

# Bord na Móna

## Prosperous Bog

# Cutaway Bog Decommissioning and Rehabilitation Plan 2021

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0506-01:

*“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 Prosperous Bog upon cessation of peat production and compliments the licence requirement to decommission the site.*

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

*Industrial peat production has now fully ceased at Prosperous Bog.*

*In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. P0506-01, due regard was also given to the 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 Prosperous 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 Prosperous Bog as environmental stabilisation, re-wetting and setting the bog on a trajectory towards development of naturally functioning peatland habitats.*

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

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## NON-TECHNICAL SUMMARY

- Industrial peat harvesting is now finished at Prosperous Bog.
- Bord na Móna is planning to rehabilitate Prosperous Bog, located 1km north-west of Prosperous in Co. Kildare.
- 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 (putting a “skin” back onto the peat), and minimising effects to downstream waterbodies. Prosperous 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.
- Prosperous Bog has deeper residual peat that has the capacity to regrow *Sphagnum* moss again, where there are suitable hydrological conditions. *Sphagnum* is a key species for restoring naturally functioning peatland conditions. This site has potential to revert to a partial carbon sink.
- The development of a range of habitats in Prosperous 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 peatland habitats.
- Prosperous Bog was utilised for industrial peat production from the 1980’s until 2020 and much of the former production area currently comprises bare peat.
- Measures proposed for Prosperous Bog include drain blocking and additional 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 Móna plan to carry out this work in 2022.
- These rehabilitation measures will be planned by a team consisting of expert ecologists, hydrologists and engineers. It is a guiding principle of Bord na Móna rehabilitation planning that no actions or activities will be undertaken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the bog via the existing outlets.
- It will take some time for vegetation and habitats to fully develop at Prosperous, and a peatland ecosystem to be restored. However, it is expected that most of the bog will be developing pioneer habitats after 5-10 years.
- This is a peatland rehabilitation plan. This plan does not consider future after-use or development. 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 bog.
- 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.

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## SUMMARY

**Name of bog:** Prosperous Bog

**Area:** 218ha

### Site description:

- Prosperous bog was drained and developed for industrial peat production in the 1980s. Peat production ceased in 2020. The bog mainly supplied horticultural peat.
- The majority of the former peat production footprint is bare peat or pioneering bare peat. Active drainage channels are still present.
- The bog has a gravity drainage system.
- Prosperous bog still retains residual deep peat. The majority of the site still has a significant depth of peat (greater than 2.6m).

### Rehabilitation goals and outcomes

Bord na Móna 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 for the further development of mainly embryonic *Sphagnum*-rich peat forming communities, wet woodland and fen habitats on shallow cutaway peats, along with management of existing habitats.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Rehabilitation will support the National Policies on Climate Action and GHG mitigation by maintaining and enhancing the current residual peat storage capacity of the bog (locking the carbon into the ground). It is expected that the bog will have reduced emissions (reduced source) as it develops naturally functioning peatland habitats. 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 Prosperous Bog.
- EPA IPC Licence - Ref. P0506-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The key objective of 'rehabilitation', as required by this licence, is achieved by the **environmental stabilisation** of the bog.
- **The Scheme (PCAS)** includes enhanced measures which are designed to exceed/meet the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Prosperous Bog, in particular, optimising **climate action benefits**.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- To minimise potential impacts on neighbouring land, boundary drains around Prosperous Bog will be left unblocked, as blocking boundary drains could affect adjacent land.
- Constraints include Turbary rights. There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM, but this bog has been developed and in use by a private company. This area of bog is currently used for turbary. An additional area of turbary lies in the south-western corner of the site.



**Criteria for successful rehabilitation:**

The Criteria for successful rehabilitation to meet Condition 10 of the IPC Licence 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, encouraging development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat through the creation of further wet *Sphagnum*-rich vegetation and fen habitat (IPC Licence validation). The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed. (IPC Licence validation).
- Stabilising/improving potential emissions to water (e.g. 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 for climate action (Climate action verification). This will be measured by an aerial survey after rehabilitation has been completed.
- Reduction in carbon emissions (Climate action verification). 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.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including embryonic *Sphagnum*-rich peat forming communities, fen, wet woodland, heath, scrub and birch woodland, where conditions are suitable, and eventually towards a reduced carbon source/part carbon sink. Some areas will naturally be dry and develop birch woodland and other drier habitats. It will take some time for stable naturally functioning habitats to fully develop at Prosperous 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 hydrology and drainage appraisal.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation.
- Carry out proposed measures, which will include a combination of hydrological management, drain blocking, peat field re-profiling and fertiliser applications targeting bare peat sections of headlands, high fields and other areas.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning phase.
- Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

**Timeframe:**

- 2021-2022: Short-term planning actions.
- 2022 - 2023: Short-term practical actions.
- 2023-2025: Any Long-term practical actions; Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- 2025: Decommission silt-ponds, if necessary.

**Budget and Costing**

- The rehabilitation plan outlined in this document is predicated on the understanding that it is the Minister's intention to support, via the Climate Action Fund 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.*

- In relation to the pre-existing Condition 10 IPC Licence requirement to carry out what can be termed the 'standard' decommissioning and rehabilitation, Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. This is updated every year. For more information see the Bord na Móna Annual Report (Bord na Móna 2021). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

### **Monitoring, after-care and maintenance**

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

- Quarterly monitoring assessments of the site to determine the general status of the site, assess the condition of the rehabilitation work, assess the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to additional rehabilitation, if needed.
- **Water quality monitoring** will be established. Monitoring of key water quality parameters for 2 years after rehabilitation will include: Ammonia, Phosphorous, Suspended solids (silt) & pH.
- 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.

### **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.

### **Validation and IPC Licence surrender**

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

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

## 1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Kilberry bog group (Ref. P0506-01). 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. Prosperous bog is part of the Kilberry bog group (see Appendix II for details of the bog areas within the Kilberry Bog Group). Prosperous Bog is located in Co. Kildare.

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

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

Note: This plan should be read in conjunction with the accompanying Map book.

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 previously 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. The Scheme commenced in 2021.

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 Scheme (PCAS) will have benefits accruing from biodiversity provision, water quality and storage attenuation as well as increased carbon storage, reduced carbon emissions and acceleration towards carbon sequestration. The Scheme will also facilitate monitoring of carbon fluxes (Greenhouse Gases and fluvial carbon) in selected areas (in addition to other established Research programmes), to monitor changes in where the interventions will accelerate the trajectory towards a naturally functioning peatland ecosystem.

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

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

These are collectively designed to optimise hydrological conditions (ideally and where possible water-levels <10 cm) for climate action benefits and to accelerate the trajectory of the site towards a naturally functioning ecosystem, and eventually a reduced carbon source/carbon sink again. (In some areas of dry cutaway this trajectory will be significantly longer, and it is not feasible in the short-term to re-wet some areas. These 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.

Prosperous Bog is proposed to be part of this Scheme (PCAS), which commenced in 2021 and this rehabilitation plan outlines the approach to be taken.

## 1.1 Constraints and Limitations

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0506-01:

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

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

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

Industrial peat extraction at Prosperous Bog permanently ceased in 2020, having commenced in the 1980's. Currently the former peat production area comprises of largely bare peat with marginal<sup>1</sup> habitats along the boundary.

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<sup>1</sup> 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 is anticipated that the combination of active enhanced rehabilitation measures and natural colonisation will quickly accelerate environmental stabilisation. Nevertheless, it will still take some time (30-50 years) for naturally functioning wetland and peatland ecosystems to fully re-establish.

There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM, but this bog has been developed by a private company.

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

Rehabilitation in other areas of the bog may also be constrained due to other property issues or issues such as rights of way.

A public right of way exists at Prosperous Bog in marginal land in the northern-eastern part of the site. A track is in use as an amenity walk along the north-east margin of the site. This track formerly accessed cutaway bog. Re-wetting will be planned as to not to impact on current amenity infrastructure. Rehabilitation measures will be integrated with the existing trackway and amenity infrastructure.

## 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 (covering the period 2011 to 2021 inclusive) 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-practice 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;
- Previous research studies on site;
- 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 Prosperous 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-practice guidance (full citations are in the References Section):

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- Barry, T.A. et al (1973). A survey of cutover peats and underlying mineral soils. Soil Survey Bulletin No. 30. Dublin, Bord na Móna and An Foras Taluntais.
- Bonn *et al.* (2017). Peatland restoration and ecosystem services- science, policy and practice.
- Carroll *et al.* (2009). *Sphagnum* in the Peak District. Current Status and Potential for Restoration. Moors for the Future Report No 16.
- Clark & Rieley (2010). Strategy for responsible peatland management.
- Eades *et al.* (2003). The Wetland Restoration Manual.
- Farrell & Doyle (2003). Rehabilitation of Industrial Cutaway Atlantic Blanket Bog, NW Mayo, Ireland.
- Gann *et al.* (2019). International Principles and Standards for the practice of Ecological Restoration.

- Hinde *et al.* (2010). *Sphagnum* re-introduction project: A report on research into the re-introduction of *Sphagnum* mosses to degraded moorland. Moors for the Future Research Report 18.
- Joosten & Clarke (2002). Wise Use of mires and peatlands – Background and Principles including a framework for Decision-making.
- Lindsay (2010). Peatbogs and Carbon: A Critical Synthesis to Inform Policy Development in Oceanic Peat Bog Conservation and Restoration in the Context of Climate Change.
- Mackin *et al.* (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service,
- McBride *et al.* (2011). The Fen Management Handbook (2011), Scottish Natural Heritage.
- McDonagh (1996). Drain blocking by machines on Raised Bogs. Unpublished report for National Parks and Wildlife Service.
- NPWS (2017a). National Raised Bog Special Areas of Conservation management plan. Department of Arts, Heritage and the Gaeltacht.
- Pschenyckj *et al.*, 2021, Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity. An Fóram Uisce.
- Quilty & Rochefort (2003). Peatland Restoration Guide, second edition. Canadian *Sphagnum* Peat Moss Association and New Brunswick Department of Natural Resources and Energy.
- Regan, *et al.* (2020). Ecohydrology, Greenhouse Gas Dynamics and Restoration Guidelines for Degraded Raised Bogs. EPA Research Report. Prepared for the Environmental Protection Agency by Trinity College Dublin.
- Renou-Wilson *et al.* (2011). BOGLAND - Sustainable Management of Peatlands in Ireland. STRIVE Report No 75 prepared for the Environmental Protection Agency.
- Schouten (2002). Conservation and Restoration of Raised Bogs: Geological, Hydrological and Ecological Studies. Dúchas - The Heritage Service of the Department of the Environment and Local Government, Ireland;
- Thom (2019). Conserving Bogs – Management Handbook.
- Wheeler & Shaw (1995). Restoration of Damaged Peatlands – with Particular Reference to Lowland Raised Bogs Affected by Peat Extraction.
- Wittram *et al.* (2015). A Practitioners Guide to *Sphagnum* Reintroduction. Moors for the Future Partnership.

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

- Kilberry Integrated Pollution Control Licence;
- Kilberry 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));
- Historic Environment Viewer at <https://webgis.archaeology.ie/historicenvironment/>
- 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 2020.
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

## 2.2 Consultation

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

## 2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this exercise, Prosperous Bog was surveyed in March 2011. Additional ecological walk-over surveys and visits have taken place at Prosperous Bog between 2012-2021 (with a final confirmatory survey taking place in October 2021). Habitat maps have been updated, where required. This rehabilitation plan is informed by the original baseline survey as well as subsequent confirmatory site walk-over surveys and visits, and updates to baseline data.

Habitat mapping followed best-practice 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 previously 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 site visit was used to categorise any changes in habitat extent at Prosperous in October 2021.

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



### 3. SITE DESCRIPTION

Prosperous Bog is located approximately 1km north-west of Prosperous in Co. Kildare (Grid reference: N 83460 29849). It is part of the Kilberry group of horticultural bogs. Gilltown Bog and Timahoe South, also part of the Kilberry bog group, are located 3km to the north-west, and 4.5km to the west respectively. Donadea Forest Park is located approximately 1km to the north of the site.

The Prosperous to Donadea public road runs along the western boundary of the site. A number of small, unpaved, bog roads allow access to the site at various points mainly along the eastern edge of the site.

There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM but this bog is being developed by a private company. Private domestic sod peat cutting is active around the south-west boundary of the site.

See Drawing number BNM-DR-23-24-01 titled Prosperous **Bog: Bog Site Location**, included in the accompanying Mapbook<sup>2</sup>, which illustrates the location of Prosperous Bog in context to the surrounding area.

#### 3.1 Status and Situation

##### 3.1.1 Site history

Prosperous bog is a relatively recent production bog and was in production from the 1980s until 2020. The bog was formerly used for horticultural peat production.

##### 3.1.2 Current land-use

Industrial peat production has now permanently ceased at Prosperous Bog.

There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM but this bog is being developed by a private company.

In addition, a small area close to the south western boundary of the site is subject to turbarry. This area will be excluded from the rehabilitation plan.

A track through the cutaway along the north-eastern margin of the site is being used as a public amenity.

##### 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

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<sup>2</sup> Cutaway Bog Decommissioning and Rehabilitation Plan – Prosperous Bog Map Book

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 Prosperous Bog, jobs would have included those to facilitate horticultural peat production.

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

The underlying geology of the northern section of the site comprises Waulsortian Limestones (Massive unbedded lime-mudstone), whilst the geology of the southern section of the site comprises Boston Hill Formation (Nodular & muddy limestone & shale)<sup>3</sup>. The underlying geology of Prosperous bog is calcareous. The underlying soils and sub-soils are classed as ‘Raised Bog Cutover Peat’. Basal peat in Prosperous bog is largely underlain with grey gritty plastic clay (GGPC), green plastic clay (GPC) and sandy clay.

Published bedrock and Quaternary geological maps only present the shallowest deposits encountered, and fail to present information on the buried peat substrate. Coring carried out by RPS in 2021 across Prosperous provided further insight into the deposits underlying the site, particularly when combined with GPR data concerning the elevation of the peat substrate.

Combining the two datasets reveals the lowest lying areas of the site to be underlain by marl (below c. 83.mOD), while some ridges of more elevated material (rising to c.86mOD) occurs below some sections towards the northern, eastern and western margins of the bog. 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). Coring also identified marl to be confined to the lowest lying sections of sub-peat terrain. These deposits would be expected to limit vertical losses to depth in areas where this occurs. Combining elevation data with the results of coring has permitted an indicative sub-peat substrate map, presented in **Error! Reference source not found.** ‘Indicative sub-peat substrate map based on GPR data and coring completed by RPS’, in the accompanying map book.

Data used in compilation of the sub-peat map suggest that lacustrine clay and marl underlie the majority of the site, although the peat rests directly on glacial till below those areas where the substrate rises above 83.5mOD (as indicated by coring and GPR survey data). Studies completed at Clara Bog, Co. Offaly indicate that glacial till derived from limestone material has a higher hydraulic conductivity than the lower lying (and younger) lacustrine deposits.

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<sup>3</sup> <https://www.gsi.ie/en-ie/data-and-maps/Pages/Bedrock.aspx>

### 3.2.2 Peat type and depths

On Prosperous peat depths are generally relatively high with peat typically being between 3.5-5.5m across the bog. The deepest deposits are found to the west, with the shallowest peat towards the east, see drawing no. BnM\_DR23\_24\_04 *Peat Depths*.

Quaternary Sediment maps show Prosperous underlain by peat, yet surrounded by inorganic deposits, including Till derived chiefly from Limestone which surrounds the bog. Glaciofluvial deposits including gravels derived from limestone occur immediately to the south of the bog.

## 3.3 Key Biodiversity Features of Interest

The majority of Prosperous Bog within the Bord na Móna boundary consists of bare peat, as this site was in production until 2021. Due to the recent cessation of peat production, there has been little opportunity for post-production habitats to develop, and habitats of biodiversity interest are therefore largely confined to the marginal habitats fringing the bare peat. The margins around the production bog contain some habitats of high local ecological value as a refuge for fauna.

### 3.3.1 Current habitats

The majority of the site is classified as bare peat as this site was in peat production until 2021. Due to the recent cessation of peat production, there has been little opportunity for post-production habitats to develop, and biodiversity interest is therefore largely confined to the margins of the site.

No significant vegetation regeneration has yet occurred in the formerly active production areas. A works area is located along the western edge of the site.

One noteworthy feature of Prosperous Bog is that the majority of the cutover bog in the eastern and north-eastern part of the site has been abandoned for some time. The only active domestic peat-cutting within the BNM boundary is being carried out in the south-west corner of the site (and this is significantly large in scale). There is still some remnant high bog along the margins that is in places being colonised by scrub, with a line of Birch and Gorse scrub marking the old facebank in places along the eastern side. The old face bank was not clearly visible in some sections and the boundary between the old cutover and the remnant raised bog was not always clear.

The largest sections of un-drained remnant high bog are located along the eastern side and these still have a typical high bog species assemblage. There still are signs of degradation and old pools have dried up or have infilled. However, there is still some remnant cover of *S. magellanicum* in places along with hummocks of *S. capillifolium* and *S. papillosum*. (These typical high bog features are likely to be related to the relatively young age of the production bog and the fact that these margins have not had quite as long to degrade yet). The remnant section of raised bog ran the entire length of the eastern side of the site, however it was narrow (<30m). A good diversity of plant species was present on the raised bog including Heather, Deergass, Bog Asphodel and Bog Rosemary along with mosses such as *Sphagnum magellanicum*, *S. capillifolium*, *S. cuspidatum* and *S. austinii* (small amount).





The majority of the cutover margin, particularly the eastern side is relatively mature and has some well-developed secondary peatland habitats. Some of the old cutover has developed quite similar high bog vegetation with Heather and Hare's-tail Bog-Cotton prominent. Other species such as Deergass are present. However, the old cutover bog is still firm and dry and there is relatively poor development of *Sphagnum* cover. Some of these secondary cutover communities could be classified as secondary wet heath (HH3) (or regenerating raised bog community - PB1) due to the presence of *Sphagnum* cover and the mixed proportions of Purple Moor-grass, Heather and Hare's-tail Bog Cotton. There were some wet areas in these sections with some *Sphagnum* present. Gorse is spreading over the cutover in places, particularly along old drains and along an old access track. The eastern margin is characterised by tall mature Birch woodland (WN7). The bog woodland consisted of mature Birch with some Scot's Pine in places. The ground flora consisted of Bramble and Bracken.

Some tree planting (Beech and Birch) has been planted in the north western corner of the site. These trees were likely planted as a shelterbelt for neighbouring houses.

See Drawing number BNM-DR-23-24-17 titled **Prosperous Bog: Current Habitat Map**, included in the accompanying Mapbook, which illustrates the habitats at Prosperous Bog.

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<p><i>Bare Peat is the main habitat at Prosperous Bog.</i></p>	<p><i>Cutover bog along the eastern margin of Prosperous.</i></p>
	
<p><i>Turbary area adjacent to the south-western boundary of Prosperous bog</i></p>	<p><i>Heather (<i>Calluna vulgaris</i>) dominated community established on the former cutover areas in the south-east of the site.</i></p>

*Table 1: Photos of Habitats at Prosperous Bog (October 2021).*

### 3.3.2 Species of conservation interest

A number of species of conservation concern utilize the habitats available at Prosperous Bog. The following is a summary of the records of these species available within both BnM records and those of the National Biodiversity Centre.

A review of available Biodiversity records from the National Biodiversity Data Centre (hereafter NBDC) of flora and fauna recorded within a polygon including Prosperous Bog found records for the terrestrial mammal species, including Irish Hare (*Lepus timidus subsp. hibernicus*), Pine Marten, several records for Badger (*Meles meles*) adjacent to eastern margins of the site boundary. Multiple signs of terrestrial mammal species have been recorded on or in close proximity to the bog during BNM ecology surveys including Badger, Hare, Red Fox, Pine Marten and Rabbit.

A number of bat species have also been recorded on or within 5km of the bog including; Leisler's Bat (*Nyctalus leisleri*), Common Pipistrelle (*Pipistrellus pipistrellus sensu lato*), Soprano Pipistrelle (*Pipistrellus pygmaeus*) Daubenton's Bat (*Myotis daubentonii*) and Brown Long-eared Bat (*Plecotus auritus*).

Prosperous Bog intersects two 10km squares (N82 & N83), which combined have records of 105 species of birds (2007-2011 Bird Atlas period), 423 species of flowering plant, 2 species of amphibian, 26 species of butterfly, 247 species of moth, 24 species of terrestrial mammal, 94 species of mollusc, 126 species of moss, and 16 species of liverwort and 1 reptile species.

NBDC records for lepidopteran species of conservation interest at Prosperous bog and within 2km of the bog boundary include Dingy Skipper (*Erynnis tages*), Marsh Fritillary (*Euphydryas aurinia*), Small Heath (*Coenonympha pamphilus*) and Large Heath (*Coenonympha tullia*). Other faunal species recorded during Bord na Móna surveys include Small Tortoiseshell butterfly and Frog spawn.

Numerous bird species are known to use the cutover bogs in Ireland's midlands as breeding grounds, wintering grounds or both. NBDC records for red-listed<sup>4</sup> bird species of conservation concern recorded at Prosperous Bog or within 1km of the site include Meadow Pipit (*Anthus pratensis*) and European Golden Plover (*Pluvialis apricaria*). Buzzard (*Buteo buteo*), red listed species Snipe (*Gallinago gallinago*) and Kestrel (*Falco tinnunculus*), and amber listed species Mallard (*Anas platyrhynchos*) and skylark (*Alauda arvensis*) have been recorded on Prosperous bog during previous surveys carried out by Bord na Móna ecologists.

During the most recent visit to Prosperous in October 2021, 12 bird species were recorded utilising or associating with habitats onsite, including the red listed species Meadow Pipit (*Anthus pratensis*) and Snipe (*Gallinago gallinago*); amber listed species mallard, and a pair of Buzzard (*Buteo buteo*) near the works area.

### 3.3.3 Invasive species

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

There are NBDC records and BNM records for *Rhododendron ponticum* from marginal habitat in the western section of the site.

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<sup>4</sup> Gilbert G, Stanbury A and Lewis L (2021), "Birds of Conservation Concern in Ireland 2020 –2026". Irish Birds 9: 523–544

No aquatic invasive species are described in available EPA documentation<sup>5</sup> in respect of WFD Cycle 2 sub-catchment reporting.

A broad range of common garden escapes are occasionally present around the margins of Bord na Móna bogs, and although spatial overlap with the PCAS is expected to be limited, these are, where necessary, to be treated in line with best practice during PCAS activities.

### 3.4 Statutory Nature Conservation Designations

There are a number of European Sites (SAC's or SPA's) in close proximity (i.e. within a 5km radius at minimum) to Prosperous Bog. In addition, there are a number of nationally designated sites (NHAs and pNHAs) in proximity to the site.

Ballynafagh Bog SAC (site Code: 000391) and the overlapping Ballynafagh Bog pNHA (site code: 000391) are located approximately 738m to the west of the site. The qualifying interests of Ballynafagh Bog SAC include Active raised bogs [7110], Degraded raised bogs still capable of natural regeneration [7120] and Depressions on peat substrates of the *Rhynchosporion* [7150].

Ballynafagh Lake SAC (site Code: 001387) and the overlapping Ballynafagh Lake pNHA (site code:001387), lie approximately 1.7km to the west of Prosperous Bog. The qualifying interests of Ballynafagh Lake SAC include Alkaline fens [7230], *Vertigo moulinsiana* (Desmoulin's Whorl Snail) [1016] and *Euphydryas aurinia* (Marsh Fritillary) [1065].

Hodgestown Bog NHA (site Code: 001393) is located approximately 2km west of the site. Donadea Wood NHA (Site code: 001391) lies approximately 970m north of Prosperous Bog. The Grand Canal pNHA (site code: 002104) lies approximately 3.3km south of Prosperous Bog.

There are no Special Protection Areas (SPAs) in close proximity to Prosperous Bog.

#### 3.4.1 Other Nature Conservation Designations

The Ramsar Convention entered into force in Ireland on 15<sup>th</sup> March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha. There are no Ramsar Sites in the local vicinity of Prosperous Bog (i.e. within 3km). The closest Ramsar Site to Prosperous Bog is Pollardstown Fen, Co. Kildare, which lies approximately 13km south-west of the site.

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

### 3.5 Hydrology and Hydrogeology

The majority of Prosperous Bog is located in the Boyne catchment (WFD Catchment id: 07), and in the Blackwater [Longwood] sub catchment\_010 (WFD sub catchment id: 07\_6). The south west section of the bog lies in the Barrow catchment (WFD Catchment id: 14) and the Slate sub catchment\_010 (WFD sub catchment id: 14-16).

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<sup>5</sup> [https://catchments.ie/wp-content/files/subcatchmentassessments/07\\_6%20Blackwater\[Longwood\]\\_SC\\_010%20Subcatchment%20Assessment%20WFD%20Cycle%202.pdf](https://catchments.ie/wp-content/files/subcatchmentassessments/07_6%20Blackwater[Longwood]_SC_010%20Subcatchment%20Assessment%20WFD%20Cycle%202.pdf)

Regional hydrological data suggest that Prosperous receives average precipitation of 778mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 528mm/yr, leaving an average effective precipitation of 250mm/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 250mm/yr, which equates to an annual runoff rate of c. 2,500m<sup>3</sup>/ha.

There are several drains/channelised streams around the margins that drain the site. The Derrycrib Stream (EPA Code: 07D38) flows in a northerly direction along the eastern boundary of the site. The Derrycrib Stream is a tributary of the River Blackwater [Longwood] (EPA Code: 07B02) which occurs to the north-west of the site. The Slate (EPA Code 14S01), occurs flows in a south-westerly direction along the southern site boundary. A tributary stream of this watercourse lies in the south-western part of the site.

Prosperous Bog has a gravity drainage regime. Hydrological modelling (BNM-DR-23-24-09 titled **Prosperous Bog: Depression analysis**) indicates that parts of the bog are natural basin with significant potential for re-wetting, with the assumption that all drains would be blocked. It is likely that a portion of the basins in target areas will re-wet with deeper water, creating a mosaic of wetland habitats, when drains are blocked.

Three outfall points and associated silt pond infrastructure exist on Prosperous Bog former production area. Outfalls are situated in the north, south and east of the site. The outfall in the south of the site discharges water into the River Slate. The outfalls in the northern and eastern part of the site discharge water into the Derrycrib stream.

GSI data indicates that Prosperous is underlain by Waulsortian Limestone and the Boston Hill Formation. Both geological formations are classified as Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones. A bedrock fault trends through the bog from SW-NE. There are no mapped karst features within the confines of the bog or its surrounding areas. The nearest bedrock outcrop is located 1.25km South-East of Prosperous Bog.

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

Prosperous Bog lies within a locally important aquifer - bedrock which is moderately productive only in local zones. An aquifer is an underground body of water-bearing rock or unconsolidated materials (gravel or sand) from which groundwater can be extracted in useful amounts. GSIs Aquifer classes are divided into three main groups based on their resource potential, and further subdivided based on the type of openings through which groundwater flows. There are nine aquifer categories in total. Locally important aquifers are capable of supplying locally important abstractions (e.g. smaller public water supplies, group schemes), or good yields (100-400 m<sup>3</sup>/d). This data gives an indication of sub-surface deposits (bedrock and unconsolidated materials) in terms of their groundwater resource potential and dominant groundwater flow type.

Regionally important aquifers are those in which the network of fractures, fissures and joints, through which groundwater flows, is well connected and widely dispersed, resulting in a relatively even distribution of highly permeable zones. There is good aquifer storage and groundwater flow paths can be up to several kilometres in



length. There is likely to be substantial groundwater discharge to surface waters ('baseflow') and large (>2,000 m<sup>3</sup>/d), dependable springs may be associated with these aquifers.

### 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. Industrial peat production has now permanently ceased at Prosperous Bog.

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. Silt pond decommissioning will be considered when sites are deemed to be on a trajectory of environmental stability and peatland rehabilitation has been completed.

Prosperous bog has three treated surface water outlets. There are two north to the IE\_EA\_07B020060 BLACKWATER (LONGWOOD)\_010 and one south to the River Slate (IE\_SE\_14S010000 SLATE\_010). The Blackwater was not listed as being under pressure from peat extraction in the 2nd cycle of the River Basin Management Plan for Ireland, and is indicated as remaining so in the third cycle which is currently out for consultation, but the Slate continues to be indicating as being under pressure from peat extraction.

Details of silt ponds, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed on the accompanying structures map along with water quality map. See Drawing number BNM-DR-23-24-02 titled **Prosperous Bog: Structures and Sampling**, along with Drawing number BNM-DR-23-24-WQ01 titled **Prosperous Bog: Water Quality Map** included in the accompanying Mapbook, which illustrate the various drainage and water quality infrastructure present at Prosperous.

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

The main emission limit value associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 4.53mg/l and COD 100mg/l. Initial monthly ammonia concentrations from September 2021 to date have a range of 1.05 to 1.69 mg/l with an average of 1.355mg/l. Results for suspended solids for the same period indicate a range of >2 with an average of 2mg/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 for Ammonia, with COD exceeding the trigger level once during the monitoring events, due to naturally occurring peat and subsoil interactions. See Table 3.1.

Bog	SW	Monitoring	Sampled	pH	SS	TS	Ammonia	TP	COD	Colour
Prosperous	SW-15	Q1 21	02/03/2021	6.6	2	249	3.43	0.09	51	212
Prosperous	SW-16	Q1 21	02/03/2021	7	2	190	1.07	0.05	51	222
Prosperous	SW-17	Q1 21	02/03/2021	5.3	2	89	0.215	0.05	53	178
Prosperous	SW-15	Q1 20	18/03/2020	6.5	2	56	1.17	0.05	66	219
Prosperous	SW-16	Q1 20	18/03/2020	6.1	2	61	1.13	0.05	67	199
Prosperous	SW-17	Q1 20	18/03/2020	7	2	131	0.988	0.05	66	236
Prosperous	SW-15	Q1 19	09/04/2019	7	5	120	1.8	0.05	92	274
Prosperous	SW-16	Q1 19	09/04/2019	7	14	130	1.7	0.06	85	285
Prosperous	SW-17	Q1 19	09/04/2019	6.3	24	180	0.07	0.23	235	620
Prosperous	SW-15	Q1 17	14/03/2017	7.7	5	212	3.6	0.05	58	159
Prosperous	SW-16	Q3 17	15/09/2017	7.2	5	110	0.38	0.05	62	234
Prosperous	SW-17	Q3 17	15/09/2017	7.8	5	188	2.1	0.05	61	106
Prosperous	SW-15	Q3 17	15/09/2017	7.4	7	112	0.39	0.05	68	191

Table 3.1.

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 September 2021 and is enabling a baseline to be established, with sampling to progress during the scheduled works, and for a period of up to 2 years post rehabilitation. Depending on the period required to confirm that the main two parameters, suspended solids and ammonia as remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration, the monitoring programme and intensity will be periodically reviewed and amended.

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

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Rehabilitation of cutaway peatland is closely linked with control of emissions. One of the criteria for successful rehabilitation is stabilisation through re-vegetation, which will stabilise all substrates and in turn remove the need for further silt control measures. This site is largely bare peat. Re-wetted peat also aids the primary objective of stabilizing peat, as when peat is re-wetted it is not vulnerable to wind erosion. Re-wetted peat and the development of wet peatland habitats can also act as sinks for silt and mobile peat, and increases additional retention time for solids, and the peatland vegetation can quickly stabilise this material within blocked drains on site (by acting like constructed wetlands).

Water quality of water discharges from restored peatlands normally improves as a result of bog restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Bog restoration 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 Móna peatland 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 Prosperous has been completed. 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 water body receptors, the Blackwater (Longwood\_010) (EPA Code: 07B02) and the River Slate (EPA Code 14S01), and is expected to support the future status of the waterbody as being of Good 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 some active drainage, which facilitates the oxidation of peat. Peat extraction generally transforms a natural peatland which acts as a modest carbon sink into a cutaway ecosystem which is a large source of carbon dioxide (2–5 t C/ha/year) (Waddington & McNeil, 2002; Alm *et al.*, 2007; Wilson *et al.*, 2007, Wilson *et al.*, 2015). Furthermore, they are also a significant source of methane (Huttunen *et al.*, 2003; Laine *et al.*, 2007a) as a consequence of the conditions within the peat body that provide a suitable environment for the microbial breakdown of plant litter and root exudates. Degraded peatlands also release carbon/GHG emissions via the fluvial/aquatic pathway (Dissolved Organic Carbon – DOC, Suspended Solids/Particulate Matter, degassing of GHGs from water).

The EPA-funded CarbonRestore Project (Renou-Wilson *et al.* 2012) found that rewetting of drained peatlands can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the C-sink function. The EPA NEROS project carried out GHG flux research at Moyarwood Bog and found that Moyarwood Bog was overall a Carbon sink (sink for CO<sub>2</sub> and a source for Methane) 6 years after bog restoration was carried out (Renou-Wilson *et al.* 2018).

It is expected that Prosperous Bog will become a reduced carbon source/partial carbon sink following rehabilitation. The potential of any cutaway site to develop as a 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. Much of this site is expected to develop *Sphagnum*-rich vegetation that has potential to develop as a GHG sink when there are optimal hydrological conditions. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

### 3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

The majority of Prosperous Bog can be rated as **Local Importance; lower value to Local Importance; higher value**. Bare peat and other intensively managed areas are assessed as **local importance (lower value)**. Marginal habitats including woodland, scrub, pioneer cutaway habitats and wetlands may act as a refuge and as ecological corridors for wildlife and are therefore deemed to be **locally important (higher value)**.

## 4. CONSULTATION

### 4.1 Consultation to date

Consultation seeks to engage an audience of relevant stakeholders at both a national and local level. National stakeholders have been identified from varied bog restoration and rehabilitation efforts undertaken by Bord na Móna over the past 40 years, with particular emphasis on engagement with stakeholders during their Biodiversity Action Plan programme, since 2010. National Stakeholders includes relevant government departments and agencies, relevant semi-state bodies, NGOs and other environmentally-focused groups with a national remit.

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

- General consultation with range of stakeholders at annual Bord na Móna Biodiversity Action Plan review days 2010-2018.
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).

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

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

#### **4.2 Issues raised by Consultees**

N/A Yet as consultation has not commenced.

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

N/A Yet as consultation has not commenced.

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## 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 waterbodies 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 hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation communities on deep peat, or reed swamp and fen on shallow more alkaline peat and other subsoils, where present.
- Optimising hydrological conditions for the development of active raised bog on extant high bog.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Supporting amenity land-use. Integrating rehabilitation measures with any amenity infrastructure on site. It is not proposed to carry out any rehabilitation actions to change or negatively affect any amenity infrastructure.
- 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.
- Rehabilitation to be integrated with the existing trackway and amenity infrastructure.

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 Prosperous Bog. This will happen over a longer timeframe than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (See Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- It is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). Furthermore, only a proportion of the bog has potential to develop *Sphagnum*-rich habitats in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.
- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as such the development of new habitat to support biodiversity and local attenuation of water flows from the bog.

- WFD status in receiving water bodies can be affected by peatlands and peat extraction, but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At Risk from peatlands and from peat extraction are likely to have several contributory sources of impacts (private peat extraction and Bord na Móna). Reducing pressures due to former peat extraction activities at Prosperous Bog will contribute to stabilising or improving water quality status of receiving water bodies in general. Ultimately, improving the WFD status of the receiving water-body will depend on reducing pressure from a range of different sources, including peatlands in general (private and Bord na Móna).
- Bord na Móna are also planning rehabilitation measures in some nearby bogs (e.g. Timahoe South and Giltown) in 2022. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the River Blackwater (Longwood) and the River Slate from rehabilitating more than one bog in the same catchment.
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features. An Archaeological Impact Assessment (AIA) is to be carried out under the PCAS scheme.

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## 6. SCOPE OF REHABILITATION

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

- The area of Prosperous Bog.
- EPA IPC Licence - Ref. P0506-01. 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. Prosperous bog is part of the Kilberry 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 Prosperous Bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Prosperous Bog mean that deep peat re-wetting and the promotion of *Sphagnum*-rich vegetation is the most suitable rehabilitation approach for this site. Prosperous Bog has a gravity drainage regime and has residual deep peat along with shallower areas.
- The key goals and outcomes of rehabilitation set by Bord na Móna. Bord na Móna have defined the key goal and outcome of rehabilitation at Prosperous Bog as **environmental stabilisation, optimising residual peat re-wetting, and the development of embryonic Sphagnum-rich vegetation on deep peat**.
- Rehabilitation of Prosperous 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.

### 6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- Remaining peat depths are between greater than 2.6 metres deep for the majority of the site.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care has to be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, any new archaeology may require rehabilitation measures will be reviewed and adapted. If this occurs, rehabilitation measures will be reviewed and adapted. An Archaeological Impact Assessment (Appendix XII) will be carried out to mitigate against any

impact on found archaeology at Prosperous Bog. In the worst-case scenario works affecting the surface and sub-surface of the bog might disturb previously unknown archaeological deposits or artefacts without preservation by record taking place. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

- **Turbary.** Parts of the south-western section of Prosperous Bog (partly within the areas owned and under the control of Bord na Móna) are currently being used by domestic turf cutters to harvest peat.
- **Public Rights of Way.** Several Rights of Way exist at Prosperous Bog in marginal land in the northern, western and eastern section of the site. A track is in use as an amenity walk through the cutaway along the north-east margin of the site. This track formerly accessed cutaway bog. Re-wetting will be planned as to not to impact on current amenity infrastructure. Rehabilitation measures will be integrated with the existing trackway and amenity infrastructure. is being used as a public amenity. 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.

## 6.2 Key Assumptions

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

## 6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM, but this bog has been developed and used by a private company.
- The longer-term development of stable naturally functioning habitats to fully develop at Prosperous Bog. The plan covers the short-term rehabilitation **actions** and **an additional monitoring and after-care programme** to monitor the rehabilitation and to respond to any needs.
- This plan is not intended to be an after-use or future land-use plan for Prosperous Bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future.

## 7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

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

Rehabilitation is generally defined by Bord na Móna as:

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

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

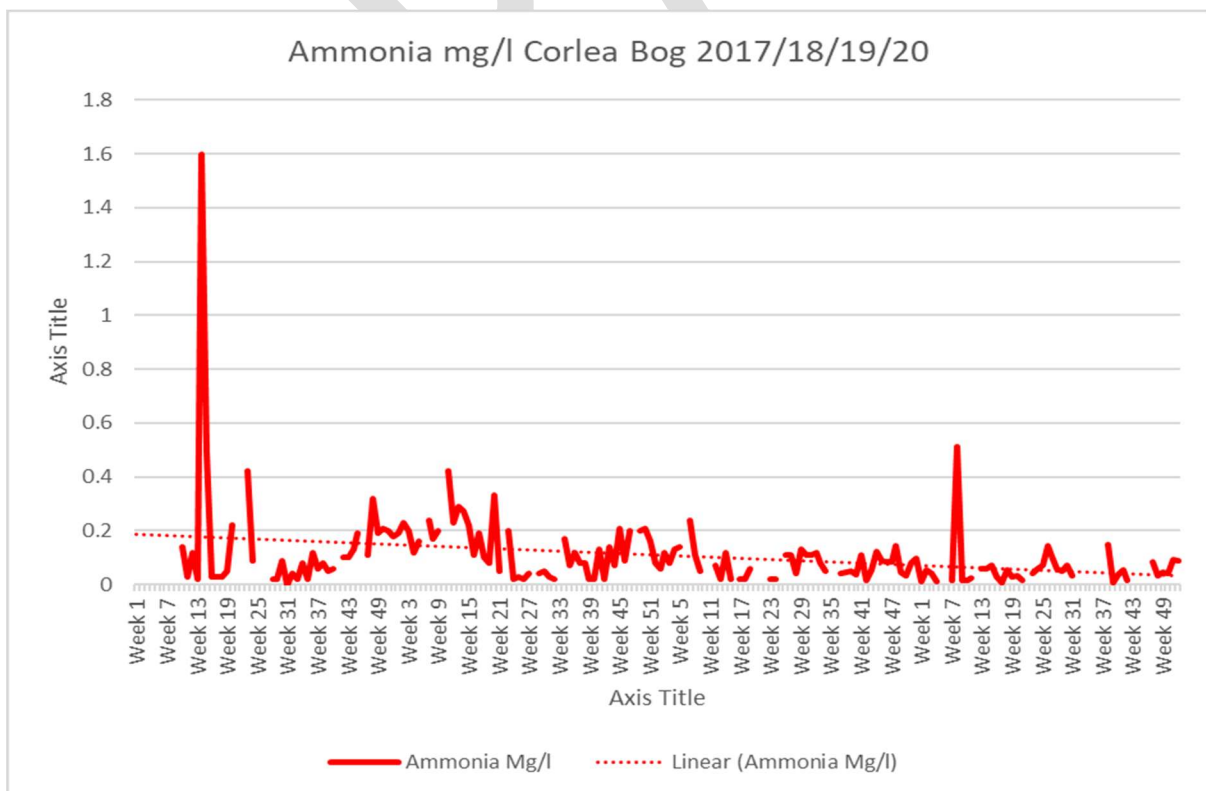
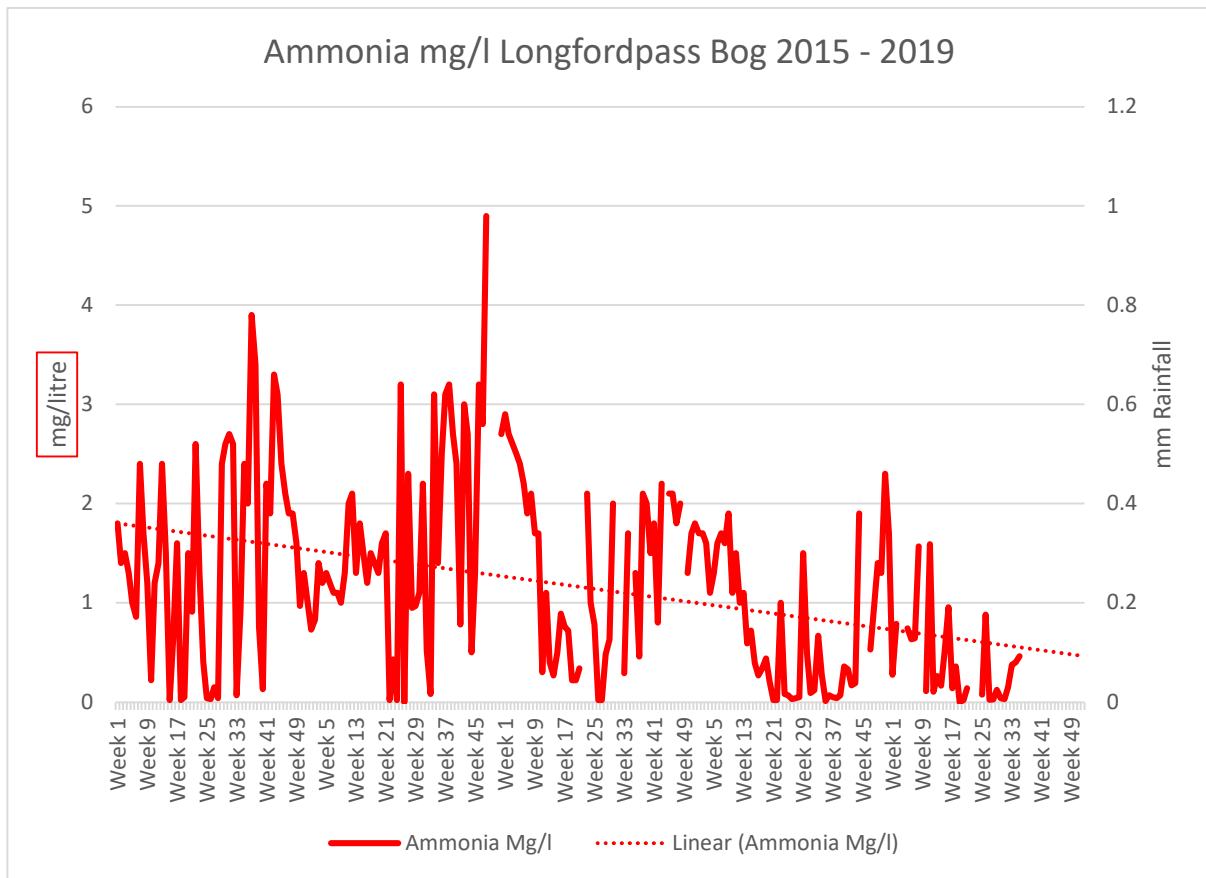
### 7.1. Criteria for successful rehabilitation to meet EPA IPC licence conditions:

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

With regard to predicting and estimating likely trends that might materialize or could be considered as a target, monitoring of surface water ammonia emissions from Longfordpass bog in Littleton over 3 yrs., post cessation of peat extraction with ongoing rehabilitation, were considered. These are indicating a downward trend in Ammonia concentrations (Figure 7.1).

Similarly monitoring of surface water ammonia emissions from a Corlea bog in Mountdillon over the past 4 yrs. post cessation of peat extraction with ongoing rehabilitation, indicate downward trends.

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



**Figure 7.1.** Ammonia levels over the period 2015-2019 at Longfordpass and the period 2017-2020 at Corlea.

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

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising and maximising residual peat re-wetting). This will be measured by an aerial survey after rehabilitation has been completed.
- Accelerating the trajectory of the bog towards becoming a reduced carbon source/carbon sink. 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). Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Reduction in carbon emissions. This will be estimated via a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including embryonic *Sphagnum*-rich peatland communities, fen, heath, scrub, poor fen, and birch woodland, where conditions are suitable. Some of these habitats have already in part established as pioneer vegetation/wetlands. It will take some time for stable naturally functioning habitats to fully develop at Prosperous Bog. This will be demonstrated and measured via aerial photography, habitat mapping and cutaway/habitat condition assessment. 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.
- Improvement in biodiversity and ecosystem services. This will be demonstrated by metrics outlined in Section 9.1 that can be used to measure changes in ecosystem services (e.g. water quality parameters, development of pioneer habitats, breeding bird monitoring). This will be measured by collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.

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

<b>Criteria type</b>	<b>Criteria</b>	<b>Target</b>	<b>Measured by</b>	<b>Expected Timeframe</b>
IPC validation	Rewetting in the former area of industrial peat production	Delivery of rehabilitation measures  Reduction in bare peat.	Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking)  Establishment of a baseline for future monitoring of bare peat, vegetation establishment and habitat condition.	2022-2025
IPC validation	Key water quality parameters  Ammonia, Phosphorous, Suspended solids, pH and conductivity	Reduction or stabilisation of key water quality parameters associated with this bog	Water quality monitoring for a period after rehabilitation has been completed	2021-2024
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	Where this section of the water body, that this bog drains to, has not been identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body, confirms that its classification remains at not being at risk from peat extraction associated with activities at this bog.	EPA WFD monitoring programme	WFD schedule

Criteria type	Criteria	Target	Measured by	Expected Timeframe
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.  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 bog condition assessment and appropriate carbon emission factors.	2022-2025
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  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.  Habitat establishment  Presence of key species – Sphagnum	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services  Presence of key species – <i>Sphagnum</i> – Walkover survey	2022-2025

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

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.

## 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 practice 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 degraded bog takes time. It may take 30-50 years for active raised bog vegetation to re-develop on suitable cutaway that was previously bare peat. However, Bord na Móna experience has demonstrated the effectiveness of these type of measures for re-wetting bog and creating carbon sinks (Renou-Wilson et al. 2018).
- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed enhanced measures to optimise climate action. This will focus on a collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services.



## 8. REHABILITATION ACTIONS AND TIME FRAME

Peatland rehabilitation requires detailed planning and the use of data from desktop surveys and field surveys. This data in association with topographical and hydrological modelling 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 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).

A number of illustrative figures have been produced to inform Rehab Planning and Design, including Aerial Photography, Peat Depths, LiDar Surface Maps, and Depression Analysis modelling; these are included in the accompanying Mapbook as the drawings referenced below:

BNM-DR-23-24-22 titled **Prosperous Bog: Aerial Imagery 2020**

BNM-DR-23-24-04 titled **Prosperous Bog: Peat Depths**

BNM-DR-23-24-03 titled **Prosperous Bog: LiDAR Map**

BNM-DR-23-24-09 titled **Prosperous Bog: Depression Analysis**

The rehabilitation actions themselves will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in drawing titled **BNM-DR-23-06-05 Prosperous Bog: Rehabilitation Measures** in the accompanying Mapbook (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 Prosperous bog will include (see Table 8.1):

- Deep peat measures including field re-profiling, creation of berms, blocking outfalls and managing overflows and drainage channels, and *Sphagnum* inoculation.
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels.
- Intensive drain blocking (up to 7/100m) on targeted marginal land drains.
- Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Seeding of vegetation and inoculation of *Sphagnum* will be undertaken where required.

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

Type		Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat	DPT 4	Berms and field re-profiling (45x60m cell), blocking outfalls and managing overflows & drainage channels for excess water & <i>Sphagnum</i> inoculation	133.1
Dry Cutaway	DCT2	Regular drain blocking (3/100m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	12.41
Marginal land	MLT1	No work required	27.62
Marginal land	MLT2	More intensive drain blocking (max 7/100 m)	25.24
Drainage	Drainage	Silt Ponds	0.66
Constraint	Constraint	Other Constraints (Turbarry rights)	11.37
Additional Land	Additional Land		6.8
<b>Total</b>			<b>217.3</b>

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

- Seek formal approval of the enhanced plan, noting the alternative 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 engineering drawings outlining how the various rehabilitation methodologies (The Scheme PCAS) will be applied to Prosperous Bog. This will take account of peat depths, topography, drainage and hydrological modelling. (See map for an indicative view of the application of different rehabilitation methodologies).
- A drainage management assessment of the proposed enhanced rehabilitation measures will be carried out and any issues identified resolved and the rehabilitation plan adapted.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation will be carried out. The results of this assessment will be incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.
- An assessment of pumping requirements to complete decommissioning is to be carried out.
- A review of issues that may constrain rehabilitation such as known rights of way, turbarry and existing land agreements is to be carried out
- A review of remaining milled peat stocks is to be carried out. There are peat stocks remaining on the bog.
- An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- Carry out Appropriate Assessment 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 implantation of the rehabilitation plan.

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

- Carry out proposed measures as per the detailed site plan. This will include a combination of drain blocking, and fertiliser applications targeting bare peat areas of headlands, high fields and other areas (where required) in addition to management prescriptions. All rehabilitation will be carried out with regard to best practice environmental control measures (Appendix IV).
- Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions.
- Carry out the proposed monitoring, as outlined.
- While natural colonisation is expected to commence almost immediately once peat production ceases, Phase 2 actions will be carried out in targeted areas to accelerate re-vegetation and colonisation of target species. Phase 2 actions may include seeding of targeted vegetation and inoculation of *Sphagnum*.
- Silt ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent potential suspended solids run-off 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 -2023:** Short-term practical actions.
- **2023-2025:** Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- **2025:** 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 different cutaway types across the site (See Appendix I).

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## 9. AFTERCARE AND MAINTENANCE

### 9.1 Programme for monitoring, aftercare and maintenance

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

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

rehabilitation measures, but may demonstrate that more time is required before key criteria for rehabilitation has been achieved. Monitoring of water quality will then also continue for another period to be defined.

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

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

- Vegetation and habitat monitoring after rehabilitation is completed using a cutaway bog condition assessment (Similar to ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels. 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.

## 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.
- 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:

- The area of Prosperous Bog.
- EPA IPC Licence - Ref. P0506-01. 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. Prosperous Bog is part of the Kilberry Bog Group.
- The current condition of Prosperous Bog. This site has gravity drainage.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- To minimise potential impacts on neighbouring land. Boundary drains around Prosperous Bog will be left unblocked as blocking boundary drains could affect adjacent land.

### Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Prosperous Bog is environmental stabilisation of the site via peatland re-wetting. This is defined as:

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

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

### Criteria for successful rehabilitation:

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

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

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

### **Rehabilitation targets**

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat blockages and re-wetting). This will be demonstrated by a post rehab aerial survey.
- Stabilising potential emissions from the site (e.g. 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:**

- Blocking field drains in drier sections of the former industrial production area using a dozer to create regular peat blockages (three blockages per 100 m) along each field drain.
- Re-alignment of piped drainage; and management of water levels to create/enhance existing re-wetting.
- No measures are planned for the majority of surrounding marginal peatland habitats.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning phase.
- Evaluate success of short-term rehabilitation measures and enhance where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

### **Timeframe:**

- 2022-2023. 1<sup>st</sup> phase of rehabilitation. Field drain blocking.
- 2024. 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.
- 2024-2026. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024-2026. Decommission silt-ponds, if necessary.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	133.1
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	12.4
Marginal Land	MLT1	No work required	59.7
Other	Silt Pond	Silt ponds	0.7
Other	Constraint	Rights of Ways and constrained areas/buffers/Archaeology	11.4
<b>Total</b>			<b>217.3</b>

See Drawing number BNM-DR-23-24-20 titled **Prosperous Bog: Standard Rehab Measures** included in the accompanying Mapbook which illustrates the standard rehab measures to be applied.

#### Monitoring, after-care and maintenance

- There will be initial quarterly monitoring assessments of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, assess the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to additional rehabilitation.
- Water quality monitoring will be established.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at [www.epa.ie](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 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;
- Water quality monitoring demonstrates that water quality of discharge is stabilising or improving; and
- The site has been environmentally stabilised.

## APPENDIX II: BOG GROUP CONTEXT

The Kilberry Bog Group IPC Licensed area is made up of five bog areas (Allen (Mouds), Gilltown, Kilberry, Prosperous and Ummeras) most of which were in active milled peat production up to 2021. These bogs primarily supplied horticultural peat with some fuel peat. Fuel peat was transported to other Bord na Móna facilities, depending on market demand. Bogs that have been in milled peat production for decades have been slowly becoming cutaway as horticultural peat is extracted from the individual bog areas.

Industrial peat production history varies across the Kilberry Bog group, so there is a wide range of residual peat depths present. The majority of the bogs have been in active peat production until recently and are bare peat, and a small proportion has become cutaway. Kilberry Bog has had a long peat production history that has focused on horticultural peat production. Cutaway areas where the more acidic horticultural peat has been harvested still have relatively deep peat reserves, as much of the fuel peat at these sites has not been utilised. Ummeras and Mouds Bog both have areas where horticultural peat has been completely harvested and fuel peat was also harvested. Prosperous and Gilltown have a much younger milled-peat production history and more acidic peat is still present in the upper levels of these sites. More acidic peat can lead to the development of Heather-dominated communities in places or where it is wet, *Sphagnum*-rich vegetation (embryonic peat forming communities) can establish. Examples of these types of communities can be seen at Kilberry.

The rehabilitation plan for the Kilberry Bog Group encompasses all areas involved in industrial peat production including milled peat production areas and associated facilities.

A breakdown of the component bog areas for the Kilberry Bog Group IPC License Ref. P0506-01 is outlined in Table Ap-2.

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

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Allen (Mouds)	433	Cutover Bog Industrial peat production commenced at Allen Bog in 1956. This bog still retains residual deep peat.	Allen (Mouds) Bog formerly supplied mainly horticultural peat.  Most of the site is bare peat and some naturally colonising cutaway is already present.	2020	To be updated 2021
Gilltown	344	Cutover Bog Industrial peat production commenced at Gilltown Bog in 1976. This bog still retains residual deep peat.	Gilltown Bog formerly supplied mainly horticultural peat.  The majority of the bog is bare peat and there is some naturally colonising cutaway.  The proposed Irish Water pipeline crosses this bog.	2020	To be updated 2021
Kilberry	978	Cutover Bog Industrial peat production commenced at Kilberry Bog in 1941. This bog still retains residual deep peat.	Peat extraction history at Kilberry Bog pre-dates Bord na Móna. Kilberry Bog formerly supplied mainly horticultural peat.  The majority of the bog is currently bare peat. There is some naturally colonising cutaway at different stages.  There have also been several re-wetting and <i>Sphagnum</i> inoculation rehabilitation trials at Kilberry.	2020	Draft 2017

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Prosperous	217	Cutover Bog Industrial peat production commenced at Prosperous Bog in 1980's. This bog still retains residual deep peat.	Prosperous Bog formerly supplied mainly horticultural peat.  The majority of the bog is bare peat and there is some naturally colonising cutaway.	2020	To be updated 2021
Ummeras	292	Cutover Bog Industrial peat production commenced at Ummeras Bog in 1972. This bog still retains residual deep peat.	Ummeras Bog formerly supplied mainly horticultural peat  The majority of the bog is bare peat and there is some naturally colonising cutaway.	2019	Finalised Plan 2021
Total	2264				

See Drawing number BNM-DR-23-24-24 titled **Kilberry Bog Group**, included in the accompanying Mapbook which illustrates the location of Prosperous Bog and the Kilberry Bog Group in context to the surrounding area.

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## APPENDIX III: ECOLOGICAL SURVEY REPORT

<b>Ecological Survey Report</b>			
<p><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></p>			
<b>Bog Name:</b>	<u>Prosperous</u>	<b>Area (ha):</b>	218ha
<b>Works Name:</b>	Hort Bogs	<b>County:</b>	Kildare
<b>Recorder(s):</b>	MMC & DF	<b>Survey Date(s):</b>	28 <sup>th</sup> March 2011
<p><b>Habitats present (in order of dominance)</b></p> <p>The most common habitats present on the production bog at this site include:</p> <ul style="list-style-type: none"> <li>• Bare Peat (BP) (Codes refer BnM classification of pioneer habitats of production bog. See Appendix II).</li> <li>• Dry pioneer Purple Moorgrass-dominated grassland (gMol)</li> <li>• Pioneer Heather-dominated dry heath (dHeath) (in abandoned cutover bog areas)</li> <li>• Pioneer dry calcareous grassland (gCal)</li> <li>• Pioneer Bog Cotton and/or Soft Rush-dominated poor fen (pEang, pJeff)</li> <li>• Birch-dominated scrub (eBir, oBir) (on abandoned cutover bog)</li> <li>• Gorse-dominated scrub (eGor)</li> <li>• Silt ponds (Silt) with Gorse/Birch scrub and Purple Moorgrass-dominated grassland (gMol)</li> <li>• Riparian zones (Rip) (with drains and associated habitats such as scrub)</li> </ul> <p>The most common habitats found around the margins of the site include:</p> <ul style="list-style-type: none"> <li>• Cutover Bog (PB4) (mostly abandoned with secondary dry heath, scrub, some wet heath) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II.)</li> <li>• Birch woodland (WN7)</li> <li>• Scrub (WS1)</li> <li>• Raised bog (PB1) (minor remnants of high bog)</li> <li>• Hedgerows (WL1)</li> <li>• Improved grassland (GA1)</li> <li>• Amenity grassland (GA2) (around Works area)</li> <li>• Wet grassland (GS4)</li> </ul>			
<p><b>Description of site</b></p> <p>Prosperous Bog is situated approximately 2km from Prosperous in Co Kildare. The Prosperous to Donadea public road runs along the western boundary of the site. A number of small, unpaved, bog roads allow access to the site at various points</p>			



mainly along the eastern edge of the site. Private domestic sod peat cutting is very active on this site around the margins with large sections of cutover bog located along the southern and western boundaries of the site.

There is a small area of production bog to the west of the Prosperous to Donadea public road. Part of this is still owned by BnM but this bog is being developed by a private company.

Prosperous Bog is a relatively young production bog and horticultural peat is currently being harvested from the majority of the site. The peat is mostly red/brown acidic *Sphagnum* peat. One noticeable feature of this bog is that the bog is still relatively high compared to other older production bogs, as it still retains its dome shape, compared to older production bogs that slope downwards to the centre of the site. All the production bog is available for production and is bare peat at present. Wildlife usage of the production bog is relatively poor but there were still signs of foraging mammals such as Fox and Badger around the margins.

A Works area is located along the western edge of the site. This area consisted of a tippler (used to load peat on to lorries), some hard core (parking), containers and a large area of amenity grassland (GA2). This area is used to load lorries with peat which is then transported to Holland for use as horticultural peat.

One noteworthy feature of Prosperous Bog is that the majority of the cutover bog has been abandoned for some time. The only active domestic peat-cutting within the BNM GIS boundary is being carried out in the south-west corner of the site (and this is significantly large in scale). There is still some remnant high bog along the margins that is in places being colonised by scrub, with a line of Birch and Gorse scrub marking the old facebank in places along the eastern side. The old face bank was not clearly visible in some sections and the boundary between the old cutover and the remnant raised bog was not always clear. The largest sections of un-drained remnant high bog are located along the eastern side and these still have a typical high bog species assemblage. There still are signs of degradation and old pools have dried up or have infilled. However, there is still some remnant cover of *S. magellanicum* in places along with hummocks of *S. capillifolium* and *S. papillosum*. (These typical high bog features are likely to be related to the relatively young age of the production bog and the fact that these margins have not had quite as long to degrade yet). The remnant section of raised bog ran the entire length of the eastern side of the site, however it was narrow (<30m). A good diversity of plant species was present on the raised bog including Heather, Deer Sedge, Bog Asphodel and Bog Rosemary along with mosses such as *Sphagnum magellanicum*, *S. capillifolium*, *S. cuspidatum* and *S. austinii* (small amount).

The majority of the cutover margin, particularly the eastern side is relatively mature and has some well-developed secondary peatland habitats. Some of the old cutover has developed quite similar high bog vegetation with Heather and Hare's-tail Bog-Cotton prominent. Other species such as Deergrass are present. However, the old cutover bog is still firm and dry and there is relatively poor development of *Sphagnum* cover. Some of these secondary cutover communities could be classified as secondary wet heath (HH3) (or regenerating raised bog community - PB1?) due to the presence of *Sphagnum* cover and the mixed proportions of Purple Moor-grass, Heather and Hare's-tail Bog Cotton. There were some wet areas in these sections with some *Sphagnum* present. Gorse is spreading over the cutover in places, particularly along old drains and along an old access track. The eastern margin is characterised by tall mature Birch woodland (WN7). The bog woodland consisted of mature Birch with some Scot's Pine in places. The ground flora consisted of Bramble and Bracken.

Some tree planting (Beech and Birch) had been planted in the north western corner of the site. These trees were young and did seem to be thriving. These trees were likely planted as a shelterbelt for neighbouring houses.

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

None

**Adjacent habitats and land-use**

Adjacent habitats include wet grassland (GS4), improved agricultural grassland (GA1), conifer plantation (WD4), raised bog (PB1), cutover bog (PB4), scrub (WS1) and Birch woodland (WN7).

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

- The Slate River flows along the eastern boundary of the site. This River is a tributary of the Figile River to the west.
- Prosperous Bog is divided between two main river catchments. The northern section of the site is located in the Eastern Boyne region while the southern section of the site is located in the South Eastern Barrow region.

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

Prosperous is a relatively young production bog and red/brown acidic *Sphagnum* peat is exposed at present.

#### **Fauna biodiversity**

##### **Birds**

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

- A pair of Buzzard, possibly nesting on or near the site.
- Chiffchaff
- Mallard (have breed in siltponds in the past)
- Snipe (20) (mainly on the intact high bog along the eastern margin
- Skylark
- Kestrel
- Other more common bird species included Blackbird, Rook, Magpie, Wood Pigeon, Meadow Pipit, Coal Tit, Great Tit, Blue Tit, Pheasant, Chaffinch, Robin and Song Thrush

##### **Mammals**

Signs of several mammal species were recorded during the survey.

- Badger
- Fox
- Hare
- Rabbit
- Pine Marten

##### **Other species**

- Frog Spawn (silt ponds)
- Small Tortoiseshell

<b>Fungal biodiversity</b> N/A
<b>References</b> 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.
<b>HABITAT DESCRIPTIONS</b> (See Habitats Description Document for detailed description of each vegetation community not described in this section.)
<b>HABITAT DESCRIPTIONS</b>

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## APPENDIX IV. ENVIRONMENTAL CONTROL MEASURES TO BE APPLIED TO BOG REHABILITATION

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

## APPENDIX V. BIOSECURITY

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

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

- Any areas of high bog will be subject to a confirmatory survey to establish presence or absence, where relevant, of invasive species within close proximity to activity locations.
- Records of problematic invasive species within the various bog units will be marked out with signs to highlight areas of infestation to personnel.
- All plant machinery will be restricted from disturbing known colonies of invasive species.
- All plant machinery will avoid unnecessary crossings to adjoining lands.
- Good site hygiene will be employed to prevent the introduction and spread of problematic invasive alien plant species (i.e. Japanese Knotweed (*Fallopia japonica*), Himalayan Balsam (*Impatiens glandulifera*), Himalayan Knotweed (*Persicaria wallichii*), etc.) by thoroughly washing vehicles prior to entering the area.

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).

In addition to the above, Best Practice measures around the prevention and spread of Crayfish plague<sup>6</sup> will be adhered with throughout all rehabilitation measures and activities.

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<sup>6</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 Kilberry bog group (Ref. PO-506-01). 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 Kilberry 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 Draft National River Basin Management Plan 2022-2027 (Water Framework Directive)**

The National River Basin Management Plan (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 2018-2021 outlined 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) was part



of the WFD (2018-2021) programme of measures. The NRBMP 2018-2021 takes account of the fact that Bord na Móna was 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 2018-2021 rehabilitation target was 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 was expected to have a positive impact on water quality and will help the NRBMP 2018-2021 deliver its objectives in relation to the Water Framework Directive and is one of the five key principle actions.

The draft NWBMP 2022-2027 describes how the number of waterbodies impacted by peat, industry and forestry have decreased by 10, 10 and 5 waterbodies, respectively since the second cycle. Impacts on water quality and river habitat arising from peat and peat extraction and associated drainage include the release of ammonium and fine-grained suspended sediments, and physical alteration of aquatic habitats. Drainage of peatlands also results in changes to the hydromorphological condition of rivers.

The draft NWBMP 2022-2027 outlines how maintaining and restoring Irish bogs will lead to a decrease in waterborne carbon leaching to levels comparable with intact bogs as well as reducing losses of peat silt and ammonia. Vegetation on the surface of the peat can also slow the flow of water over the land surface. Based on the EPA's most recent reports, peat extraction and drainage is impacting on 106 water bodies across the country, with peat the single pressure on 28 of these water bodies. However, compared to the data in the second-cycle plan, the number of water bodies impacted by peat has decreased.

The cessation of industrial peat extraction by Bord na Móna in 2021 was 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. This is now being supported by the results and conclusions of the draft NWBMP 2022-2027.

## **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 2021-2025**

The All-Ireland Pollinator Plan 2021-2025 outlines key objectives and actions to protect and support pollinating insects and the habitats they rely on. A Bord na Móna specific action in this plan includes 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.

## 11 National Archaeology Code of Practice

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.

**Below to be reviewed and updated**

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

Item	Description	Prosperous 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
4	Decommissioning or Removal of Buildings and Compounds	Decommissioning or Removal of Buildings and Compounds
5	Decommissioning Fuel Tanks and associated facilities	Where relevant
6	Decommissioning and Removal of Bog Pump Sites	Not applicable
7	Decommissioning or Removal of Septic Tanks	Where relevant

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.

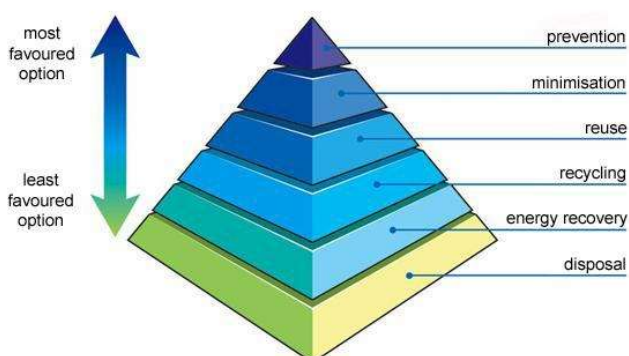
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

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 be 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	Prosperous Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Where Applicable
3	Decommissioning Railway Level Crossing	Where Applicable
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog
5	Removal of High Voltage Power Lines	Where Applicable



## APPENDIX VIII. GLOSSARY

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

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

**Dry cutaway bog:** Cutaway bog is categorised as dry cutaway where it is not practical or feasible to re-wet these areas completely. It is inevitable that some areas of cutaway will remain relatively dry due to the heterogenous topography of the cutaway, as well as requirements for continued drainage on site for identified after-uses, or off site in relation to neighbouring lands or other infrastructure. Ridges and mounds of glacial deposits can become exposed during peat extraction and form a heterogenous topographical mosaic separated by basins. Dry cutaway may have very thin or no residual peat where ridges and mounds have been exposed. The exposed sub-soils are a mix of glacial gravels, muds and tills that can be quite free-draining. Dry cutaway may also have deeper residual peat, but in a location (i.e. at the margin) where the peat cannot 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 the Scheme, which is proposed to be 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 has changed so radically (with the removal of the acrotelem – the living layer and much of the peat mass). However, they can be returned to a **trajectory** towards a naturally functioning peatland system (Renou-Wilson, 2012). **Raised bog restoration** is an objective of some BnM sites where there is residual natural raised bog vegetation and where the majority of the peat is still intact.

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

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

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

## APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

### (Minimisation, treatment, recovery and disposal)

#### Objective:

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

#### Scope:

This plan covers IPPC Licence's Ref P0506-01, Kilberry Group of Bogs located in County Kildare and County Offaly.

#### 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 the Kilberry bog group 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 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:

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

##### 1.3 Bog Timbers:

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

#### 2.0 P0506-01 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:

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

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

##### 3.0 Minimisation.

##### 3.1 Silt pond excavation material and cleanings.

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

### 3.2 Power Station Screenings.

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

### 3.3 Bog Timbers.

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

## 4.0 Treatment

### 4.1 Silt pond excavation material and cleanings.

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

### 4.2 Power Station Screenings.

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

### 4.3 Bog Timbers

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

## 5.0 Recovery

### 5.1 Silt pond excavation material and cleanings.

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

### 5.2 Power Station Screenings.

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

### 5.3 Bog Timbers

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

## 6.0 Disposal

### 6.1 Silt pond excavation material and cleanings.

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

### 6.2 Power Station Screenings.

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

### 6.3 Bog Timbers

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

## 7.0 Extractive Waste Management Plan

### 5 (2a)(i)

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

### 5 (2a)(ii)

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

### 5 (2a)(iii)

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

### 5 (2a)(iv)

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

**5 (2a)(v)**

Peat mineral resources do not undergo any treatment.

**5 (2b)**

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

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

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

**5 (3)**

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

The peat excavations and cleanings are stored in locations and in a manner that they could not collapse, and are remote in their nature. The stockpiles are located adjacent to silt ponds that are cleaned regularly and as such these stockpiles are managed and levelled to facilitate further cleanings.

Therefore the material stored at these waste facilities would not be considered to be a Category A waste facility.

**Classification in accordance Annex II.**

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

**Description of operations.**

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

**Closure plan. (Bog Rehabilitation Plan).**

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

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

**10.2 Cutaway Bog Rehabilitation Plan:**

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

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

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

10.4 A final validation report to include a certificate of completion for the Rehabilitation Plan, for all or part of the site as necessary, shall be submitted to the Agency within six months of execution of the plan. The licensee shall carry out such tests, investigations or submit certification, as requested by the Agency, to confirm that there is no continuing risk to the environment. This plan including maps and ecological classifications are available on file at the Kilberry 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-affected 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 Kilberry IPPC Licence P0506-01.

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## APPENDIX X. MITIGATION MEASURES FOR THE APPLICATION OF FERTILISER

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

Water body / Feature	Buffer zone
Any water supply source providing 100m <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*

## **APPENDIX XI. CONSULTATION SUMMARIES**

**Table APX -1 Consultees contacted**

**Table APX -2 Response summary from Consultees contacted**

DRAFT



**Archaeological Impact Assessment of Proposed Bog  
Decommissioning and Rehabilitation at Prosperous Bog, Co.  
Kildare**

**Draft**

**Report For**

**Bord Na Móna Energy Ltd.**

**Author**

**Dr. Charles Mount**

**Bord Na Móna Project Archaeologist**





## Introduction

The EPA (2020) *Guidance on the process of preparing and implementing a bog rehabilitation plan* notes that the licensee should characterise the bog prior to embarking on detailed planning and implementation. This characterisation should detail how the land is classified in terms of statutory protections, e.g. as European sites, world heritage sites, RAMSAR sites, National Heritage Areas, national monuments, archaeological heritage, etc. This archaeological impact assessment report was prepared by Dr. Charles Mount for Bord na Móna Energy Ltd to fulfil this characterisation in relation to archaeological heritage. It represents the results of a desk-based assessment of the impact of proposed bog rehabilitation of c.306 hectares at Prosperous Bog, Co. Kildare on the known archaeological heritage of the bog. The proposed rehabilitation actions will be a combination of measures to create wetlands and re-wet deep peat as outlined in the draft Methodology Paper for the proposed Bord na Móna Decommissioning, Rehabilitation and Restoration Scheme. These enhanced measures for Prosperous Bog will include:

- Deep peat measures including field re-profiling, creation of berms, blocking outfalls and managing overflows and drainage channels, and Sphagnum inoculation.
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels.
- Intensive drain blocking (up to 7/100m) on targeted marginal land drains.
- Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Seeding of vegetation and inoculation of Sphagnum will be undertaken where required.

Prosperous Bog is located c.0.6km north of Prosperous village, Co. Kildare, and north-west of the R408 road. The overall rehabilitation area occupies the townlands of Ballynafagh, Ballynagappagh, Betaghstown, Corkeragh, Cott and Kilmurry on OS 6 inch sheets Kildare Nos. 9 and 13.

## Methodology

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

- The Peatland Survey 2005
- The Sites and Monuments Record that is maintained by the Dept of Housing, Local Government and Heritage
- The topographical files of the National Museum of Ireland.
- The Excavations database
- Previous assessments

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



## Desktop assessment

### Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Kildare which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1995). This record was published by the Minister in 1996 and includes sites and monuments that were known in Prosperous Bog before that date. This review established that there are no RMPs located in the proposed rehabilitation area (see Fig. 1).

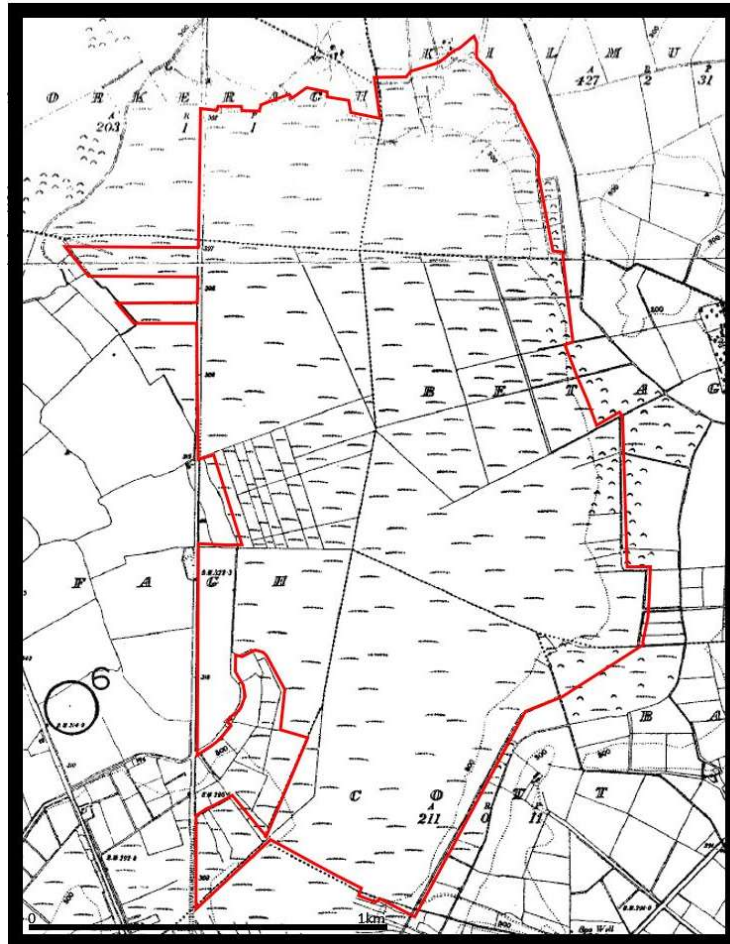


Fig. 1. Prosperous Bog, Co. Kildare, detail of the RMP map sheets Nos. 9 and 13. The proposed rehabilitation area is outlined with the red line. There are no RMPs in the rehabilitation area.

### Peatland Survey 2005

Prosperous Bog was surveyed by Archaeological development Services (ADS) in 2005 as part of the Archaeological Survey of Ireland Peatland Survey (Licence No. 05E0820) (Whitaker 2006, 32-6). Five sightings of archaeological material were made (see Table 1). These archaeological sightings were notified to the Archaeological Survey of Ireland.



SMR_NO	SMR Class	Peatland Survey 2016 No..	Survey Type	Townland	Irish Grid E	Irish Grid N	Depth BS m
KD013-028----	Structure - peatland	PPS001	Archaeological Wood	Ballynafagh	283316	229258	0.78
KD013-029----	Structure - peatland	PPS002	Archaeological Wood	Colt	283426	228842	0.10
KD013-030----	Structure - peatland	PPS003	Archaeological Wood	Colt	283562	228864	0.05
KD013-031----	Structure - peatland	PPS004	Archaeological Wood	Colt	283743	229163	0.00
KD013-032----	Structure - peatland	PPS005	Archaeological Wood	Colt	283560	228850	0.08

Table 1. List of archaeological sightings in Prosperous Bog made by the Peatland Survey 2005 and included in the SMR.

### Sites and Monuments Record

The Sites and Monuments Record (SMR) which is maintained by the Department of Housing, Local Government and Heritage was examined as part of the assessment on the 25th of November 2021. The SMR consists of records included in the RMP and sites and monuments notified to the Dept. since the publication of the RMP. This review established that there are five entries in the SMR in the proposed rehabilitation area (see Table 1). These entries are the material notified by the Peatland Survey 2005 and are classified as Structure – peatland.

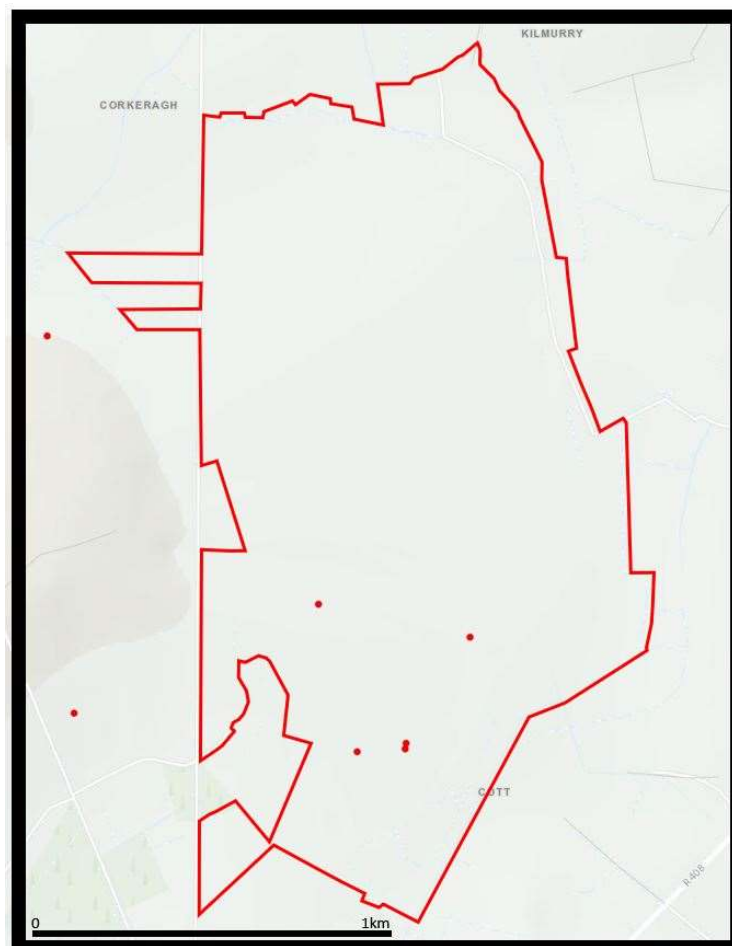


Fig. 2. Prosperous Bog, Co. Kildare, detail of the SMR. The proposed rehabilitation area is outlined with the red line. There are five SMRs in the rehabilitation area.



### Previous assessments

Prosperous Bog has been the subject of an Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01. This assessment included a review of the topographical files and finds registers of the National Museum of Ireland intended to identify all finds from the bog reported to the Museum by that date and these finds are included below in Table 2 (Pers Comm. Jane Whitaker). The assessment noted the archaeological material identified in the Peatland Survey in 2006 and noted that there was a moderate potential for archaeological features to be uncovered during the course of any future development works in Prosperous Bog.

### Reported finds

As noted above the Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01 contains a complete list of known finds from Prosperous Bog reported to the National Museum of Ireland up to 2018. There are no stray finds recorded from Prosperous Bog in the Topographical Files of the National Museum of Ireland. A polished stone axehead (1987:152) was recovered from a ploughed field in the townland of Ballynafagh (see Table 2).

Townland	Museum No.	Description
Ballynafagh	1987:152	Polished stone axehead

Table 2. List of archaeological finds from Prosperous Bog reported to the National Museum of Ireland.

### Archaeological investigations

Reports of archaeological excavations and licensed monitoring in the study area listed in the excavations database at [excavations.ie](http://excavations.ie) were examined as part of the assessment. There are no additional reports of archaeological investigation carried out in the rehabilitation area.

### Impact assessment

A total of five sightings of archaeological material were identified and recorded in Prosperous Bog by the Peatland Survey in 2005 and these were subsequently entered into the Sites and Monuments Record. Examination of LIDAR data for peat depth at the five locations indicates that all five sightings have been removed (see Table 3).

SMR_NO	SMR Class	Peatland Survey 2016 No..	Townland	ITM E	ITM N	Depth BS m	Peat depth 2008 m	Peat depth 2020 m	Status	Status
KD013-028--- -	Structure - peatland	PPS001	Ballynafagh	683248.5996	729285.5253	0.78	88.90	86.95	1.95	Gone
KD013-029--- -	Structure - peatland	PPS002	Colt	683358.5731	728869.6150	0.10	89.15	87.68	1.47	Gone
KD013-030--- -	Structure - peatland	PPS003	Colt	683494.5438	728891.6095	0.05	88.55	86.76	1.78	Gone
KD013-031--- -	Structure - peatland	PPS004	Colt	683675.5067	729190.5436	0.00	87.68	86.34	1.34	Gone
KD013-032--- -	Structure - peatland	PPS005	Colt	683492.5441	728877.6125	0.08	88.89	87.20	1.69	Gone

Table 3. List of archaeological sightings in Prosperous Bog with the depth of peat removed and current status.



## **Recommendations**

There is no known surviving archaeological material in Prosperous Bog. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

## **Conclusion**

This is a desk-based archaeological assessment and includes a collation of existing written and graphic information to identify the likely archaeological potential of the proposed rehabilitation area. A total of five sightings of archaeological material were identified and recorded in Prosperous Bog but they were subsequently destroyed. There is no known surviving archaeological material in Prosperous Bog. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

## **References**

DAHGI 1996. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Kildare.

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

Whitaker, J. 2006. Peatland Survey 2005 Allen, Kilberry & Coolnamóna Bogs Counties Kildare, Laois, Meath, Offaly, & Westmeath. Unpublished report for the Department of the Environment, Heritage and Local Government.

Dr. Charles Mount  
29 November 2021

## 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



# 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 .....

**3) Records**

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