIX XII. ARCHAEOLOGY

### 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.



|                                       |                          |                         |
|---------------------------------------|--------------------------|-------------------------|
| <b>Bord na Móna</b>                   | <b>Procedure: ENV017</b> | <b>Rev: 1</b>           |
| <b>Title: Archaeological Findings</b> | <b>Approved: EM</b>      | <b>Date: 13/10/2020</b> |

## 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 .....

## 9. Records

| Revision Index |            |                       |          |
|----------------|------------|-----------------------|----------|
| Revision       | Date       | Description of change | Approved |
| 1              | 13/10/2020 | First release         | EMcD     |
|                |            |                       |          |