

# **Bord na Móna**

## **Begnagh Bog**

# **Cutaway Bog Decommissioning and Rehabilitation Plan 2022**

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0504-01:

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

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

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

*In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. PO-504-01, due regard was also given to the proposed Peatlands Climate Action Scheme (PCAS) announced by the Minister. This Scheme will see the Minister support, via the Climate Action Fund and Ireland’s National Recovery and Resilience Plan, Bord na Móna in developing a package of measures, ‘the Scheme’, for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme’. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e, measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support. The additional costs of the Scheme will be supported by Government, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.*

*While this document outlines the enhanced rehabilitation measures planned for the Begnagh 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 Begnagh Bog as environmental stabilisation, re-wetting and setting the bog on a trajectory towards development of naturally functioning peatland and wetland habitats.*

*Any consideration of any other future after-uses for Begnagh 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.*

Document Control Sheet						
Document Name:		Begnagh Bog Draft Rehabilitation Plan 2022				
Document File Path:		G:\Ecology Team\EPA draft rehab plans 2017 word docs\Mountdillon ref.504 (Lough Ree)\Begnagh				
Document Status:		Final				
This document comprises:	DCS	TOC	Text (Body)	References	Maps	No. of Appendices
	1	2	50	4	(3)	12
Rev.	0.1	Author(s):		Checked By:		Approved By:
	Name(s):	CC		MMC		MMC
	Date:	11.02.22		11.02.22		11.02.22
Rev.	1	Author(s):		Checked By:		Approved By:
	Name(s):	CC		MMC		MMC
	Date:	28/02/2022		28/02/2022		28/02/2022
Rev.	1.1	Author(s):		Checked By:		Approved By:
	Name(s):					
	Date:					

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

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## NON-TECHNICAL SUMMARY

- Bord na Móna is planning to rehabilitate Begnagh Bog, southeast of Cloondara, Longford, Co. Longford in Co. Longford.
- Peat harvesting is now finished at Begnagh Bog.
- This is happening as Bord na Móna are obliged to carry out peatland rehabilitation via an IPC License issued by the Environmental protection Agency. In addition, the Government has agreed to support peatland rehabilitation via the establishment of the Peatland Climate Action Scheme (PCAS). This is funded via the government and by Bord na Móna.
- The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat, and minimising impacts to downstream. The bog was drained in the past to allow peat production. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain-blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.
- In general soggy ground conditions are preferred. This means the remaining peat is wet and that plants that prefer wetter conditions, like Bog Cotton and Reeds will thrive.
- Many Bord na Móna bogs can not be restored back to raised bog, as so much peat has been removed and the environmental conditions have been modified. However other natural habitats will develop like shallow wetlands with Reedbeds and Birch woodland, and in time a naturalised peatland can be restored.
- The development of a range of habitats in Begnagh Bog will support biodiversity including plants, insects, birds and mammals. This includes some species that are rare and protected in the wider landscape. It will increase the national area of native woodland. Many wetland habitats in the wider landscape have been reclaimed for agriculture and other uses and peatland rehabilitation is an opportunity to create new wetland habitats.
- Begnagh Bog was drained and developed for industrial peat production in the 1977. Peat production ceased in 2020. Therefore, much of the site currently comprises of bare peat. A small part of the site has already established pioneer peatland habitats.
- Measures proposed for Begnagh Bog include drain blocking and other measures required to raise water levels to the surface of the peat (changing levels of pipes for example). Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth.
- Bord na Mona plan to carry out this work in 2022.
- These rehabilitation measures will be planned by a team consisting of ecologists, hydrologists and engineers. It is a principle of Bord na Móna rehabilitation planning that no actions will be taken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the site via the existing outlets.
- It will take some time for vegetation and habitats to fully develop at Begnagh, and a peatland ecosystem to be restored. However, it is expected that most of the site will be developing pioneer habitats after 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 planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site.

- Longford County Council do have plans to develop a greenway or amenity walking/cycling track along the BnM industrial railway through Begnagh. This would link to Knappoge bog to the west and Clooneeny bog. This amenity can be integrated into the rehabilitation plan.
- 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.



## PLAN SUMMARY

**Name of bog:** Begnagh

**Area:** 265ha

### Site description:

- Begnagh Bog was drained and developed for industrial peat production in the 1977. Industrial peat production ceased in 2020.
- Begnagh has a pumped drainage regime to support industrial peat extraction.
- The former peat production footprint now comprises bare peat, mosaics of pioneer vegetation and emergent scrub habitats. The southern section has developed a mosaic of wetland habitats. Some active drainage channels are present on site.
- Peat depths are varied across the site. Much of the north-eastern part of the site and a small section of the southeast of the site still contain areas of deep peat i.e. 1-2.6 + m. Other areas within the east and south have been shallow peat, approximately 0 - 1m.
- Begnagh bog is drained by the Fallan River which flows northward along the eastern site boundary. This river is a tributary of the Camlin River which in turn discharges into the River Shannon (Upper). The Royal Canal is located adjacent to part of the western boundary of Begnagh.

### Rehabilitation goals and outcomes

Bord na Móna is committed to discharging the obligations arising from Condition 10 of the IPC licence. The primary goals and outcomes of this plan are to (1) meet condition 10 requirements and (2) optimise climate action benefits from enhanced rehabilitation measures.

Optimising hydrological conditions for **climate action benefits as part of PCAS**. This will be achieved via **wetland creation and intensive re-wetting**. This will be achieved via intensive **re-wetting**. This is defined as:

- Carrying out enhanced rehabilitation with the application of enhanced peat rehabilitation measures to re-wet peat and slow water movement across the site. The site has developed a mosaic of pioneer cutaway habitats in some areas; notably on shallow peat/gravel ridges or in low lying wetter depressions. Rehabilitation will focus on targeted actions to raise water levels in areas where there is still significant bare peat cover. This site will develop a mosaic of compatible wetland and cutaway peatland habitats.
- Optimising hydrological conditions for the development of fen, reed swamp and wet woodland on shallow cutaway peat, and eventually naturally functioning peatland and wetland habitats.
- Stabilisation or improvement in water quality parameters (e.g. suspended solids).
- Environmental stabilisation.
- Rehabilitation will support the National Policies on Climate Action and Green House Gas (GHG) mitigation by maintaining and enhancing the current condition peat storage capacity of the bog (locking the carbon into the ground). In time, it is expected that the bog will develop as a reduced carbon source. The development of carbon sink function is dependent on the restoration of peat-forming conditions. It will also support Ireland's commitments towards Water Framework Directive and the National River Basin Management Plan 2018-2021.

### Scope of rehabilitation

The principal scope of this rehabilitation plan is defined by:

- The area of Begnagh Bog.
- EPA IPC Licence - Ref. PO-504-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The key objective of 'rehabilitation', as required by this licence, is achieved by the **environmental stabilisation** of the bog.

- The enhanced rehabilitation measures defined in the Scheme (PCAS), which are designed to exceed/meet the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Begnagh Bog, in particular, optimising **climate action benefits**.
- The local environmental conditions of this bog. Begnagh Bog has variable environmental characteristics with a range of residual peat depths, and variable hydrology and topography. Begnagh is suited to cutaway wetland development, particularly in the southern and north-eastern sections.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- Minimising potential impacts on neighbouring land. Some boundary drains around Begnagh Bog will be left unblocked as blocking boundary drains could affect adjacent land.

### Criteria for successful rehabilitation:

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

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

Meeting climate action verification criteria and monitoring of these criteria is dependent on support from PCAS or other sources of funding.

### Summary of measures:

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

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

- Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

**Timeframe:**

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

**Monitoring, after-care and maintenance**

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

- There will be initial quarterly monitoring assessments of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, assess the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to any additional rehabilitation.
- **Water quality monitoring** will be established. Monitoring of key water quality parameters will include: Ammonia, Phosphorous, Suspended solids (silt), pH and conductivity.
- Where other uses are proposed for the site, these will be assessed by Bord na 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. This will be repeated after 5 years to map and validate changes.
- Biodiversity Ecosystem services will be monitored using specific indicators.
- Carbon emissions monitoring only be carried out on a small proportion of BnM sites to develop better understanding of carbon emissions and GHG emission factors from different types of BnM sites and will be developed on association with other established research programmes. Reduction in carbon emissions will be modelled by a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future.
- Monitoring as part of Climate Action Verification is dependent on support from PCAS or other external funding.

**Validation and IPC Licence surrender**

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

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

## 1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mount Dillon bog group (Ref. PO-504-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the cutaway boglands within the licensed area. The bog is part of the Mount Dillon bog group (see Appendix II for details of the bog areas within the Mount Dillon bog group). Begnagh Bog is located southeast of Cloondara, Longford, Co. Longford, see Drawing number BNM-DR-23-05-01 titled **Begnagh Site location**.

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. Ref. PO 504-01:

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

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

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

It is proposed by Government that Bord na Móna carry out a Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme on its peatlands. Note this proposal is also known colloquially as the ‘Peatlands Climate Action Scheme’ (PCAS). The additional costs of the Scheme will be supported by Government through the Climate Action Fund and Ireland’s National Recovery and Resilience Plan, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator. Bord na Móna have identified a footprint of 33,000 ha as peatlands suitable for this scheme. This Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations (Appendix VII & IX) under existing EPA IPC licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered.

Only the costs associated with the additional, enhanced and accelerated rehabilitation, i.e. those measures which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10, will be eligible for support under the Scheme. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021).

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

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

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

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

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

These measures are designed to encourage the development of peat-forming habitats, where possible. They are also designed to further slow the movement of water across the site (with the site acting similarly to a constructed wetland), slowing the release of water (improving local water attenuation) and water quality is also expected to improve as the site returns to a naturally functioning peatland ecosystem. The measures will also accelerate the development of new habitats for a range of species under pressure in the wider landscape and will have the potential to develop habitats (e.g. Annex I raised bog, wetlands that support wader water birds of conservation interest) that will contribute towards the delivery of national biodiversity objectives.

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

## 1.1 Constraints and Limitations

This document only covers the area of Begnagh Bog, Drawing number BNM-DR-23-05-24 titled **Begnagh Site Location Group**.

Industrial peat extraction at Begnagh Bog permanently ceased in 2020. Currently the former peat production area comprises both bare peat and some re-vegetated areas. The combination of active rehabilitation measures and natural colonisation will quickly establish and/or increase the extent of pioneer vegetation and will be planned to accelerate environmental stabilisation. Nevertheless, it will take some time (30-50 years) for naturally functioning peatland ecosystems to fully re-establish.

Areas of cutover bog, i.e. remnant high bog areas at the site margins (see Drawing number BNM-DR-23-05-24 titled **Begnagh Site Location Group**.), have also been identified as constraints, as these will not be subject to rehabilitation measures. This is largely due to the variation in topography (usually higher in elevation to the

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

## 2. METHODOLOGY

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

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

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

### 2.1 Desk Study

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

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

- Lindsay (2010). Peatbogs and Carbon: a Critical Synthesis to Inform Policy Development in Oceanic Peat Bog Conservation and Restoration in the Context of Climate Change.
- Mackin *et al.* (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service,
- McBride *et al.* (2011). The Fen Management Handbook, (2011), Scottish Natural Heritage.
- McDonagh (1996). Drain blocking by machines on Raised Bogs. Unpublished report for National Parks and Wildlife Service.
- NPWS (2017a). National Raised Bog Special Areas of Conservation management plan. Department of Arts, Heritage and the Gaeltacht.
- Quinty & Rochefort (2003). Peatland Restoration Guide, second edition. Canadian *Sphagnum* Peat Moss Association and New Brunswick Department of Natural Resources and Energy.
- Regan, *et al.* (2020). Ecohydrology, Greenhouse Gas Dynamics and Restoration Guidelines for Degraded Raised Bogs. EPA Research Report. Prepared for the Environmental Protection Agency by Trinity College Dublin.
- Renou-Wilson *et al.* (2011). BOGLAND - Sustainable Management of Peatlands in Ireland. STRIVE Report No 75 prepared for the Environmental Protection Agency.
- Pschenyckyj *et al.*, 2021, *Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity*, Report produced for An Fóram Uisce, Online, Available at: [https://thewaterforum.ie/app/uploads/2021/04/Peatlands\\_Full\\_Report\\_Final\\_March2021b.pdf](https://thewaterforum.ie/app/uploads/2021/04/Peatlands_Full_Report_Final_March2021b.pdf), Accessed 17.08.2021.
- 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:

- Mount Dillon Integrated Pollution Control Licence;
- Mount Dillon Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database ([www.epa.ie](http://www.epa.ie));
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity;
- BirdWatch Ireland online data (including I-WeBS and CBS datasets; [www.birdwatchireland.ie](http://www.birdwatchireland.ie));
- Geological Survey of Ireland - National Draft Bedrock Aquifer map;
- Geological Survey of Ireland - Groundwater Database ([www.gsi.ie](http://www.gsi.ie));
- National Parks & Wildlife Services Public Map Viewer ([www.npws.ie](http://www.npws.ie));
- Water Framework Directive catchments.ie/maps/ Map Viewer ([www.catchments.ie](http://www.catchments.ie));
- OPW Indicative Flood Maps ([www.floodmaps.ie](http://www.floodmaps.ie));
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps ([www.cfram.ie](http://www.cfram.ie));
- River Basin Management Plan for Ireland 2018 – 2021;



- Bord na Móna Annual Report 2021;
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

## 2.2 Consultation

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

## 2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. Additional ecological walk-over surveys and visits have taken place at Begnagh Bog in 2021 to inform rehabilitation planning and habitat maps have been updated, where required. This rehabilitation plan is informed by the original baseline survey as well as subsequent site walk-over surveys and visits, and updates to baseline data.

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

A detailed ecological baseline survey report for Begnagh Bog is contained in Appendix II.

### 3. SITE DESCRIPTION

Begnagh Bog is located adjacent to the south of the N5, 1.2km southeast of Cloondara and 5km west-southwest of Longford town, Co. Longford.

See Drawing number BNM-DR-23-05-01 titled **Begnagh Bog: Bog Site Location**, included in the accompanying Mapbook<sup>1</sup>, which illustrates the location of Begnagh Bog in context to the surrounding area.

The surrounding landscape is a mosaic primarily consists of low-lying agricultural land (pasture) interspersed with other raised bogs, many of which have also been managed by Bord na Móna for peat production with some areas utilised for domestic turf-cutting. Some small areas of plantation forestry also occur in the area, particularly to the northeast of the site.

The Fallan River, a tributary of the River Shannon (Upper), flows northward along the eastern boundary of Begnagh Bog. The Royal Canal is located adjacent to part of the southwestern section of the site. The Royal Canal is used as an amenity area for angling and boating. A narrow band of Birch woodland (WN7) separates the site from the Royal Canal. Begnagh is linked to Knappoge bog to the west and Clooneeny bog to the east (also owned by Bord na Móna) by an industrial railway line and a machinery travel path. The railway line runs east-west and divides Begnagh into two main sections, namely; the larger north and smaller southern sections.

#### 3.1 Status and Situation

##### 3.1.1 Site history

The site formerly provided peat for use in the Lough Ree Power Station, Lanesborough, Co. Longford. The existing east-west rail line through Begnagh is still maintained to facilitate access through Bord na Mona properties.

##### 3.1.2 Current land-use

Industrial peat production has now permanently ceased at Begnagh Bog. Future land-use has not been defined by Bord na Móna.

An amenity track has been proposed through part of this site part of the Mid-Shannon Wilderness Park Greenway (Flynn, Furney Environmental Consultants, 2021<sup>2</sup>). The proposed route will predominantly follow the existing railway network that bisects the site. This would link to Knappoge bog to the west and Clooneeny bog to the east.

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<sup>1</sup> Cutaway Bog Decommissioning and Rehabilitation Plan - Clooneeny Bog Map Book

<sup>2</sup> Flynn, Furney Environmental Consultants, 2021, Ecological Impact Assessment, *Mid-Shannon Wilderness Park Greenway: Ecological Impact Assessment Report*, Document No: MSWP-RP-EN-0005-P02

### 3.1.3. *Socio-Economic conditions*

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

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

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

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

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

## 3.2 **Geology and Peat Depths**

### 3.2.1 *Sub-soil geology*

The underlying geology at Begnagh Bog is limestone (Waulsortian limestones)<sup>3</sup>. The underlying soils and sub-soils are classed as 'Raised Bog Cutover Peat'. The peat is underlain by glacial deposits, lacustrine clays and green plastic clay. The glacial deposits generally consist of grey gravelly clay/silt and are exposed as gravel mounds and ridges in places. Gravel has also been exposed at several locations through the bog where there are ridges and mounds.

Published bedrock and Quaternary geological maps only present the shallowest deposits encountered, and fail to present in information on the buried peat substrate. Coring carried out by RPS in 2021 across Begnagh 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 and lacustrine clay (below c. 39.5mOD), while one main ridge of more elevated material (rising to >43.5mOD) trends into the bog in a south-east to north-westerly direction. This has been interpreted as glacial till (based on comparable features

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

present in the surrounding area). The lacustrine deposits encountered would be expected to limit vertical losses to depth in areas where this occurs.

### 3.2.2 Peat type and depths

Commercial milled peat extraction was undertaken at Begnagh Bog up until 2020. As a result of the harvesting programme in place at Begnagh, peat depths are varied across the site. Much of the southern section contains shallow peat reserves. Peat depths of 0-1m occur over approximately 75% of the southern section. However, some areas of deeper peat, 1.1-2.6m in depth, still persist. The northern section contains deeper peat reserves, particularly within the west. Approximately 80% of the peat reserves in the northern section are 1-2.5m in depth. The remainder of the northern portion of Begnagh Bog contains peat reserves of 0-1m in depth, much of which is associated with a gravel ridges that runs southeast to northwest.

## 3.3 Key Biodiversity Features of Interest

The majority of the site can be rated as local importance (lower value) as the majority of the site comprises bare peat and is managed primarily for industrial peat production (NRA, 2009). Some of the marginal lands within the site boundary, containing remnant cutaway bog, woodland or grassland have been assessed as of local importance (higher value) in a local context. Parts of the cutaway bog are currently developing pioneer cutaway wetland habitats (poor fen, reed swamp, birch scrub). Another area within the centre of the site, on a gravel ridge, has developed a soft rush dominated poor fen with establishing birch (*Betula pubescens*) scrub.

Habitats along the margins of the site include Birch woodland (WN7), scrub (WS1), remnant sections of raised bog (PB1), canals (FW3), lowland depositing river (FW2) and wet grassland (GS4). The areas of Birch woodland and scrub are dominated by birch (*Betula pubescence*), gorse (*Ulex europaeus*), willow (*Salix* sp.), bracken (*Pteridium aquilinum*) and bramble (*Rubus fruticosus* agg.). The sections of remnant raised bog are small and dry and dominated by ling heather (*Calluna vulgaris*). The wet grassland component is managed for agriculture by local farmers.

The Royal Canal (to the west) and the Fallan River (to the east) are important wildlife corridors for a variety of flora and fauna in the area and these habitats support ecologically important for a wide variety of species, including otter.

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

### 3.3.1 Current habitats

#### Northern section

The majority of this area is dominated by bare peat with some sections of pioneer vegetation communities occurring where peat extraction ceased due to the shallow nature of the peat or presence of a glacial ridge. An area of exposed glacial sub-soil is also present within the southeast corner of this section that is being colonised predominantly by soft rush (*Juncus effusus*) and Birch (*Betula pubescence*) scrub. A number of small remnant cutaway bog parcels exist at the bog margins and are very degraded, now supporting establishing birch and lodgepole pine woodland. Some of the marginal lands, particularly along the eastern boundary contain dry grassland that supports a diverse range of plants and associated invertebrates.

### Southern Section

The majority of this area is dominated by bare peat pioneer vegetation communities. Reedbeds, poor fen and Birch scrub are present. Small areas of open water habitat occur in the southern area of this section. An area of well-established poor fen occurs within the south of the site comprising largely of common cottongrass (*Eriophorum angustifolium*), marsh arrowgrass (*Triglochin palustris*), soft rush (*Juncus effusus*), bottle sedge (*Carex rostrata*), common reed (*Phragmites australis*), greater reedmace (*Typha latifolia*) and reed sweet grass (*Glyceria maxima*). This area also contained some tussocks of Cyperus sedge (*Carex pseudocyperus*). Some of the marginal lands, particularly along the eastern boundary contain dry grassland that supports a diverse range of plants and associated invertebrates. A small section of land to the extreme south of the site is dominated by bracken.

A habitat map of Begnagh Bog is shown in Drawing number BNM-DR-23-05-17 titled **Begnagh Site – Current Habitat Map**.



 <p>View of the milled peat surface (2021) across the north of Begnagh bog.</p>	 <p>View of wetland habitat and emergent vegetation within the south of Begnagh Bog (2021)</p>
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Table 1: Photos of Habitats at Begnagh Bog.

#### 3.3.2 Species of conservation interest

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

Multiple mammal species have been recorded at Begnagh Bog. Evidence of badger *Meles meles*, fox *Vulpes vulpes* and hare *Lepus timidus hibernicus*), otter (*Lutra lutra*) and mink (*Neovison vison*) were observed on site during BnM walkover surveys.

Lepidopteran and Odonata species recorded on site included; blue tailed damselfly, brown hawker, ringlet, green-veined white, meadow brown butterfly, peacock, small copper, orange tip butterfly, large white butterfly, buff

tailed bumblebee, common darter and four-spotted chaser. Sulphur knapweed moth (*Agapeta zoegana*) was also recorded in July 2021, within dry grassland along the eastern boundary of the site.

Common frog *Rana temporaria* has also been recorded within the site during walkover surveys undertaken in 2021.

Ringed plover (*Charadrius hiaticula*) and snipe (*Gallinago gallinago*) have been recorded during the breeding season on site. A number of recently fledged sparrowhawk (*Accipiter nisus*) were recorded within the north of the site in July 2021, while a number of individuals were also recorded from a small area of scrub within the southwest of the site on the same date. It is possible that kestrel could also breed on site as suitable habitat exists at the margins, however, no confirmed breeding records exist. Other more common species recorded within the site include buzzard, willow warbler, mallard, wood pigeon, swallow, long-tailed tit, green finch, hooded crow and grey heron.

### 3.3.3 Invasive Alien Species

Invasive alien species known to occur at the subject bog (or desktop review suggests presence is likely), and for which reasonably foreseeable source impact pathways for dispersal may result from the proposed PCAS are described here. The only invasive species recorded at the site was Canadian waterweed (*Elodea canadensis*), recorded on the 21<sup>st</sup> July 2021 by Bord na Mona ecology staff. This species is listed under Regulations 49 and 50 of the EC Birds and Natural Habitats Regulations which prohibits the introduction, breeding, release or dispersal of the species listed on Part 1 the Third Schedule.

## 3.4 Statutory Nature Conservation Designations

There are no European Sites, Special Areas of Conservation (SAC) or Special Protection Areas (SPA), located within or adjacent to Begnagh Bog. The nearest EU Designated sites to Begnagh Bog are Lough Forbes Complex SAC and Ballykenny-Fisherstown Bog SPA, both of which are located over 350 metres to the north of the site. Due to its location within the catchment, Begnagh is hydrologically connected to both Lough Forbes Complex SAC and Ballykenny-Fisherstown Bog SPA via the Fallan River, located adjacent to the east of the site. In addition, hydrological connectivity has also been identified between Begnagh bog and Lough Ree SAC and Lough Ree SPA (located over 17km surface water distance downstream). Brown Bog SAC is located over 1.8km to the northeast of Begnagh Bog. However, no hydrological connection exists. This rehabilitation plan will be subject to the Appropriate Assessment process, as per Article 6 of the EU Habitats Directive 92/43/EEC. The Appropriate Assessment will be provided as part of the accompanying documentation. A full list of EU Designated Sites occurring within the likely zone of impact of Begnagh bog is provided in the accompanying Appropriate Assessment documentation.

There are no Natural Heritage Areas (NHAs) located adjacent, or in close proximity to, Begnagh Bog. The nearest NHA is Mount Jessop Bog NHA, located over 3km from to the southeast.

A number of non-statutory designated sites also occur in the wider area around Begnagh bog. The Royal Canal pNHA (NPWS Site Code: 002103) is located adjacent to the west of the site, however, no hydrological connectivity exists between the bog and the canal. Lough Forbes Complex pNHA occurs approximately 340 metres to the north of the site.

### 3.5 Hydrology and Hydrogeology

Begnagh forms part of the Upper Shannon Catchment (Catchment ID : 26C) as defined by the EPA under the Water Framework Directive (WFD) and is primarily situated within the Shannon[Upper]\_SC\_060 sub-catchment, with a small portion of the bog falling within the Shannon[Upper]\_SC\_080 sub-catchment. The bog is located west of the town of Longford between the Fallan River to the east and the Royal Canal to the west. The bog contains several drainage pathways and discharge locations, with the majority of the bog discharging to the Fallan River to the East of the bog.

Regional hydrological data suggest that Begnagh receives average precipitation of 935mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 502mm/yr. A, leaving an average effective precipitation of 433mm/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 433mm/yr, which equates to an annual runoff rate of c. 4,330m<sup>3</sup>/ha.

The bog drains towards the Fallan River via five sets of silt ponds. The Fallan River drains to the north to the Camlin River, which in turn, drains to the River Shannon a short distance away. There is no hydrological connection between the canal and the bog. No water discharges from the bog to the canal.

The bog has field drains running in a general north to south orientation. Begnagh has a pumped drainage system and there are two sets of pumps at the bog to facilitate drainage for peat production.

GSI data indicates that Begnagh Bog is underlain by Visean Limestone bedrock which is classified as regionally important aquifer this bedrock type is subject to karstification (conduit). Geological Survey of Ireland (GSI) mapping identifies several karst features (enclosed depressions) within close proximity to the bog, with the nearest feature being located <400m from the western boundary of the bog. Given the karstified nature of the bedrock underlying Begnagh the bedrock is considered to have potential to facilitate relatively high rates of groundwater flow. No data exists concerning depth to bedrock, however, several karstified bedrock outcrop features can be identified in close proximity to the bog (<1km).

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.

The main subsoil types in the surrounding area includes till derived from limestone (Note: conflict between latest GIS data available from GSI and data presented on Groundwater Data Viewer which suggests only limestone till, whereas GIS layers indicate western side is dominated by limestone till while the eastern side is sandstone till). While Groundwater Vulnerability is typically used to indicate the susceptibility to groundwater pollution, it can provide a useful proxy indication of likely groundwater flow rates in the surrounding area. Groundwater vulnerability for the surrounding areas is generally ranges between moderate to high, given the moderately permeable nature of these subsoil types; however, a number of high and extreme vulnerability areas can be identified in the surrounding area, given the shallow subsoil depths and highly permeable aquifer underlying the bog.

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

Drainage is an important feature of industrial peat production and there were extensive field drains maintained throughout bog areas to facilitate industrial peat production annually, each of which eventually drains into a terminal silt pond that allows for settlement of suspended solids before entering the main river systems. In accordance with the existing Integrated Pollution Control licence, all drainage water from boglands in a licensed area is discharged via an appropriately designed silt pond treatment arrangement as required in Condition 6.6. of the licence.

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

Begnagh bog has 5 treated surface water outlets to the Fallon River IE\_SH\_26F010200 FALLAN\_020. The Fallon river flows to the Camlin River (IE\_SH\_26S021600 SHANNON (Upper)\_090). While the Fallon is not at Risk or under pressure from peat extraction, the Shannon Upper was indicated as being under pressure from peat extraction in the second cycle of the river basin management plan and is indicated as remaining so in the third cycle, currently under preparation.

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-23-05-02 titled **Begnagh Bog: Structures and Sampling**, along with Drawing number BNM-DR-26-05-WQ01 titled **Begnagh Bog: Water Quality Map** included in the accompanying Mapbook, which illustrate the various drainage and water quality infrastructure present at Begnagh Bog.

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 1.42mg/l and COD 100mg/l.

Initial monthly ammonia concentrations from November 2020 to August 2021 have a range of .005 to 0.662 mg/l with an average of 0.116 mg/l.

Initial monthly results are included in appendix XIII. These results are for 14 months from November 2020 to Dec 2021 and indicate the baseline water quality from a minimum of 70% of the bogs catchment. This was the first full summer season without any peat extraction and as expected some of the key water quality parameters, that can impact water quality from peat extraction activities, such as suspended solids, remained relatively static, with some exceptions. During this period ammonia indicating a slight upward trend, again linked to a season where peat extraction did not take place. All other parameters fluctuated slightly, most likely influenced by normal weather patterns, especially rainfall., with suspended solids in a downward trend during the period.

Monthly ammonia concentrations from November 2020 to December 2021 had a range of 0.005 to 0.876 mg/l with an average of 0.194 mg/l.

Results for suspended solids for the same period indicate a range of 2 to 10mg/l with an average of 2.6 mg/l.



From an analysis of any monitoring over the previous 5 yrs, during such time where peat extraction was undertaken each Summer, the IPC licence environmental monitoring of some of the discharges from this bog, indicate that results were under the ELV for SS and trigger levels for ammonia and COD (Table 3.1).

**Table 3.1 Surface water monitoring results for Begnagh.**

Bog	SW	Monitoring	pH	SS	TS	Ammonia	TP	COD	Colour
Begnagh	SW-51	Q1 21	6.9	3	95	0.051	0.05	34	312
Begnagh	SW-52	Q1 21	6.1	2	45	0.375	0.05	11	180
Begnagh	SW-53	Q1 21	6.3	2	112	0.185	0.05	38	287
Begnagh	SW-54	Q1 21	6.5	4	101	0.033	0.05	36	301
Begnagh	SW-55	Q1 21	7.1	3	158	0.074	0.05	43	313
Begnagh	SW-51	Q3 18	8.2	10	380	0.06	0.07	64	132
Begnagh	SW-52	Q3 18	7.8	5	244	0.72	0.13	68	263
Begnagh	SW-53	Q3 18	6.5	5	132	0.969	0.05	110	350
Begnagh	SW-54	Q3 18	7.3	5	180	0.88	0.05	95	437
Begnagh	SW-55	Q3 18	6.5	5	214	1	0.06	83	313
Begnagh	SW-51	Q4 15	7.3	5	230	0.2	0.05	83	218
Begnagh	SW-52	Q4 15	7.5	16	316	0.17	0.05	70	196
Begnagh	SW-53	Q4 15	7.5	26	328	0.18	0.05	101	204
Begnagh	SW-54	Q4 15	7.6	5	328	0.1	0.05	11	105
Begnagh	SW-55	Q4 15	7.4	5	497	0.03	0.05	54	105

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. Re-wetted peat also aid the primary objective of stabilizing peat, as when peat is re-wetted it minimises risk 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/rehabilitated peatlands normally improves as a result of bog rehabilitation and restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Peatland rehabilitation is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Móna Raised Bog Restoration Project and ongoing Bord na Móna 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 Begnagh Bog has been completed. The existing silt pond will continue to be maintained and operated as long as required, or such point as they can be decommissioned, with no change in outfall type. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of the key downstream water body receptors, and is expected to support the improvement of the current and future status of the receiving water-courses.

### **Decommissioning and Rehabilitation Programme Water Quality Monitoring.**

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

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

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

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

### **3.7 Fugitive Emissions to air**

None

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

### 3.8 Carbon emissions

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

The EPA-funded CarbonRestore Project (Renou-Wilson *et al.* 2012) found that rewetting of drained peatlands can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the C-sink function.

It is expected that Begnagh Bog can become a reduced carbon source following rehabilitation. The potential of any cutaway site to develop as a reduced carbon source/carbon sink in the longer-term depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich or other peat-forming habitats, the balance of carbon fluxes from different cutaway habitats and future climatic conditions. The site is expected to develop Reed Swamp and fen habitats. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

### 3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

The majority of the site can be rated as having a local importance (lower value) **(E)** as the site is predominantly comprised of bare peat, with small areas of developing open pioneering habitats, wetlands and scrub.

It is expected that the overall ecological value of this site will increase in the future as the site re-vegetates, matures and forms semi-natural habitats, such as more extensive areas of fen and reed swamp.

## 4. CONSULTATION

### 4.1 Consultation to date

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

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

- General consultation with range of stakeholders at annual Bord na Mona Biodiversity Action Plan review days 2010-2018.
- Longford Wetland Wilderness (general proposal led by Longford County Council and other stakeholders. This has had several iterations. See Lough Ree and Mid Shannon, Spirit Level 2017. A feasibility study for Longford County Council).
- Feehan, J. (2004) A Long-Lived Wilderness; the future of the north midlands peatland network UCD/NWWPC.
- Lauder, A. & O'Toole L. (2017). Concept development for a landscape-scale Wetland Wilderness Park in the Mid Shannon Region. A report funded by the Heritage Council's Heritage Grant Scheme.
- Foss, P.J., Crushell, P. & Gallagher, M.C. (2017). Counties Longford & Roscommon Wetland Study. Report prepared for Longford and Roscommon County Councils.
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Sub-committee on Shannon Flooding Work Programme and Measures (OPW, Waterways Ireland, ESB, LA's, Fisheries Ireland, NPWs etc).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Sub-committee on Shannon Flooding Work Programme and Measures (OPW, Waterways Ireland, ESB, LA's, Fisheries Ireland, NPWs etc.).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).
- Proposed Mid-Shannon Wilderness Park Greenway development at Begnagh (Longford County Council).

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

Telephone correspondence was undertaken in follow up to submissions received. Further to the above, as a means of further notification for those based near to any proposed PCAS activities, a leaflet detailing PCAS plans for Begnagh Bog, contact details and the PCAS website address was delivered to each house within a 1Km radius of the bog.

Records of site visits with interested parties and scheduled meetings were retained to inform the current chapter.

## **4.2 Issues raised by Consultees**

To date, a number of issues have been raised by consultees during the consultation process for both the current and previous drafts of the rehabilitation plan for Begnagh Bog – these are summarised below. A number of general submissions in respect of previous PCAS consultation are also referenced where applicable.

### *4.2.1 Assessments of rehabilitation*

To date a number of consultees including: the IFA, the IMSCA and Trinity College Dublin have raised concerns regarding the duration and scope of consultation period. Stakeholders suggested that the consultation period should be extended to allow all potential stakeholders to make submissions where required.

Queries on pre-rehabilitation assessments were raised by NPWS and the National Museum of Ireland relating to the finalisation of several bog rehab plans in 2021 in relation to Appropriate Assessment, Environmental Impact Assessment and Strategic Environmental Assessment.

Queries on pre-rehabilitation assessments were raised by Dept. of Agriculture, Food, and the Marine (Environmental Co-ordination Unit, Climate Change and Bioenergy unit) in relation to Appropriate Assessment, Environmental Impact Assessment and Flood Risk Assessment.

### *4.2.2 Restoration Scope*

Restoration/rehabilitation of marginal habitats was raised by IPCC and BCI relating to the finalisation of several bog rehab plans in 2021 as worthy of consideration within the rehabilitation measures to support climate action and biodiversity objectives.

### *4.2.3 Monitoring*

Further details on monitoring of ecological metrics, and how and where reporting on this monitoring would take place, was raised the IPCC, University College Dublin and Trinity College researchers in their respective submissions relating to the finalisation of several bog rehab plans in 2021. Butterfly Conservation Ireland previously also suggested that monitoring of Large Heath butterfly be considered to assess the success of the proposed rehabilitation actions. Irish Water have in the past reiterated the requirement of a strong monitoring program with respect to water quality during and post rehabilitation.

### *4.2.4 Flooding of adjacent land*

The IFA, The Department of Agriculture Food and the Marine, individual local residents and ICMSA queried likely impacts relating to the finalisation of several bog rehab plans in 2021 and the finalisation for this Rehabilitation Plan arising from the proposed re-wetting associated with the rehabilitation in relation to flooding on adjoining lands and, specifically, with regards to the maintenance of drains. The IFA also raised the issue of Health and Safety in relation to raising water levels as well as possible impacts on land and property prices. The OPW expressed concerns regarding the potential impacts of rehabilitation on OPW arterial drainage works.

Specifically with respect to Begnagh, the Dept. of Agriculture, Food, and the Marine (Environmental Co-ordination Unit, Climate Change and Bioenergy unit) highlighted the potential risks that any rehabilitation works to the bog may have on adjoining landowners land. They requested that Bord na Mona carry out a Risk Assessment in advance and communicate as necessary with impacted landowners, they also recommended having a strong communication campaign and ensuring stakeholders have access to all relevant information particularly around preventative measures to prevent adverse land impacts

A number of landowners /residents (including some acting on behalf of a group) raised specific queries on flooding relating to PCAS activities at Begnagh. The DAFM recommended a Hydrological Assessment be carried out regarding risk of flooding.

#### *4.2.5 Land Management*

The OPW sent a submission on 19/11/2021 advising that Begnagh Bog, does not overlap with any OPW Arterial Drainage Scheme.

#### *4.2.6 Water Quality related*

A local group water scheme requested that a comprehensive review be undertaken to ensure that local raw water quality will not be impact.

Regarding Begnagh Bog Irish Water responded by outlining their support for the scheme and asking if BNM could highlight within the plan the potential for improvements to drinking water sources and referencing these improvements in the criteria for successful rehabilitation. They also requested that consideration be given to the design of the monitoring programme, the extent of the monitoring post restoration, and water colour as an indicator to track.

They asked that they be kept informed if silt pond decommissioning is necessary. In addition, they asked if this project had potential to offer cumulative beneficial impacts with other bog rehabilitation projects in the same catchment and if that had been assessed.

#### *4.2.7 Future Management*

The IFA previously expressed concerns regarding the future ownership of the BnM bogs subject to rehabilitation. They expressed a desire for contingency planning for potential future ownership of designated bogs so as to ensure no negative impacts arise on adjacent properties from any new ownership.

#### *4.2.8 Other issues*

One landowner wanted to know if Bord na Mona were taking over their bog, whether their turf cutting rights were going to be affected. A further landowner requested detail on topographical surveys and long term monitoring or maintenance. One local resident queried specifically about Bord na Mona maintaining any drains/rivers that flow into/through/adjacent to Begnagh and under the canal.

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

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

#### *4.3.1 Consultation*

BnM are carrying out ongoing consultation as part of the process of developing the rehabilitation plan for Begnagh Bog. This is ongoing with a dedicated Community Liaison Officer communicating to affected and interested parties. A website has been developed to make information available. This will be continually updated. It is expected that some PCAS Bogs will become demonstration sites so that interested stakeholders can come to visit and observe the measures on the ground.

#### *4.3.2 Assessments of rehabilitation*

AA screening will be undertaken on all the bogs as part of PCAS and this is currently being undertaken by external consultants for Begnagh Bog. Where required, Natura Impact Statements shall be completed and submitted to the Minister in accordance with 42(9) and 42(10) of the Habitats Regulation, noting that Bord na Móna is

prescribed as a ‘public authority’ under this legislation. In relation to the SEA Directive and EIAR Directive, this has been considered and the legal advice to date is that the scheme does not come under these Directives.

An Archaeological Impact Assessment (AIA) has been undertaken on all the bogs in PCAS (Appendix XII). The aim for known archaeology on these bogs is to accomplish preservation in situ and we are taking steps to identify and avoid all known archaeology. Bord na Móna aim to achieve this through including all known archaeology in the planning process of rehabilitation works and implementing an exclusion or buffer zone around these features. These measures should sufficiently protect any archaeology in these areas, during any ground works in the final plan. It is anticipated that any archaeology will benefit from the ultimate remit of the rehabilitation, in that water tables will be raised thereby preserving in-situ. There is also an identified procedure for managing reports of stray finds that may arise during rehabilitation works.

#### *4.3.3 Restoration Scope*

As part of the PCAS, all restoration/rehabilitation options have been developed to support climate action and biodiversity objectives. Other issues such as existing amenity, social impacts, industrial history, archaeology were not part of the direct scope of PCAS but were considered when developing the rehabilitation plan. After use of the bog is outside the scope of PCAS. Rehabilitation will lead to the development of a stable diverse re-wetted cutaway landscape that will have added benefits for future amenity development in the future.

#### *4.3. Monitoring*

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

#### *4.3.5 Flooding on adjacent land*

It is the intention of Bord na Móna that the re-wetting of the bogs will be carried out in such a manner that does not impact on third party lands. Where it is deemed that blocking of a shared drain would cause any adjoining lands to flood, this will be avoided and alterations made to the rehabilitation plan. **Drains around the margins of Begnagh Bog will not be blocked.**

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

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

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

#### *4.3. Water Quality Related*

It is the expectation of BnM that rehabilitation measures should positively impact the water quality in receiving water bodies through enhancing the water attenuation across rehabilitated sites. The robust water monitoring programme implemented as part of PCAS will be used to assess water quality leaving rehabilitated sites at designated points.

An overview of the Water Quality Monitoring plan was provided to Irish Water, and confirmation given that water colour is being monitored.

Bord na Móna also advised that decommissioning of silt ponds will only be carried out when the EPA are satisfied that adequate stabilisation of the bog has been achieved and silt ponds are no longer required. This decommissioning will be determined by water quality results and EPA approval.

It was also confirmed that rehabilitation of bogs in the same catchment is likely to result in beneficial impacts on water quality in the catchment. This will be captured by the results from EPA monitoring stations in the vicinity of the bogs. Bord na Móna are also commencing quarterly sampling upstream and downstream, where there are gaps in existing EPA monitoring.

Further consultation is to be undertaken with the local group water scheme.

#### *4.3.7 Future Management*

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

#### *4.3.8 Other issues*

Bord na Mona has replied to landowners who queried issues around loss of turbary rights, and responded advising that the leaflet drop did not refer to turf cutting rights. We also advised that the scheme was focused on re-wetting of Bord na Mona owned bogs and not based on turf cutting.

Bord na Mona has replied to landowners who raised concerns over access rights or flooding issues and agreed to further communication prior to or post proposed rehabilitation. This includes the organisation of meetings or facilitating onsite visits.

#### *4.3. Concluding statement.*

- No specific issues were raised during consultation that required significant changes to the substance of the rehabilitation plan.
- Issues raised by several consultees in relation to potential impacts on adjacent land had already been accounted for during the hydrological analysis and assessment, and corresponding adaptations to incorporate Drainage Management Plan mitigation measures. Future drain maintenance will be considered in the BnM Care and Maintenance Programme for this bog.
- Marginal drains will not be blocked to avoid impacts on adjacent lands, rights of way, or turf-banks.
- No changes were required to the rehabilitation plan to enable any future potential amenity.



## 5. REHABILITATION GOALS AND OUTCOMES

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

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving water-bodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Optimising hydrological conditions for **climate action benefits as part of PCAS**. Optimising hydrology for the development of embryonic *Sphagnum*-rich vegetation communities on deep peat, and eventually naturally functioning and peatland habitats.
- Optimising hydrological conditions for the development of reed swamp and fen on shallow more alkaline peat and other subsoils.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, where possible.
- Supporting ongoing and future amenity land-use planning. Integrating rehabilitation measures with planned 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.

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

- In relation to the proposed Mid-Shannon Wilderness Park Greenway, it is not proposed to carry out any intensive rehabilitation actions to change or negatively affect any amenity infrastructure or existing land-uses. It is intended that the proposed greenway will utilise the existing railway infrastructure that bisects the site. This future land use will not have a significant effect on rehabilitation planning, which will be focused on the bare peat production areas.
- It will take some time for stable naturally functioning habitats to fully develop at Begnagh Bog. This will happen over a longer time-frame than the implementation of this rehabilitation plan
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (see Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- It is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). Furthermore, only a small proportion of the bog has potential to develop *Sphagnum*-rich habitats in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of

the whole bog, making the overall bog wetter. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.

- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At Risk from peatlands and from peat extraction are likely to have several contributory sources of impacts (private peat extraction and Bord na Móna).
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features.
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Clooneeny to the east and Knappoge to the west) in 2021. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the Fallan and Camlin Rivers, both tributaries of the River Shannon (Upper), from rehabilitation more than one bog in the same catchment.

## 6. SCOPE OF REHABILITATION

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

- The area of Begnagh Bog (Drawing number BNM-DR-23-05-01 titled **Begnagh Site Location**).
- EPA IPC Licence - Ref. PO-504-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the cutaway boglands within the licensed area. Begnagh bog is part of the Mount Dillon 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 Begnagh Bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilisation is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Begnagh Bog identify cutaway re-wetting as the most suitable rehabilitation approach for this site. In some parts of the site, where shallow peat depths remain, i.e. within the south and east, there is an alkaline influence on the water chemistry. This means that re-wetting will lead to the development of fen, Reed Swamp and other associated wetland/peatland habitats.
- Parts of the southern basin and an exposed gravel ridge within the east of the site have already largely vegetated and stabilised. These areas will further benefit from targeted drain blocking and water management measures.
- Integrating rehabilitation measures with future potential amenity projects i.e. the Mid-Shannon Wilderness Park Greenway. It is not proposed to change any conditions around the area proposed for this project.
- Enhancing existing wetlands where possible and where feasible. Any measures will be positively aligned with the above land-uses.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog. Bord na Móna have defined the key goal and outcome of rehabilitation at Begnagh Bog as **environmental stabilisation and optimising suitable hydrological conditions, and setting the site on a trajectory towards the development of naturally functioning peatland habitats (fen, reed swamp and other associated wetland habitats)**.
- Rehabilitation of Begnagh Bog will support multiple National strategies of climate action, biodiversity action and other key environmental strategies such as the Water Framework Directive.
- The time frame for the delivery of the planned rehabilitation will be undertaken according to available resources and appropriate constraints.
- Some rehabilitation measures are proposed on the marginal cutover bog zone at the peripheries of the bog.

### 6.1 Key constraints

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

status), and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).

- At Begnagh Bog, the majority of the bog has been cutaway. There are local factors that will influence the future trajectory of this site (it was always a relatively 'wet' bog and was therefore being pumped to manage water levels) which need to be considered as part of the wider rehabilitation work.
- **Current/future land-use.** The key land-uses for the site are amenity. As described above, there are proposals for part of the Mid-Shannon Wilderness Park Greenway to utilise the existing railway corridor through the site. Any proposed enhancement measures (ie. targeted drain-blocking) will be positively aligned with current land-uses and will look to facilitate amenity, where possible. There are proposals to extend amenity infrastructure and rehabilitation will be positively aligned to enable any future amenity development. Re-wetting will be planned as to not to rule out potential future amenity.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care must be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land. For example, commercial Coillte forestry plantation occurs outside of, but adjacent to, the northeast corner of Begnagh bog.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. If this occurs, rehabilitation measures will be reviewed and adapted. An archaeological impact assessment of the proposed rehabilitation at Begnagh bog has been undertaken (see Appendix XII).
- **Public Rights of Way.** Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remain intact where possible. In some instances, depending upon previous land-uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies during the consultation work associated with the decommissioning and rehabilitation work described here.

## 6.2 Key Assumptions

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

## 6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- The longer-term raised bog restoration trajectory of the site. The plan covers the short-term rehabilitation **actions** and **an additional monitoring and after-care programme** to monitor the rehabilitation during the Scheme and to respond to any needs (failure of environmental stabilisation for example). It is expected that this rehabilitation plan will set the site on an enhanced and accelerated trajectory towards environmental stabilisation and wetland creation. The plan does not set any goals or

outcomes, for example, the extent (specific area) of active raised bog habitat (ARB) that may develop at this site in the long-term. This is beyond the scope of this rehabilitation plan.

- This plan is not intended to be an after-use or future land-use plan for Begnagh Bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future. This will require further engagement with stakeholders.

## 7. CRITERIA FOR SUCCESSFUL REHABILITATION

This section outlines what criteria will be used to indicate successful rehabilitation and what key criteria/targets will be used to mark the achievement of the rehabilitation goals and outcomes and validate the completion of the rehabilitation.

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

Rehabilitation is generally defined by Bord na Móna as

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

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

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

- Rewetting of residual peat in the former area of industrial peat production to offset potential run off of suspended solids and to encourage development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat. Table 7.1 provides a summary of the criteria for successful rehabilitation and associated monitoring. The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed.
- That there is a stabilizing/improving concentration of suspended solids and ammonia in discharges from Bord na Móna sites, associated with the measures undertaken to stabilize the peat surface by the blocking of the internal drainage system and the maximized rewetting of the peat surface. This will be demonstrated by developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be measured via water quality monitoring (suspended solids and ammonia) for at least 2 years after the rehabilitation has been completed.
- Receiving water bodies have been classified under the River Basin Management Plan and this classification includes waters that are At Risk from peatlands and peat extraction. The success criteria will be that the At Risk classification will see improvements in the associated pressures from this peatland or if remaining At Risk, that there is an improving trajectory in the pressure from this peatland. This will be measured by the EPA Water Framework Directive monitoring programme.

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

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

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

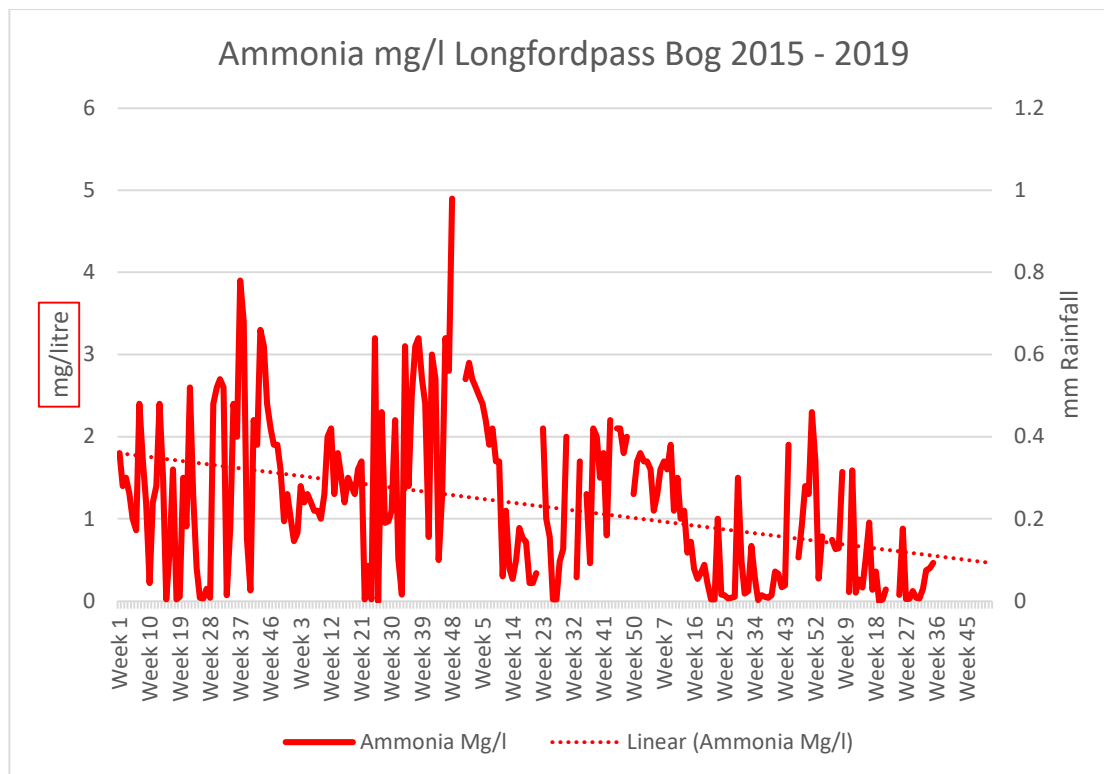


Plate 7.1 Example of decreasing ammonia emissions at Longfordpass bog following cessation of peat extraction and commencement of rehabilitation

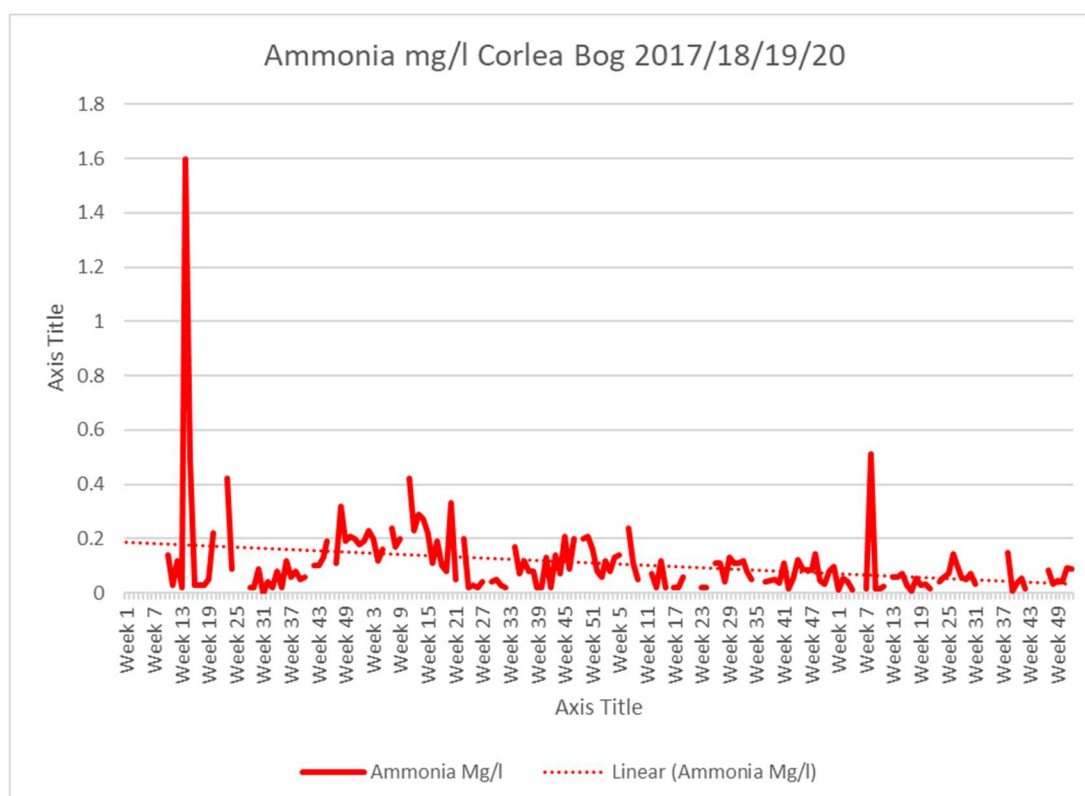


Plate 7.2 Example of decreasing ammonia emissions at Corlea bog following cessation of peat extraction and commencement of rehabilitation.

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

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising residual peat re-wetting). This will be measured and demonstrated by site monitoring (updated aerial photography) to measure the extent of suitable hydrological conditions.
- Accelerating the trajectory of the site towards becoming reduced carbon source. This will be measured through habitat mapping and the development of cutaway bog condition assessment. This cutaway bog condition assessment will include assessment of environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels (similar to ecotope mapping).
- Reduction in carbon emissions. This will be estimated via a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including, fen, reed swamp, wet woodland, heath, scrub, birch woodland, and embryonic *Sphagnum*-rich peatland communities, where conditions are suitable. These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning habitats to fully develop at Begnagh Bog. This will be demonstrated by the reduction in bare peat and the establishment of further pioneering habitats. This will be measured via aerial photography, habitat mapping and cutaway/habitat condition assessment.
- Improvement in biodiversity and ecosystem services. This will be demonstrated by metrics outlined in Section 9.1 that can be used to measure changes in ecosystem services (e.g. water quality parameters, development of pioneer habitats, breeding bird monitoring). This will be measured by collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services. Baseline monitoring will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future. These metrics will be defined in the context of the overall Scheme resources and after consultation with stakeholders.



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

<b>Criteria type</b>	<b>Criteria</b>	<b>Target</b>	<b>Measured by</b>	<b>Expected Time-frame</b>
IPC validation	Rewetting in the former area of industrial peat production	Delivery of rehabilitation measures  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.	2021-2025
IPC validation	Key water quality parameters  Ammonia, Phosphorous, Suspended solids (silt), pH and conductivity	Reduction or stabilisation of key water quality parameters	Water quality monitoring. Started in advance of the proposed rehabilitation.	2020-2023
IPC validation	Reducing pressure from peat production on the local river catchment (WFD)	No decline in the WFD status of the local river catchment	EPA WFD monitoring programme	WFD schedule
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action	Optimal extent of suitable hydrological conditions	Aerial photography and Habitat mapping to map extent of suitable hydrological conditions.  Baseline monitoring to be carried out during the Scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a high bog condition assessment and appropriate carbon emission factors.	2021-2025

Criteria type	Criteria	Target	Measured by	Expected Time-frame
Climate action verification	Setting the site on a trajectory towards establishment of a mosaic of compatible habitats	Establishment of compatible cutaway habitats	Habitat map, Cutaway bog condition map  Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025
Climate action verification	Biodiversity and ecosystem services.  Habitat establishment  Presence of key species – Sphagnum  Wintering birds	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services (to be defined).  Presence of key species – Sphagnum – Walkover survey  Baseline monitoring to be carried out during the Scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025

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

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

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

- **Funding to pay for resources required to deliver the planned rehabilitation (Bord na Móna and external).** Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan.
- **Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.**
- **Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.**
- **Weather conditions to be within normal limits over the rehabilitation plan timeframe.** Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of

rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.

- **Rehabilitation measures to be effective.** The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practise applied internationally in peatland management. Measures proposed in this plan have already been shown to be effective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.
- **Natural colonisation of vegetation to develop semi-natural habitats at a rate within the normal limits.** The development of naturally functioning semi-natural habitats on cutaway peatland takes time. Pioneer vegetation can develop relatively quickly (3-10 years) and wetland habitats can develop relatively quickly. Birch woodland take 20-30 years to develop. However, it may take 50 years for active raised bog vegetation to re-develop on ground that was previously cutaway. Different environmental conditions will have a significant impact on the rate of natural colonisation, and as a result of the combination of different environmental conditions and the application of different rehabilitation measures, there will be a variety of habitat outcomes.
- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed measures to optimise climate action. This will focus on collecting a range of scientific data that can then quickly be adapted into metrics that can be used to measure changes in various ecosystem services.

## 8. REHABILITATION ACTIONS AND TIME FRAME

Peatland rehabilitation requires detailed planning and the use of data from desktop surveys and field surveys. This data in association with remaining peat depths, topographical and hydrological modelling 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-23-05-22 titled **Begnagh Bog: Aerial Imagery2020**

BNM-DR-23-05-04 titled **Begnagh Bog: PeatDepths**

BNM-DR-23-05-03 titled **Begnagh Bog: LiDAR Map**

BNM-DR-23-05-07 titled **Begnagh 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-23-05-05 Begnagh 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.)

The rehabilitation actions will be a combination of PCAS measures to re-wet peat. (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 Begnagh Bog will include:

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a parts of the northeast and south east of the site will develop a mosaic of wetland habitats with some permanent deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent River Fallen. Pumps are expected to be decommissioned and removed at Begnagh Bog.
- Intensive drain blocking around existing wetland or standing water to create/promote the spread of wetland habitats.
- Re-wetting some areas of the bog through regular field drain blocking using a dozer/excavator to create three peat barriers every 100 m along each field drain.
- Peat field re-profiling to reduce the camber of the fields and cell-bunding between high fields to manage/optimize water levels for revegetation.

- Re-alignment of piped drainage.
- Blocking drains in targeted existing pioneering vegetation mosaics, to accelerate re-wetting, and/or manage water levels to the correct height to accelerate the current trajectory towards reed swamp and fen, using a dozer/excavator.
- The creation of berms across some sections of the bog to control/retain water levels. This measure seeks to retain shallow (< 10 cm) water conditions across multiple fields.
- Assessment of potential to remove/prevent the spread of the invasive species Canadian waterweed (*Elodea canadensis*) from the northeast of the site and the implementation of relevant control measures. Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields.
- Modifying water levels at outfalls, as it may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated. This will further slow the movement of water through and out of Begnagh Bog.
- Some small bog remnants around the margins of the bog will be targeted for drain-blocking.
- The existing silt ponds will be retained and maintained during the rehabilitation phase. During the monitoring and verification phase the silt ponds will be continually inspected and maintained, where appropriate. When it is deemed that the silt ponds are not required, as the bog has been successfully stabilised and there is no silt run-off, the condition of the silt ponds will be reviewed. The silt ponds will either be de-watered (water levels lowered to a level where the silt pond will naturally develop as a small wetland feature), left in situ, or infilled (where discharges do not require silt control).
- Seeding of vegetation and inoculation of *Sphagnum* will be undertaken where required. In some areas where vegetation has already established, seeding of vegetation is not required.

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

Type	Code	Enhanced Rehabilitation Measure	Extent (Ha)
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	1.8
Dry cutaway	DCT2	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	63.7
Wetland	WLT2	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site	5.6
Wetland	WLT3	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes	9.1
Wetland	WLT4	More intensive drain blocking (7/100 m), + blocking outfalls and managing overflows with a controlled weir outfall + transplanting Reeds and other rhizomes	35.0
Deep Peat	DPT 2	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows	8.4
Deep Peat	DPT4	Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows with a controlled weir outfall + drainage channels for excess water + + Sphagnum inoculation	105.4
Marginal land	MLT1	No work required (Marginal land including Silt Ponds)	26.4
Constrained areas		Rehabilitation aligned to constraints	9.1
Silt ponds		Silt ponds	0.5
Total			<b>265.1</b>

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

- Seek formal approval of the enhanced plan, noting the alternative adapted standard plan should funding from the Scheme not materialise, from the EPA.
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with detailed site drawings outlining how the various rehabilitation methodologies (with the Scheme) will be applied to Begnagh 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 has been carried out, any issues identified resolved and the rehabilitation plan adapted.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation has been carried out. The results of this assessment have been incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.
- An assessment of pumping requirements to complete decommissioning has been carried out. Pumps are expected to be decommissioned and removed.

- A review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements has been carried out, and incorporated into the rehabilitation plan, where needed.
- A review of remaining milled peat stocks has been carried out. There are no remaining peat stocks.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation, such as the presence of sensitive ground-nesting bird breeding species (e.g. curlew, ringed plover or lapwing) or marsh fritillary butterfly larval webs, etc. The scheduling of rehabilitation operations will be adapted, if needed. Surveys will be scoped and carried out based on the baseline ecological survey and previous knowledge of sites.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- An Appropriate Assessment of the Rehabilitation Plan has been carried out. (Note that the rehabilitation plan for Begnagh screened out at the Stage I.)
- See Begnagh Decommissioning and Rehabilitation Plan – Addendum 1 for more details.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implementation of the rehabilitation plan.

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

- Carry out proposed measures as per the detailed site plan. This will include a combination of hydrological management, drain blocking, peat field re-profiling and cell-bunding. All rehabilitation will be carried out with regard to best practice environmental control measures (Appendix IV).
- Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions.
- Carry out the proposed monitoring, as outlined in Section 9 of this report and accompanying documents.
- While natural colonisation is expected to commence almost immediately once peat production ceases, Phase 2 actions will be carried out in targeted areas to accelerate re-vegetation and colonisation of target species. Phase 2 actions will include fertiliser application on high fields and headlands (where there is bare peat).
- Silt-ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent silt 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. Short-term practical actions.
- 2022-2025. 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 deep peat habitats, wetland habitats, shallow cutaway areas, drier areas, and regenerating bog communities across the bog (See Appendix I).



## 9. AFTERCARE AND MAINTENANCE

### 9.1 Programme for monitoring, aftercare and maintenance

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

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

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

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

- Vegetation and habitat monitoring will be carried out 5 years after rehabilitation is completed using a cutaway bog condition assessment (Similar to ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated peatland habitats. This means that potential GHG emissions can be estimated from the site, as the site continues along its trajectory towards a naturally functioning peatland ecosystem.
- It is proposed to monitor the improvement of some biodiversity ecosystem services. A breeding bird and Pollinator monitoring programme will be established. Specific pollinator indicators will be monitored (i.e. bees and butterflies). To be defined in relation to monitoring of the overall Scheme and after consultation with stakeholders.

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

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

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

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

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

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

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

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

### Scope of rehabilitation

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

- EPA IPC Licence - Ref. PO-504-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Begnagh bog is part of the Mount Dillon group.
- A key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- The area of former industrial peat production at Begnagh Bog. Industrial peat production has now permanently ceased at Begnagh Bog.
- Minimising potential impacts on neighbouring land. Some boundary drains around Begnagh Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Land-use. There are proposals to develop a greenway across Begnagh along the railway track.

### Rehabilitation goals and outcomes

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

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

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

### Criteria for successful rehabilitation:

- Rewetting of residual peat in the former area of industrial peat production to offset potential 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 barriers, elevated water levels and re-wetting).  
Stabilising potential emissions from the site (silt run-off). The key target will be developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be demonstrated by water quality monitoring results.

### **Rehabilitation measures:**

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

### **Timeframe:**

- 2022. 1<sup>st</sup> phase of rehabilitation. Field drain blocking with dozer/excavator.
- 2022. 2<sup>nd</sup> phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1<sup>st</sup> phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.
- 2024-2025. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024-2025. Decommission silt-ponds, if necessary.



## Budget and Costing

- Bord na Móna maintains a Provision on its balance sheet to pay for the future costs of rehabilitation and decommissioning when industrial peat extraction ceases. This is updated every year. For more information see the Bord na Móna Annual Report (Bord na Móna, 2021). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.
- At this time, a standard rehabilitation provision has been allocated to the site based on the area of different cutaway types across the bog.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Dry Cutaway	DCT1	Limited drain blocking, Blocking outfalls and managing water levels with overflow pipes	65.5
Deep Peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	113.8
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	49.8
Marginal land	MLT1	No work required	26.4
Constraint			9.09
Silt ponds		Silt-ponds	0.45
<b>Total</b>			<b>265.08</b>

See Drawing number BNM-DR-23-05-20 titled **Begnagh 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 any additional rehabilitation.
- Water quality monitoring will be established.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at [www.epa.ie](http://www.epa.ie).
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, and Chemical Oxygen Demand (COD).
- This sampling regime on a selected number of silt ponds will be carried out over a two-year cycle. The original (licence) requirement was for a quarterly sampling regime.

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

**Validation and IPC Licence surrender**

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

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

## APPENDIX II: BOG GROUP CONTEXT

The Mount Dillon Bog Group IPC Licensed area is made up of two sub-groups (Lough Ree (the Mount Dillon Energy Peat Group) and Mostrim) and have been in industrial peat production for several decades. There are 28 defined sites covering a total area of 11,322 ha. Of the 28 sites, 23 mainly straddle the River Shannon within counties Roscommon and Longford, with five sites partially in County Westmeath to the east. Each bog area further comprises a range of habitats from bare milled peat production areas to re-colonising cutaway to workshops areas and transport infrastructure. Industrial peat extraction from these sites mainly supplied ESB power stations at Lanesborough (LRP) or for horticultural peat products.

Industrial peat extraction in the Mount Dillon Bog Group ceased in 2019. It is planned to supply remaining milled peat stocks to Lanesborough (LRP) during 2020. Both power stations will cease using peat by the end of 2020. All remaining horticultural peat stocks will also be removed during 2020. Intensive decommissioning and rehabilitation for the Mount Dillon Bog Group is expected to start in 2020/2021.

One bog site, Cloonmore, was never used for industrial peat production and several bogs in the Mostrim group have been drained but never fully developed and still retain typical high bog characteristics. These include Clonwhelan, Glenlough and a section of Mostrim. These sites have been zoned for biodiversity and a high bog drain blocking will be used to re-wet the high bog and encourage restoration of the raised bog habitat. Several sites (Glenlough, Mostrim, Clonwhelan and Clynan) were assessed by consultants for NPWS as part of the review of the raised bog Natural Heritage Area network (NPWS 2014).

The rehabilitation plan for the Mount Dillon Bog Group encompasses all areas involved in industrial peat production including industrial production areas and associated facilities. It also includes rehabilitation measures for those bogs that were initially drained but not fully developed.

A breakdown of the component bog areas for the Mount Dillon Bog Group IPC License Ref. PO-504-01-01 is outlined in Table Ap-2.

Industrial peat production history varies across the Mount Dillon bog group, so there is a wide range of peat depths at present. Bogs close to Lanesborough tend to have shallower peat depths or have been cutaway, while some bogs on the periphery of the group tend to have deeper peat reserves. Several sites such as Mount Dillon and Garryduff have been mostly cutaway to the fen peat layers or in some cases to expose the underlying gravel/sub-soil. Several bogs in the Mostrim group have only been partially developed or have had no industrial peat production, and have relatively deep peat depths

*Table Ap-2: Mount Dillon Bog Group names, area and indicative status (Mount Dillon Energy Peat sub-group)*

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Begnagh	265	Cutover Bog  Industrial peat production commenced at Begnagh Bog in 1977 and ceased in 2020. Deep peat reserves remain on much of the former production area. Begnagh is considered a deep peat cutover bog.	Begnagh Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power  Some areas of cutaway on site are developing pioneer cutaway vegetation communities.	2020	Finalised 2022

Clooneeny	358	<p>Cutover Bog</p> <p>Industrial peat production commenced at Clooneeny Bog in 1985 and ceased in 2020. Deep peat reserves remain on much of the former production area. Clooneeny is considered a deep peat cutover bog.</p>	<p>Clooneeny Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power</p> <p>Most of the former production area on site is bare peat.</p> <p>Some areas of cutaway on site are developing pioneer cutaway vegetation communities.</p>	2020	Finalised 2022
Cloonmore	102	N/A	Never developed for industrial peat production; scattered plots.	N/A	N/A
Cloonshannagh	494	<p>Cutover Bog</p> <p>Industrial peat production commenced at Cloonshannagh Bog in 1985 and ceased in 2020. Deep peat reserves remain across the former production area. Cloonshannagh is considered a deep peat cutover bog.</p>	<p>Cloonshannagh Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power</p> <p>Restoration work has been carried out on a 38ha section of high bog within Cloonshannagh Bog.</p> <p>Some of the former production area on site is developing pioneer cutaway vegetation communities, the remainder of the site is bare peat.</p>	2020	Draft 2017
Cloonshannagh Rail Link	28	Cloonshannagh rail link is a link between sites.	N/A	N/A	N/A
Corlea	163	<p>Cutaway Bog</p> <p>Industrial peat production commenced at Corlea Bog in 1960 and ceased in 2018. Long-term peat extraction has reduced peat reserves on this bog. Corlea is considered a shallow peat cutaway bog.</p>	<p>The former production area at Corlea has already extensively colonised. Pioneer wetland and scrub development has occurred over much of the site.</p> <p>Some wetland and rehabilitation management was undertaken between 2016-2018.</p> <p>Part of site leased to local community development group to develop amenity walkway in association with Longford County Council.</p>	2018	Draft 2019
Derraghan	289	<p>Cutover Bog</p> <p>Industrial peat production commenced at Derraghan Bog in the 1940's and ceased in 2020. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derraghan is considered a shallow peat cutover bog.</p>	<p>Derraghan Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power</p> <p>Much of the former production area at Derraghan has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.</p>	2020	Finalised 20221
Derryadd	653	<p>Cutover Bog</p> <p>Industrial peat production commenced at Derryadd Bog in 1960 and ceased in 2020. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryadd is considered a shallow peat cutover bog.</p>	<p>Much of the former production area at Derryadd has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities</p> <p>Derryadd Bog will form part of the footprint of Derryadd Windfarm for which planning permissions were granted in 2020.</p>	2020	Draft 2017
Derryadd2	328	<p>Cutover Bog</p> <p>Industrial peat production commenced at Derryadd 2 Bog in 1960 and ceased in 2020. Long-term peat extraction has reduced peat reserves on this bog. Most of</p>	<p>Much of the former production area at Derryadd 2 has been out of peat production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities</p>	2020	Draft 2017

		the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryadd 2 is considered a shallow peat cutover bog.	Derryadd 2 Bog will form part of the footprint of Derryadd Windfarm for which planning permissions were granted in 2020.		
Derryarogue	895	Cutover Bog Industrial peat production commenced at Derryarogue Bog in 1941 and ceased in 2020. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryarogue is considered a shallow peat cutover bog.	Much of the former production area at Derryarogue has been out of production for some time. These areas have already extensively colonised with pioneer wetland, cutaway and scrub vegetation communities.  Derryarogue Bog will form part of the footprint of Derryadd Windfarm for which planning permissions were granted in 2020. An amenity walkway through part of Derryarogue is proposed for the Derryadd Windfarm project	2020	Draft 2019
Derrycashel	388	Cutover Bog Industrial peat production commenced at Derrycashel Bog in 1951 and ceased in 2018. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derrycashel is considered a shallow peat cutover bog.	Derrycashel Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power  Much of the former production area at Derryarogue has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.  Some wetland and rehabilitation management was undertaken (c.60ha) between 2014-2015.	2018	Finalised 2021
Derrycolumb	454	Cutover Bog Industrial peat production commenced at Derrycolumb Bog in the 1980's and ceased in 2019. Most of the former production area still has deep peat reserves. Derrycolumb is considered a deep peat cutover bog.	Derrycolumb Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power  Much of the former production area at Derrycolumb has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.	2018	Finalised 2021
Derrymoylin	356	Cutover Bog Industrial peat production commenced at Derrymoylin Bog in 1985 and ceased in 2020. Long-term peat extraction has reduced peat reserves on this bog. Derrymoylin is considered a shallow peat cutover bog.	Derrymoylin Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Most of the former production area on site is bare peat.	2020	Draft 2021
Derryshannoge	452	Cutover Bog Industrial peat production commenced at Derryshannoge Bog in 1985 and ceased in 2020. Deep peat reserves remain across most of the site. Derryshannoge is considered a deep peat cutover bog.	Derryshannoge Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Much of the former production area at Derryshannoge has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2017
Edera	281	Cutover Bog  Development for industrial peat production commenced at Edera Bog in 1990's. Active extraction from Edera began in 2003 and ceased in 2018. Edera is considered a deep peat cutover bog.	Edera Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  The majority of Edera Bog former production area is bare peat.	2020	Finalised 2021
Erenagh	93	Cutover Bog  Development for industrial peat production commenced at Erenagh Bog in 1970's.	Erenagh Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Much of the former production area at Erenagh has been out of production for some	2020	Draft 2017

		Erenagh is considered a deep peat cutover bog.	time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.		
Granaghan	212	Cutover Bog  Development for industrial peat production commenced at Granaghan Bog in 1980's. Long-term peat extraction has reduced peat reserves on this bog but deep peat reserves remain on site. Granaghan is considered a deep peat cutover bog.	Granaghan Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.  The majority of Granaghan Bog former production area is bare peat.	2020	Draft 2017
Killashee	110	Cutover Bog  Development for industrial peat production commenced at Killashee Bog in 1985.  Killashee is considered a deep peat cutover bog.	Killashee Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.  The majority of Killashee Bog former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2017
Knappoge	313	Cutaway Bog Peat Production at Knappoge bog commenced in 1963, and finished in 2018. Peat depths on the former production area are generally shallow. There are some pockets of deeper peat. Knappoge is considered a shallow peat cutaway bog.	Knappoge Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  The majority of Knappoge Bog former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2018	Draft 2021
Lough Bannow	739	Cutaway Bog Peat Production at Lough Bannow bog commenced in the 1960'S, and finished in 2020. Peat depths on the former production area are generally shallow. There are some pockets of deeper peat. Lough Bannow is considered a shallow peat cutaway bog.	Much of the former production area at Lough Bannow has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities. A small (35ha) conifer plantation was established in 1980's. Lough Bannow will form part of the footprint of Derryadd Windfarm for which planning permissions were granted in 2020.	2020	Draft 2017
Moher	483	Cutover Bog Peat Production at Moher bog commenced in the 1960'S, and finished in 2020. Peat depths on the former production area remain relatively deep. Moher is considered a deep peat cutover bog.	Moher Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Much of the former production area at Moher has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2021
Mount Dillon	592	Cutaway Bog Peat Production at Mount Dillon bog commenced in the 1940'S, and finished in 2020. Peat depths on the former production largely shallow and the peat is considered cutaway. Some deep peat remains on the west of the site. Mount Dillon is considered a shallow peat cutaway bog.	Mount Dillon Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Much of the former production area at Mount Dillon has been out of production for some time. These areas have already extensively colonised with pioneer cutaway, wetland and scrub vegetation communities.	2020	Draft 2017

See Drawing number BNM-DR-23-05-24 titled **Mount Dillon Bog Group**, included in the accompanying Mapbook which illustrates the location of Begnagh Bog and the Mount Dillon Bog Group in context to the surrounding area.

## APPENDIX III: ECOLOGICAL SURVEY REPORT

<b>Ecological Survey Report</b> <b>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.</b>			
<b>Bog Name:</b>	<b><u>Begnagh</u></b>	<b>Area (ha):</b>	266ha
<b>Works Name:</b>	Mount Dillon	<b>County:</b>	Longford
<b>Recorder(s):</b>	BnM Ecology Section	<b>Survey/ monitoring Date(s):</b>	10 <sup>th</sup> August 2012
<b>Habitats present (in order of dominance)</b> <p>The most common habitats present 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>• Pioneer dry heath communities (dHeath)</li> <li>• Scrub (eBir, OBir and CBir).</li> <li>• Silt Ponds (Silt) with associated habitats such as scrub, Bracken, rank grassland (GS2), dry calcareous grassland (gCal) and typical pioneer communities of disturbed areas (disTuss).</li> </ul> <p>The most common habitats present around the margins at this site include:</p> <ul style="list-style-type: none"> <li>• Birch woodland (WN7) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II)</li> <li>• Scrub (WS1) (Gorse scrub and Birch scrub developing of dry high bog around margins)</li> <li>• Raised bog (PB1)</li> <li>• Cutover bog (PB4) (several small fragments)</li> <li>• Wet grassland (GS4)</li> </ul>			
<b>Description of site</b> <p>Begnagh Bog is located approximately 4km to the North of Killashee in County Longford. This site is located within one main block. A rail link connects the site with Knappogue to the west and Clooneeny to the East, the rail line crosses the site close to the southern boundary. The majority of the site is in active industrial peat production and the peat is used as fuel peat in Lough Ree Power in Lanesborough. Begnagh has been in full industrial peat production since the early 1980's and contains two pumps. A small works area is located along the eastern edge of the site.</p> <p>The Royal Canal flows along the western boundary of the site and the Falan River flows alongside the eastern boundary of the site. The Royal Canal is used as an amenity area for angling and boating, A narrow band of Birch woodland separates the site from the Royal Canal. The Canal and the Falan River are important wildlife corridors for the flora and fauna of the area and these habitats support ecologically important species such as Otter along with various species of bird and fish.</p> <p>There are a number of small areas of cutaway on the site that have begun to become colonised with vegetation. None of the cutaway areas are old and have begun to become to become colonised with pioneer poor fen vegetation (pRos and pJeff) in recent years.</p>			

<p>Habitats along the margins of the site include Birch woodland (WN7), scrub (WS1), remnant sections of raised bog (PB1), Canal (FW3), lowland depositing river (FW2) and wet grassland. The areas of Birch woodland and scrub are poorly developed and are dominated by Birch, Gorse, Willow, Bracken and Bramble. The sections of remnant raised bog are small and dry with Heather dominance. The wet grassland areas are managed by local farmers.</p>
<p><b>Designated areas on site (cSAC, NHA, pNHA, SPA other)</b></p> <p>None</p> <p>The Royal Canal pNHA (site code – 002103) adjoins the western boundary of the site. The production bog at Begnagh does not overlap with this designated site.</p>
<p><b>Adjacent habitats and land-use</b></p> <p>Adjacent habitats include lowland depositing river (FW2), wet grassland (GS4), improved agricultural grassland (GA1), cutaway bog (PB4), conifer plantation and raised bog (PB1).</p>
<p><b>Watercourses (major water features on/off site)</b></p> <ul style="list-style-type: none"> <li>• The Royal Canal occurs adjacent to the western boundary of the site. The Royal Canal merges with the River Shannon further downstream.</li> <li>• The Fallan River occurs alongside the eastern boundary of the site. This river is a tributary of the Camlin River which in turn discharges into the River Shannon.</li> </ul>
<p><b>Peat type and sub-soils</b></p> <p>Begnagh, for the most part, contains between 1m and 2.6m of peat. The peat is used as fuel peat in Lough Ree Power.</p>
<p><b>Fauna biodiversity</b></p> <p><b>Birds</b></p> <p>Several bird species were noted on the site during the survey.</p> <ul style="list-style-type: none"> <li>• Buzzard</li> <li>• Willow Warbler</li> <li>• Mallard</li> <li>• Other more common species include Wood Pigeon, Swallow, Long-tailed Tit, Green Finch, Grey Crow and Grey Heron.</li> </ul> <p><b>Mammals</b></p> <p>Signs of several mammal species were noted on the site during the survey.</p> <ul style="list-style-type: none"> <li>• Fox</li> <li>• Badger</li> <li>• Otter</li> <li>• Hare</li> </ul>



- Mink

**Other Species**

Coarse fish in the canal and the river.

Butterflies

- Large White, Peacock, Meadow Brown, Green-veined White, Small copper.

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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.
- The proposed activities will be restricted to daylight hours and there will be no requirement for artificial lighting.
- All plant and equipment for use will comply with the Construction Plant and Equipment Permissible Noise Levels Regulations (SI 359/1996).
- 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 bowzers. Only dedicated trained and competent personnel will carry out refuelling operations.
- Mobile storage such as fuel bowzers will be bunded to 110% capacity to prevent spills. Tanks for bowzers and generators shall be double skinned. When not in use, all valves and fuel trigger guns from fuel storage containers will be locked. All pumps using fuel or containing oil will be locally and securely bunded where there is the possibility of discharge to waters.
- Potential impacts caused by spillages etc. during rehabilitation will be reduced by keeping spill kits and other appropriate equipment on-site.
- Site activities will be carried out in accordance with 'best practice'. In order to ensure compliance and implementation of 'best practice', these measures will be communicated to relevant Bord na Móna staff and updated as required.

## APPENDIX V: BIOSECURITY

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

The potential for importation or introduction of non-native plant species (such as Japanese Knotweed, Himalayan Balsam, etc.) during future rehabilitation management, such as drain-blocking using excavators, has the potential to result in the establishment of invasive species within the site.

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

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

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

In addition to the above, Best Practise measures around the prevention and spread of Crayfish plague<sup>4</sup> and Zebra Mussel will be adhered with throughout all rehabilitation measures and activities.

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<sup>4</sup> <https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/>

## APPENDIX VI: POLICY AND REGULATORY FRAMEWORK

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

Today, Bord na Móna is undertaking a number of highly significant actions in support of climate policy. These actions involve a radical transformation and decarbonisation of nearly the entire Bord na Móna business. This transformation will be driven by unlocking the full potential of our land and creating significant value for Ireland and the Midlands in particular.

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

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

### 1 EPA IPC Licence

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mount Dillon bog group (Ref. PO-504-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Mount Dillon group. This regulatory requirement is the main driver of the development of this rehabilitation plan.

### 2 The Peatlands Climate Action Scheme (PCAS)

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

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

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

The proposed enhanced rehabilitation detailed in this document, are predicated on the understanding that the element of the activities, over and above the ‘standard’ rehabilitation necessary to comply with pre-existing Condition 10 IPC Licence requirements, will be deemed eligible costs be 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 2015-2020**

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

## **10 Land-use planning policies**

As Bord na Móna operates in many counties across Ireland, it is important to note the respective development plans in these counties. Many of the existing development plans recognise the potential that exists in the after-use of cutover/cutaway peatlands. Bord na Móna seeks to work with all of the relevant local authorities to ensure



that the most appropriate after-uses are reflected in local planning policy. The following areas of consistent importance are of both direct and indirect relevance to Bord na Móna: heritage, tourism, biodiversity/conservation, landscape, renewable energy, and economy/enterprise.

Begnagh Bog is located in an area zoned by Longford County Council as open countryside.

## 11 National Archaeology Code of Practise

Bord na Móna operates under an agreed Code of Practice regarding archaeology with the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland which provides a framework to enable the Company to progress peat extraction whilst carrying out archaeological mitigation. (<https://www.archaeology.ie/sites/default/files/media/publications/cop-bord-na-mona-en.pdf>)

The Code replaced a set of Principles agreed with the Department of Arts, Heritage and the Gaeltacht in the 1990s. Under the Code Bord na Móna, the Minister and Director work together to ensure that appropriate archaeological mitigation is carried out in advance of peat extraction.

- BNM must ensure that any monuments or archaeological objects discovered during peat extraction are protected in an appropriate manner by following the Archaeological Protection Procedures.
- BNM must ensure that any newly discovered monuments on Bord na Móna lands are reported in a timely manner to the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht.
- BNM must ensure that any archaeological objects discovered on Bord na Móna lands are reported immediately to the Duty Officer of the National Museum of Ireland.
- Bord na Móna will adhere to the Archaeology Code of Practise 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 EUs headline target for progress by 2020 is to:

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

This rehabilitation plan is aligned to the CBD target and the EU Biodiversity Strategy target and will help Ireland meet its commitment to these international Biodiversity policies.

### **13 Bord na Móna commitments**

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

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

In line with Bord na Móna's accelerated decarbonisation programme, the company made a further commitment to a significantly larger rehabilitation target. This was reflected in our plans to rehabilitate a further 20,000 hectares of cutaway and cutover bog to wetland and woodland mosaics by 2025. In addition, we planned to restore a further 1,000 hectares of raised bog habitat by 2025.

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

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

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

The general after-use strategy of Bord na Móna is outlined in the Bord na Móna Strategic Framework for Future-Use of Cutaway Bogs 2020 (draft document). This document outlines how Bord na Móna's cutover peatland estate is complex in nature with great variability in terms of peat depths, peat types, drainage, subsoil condition and environmental value. Thus, future options require consideration on a site-specific basis, also bearing in mind the considerable internal variation within bogs. The development of the land-bank will also take account of national needs, while also taking account of the various national legislation, policies and plans related to the management of peatlands. In general, Bord na Móna will seek to balance and optimise commercial, social, and environmental value of these sites, and develop integrated land-uses, while taking account of the need for sustainability and their biodiversity value.

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

## APPENDIX VII. DECOMMISSIONING

### 1. Condition 10 Decommissioning

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

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

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

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

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

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

Item	Description	Begnagh Decommissioning Plan
1	Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices	Clean-up of Bog
2	Cleaning Silt Ponds	Cleaning Silt Ponds
3	Decommissioning Peat Stockpiles	Peat Stockpile Management via Levelling
4	Decommissioning or Removal of Buildings and Compounds	Decommission and Removal of Porto-cabin tea centre and materials store
5	Decommissioning Fuel Tanks and associated facilities	Decommissioning and De-Gassing Mobile Fuel Tanks
6	Decommissioning and Removal of Bog Pump Sites	Where required
7	Decommissioning or Removal of Septic Tanks	De-sludge Septic Tank

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

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

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

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

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

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

7.3.3 The ultimate destination of the waste.

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

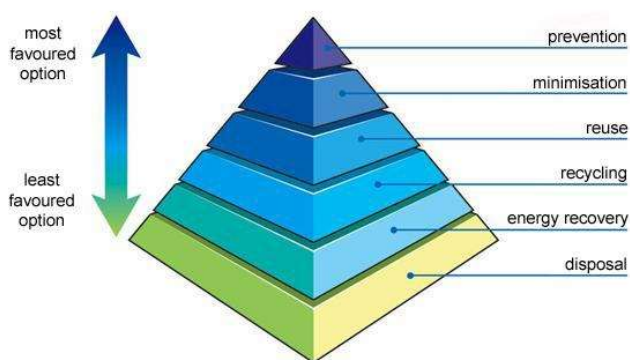
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

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

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

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



The list of such items and the decommissioning methodologies are defined in the proposed **Methodology** paper.

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

## 2. Enhanced Decommissioning.

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

Item	Enhanced Decommissioning Type	Begnagh Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Not Applicable
3	Decommissioning Railway Level Crossing	Decommissioning Railway Level Crossing
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog.
5	Removal of High Voltage Power Lines	Where required

## 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 heterogeneous 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 heterogeneous topographical mosaic separated by basins. Dry cutaway may have very thin or no residual peat where ridges and mounds have been exposed. The exposed sub-soils are a mix of glacial gravels, muds and tills that can be quite free-draining. Dry cutaway may also have deeper residual peat but in a location (i.e. at the margin) where the peat can not be re-wetted due to boundary constraints. Dry cutaway may also develop in situations where there is a relatively steep slope that inhibits re-wetting. The majority of dry cutaway will develop towards grassland, heath, scrub and dry woodland habitats.

**Enhanced decommissioning:** This is defined as decommissioning carried out under Scheme, which is proposed to 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. P0504 -01, Mount Dillon Bog Group in County Longford.

#### 1.0 Extractive Waste:

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

##### 1.1 Silt Pond excavations and maintenance.

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

##### 1.2 Power Station screenings:

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

##### 1.3 Bog Timbers:

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

#### 2.0 P0504-01 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 Mount Dillon IPPC Licence Coordinators office.

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

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

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

**Review.**

This plan will be reviewed every five years, the first review to take place in September 2017. This review will entail an inspection of these waste facilities to ensure their placing, management, maintenance and stability comply with the requirements of the Extractive Waste Management requirements and condition 7.5, 7.6 and 7.7 of the Mount Dillon IPPC Licence Ref. PO504 -01.

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

- Any fertiliser used will be Rock Phosphate and will not be applied in the following conditions:
  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*

An map of the areas identified for targeted fertiliser application is provided in Figure APX 1 below.

## APPENDIX XI. CONSULTATION SUMMARIES

**Table APXI -1 Consultees contacted**

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response format
Begnagh	All Landowners in vicinity of bog	Local Stakeholders	29/10/2021	Letter	Multiple responses received	Email, In Person & Telephone
Begnagh	All those with turbary rights	Local Stakeholders	29/10/2021	Letter		
Begnagh	An Forum Uisce (The Water Forum)	General Email Contact	22/10/2021	Email		
Begnagh	An Taisce	General Email Contact	22/10/2021	Email		
Begnagh	Bat Conservation Ireland	General Email Contact	22/10/2021	Email		
Begnagh	Birdwatch Ireland	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Butterfly Conservation Ireland	General Email Contact	22/10/2021	Email		
Begnagh	CARO (Climate Action Regional Office) Eastern and Midlands	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Chief Executive Longford County Council	General Email Contact	22/10/2021	Email		
Begnagh	Clonmore / Kilmore Group Water Scheme	General Contact	26/10/2021	Letter	16/11/2021	Email
Begnagh	Coillte	Multiple Email Contacts	22/10/2021	Email		
Begnagh	County Longford Shooting and Conservation Council	General Email Contact	22/10/2021	Email		
Begnagh	Department of Agriculture, Food, and the Marine	General Email Contact	22/10/2021	Email	27/10/2021	Email

Begnagh	Department of Environment, Climate and Communications	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Department of Housing, Local Government and Heritage	General Email Contact	22/10/2021	Email	12/11/2021	Email
Begnagh	Department of Housing, Local Government and Heritage NPWS	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Dept of Agriculture Food & the Marine	General Email Contact	22/10/2021	Email	27/10/2021	Email
Begnagh	Dept of Rural and Community Development	General Email Contact	09/11/2021	Email	09/11/2021	Email
Begnagh	Director of Services - Head of Finance and Regeneration	General Email Contact	22/10/2021	Email		
Begnagh	Director of Services - Strategic Infrastructure and Climate Change.	General Email Contact	22/10/2021	Email		
Begnagh	Eastern and Midland Regional Assembly	General Email Contact	22/10/2021	Email		
Begnagh	Environmental Protection Agency	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Fisheries Ireland	General Email Contact	22/10/2021	Email		
Begnagh	Friends of the Earth	General Email Contact	22/10/2021	Email	22/10/2021	Email
Begnagh	Friends of the Irish Environment	General Email Contact	22/10/2021	Email		
Begnagh	ICMSA (Irish Creamery Milk Suppliers Association)	Multiple Email Contacts	22/10/2021	Email		
Begnagh	ICSA (Irish Cattle and Sheep Farmers Association)	General Email Contact	22/10/2021	Email		

Begnagh	Inland Fisheries Ireland	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Irish Farmers Association	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Irish Farmers Association (Galway/Leitrim/Longford/Roscommon/Sligo)	General Email Contact	22/10/2021	Email		
Begnagh	Irish Farmers Association (Leitrim/Longford/Roscommon/Sligo)	General Email Contact	22/10/2021	Email		
Begnagh	Irish Farmers Association (Senior Policy Exec)	General Email Contact	22/10/2021	Email		
Begnagh	Irish Peatlands Conservation Council	General Email Contact	22/10/2021	Email		
Begnagh	Irish Raptor Study Group	General Email Contact	22/10/2021	Email		
Begnagh	Irish Rural Link	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Irish Rural Link (Community Wetlands Forum)	General Email Contact	22/10/2021	Email		
Begnagh	Irish Water	General Email Contact	22/10/2021	Email	05/11/2021	Email
Begnagh	Irish Wildlife Trust	Multiple Email Contacts	22/10/2021	Email		
Begnagh	IWAI	General Email Contact	22/10/2021	Email		
Begnagh	Local Authority Waters Programme	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Longford County Council	Martin Smyth	22/10/2021	Email		
Begnagh	Longford County Council	Donall Mac An Bheatha	22/10/2021	Email		
Begnagh	Longford County Council	Liam Flynn	22/10/2021	Email		

Begnagh	Longford County Council - Director of Services (Strategic Infrastructure and Climate Change)	John Brannigan	22/10/2021	Email		
Begnagh	Longford County Council - Heritage Officer	Mairead Ni Chonghaile	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Colm Murray	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Mick Cahill	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Paul Ross	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Mark Casey	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Gerard Farrell	22/10/2021	Email		
Begnagh	Longford County Councillors - Ballymahon District	Pat O'Toole	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	Peggy Nolan	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	Uruemu Adejinmi	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	John Browne	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	Seamus Butler	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	Gerry Hagan	22/10/2021	Email		



Begnagh	Longford County Councillors - Longford	Martin Monaghan	22/10/2021	Email		
Begnagh	Longford County Councillors - Longford	Gerry Warnock	22/10/2021	Email		
Begnagh	Longford Wilderness Park (Clandillon Civil Consulting)	General Email Contact	22/10/2021	Email		
Begnagh	Longford Wilderness Park (Longford County Council)	General Email Contact	22/10/2021	Email		
Begnagh	Midlands & East Regional WFD Operational Committee	General Email Contact	22/10/2021	Email		
Begnagh	Minister for Environment, Climate and Communications	Minister Eamon Ryan	22/10/2021	Email		
Begnagh	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Minister of State Pippa Hackett	22/10/2021	Email		
Begnagh	NARGC	General Email Contact	22/10/2021	Email		
Begnagh	National Association of Regional Game Councils	Multiple Email Contacts	22/10/2021	Email		
Begnagh	National Museum of Ireland	Multiple Email Contacts	22/10/2021	Email	24/11/2021	Email
Begnagh	NPWS Rangers North Midlands	Multiple Email Contacts	22/10/2021	Email		
Begnagh	NUIG Galway	Multiple Email Contacts	22/10/2021	Email		
Begnagh	NWRA	General Email Contact	22/10/2021	Email		
Begnagh	Office of Public Works	Multiple Email Contacts	22/10/2021	Email	19/11/2021	Email

Begnagh	Oireachtas	General Email Contact	22/10/2021	Email		
Begnagh	PPN Longford Public Participation Network	General Email Contact	22/10/2021	Email		
Begnagh	Ranger Association Committee	General Email Contact	22/10/2021	Email		
Begnagh	Shannon Flood Risk State Agency Co-ordination Working Group	General Email Contact	22/10/2021	Email		
Begnagh	Sustainable Water Action Network (SWAN)	Multiple Email Contacts	22/10/2021	Email		
Begnagh	TD/Longford	Peter Burke	22/10/2021	Email		
Begnagh	TD/Longford	Sorcha Clarke	22/10/2021	Email		
Begnagh	TD/Longford	Joe Flaherty	22/10/2021	Email		
Begnagh	TD/Longford	Robert Troy	22/10/2021	Email		
Begnagh	Teagasc	General Email Contact	22/10/2021	Email		
Begnagh	The Heritage Council	General Email Contact	22/10/2021	Email		
Begnagh	Trinity College Dublin	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Turf Cutters and Contractors Association	General Email Contact	22/10/2021	Email		
Begnagh	UCD / Irish Rural Link	General Email Contact	22/10/2021	Email		
Begnagh	University College Dublin	General Email Contact	22/10/2021	Email		
Begnagh	Waterways Ireland	Multiple Email Contacts	22/10/2021	Email		
Begnagh	Waterways Ireland	General Email Contact	22/10/2021	Email		
Begnagh	Waterways Ireland Org	General Email Contact	22/10/2021	Email		

Begnagh	Woodlands of Ireland	General Email Contact	22/10/2021	Email		
Begnagh	Local residents			Site meeting	16/02/2022	

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

Organisation	Summary of Response by Stakeholder	BnM Response
Friends of the Earth	Response received 22/10/21 acknowledging receipt of email	
Dept. of Agriculture, Food, and the Marine (Environmental Co-ordination Unit, Climate Change and Bioenergy unit)	The Department of Agriculture, Food & the Marine (DAFM) made a submission on 27/10/2021 indicating their support of the scheme. They also highlighted the potential risks that any rehabilitation works to the bog may have on adjoining Residents land. They requested that Bord na Mona carry out a Risk Assessment in advance and communicate as necessary with impacted Residents, they also recommended having a strong communication campaign and ensuring stakeholders have access to all relevant information particularly around preventative measures to prevent adverse land impacts. The Dept. also recommended a Hydrological Assessment be carried out regarding risk of flooding.	Bord na Mona responded by email on 18/11/2021 thanking the Dept. for their response and their comments and advising of the various mitigation steps being taken including the appointment of external Hydrological consultants. Bord na Mona also advised of the various ways we are engaging with local communities and stakeholder organisations and providing a link to our draft Rehabilitation plans. It was also confirmed that no EIAR was necessary but Appropriate Assessments are being carried out on each bog. Bord na Mona also indicated their availability to discuss the scheme further and offered to arrange a site visit.

	The Dept. further asked that consideration be given to the proposed plans Rehabilitation measures and whether they have been considered regarding EIA and Habitats Directive assessments and indirect impacts via the source-vector pathway model.	
Irish Water	<p>Irish Water responded on 5/11/2021 outlining their support for the scheme and asking if we could highlight within the plan the potential for improvements to drinking water sources and referencing these improvements in the criteria for successful rehabilitation. They also requested that consideration be given to the design of the monitoring programme, the extent of the monitoring post restoration, and water colour as an indicator to track.</p> <p>They asked that they be kept informed if silt pond decommissioning is necessary. In addition, they asked if this project had potential to offer cumulative beneficial impacts with other bog rehabilitation projects in the same catchment and if that had been assessed?</p>	<p>Bord na Mona responded on 24/11/2021 thanking them for their support and stating that their submission will be considered, and all relevant issues will be addressed within future drafts of the Rehabilitation Plan for Begnagh and Begnagh bogs.</p> <p>An overview of the Water Quality Monitoring plan was provided, and confirmation given that water colour is being monitored.</p> <p>Bord na Mona also advised that decommissioning of silt ponds will only be carried out when the EPA are satisfied that adequate stabilisation of the bog has been achieved and silt ponds are no longer required. This decommissioning will be determined by water quality results and EPA approval.</p> <p>It was also confirmed that rehabilitation of bogs in the same catchment is likely to result in beneficial impacts on water quality in the catchment. This will be captured by the results from EPA monitoring stations in the vicinity of the bogs. BNM are also commencing quarterly sampling upstream and downstream, where there are gaps in existing EPA monitoring.</p>
Dept. of Rural and Community Development	The Dept. responded to our mail on 09/11/2021, thanking us for our correspondence and advising they would review document and submit an input if necessary.	

Department of Housing, Local Government and Heritage	The Dept responded to our email on 12/11/2021 on behalf of Minister Malcolm Noonan and asking us to forward these to the Peatlands Unit.	Bord na Mona responded on 15/11/2021 confirming the communication was also sent to the relevant unit.
Clonmore / Kilmore Group Water Scheme	The GWS responded on 16/11/2021 advising they operate and maintain a private water scheme in the local community and requested that Bord na Mona perform a comprehensive review of the proposed decommissioning and rehabilitation measures, to ensure that the raw water quality will not be impacted by the works involved in the scheme.	Bord na Mona responded on 18/11/2021 advising that their submission had been forwarded to our Engineering Department for comment. The GWS acknowledged our response.
Office of Public Works	<p>The OPW sent a submission on 19/11/2021 advising that Begnagh Bog, does not overlap with any OPW Arterial Drainage Scheme.</p> <p>The Shannon CFRAM Study has identified Cloondara as an AFA, however no structural flood relief scheme is proposed at this time because of the low flood risk. Begnagh bog is drained by the Fallan River, a tributary of the Camlin River which flows through Cloondara Village. They also expressed their overall support for the scheme.</p>	Bord na Mona responded to the OPW on 09/12/2022 thanking them for their support of the scheme and advising that their submission will be considered and addressed in future drafts of the Rehabilitation Plan.

National Museum of Ireland (NMI)	The NMI responded on 24/11/2021 acknowledging receipt of our email and thanking us for the opportunity to comment. They advised they would shortly issue a collective response.	
Local Resident A	Local spoke with Bord na Mona Liaison Officer on 04/11/2021 regarding possible flooding impacts	Liaison Officer advised Resident to make his submission and requested that he be included in upcoming discussions.
Local Resident B	Resident contacted us by telephone 05/11/2021 wanting to know if Bord na Mona taking over their bog and discussed turbary rights	Bord na Mona responded on 12/11/2021 and discussed concerns with Resident, no follow up required.
Local Resident C	Resident contacted us by telephone on 16/11/2021 asking for more information on planned works in Begnagh Bog and specifically about Bord na Mona maintaining any drains/rivers that flow into/through/adjacent to Begnagh and under the canal	Bord na Mona contacted stakeholder on 23/11/2021 and asked him to make a submission, also advised we would accept after the deadline.
Local Resident D	Resident contacted us by telephone on 19/11/2021 asking for more information on planned works in Begnagh Bog.	
Residents A & D	Residents sent us a joint letter 22/11/2021 outlining their concerns.	Bord na Mona contacted Resident on 23/11/2021 explaining the proposed rehabilitation measures and the flood mitigation risks being taken. Resident then directed to the website and the Begnagh plan which Resident could not access previously.  Resident has already made a submission via letter but may make further submissions after reviewing plans

Local Resident E	Resident emailed us on 22/11/2021 expressing concern on their own behalf and that of their neighbours. They expressed particular concern about the impact on lands adjacent to the bog regarding drainage and requesting consultation with Residents in the area prior to development proceeding.	Bord na Mona spoke with Resident and thanked them for offering to help arrange a meeting with concerned neighbours and Residents.  Date agreed for meeting.
Local Resident F	Resident contacted us via email on 22/11/2022 to express concerns about the proposed works and their impact on the drainage of his farm. The individual requested detail on the engineering/topographical surveys being carried out and the long-term monitoring/maintenance plan.	Bord na Mona responded on 23/11/2021 advising that a Hydrological risk assessment is undertaken for each bog unit which, among other things, assesses the potential impact of the various rehabilitation measures which are proposed on the local drainage network and the potential risk of causing additional flooding of adjoining lands. We also advised that we have statutory obligations to manage our landbank and protect neighbouring lands.  Bord na Mona advised that the email was forwarded to our Engineering Dept and external consultants. Resident was also asked to provide a map of his land to ensure specific concerns were addressed and that once hydrological assessment was complete, we could discuss further or arrange for a Community Liaison Officer to meet. It was also advised that all relevant issues that are raised within the submission will be considered and will be addressed within future drafts of the rehabilitation plan.
Resident B	Resident sent us a submission on 01/12/2021 flagging their concerns on their behalf and on behalf of several named residents	Bord na Mona acknowledged receipt of Residents submission on 03/12/2021 advising that the submission would be considered in the final Begnagh Bog Rehabilitation plan and noting that a Bord na Mona representative was already in touch with Resident and other concerned locals and in process of organising a meeting to discuss the issues.
Local group of resident & 2 local authority councillors – Site meeting(16/02/2022)	Briefing on PCAS, IPC Licensing, DMP, assessments, mitigation, measures, retention of boundary drainage, silt control and the expected benefits of the rewetting	There is ongoing engagement.

	<p>such as peat stabilisation, improvements in water quality, slowing water paths from the bog to boundary drains.</p> <p>Issues raised included:</p> <p>Cleaning boundary drains (how and when?)</p> <p>Access to turf banks</p> <p>Impacts on adjoining lands</p> <p>Public access</p>	
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## APPENDIX XII. ARCHAEOLOGY

### Role of the Archaeological Liaison Officer

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



Code of Practice

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# Code of Practice

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



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

**1) Purpose**

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

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

**2) Procedure**

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

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

Your Archaeological Liaison Officer is .....

**3) Records**

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



**Archaeological Impact Assessment of Proposed Bog  
Decommissioning and Rehabilitation at Begnagh Bog, Co.  
Longford**

**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.265 hectares at Begnagh Bog, Co. Longford 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 Begnagh Bog will include:

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

Begnagh Bog is located 1.5km northwest of the village of Killashee., Co. Longford, and south of the N5 road. The overall rehabilitation area occupies the townlands of Aghnagore, Begnagh, Cloonmore, Corragarrow, Killashee and Aghakkeeran and Slieve on OS 6 inch sheets Longford No. 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 Begnagh Bog. The overall extent of the rehabilitation is indicated in Fig. 1. This area was examined using information from:

- The Barry Raftery Pilot Survey 1989
- The IAWU Peatland Survey
- Bord na Mona Re-assessment survey 1999
- 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

### Peatland survey

The rehabilitation area of Begnagh Bog was the subject of a pilot survey carried out by Prof. Barry Raftery in 1989. The data in Table 1 is based on data supplied to the author by the IAWU that did not include locational data. Twenty-nine sightings made during the 1989 survey are included in the IAWU data. Two sightings were described as Toghers and the remaining as miscellaneous (see Tables 1 and 6). These archaeological sightings were notified to the Archaeological Survey of Ireland. Due to the lack of locational data it is not possible to make a concordance between the IAWU data and the SMR data.

IAWU Cat._No.	IAWU Class	Townland	N.G.R. E	N.G.R. N	Depth BS m
LF-BH 1	MISC	Begnagh	0	0	-
LF-BH 2	MISC	Begnagh	0	0	-
LF-BH 3	MISC	Begnagh	0	0	-
LF-BH 4	MISC	Begnagh	0	0	-
LF-CME 12	TOGH	Cloonmore	0	0	-
LF-CME 13	MISC	Cloonmore	0	0	-
LF-CME 14	MISC	Cloonmore	0	0	-
LF-CME 15	MISC	Cloonmore	0	0	-
LF-CME 16	MISC	Cloonmore	0	0	-
LF-CME 17	MISC	Cloonmore	0	0	-
LF-CRA 6	TOGH	Corragarrow	0	0	-
LF-CRA 7	MISC	Corragarrow	0	0	-
LF-CRA 8	MISC	Corragarrow	0	0	-
LF-CRA 9	MISC	Corragarrow	0	0	-
LF-CRA 10	MISC	Corragarrow	0	0	-
LF-CRA 11	MISC	Corragarrow	0	0	-
LF-CRA 12	MISC	Corragarrow	0	0	-
LF-CRA 13	MISC	Corragarrow	0	0	-
LF-CRA 14	MISC	Corragarrow	0	0	-
LF-CRA 15	MISC	Corragarrow	0	0	-
LF-CRA 16	MISC	Corragarrow	0	0	-
LF-CRA 17	MISC	Corragarrow	0	0	-
LF-CRA 18	MISC	Corragarrow	0	0	-
LF-CRA 19	MISC	Corragarrow	0	0	-
LF-CRA 20	MISC	Corragarrow	0	0	-
LF-CRA 21	MISC	Corragarrow	0	0	-
LF-SLV 1	MISC	Slieve	0	0	-
LF-SLV 2	MISC	Slieve	0	0	-
LF-SLV 3	MISC	Slieve	0	0	-

Table 1. List of sightings recorded during the 1989 pilot survey.

In 1991 the Irish Archaeological Wetland Unit (IAWU) did a complete survey of the rehabilitation area as part of the Archaeological Survey of Ireland Peatland Survey (Unlicensed). Sixteen additional sightings of archaeological material were made (see Table 2). These archaeological sightings were notified to the Archaeological Survey of Ireland.

IAWU Cat._No.	IAWU Class	Townland	N.G.R. E	N.G.R. N	Depth BS m
LF-CME 1	TOGH	Cloonmore & Corragarrow	207988	272321	
LF-CME 2	TOGH	Cloonmore	208021	272272	
LF-CME 3	TOGH	Cloonmore	207985	272213	
LF-CME 4	TOGH	Cloonmore	207987	272198	
LF-CME 5	WWIS	Cloonmore	208028	272164	



LF-CME 6	TOGH	Cloonmore	207875	272146	
LF-CME 7	TOGH	Cloonmore	207872	272164	
LF-CME 8	TOGH	Cloonmore	207861	272179	
LF-CME 9	WWIS	Cloonmore	207799	272105	
LF-CME 10	TOGH	Cloonmore	207776	272116	
LF-CME 11	TOGH	Cloonmore	207856	272121	
LF-CRA 1	TOGH	Corragarrow	207625	272255	
LF-CRA 2	WWIS	Corragarrow	207659	272095	
LF-CRA 3	WWIS	Corragarrow	207506	271872	
LF-CRA 4	PORO	Corragarrow	207507	271949	
LF-CRA 5	WWIS	Corragarrow	207595	272113	

Table 2. List of sites recorded by the IAWU in the rehabilitation area in Begnagh Bog in 1991.

### Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Longford which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1996). This record was published by the Minister in 1995 and includes sites and monuments that were known in Begnagh Bog before that date. This review established that there are 13 RMPs located in the proposed rehabilitation area (see Table 3 and Fig. 1). Only 13 of the 45 sightings from the B. Raftery Pilot Survey and the IAWU surveys were included in the RMP.

RMP No.	NGR E	NGR N	Townland	RMP Classification
LF013-070---	20774	27220	Corragarrow/Cloonmore	Archaeological Complex
LF013-07001-	20762	27225	Corragarrow	Togher
LF013-07002-	20766	27209	Corragarrow	Worked Wood
LF013-07003-	20751	27195	Corragarrow	Post Row
LF013-07004-	20759	27211	Corragarrow	Worked Wood
LF013-07005-	20785	27219	Cloonmore	Togher
LF013-07006-	20797	27227	Cloonmore	Togher
LF013-07007-	20796	27221	Cloonmore	Togher
LF013-07008-	20787	27215	Cloonmore	Togher
LF013-07009-	20787	27216	Cloonmore	Togher
LF013-070010-	20778	27210	Cloonmore	Togher
LF013-070011-	20780	27210	Cloonmore	Worked Wood
LF013-070012-	20778	27212	Cloonmore	Togher
LF013-070013-	20786	27212	Cloonmore	Togher

Table 3. List of sites included in the Record of Monuments and Places in Begnagh Bog.



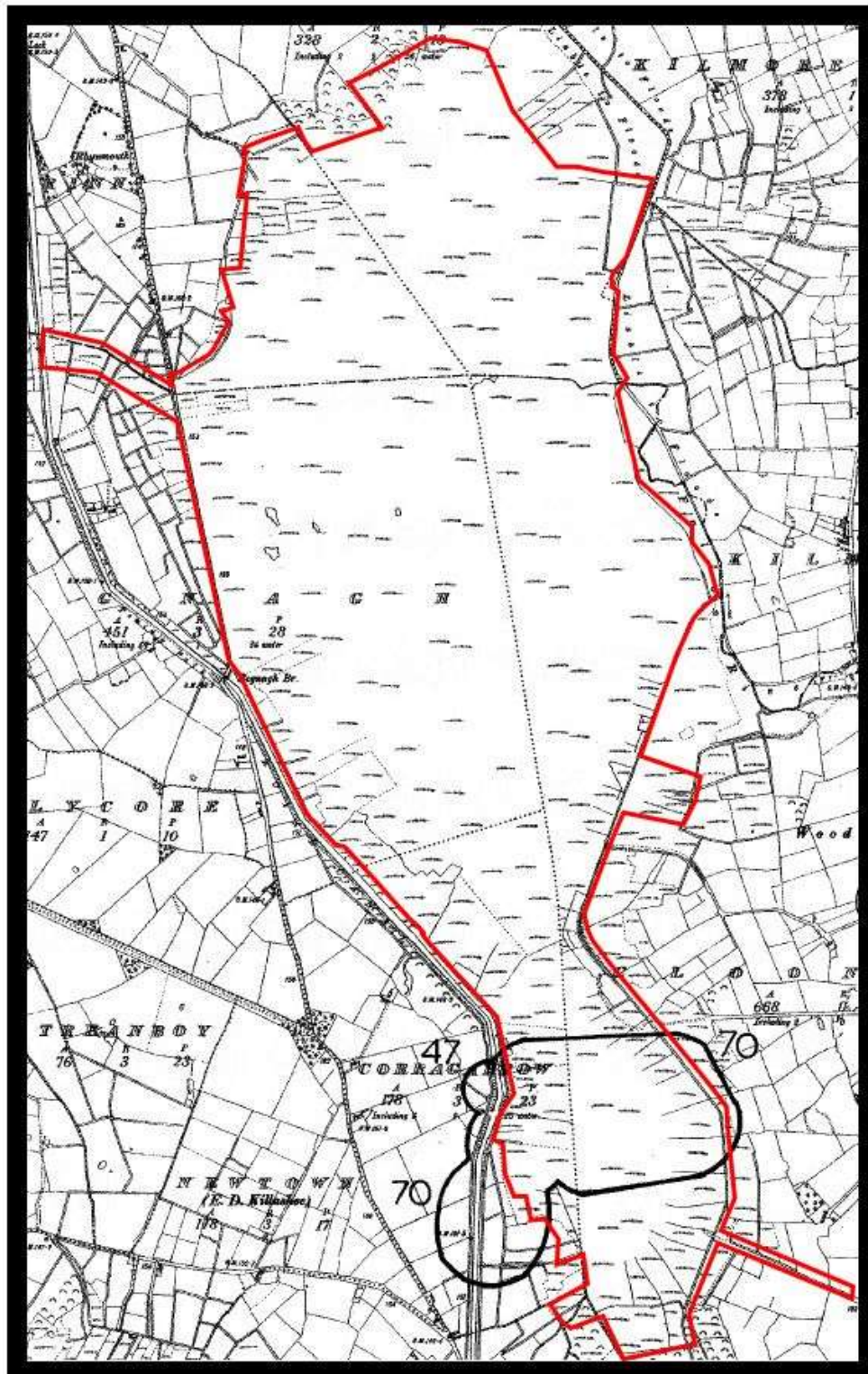


Fig. 1. Begnagh Bog, Co. Longford, detail of the Record of Monuments and Places map sheet No. 13. The proposed rehabilitation area is outlined with the red line. There are a large number of Recorded Monuments in the rehabilitation area.





### 1999 Bord na Móna Re-assessment Survey

Begnagh Bog was surveyed (unlicensed) by ADS Ltd in 1999 as part of the Bord na Móna re-assessment survey. The survey work identified 35 sightings of archaeological material that were recorded as 21 monuments (some monuments like 99BG002A-J were composed of multiple sightings of archaeological material) which were notified to the Archaeological Survey of Ireland (O'Carroll 2001, 1). There are ASI report forms available for 20 of the monuments. The depths of the sightings below the contemporary ground surface is only recorded for or can be worked out for 10 of the 20 monuments with reports, and these range between the surface and 0.85m below the surface. It is not stated in the 1999 ASI forms if any of the sightings made in 1989-91 were re-visited.

SMR_NO	SMR Class	Townland	N.G.R. E	N.G.R. N	Depth BS m	Survey Ref	Excavation Licence No.
LF013-128----	Road - class 3 togher	Corragarrow	207595	272566	0.2	99BG004A-B	01E0768
LF013-129----	Platform - peatland	Corragarrow	207578	272637	?	99BG0011A	-
LF013-130----	Platform - peatland	Corragarrow	207579	272625	?	99BG0013A	-
LF013-131----	Platform - peatland	Corragarrow	207612	272617	?	99BG0014A	-
LF013-132----	Platform - peatland	Corragarrow	207590	272641	0.3	99BG0015A	01E0767
LF013-133----	Platform - peatland	Corragarrow	207612	272626	0.3	99BG0016A	01E0767
LF013-134----	Platform - peatland	Corragarrow	207635	272627	0	99BG0017A	-
LF013-135----	Road - unclassified togher	Corragarrow	207503	272763	?	99BG0019A	-
LF013-136----	Road - unclassified togher	Corragarrow	207564	272627	?	99BG0020A	-
LF013-137----	Platform - peatland	Corragarrow	207559	272643	?	99BG0010A	-
LF013-138----	Platform - peatland	Corragarrow	207574	272577	?	99BG009A	-
LF013-139----	Road - class 3 togher	Corragarrow	207572	272571	0	99BG008A-B	-
LF013-140----	Road - class 2 togher	Corragarrow	207606	272502	0	99BG005A-B	-
LF013-141----	Road - unclassified togher	Corragarrow	207640	272566	0	99BG003A	-
LF013-142----	Road - class 1 togher	Corragarrow	207608	272533	0.85	99BG002A-J	01E0761
LF013-143----	Road - class 3 togher	Corragarrow	207591	272536	0	99BG006A	-
LF013-144----	Road - class 1 togher	Cloonmore/Corragarrow	207666	272612	0-0.57-	99BG001A-G	01E0769

Table 4. Sightings identified by the 1999 Bord na Móna Re-assessment Survey.

### Archaeological Excavations

Following the 1999 re-assessment survey of Begnagh Bog 11 sightings (of 3 toghers and 2 platforms) were chosen for excavation by the National Monuments Service and the National Museum and the work was carried out by Ellen O'Carroll of ADS Ltd, see Table 5 (O'Carroll 2001 and Whitaker 2009) .

SMR No.	1999 Cat No.	NGR E	NGR N	Townland	Classification	Date	Cuttings	License No.
LF013-128--- -	99BG004A-B	607543	772585	Corragarrow	Road - class 3 togher	AD 894-1015	1	01E0768
LF013-132--- -	99BG0015A	607538	772661	Corragarrow	Platform - peatland	163 BC-AD21	1	01E0767
LF013-133--- -	99BG0016A	607561	772647	Corragarrow	Platform - peatland	1258-1215 BC	1	01E0767
LF013-142--- -	99BG002A-J	607557	772552	Corragarrow	Road - class 1 togher	909-905 BC	4	01E0761
LF013-144--- -	99BG001A-G	607614	772632	Cloonmore/Corragarrow	Road - class 1 togher	393-387 BC	4	01E0769

Table 5. Licensed excavations carried out in Begnagh Bog.



## Sites and Monuments Record

The Sites and Monuments Record (SMR) which is maintained by the Department of Housing, Local Government and Heritage was examined as part of the assessment on the 28th of October 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 61 entries in the SMR in the proposed rehabilitation area (see Table 6). Some of the entries represent individual sightings while others represent monuments composed of multiple sightings. Twenty-eight of the 29 sightings reported by the Barry Raftery Pilot Survey are included. Sixteen have no references and are presumably the 16 sightings notified by the IAWU after the 1991 survey. The remaining 17 are part of the 21 monuments notified by the 1999 Re-assessment Survey.

SMR_NO	SMR Class	Townland	N.G.R. E	N.G.R. N	Ref	Depth BS m
LF013-070001-	Road - class 3 togther	Corragarrow	607579	772290	-	
LF013-070002-	Structure - peatland	Corragarrow	607612	772124	-	
LF013-070003-	Post row - peatland	Corragarrow	607653	771984	-	
LF013-070004-	Redundant record	Corragarrow	607549	772147	-	
LF013-070005-	Road - class 1 togther	Cloonmore/ Corragarrow	607803	772229	-	
LF013-070006-	Road - class 2 togther	Cloonmore	607939	772247	-	
LF013-070007-	Road - class 3 togther	Cloonmore	607928	772305	-	
LF013-070008-	Road - class 3 togther	Cloonmore	607829	772180	-	
LF013-070009-	Road - class 3 togther	Cloonmore	607825	772199	-	
LF013-070010-	Road - class 2 togther	Cloonmore	607733	772134	-	
LF013-070011-	Structure - peatland	Cloonmore	607754	772138	-	
LF013-070012-	Road - class 3 togther	Cloonmore	607730	772152	-	
LF013-070013-	Road - class 3 togther	Cloonmore	607940	772233	-	
LF013-070014-	Structure - peatland	Cloonmore	607982	772198	-	
LF013-070015-	Redundant record	Corragarrow	607657	771907	-	
LF013-070016-	Road - class 3 togther	Cloonmore	607810	772157	-	
LF013-071----	Redundant record	Aghnagore	607089	774508	Pers. Comm. B. Raftery	
LF013-072----	Redundant record	Aghnagore	606848	774469	Pers. Comm. B. Raftery	
LF013-073----	Redundant record	Aghnagore	606878	774330	Pers. Comm. B. Raftery	
LF013-074----	Redundant record	Aghnagore	606859	774298	Pers. Comm. B. Raftery	
LF013-075----	Redundant record	Slieve	607210	774470	Pers. Comm. B. Raftery	
LF013-075----	Redundant record	Begnagh	607210	774470	Pers. Comm. B. Raftery	
LF013-076----	Redundant record	Slieve	607000	774291	Pers. Comm. B. Raftery	
LF013-077----	Redundant record	Slieve	607678	774258	Pers. Comm. B. Raftery	
LF013-079----	Redundant record	Begnagh	606917	773830	Pers. Comm. B. Raftery	
LF013-080----	Redundant record	Cloonmore	607638	773377	Pers. Comm. B. Raftery	
LF013-081----	Redundant record	Cloonmore	607777	773910	Pers. Comm. B. Raftery	
LF013-082----	Redundant record	Cloonmore	607769	773949	Pers. Comm. B. Raftery	
LF013-085----	Road - class 3 togther	Cloonmore	607681	772698	Pers. Comm. B. Raftery	
LF013-086----	Redundant record	Cloonmore	607655	772676	Pers. Comm. B. Raftery	
LF013-087----	Redundant record	Cloonmore	607671	772671	Pers. Comm. B. Raftery	
LF013-088----	Road - class 3 togther	Cloonmore	607655	772666	Pers. Comm. B. Raftery	
LF013-089----	Road - class 3 togther	Cloonmore	607655	772666	Pers. Comm. B. Raftery	
LF013-090----	Redundant record	Cloonmore	607673	772566	Pers. Comm. B. Raftery	
LF013-091----	Road - class 3 togther	Cloonmore	607644	772634	Pers. Comm. B. Raftery	
LF013-092----	Road - class 3 togther	Cloonmore	607698	772665	Pers. Comm. B. Raftery	
LF013-093----	Post row - peatland	Corragarrow	607594	772607	Pers. Comm. B. Raftery	
LF013-094----	Road - class 3 togther	Corragarrow	607617	772613	Pers. Comm. B. Raftery	
LF013-095----	Road - class 3 togther	Corragarrow	607601	772596	Pers. Comm. B. Raftery	
LF013-096----	Redundant record	Corragarrow	607574	772579	Pers. Comm. B. Raftery	
LF013-097----	Road - class 3 togther	Corragarrow	607566	772579	Pers. Comm. B. Raftery	
LF013-098----	Road - class 3 togther	Corragarrow	607544	772588	Pers. Comm. B. Raftery	
LF013-100----	Redundant record	Corragarrow	607468	772579	Pers. Comm. B. Raftery	
LF013-101----	Road - class 3 togther	Corragarrow	607384	772708	Pers. Comm. B. Raftery	
LF013-128----	Road - class 3 togther	Corragarrow	607543	772585	99BG004A-B	0.2



LF013-129----	Platform - peatland	Corragarrow	607526	772658	99BG0011A	
LF013-130----	Platform - peatland	Corragarrow	607528	772645	99BG0013A	
LF013-131----	Platform - peatland	Corragarrow	607559	772637	99BG0014A	
LF013-132----	Platform - peatland	Corragarrow	607538	772661	99BG0015A	0.3
LF013-133----	Platform - peatland	Corragarrow	607561	772647	99BG0016A	0
LF013-134----	Platform - peatland	Corragarrow	607583	772647	99BG0017A	0
LF013-135----	Road - unclassified togher	Corragarrow	607448	772788	99BG0019A	
LF013-136----	Road - unclassified togher	Corragarrow	607448	772788	99BG0019A	
LF013-137----	Platform - peatland	Corragarrow	607513	772648	99BG003A	
LF013-138----	Platform - peatland	Corragarrow	607523	772597	99BG009A	
LF013-139----	Road - class 3 togher	Corragarrow	607521	772591	99BG008A-B	0
LF013-140----	Road - class 2 togher	Corragarrow	607555	772521	99BG005A-B	0
LF013-141----	Road - unclassified togher	Corragarrow	607589	772585	99BG0019A	
LF013-142----	Road - class 1 togher	Corragarrow	607557	772552	99BG002A-J	0.85
LF013-143----	Road - class 3 togher	Corragarrow	607540	772555	99BG006A	0
LF013-144----	Road - class 1 togher	Cloonmore/Corragarrow	607614	772632	99BG001A-G	0-0.57

Table 6. Sightings in Begnagh Bog listed in the SMR in 2021. Coordinates are ITM. Note the coordinates of the sightings made by the Pilot Survey in 1989 may not be accurate.

### Reported finds

The topographical files of the National Museum of Ireland were searched for records of finds from the bog in x 2021 and the finds are included below in Table 7.

Townland	Museum No.	Description
Begnagh	1987:153	Wooden beetle
Begnagh	1987:154	Wooden beetle
Corragarrow	1984:152	Bog butter in wooden vessel

Table 7. List of archaeological finds from Begnagh 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.

### Previous assessments

Begnagh Bog has been the subject of an Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01. The assessment noted the wood identified in the IAWU survey in 1991 and noted that there was a high potential for archaeological features to be uncovered during the course of any future development works in Begnagh Bog.

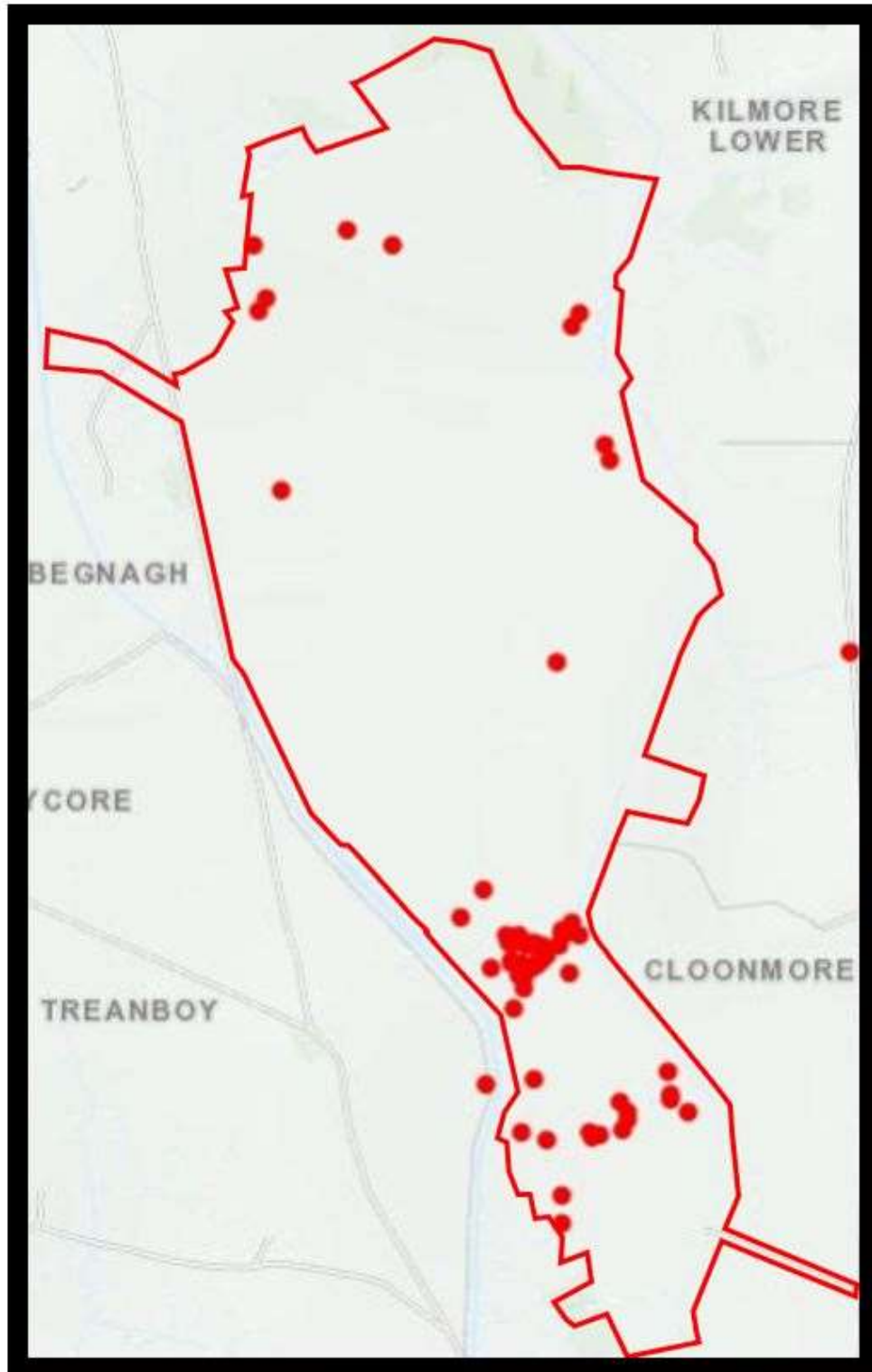
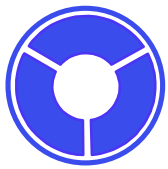


Fig. 2. Begnagh Bog, Co. Longford, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line. There are a large number of SMRs in the rehabilitation area.



## Impact assessment

At least 80 sightings of archaeological material were identified and recorded in Begnagh Bog between 1989 and 1999 by the Barry Raftery Pilot Survey, the IAWU and the Bord na Móna Re-assessment Survey. Thirteen of these sightings were included in the RMP and 61 have been included in the SMR. All recorded sightings of archaeological material in Begnagh Bog are included in Table 8. Although the depth of the 1989-91 sightings below the surface were not recorded it can be estimated that no archaeology would have been visible in the drain faces at a greater depth than 1.50m below the 1989-91 surface. The LIDAR data indicates that about 0.79m of material was removed from the locations of the 1989 sightings between 2008 and 2020 or about 0.066m per year. This suggests that between 1991 and 2020 c.1.91m of peat was removed from the locations of the sightings made in the Pilot Survey. The LIDAR data also indicates that the sightings made during the 1999 Bord na Móna Re-assessment Survey, which were no deeper than 0.85m. have also been removed as an average of 1.38m of peat has been harvested since 1999 in those locations. Therefore none of the sightings made in the 1989-1999 surveys survive in the bog. As there was a considerable quantity of known archaeological material known from the rehabilitation area and the bog has not been surveyed for more than twenty years there is a high potential for additional material to have been exposed on the bog surfaces and in the drain faces since 1999.

SMR_NO	SMR Class	Townland	N.G.R. E	N.G.R. N	Ref	Depth BS m	Peat Removed since 2008	Status
LF013-070001-	Road - class 3 togher	Corragarrow	607579	772290	-	-	0.96	Gone
LF013-070002-	Structure - peatland	Corragarrow	607612	772124	-	-	0.77	Gone
LF013-070003-	Post row - peatland	Corragarrow	607653	771984	-	-	0.39	Gone
LF013-070004-	Redundant record	Corragarrow	607549	772147	-	-	0.27	Gone
LF013-070005-	Road - class 1 togher	Cloonmore/ Corragarrow	607803	772229	-	-	0.85	Gone
LF013-070006-	Road - class 2 togher	Cloonmore	607939	772247	-	-	0.16	Gone
LF013-070007-	Road - class 3 togher	Cloonmore	607928	772305	-	-	-0.14	Gone
LF013-070008-	Road - class 3 togher	Cloonmore	607829	772180	-	-	0.84	Gone
LF013-070009-	Road - class 3 togher	Cloonmore	607825	772199	-	-	1.01	Gone
LF013-070010-	Road - class 2 togher	Cloonmore	607733	772134	-	-	1.79	Gone
LF013-070011-	Structure - peatland	Cloonmore	607754	772138	-	-	1.39	Gone
LF013-070012-	Road - class 3 togher	Cloonmore	607730	772152	-	-	1.29	Gone
LF013-070013-	Road - class 3 togher	Cloonmore	607940	772233	-	-	0.49	Gone
LF013-070014-	Structure - peatland	Cloonmore	607982	772198	-	-	0.17	Gone
LF013-070015-	Redundant record	Corragarrow	607657	771907	-	-	-0.09	Gone
LF013-070016-	Road - class 3 togher	Cloonmore	607810	772157	-	-	0.89	Gone
LF013-071----	Redundant record	Aghnagore	607089	774508	B. Raftery	-	1.42	Gone
LF013-072----	Redundant record	Aghnagore	606848	774469	B. Raftery	-	-0.74	Gone
LF013-073----	Redundant record	Aghnagore	606878	774330	B. Raftery	-	0.71	Gone
LF013-074----	Redundant record	Aghnagore	606859	774298	B. Raftery	-	0.86	Gone
LF013-075----	Redundant record	Slieve	607210	774470	B. Raftery	-	1.31	Gone
LF013-075----	Redundant record	Begnagh	607210	774470	B. Raftery	-	1.31	Gone
LF013-076----	Redundant record	Slieve	607000	774291	B. Raftery	-	1.05	Gone
LF013-077----	Redundant record	Slieve	607678	774258	B. Raftery	-	0.67	Gone
LF013-079----	Redundant record	Begnagh	606917	773830	B. Raftery	-	0.76	Gone
LF013-080----	Redundant record	Cloonmore	607638	773377	B. Raftery	-	1.68	Gone
LF013-081----	Redundant record	Cloonmore	607777	773910	B. Raftery	-	1.27	Gone
LF013-082----	Redundant record	Cloonmore	607769	773949	B. Raftery	-	1.27	Gone
LF013-085----	Road - class 3 togher	Cloonmore	607681	772698	B. Raftery	-	1.54	Gone
LF013-086----	Redundant record	Cloonmore	607655	772676	B. Raftery	-	-0.35	Gone
LF013-087----	Redundant record	Cloonmore	607671	772671	B. Raftery	-	0.13	Gone
LF013-088----	Road - class 3 togher	Cloonmore	607655	772666	B. Raftery	-	0.72	Gone
LF013-089----	Road - class 3 togher	Cloonmore	607655	772666	B. Raftery	-	0.72	Gone



LF013-090----	Redundant record	Cloonmore	607673	772566	B. Raftery	-	0.53	Gone
LF013-091----	Road - class 3 togher	Cloonmore	607644	772634	B. Raftery	-	1.24	Gone
LF013-092----	Road - class 3 togher	Cloonmore	607698	772665	B. Raftery	-	0.00	Gone
LF013-093----	Post row - peatland	Corragarrow	607594	772607	B. Raftery	-	0.54	Gone
LF013-094----	Road - class 3 togher	Corragarrow	607617	772613	B. Raftery	-	1.16	Gone
LF013-095----	Road - class 3 togher	Corragarrow	607601	772596	B. Raftery	-	1.03	Gone
LF013-096----	Redundant record	Corragarrow	607574	772579	B. Raftery	-	0.67	Gone
LF013-097----	Road - class 3 togher	Corragarrow	607566	772579	B. Raftery	-	1.30	Gone
LF013-098----	Road - class 3 togher	Corragarrow	607544	772588	B. Raftery	-	1.00	Gone
LF013-100----	Redundant record	Corragarrow	607468	772579	B. Raftery	-	0.21	Gone
LF013-101----	Road - class 3 togher	Corragarrow	607384	772708	B. Raftery	-	-0.02	Gone
LF013-128----	Road - class 3 togher	Corragarrow	607543	772585	99BG004A	0.2	0.98	Gone
LF013-128----	Road - class 3 togher	Corragarrow	-	-	99BG004B	-	-	Gone
LF013-129----	Platform - peatland	Corragarrow	607526	772658	99BG0011A	-	0.84	Gone
LF013-130----	Platform - peatland	Corragarrow	607528	772645	99BG0013A	-	1.06	Gone
LF013-131----	Platform - peatland	Corragarrow	607559	772637	99BG0014A	-	0.63	Gone
LF013-132----	Platform - peatland	Corragarrow	607538	772661	99BG0015A	0.3	1.12	Gone
LF013-133----	Platform - peatland	Corragarrow	607561	772647	99BG0016A	0	0.42	Gone
LF013-134----	Platform - peatland	Corragarrow	607583	772647	99BG0017A	0	1.13	Gone
LF013-135----	Road - unclassified togher	Corragarrow	607448	772788	99BG0019A	-	0.91	Gone
LF013-136----	Road - unclassified togher	Corragarrow	607448	772788	99BG0019A	-	0.91	Gone
LF013-137----	Platform - peatland	Corragarrow	607513	772648	99BG003A	-	0.94	Gone
LF013-138----	Platform - peatland	Corragarrow	607523	772597	99BG009A	-	0.91	Gone
LF013-139----	Road - class 3 togher	Corragarrow	607521	772591	99BG008A	0	0.92	Gone
LF013-139----	Road - class 3 togher	Corragarrow	-	-	99BG008B	0	-	Gone
LF013-140----	Road - class 2 togher	Corragarrow	607555	772521	99BG005A	0	1.07	Gone
LF013-140----	Road - class 2 togher	Corragarrow	-	-	99BG005B	0	-	Gone
LF013-141----	Road - unclassified togher	Corragarrow	607589	772585	99BG0019A	-	0.78	Gone
LF013-142----	Road - class 1 togher	Corragarrow	607557	772552	99BG002A	0.85	1.21	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002B	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002C	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002D	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002E	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002F	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002G	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002H	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002I	-	-	Gone
LF013-142----	Road - class 1 togher	Corragarrow	-	-	99BG002J	-	-	Gone
LF013-143----	Road - class 3 togher	Corragarrow	607540	772555	99BG006A	0	1.27	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	607614	772632	99BG001A	0-0.57	1.04	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	607614	772632	99BG001A	0.57	1.04	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001B	0	-	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001C	-	-	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001D	-	-	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001E	-	-	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001F	0.3-0.4	-	Gone
LF013-144----	Road - class 1 togher	Cloonmore/C orragarrow	-	-	99BG001G	0.3-0.4	-	Gone

Table 8. Sightings of archaeological material in Beggagh Bog. Coordinates are ITM. Note the coordinates of the sightings made by the Pilot Survey in 1989 may not be accurate.





## Recommendations

There is no known surviving archaeological material in Begnagh Bog. There was a considerable quantity of known archaeological material from previous surveys and associated excavations, in the area to be rehabilitated. The bog has not been surveyed for more than twenty years and there is a high potential for additional material to have been exposed on the bog surfaces and in the drain faces. 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. There is no known surviving archaeological material in Begnagh Bog. There was a considerable quantity of known archaeological material from previous surveys and associated excavations, in the area to be rehabilitated. The bog has not been surveyed for more than twenty years and there is a high potential for additional material to have been exposed on the bog surfaces and in the drain faces. 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.

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Dr. Charles Mount  
5 November 2021

## APPENDIX XIII. INITIAL WATER QUALITY DATA FROM BEGNAGH

Table AP13.1. Water quality data for 12 months from November 2020 to Dec 2021 at Begnagh.

PCAS SW Sampling Scheme					Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	2	2	3	2	2	2	2	2	2	NF	2	NF
Mountdillon	P0504-01	Begnagh	296	SW54	2	2	5	10	2	2	2	2	2	4	2	2
PCAS SW Sampling Scheme					Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co
Mountdillon	P0504-01	Begnagh	293	SW51	276	228	164	200	246	62.4	59.9	189	NF	156	NF	454
Mountdillon	P0504-01	Begnagh	296	SW54	151	151	169	257	166		134	54.6	266	140	134	216
PCAS SW Sampling Scheme					COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	78	60	43	61	74	23	16	68	NF	59	NF	86
Mountdillon	P0504-01	Begnagh	296	SW54	30	44	44	39	45		55	18	19	10	53	55
PCAS SW Sampling Scheme					pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units
Mountdillon	P0504-01	Begnagh	293	SW51	7.4	7.4	8	7.4	7.5	7.8	7.6	8	NF	7.7	NF	6.9
Mountdillon	P0504-01	Begnagh	296	SW54	7.4	7.7	7.7	7.6	8		7.9	7.7	7.2	7.6	7.6	7.3
PCAS SW Sampling Scheme					TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	0.09	0.05	0.05	0.06	0.13	0.05	0.08	0.05	NF	0.05	NF	0.05
Mountdillon	P0504-01	Begnagh	296	SW54	0.06	0.05	0.05	0.11	0.06		0.05	0.06	0.2	0.05	0.05	0.05
PCAS SW Sampling Scheme					TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	313	359	173	212	321	269	207	482	NF	337	NF	216
Mountdillon	P0504-01	Begnagh	296	SW54	355	376	348	400	302		367	250	323	353	350	166
PCAS SW Sampling Scheme					Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	0.105	0.1	0.116	0.217	0.025	0.013	0.005	0.016	NF	0.177	NF	1.17
Mountdillon	P0504-01	Begnagh	296	SW54	0.047	0.076	0.162	0.662	0.048		0.126	0.029	0.876	0.038	0.047	0.026
PCAS SW Sampling Scheme					DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC
Bog Group	Licence No	Bog Name	Unique I.D No.	SW Code - GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Begnagh	293	SW51	34.3	30.6	15.8	22.9	30	10.3	8.27	76.6	NF	22.3	NF	32.9
Mountdillon	P0504-01	Begnagh	296	SW54	17.8	18.2	18.9	15.1	18.5		17.8	43.4	25.5	19.2	16.8	21



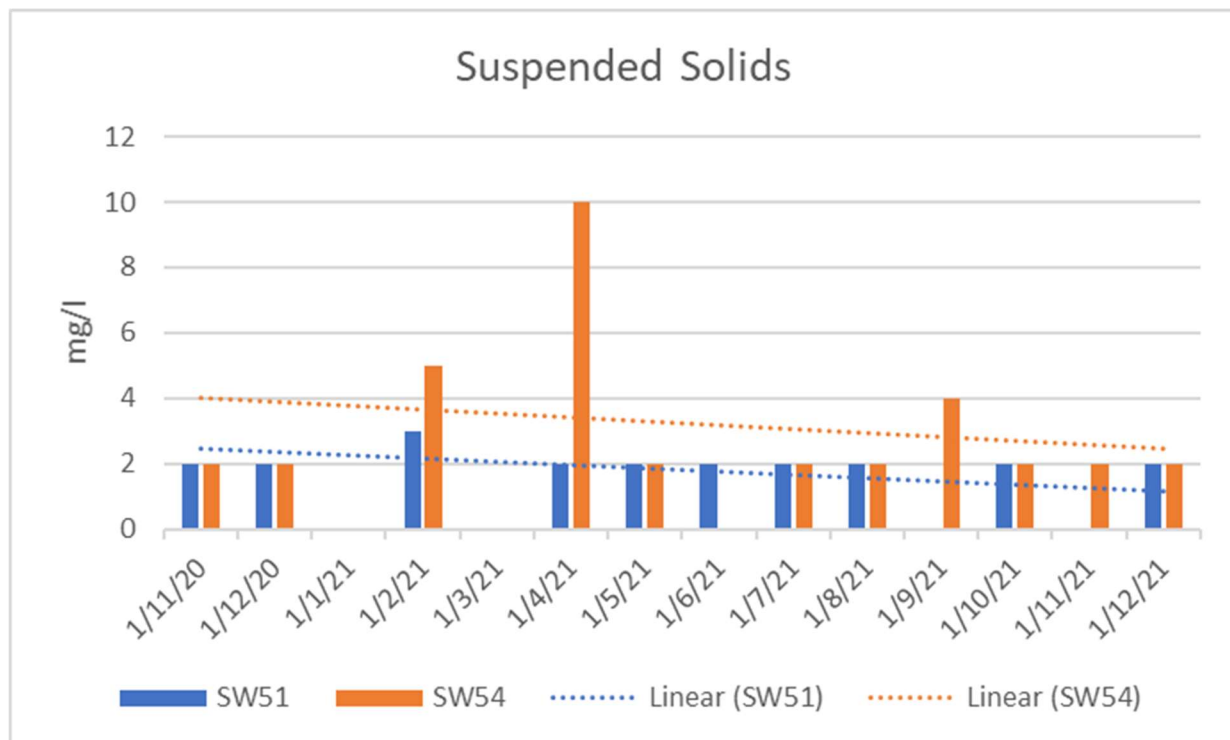


Figure AP13.1. Suspended solids in water sampling at Begnagh from different discharge points. 35 mg/l is the emission limit value.

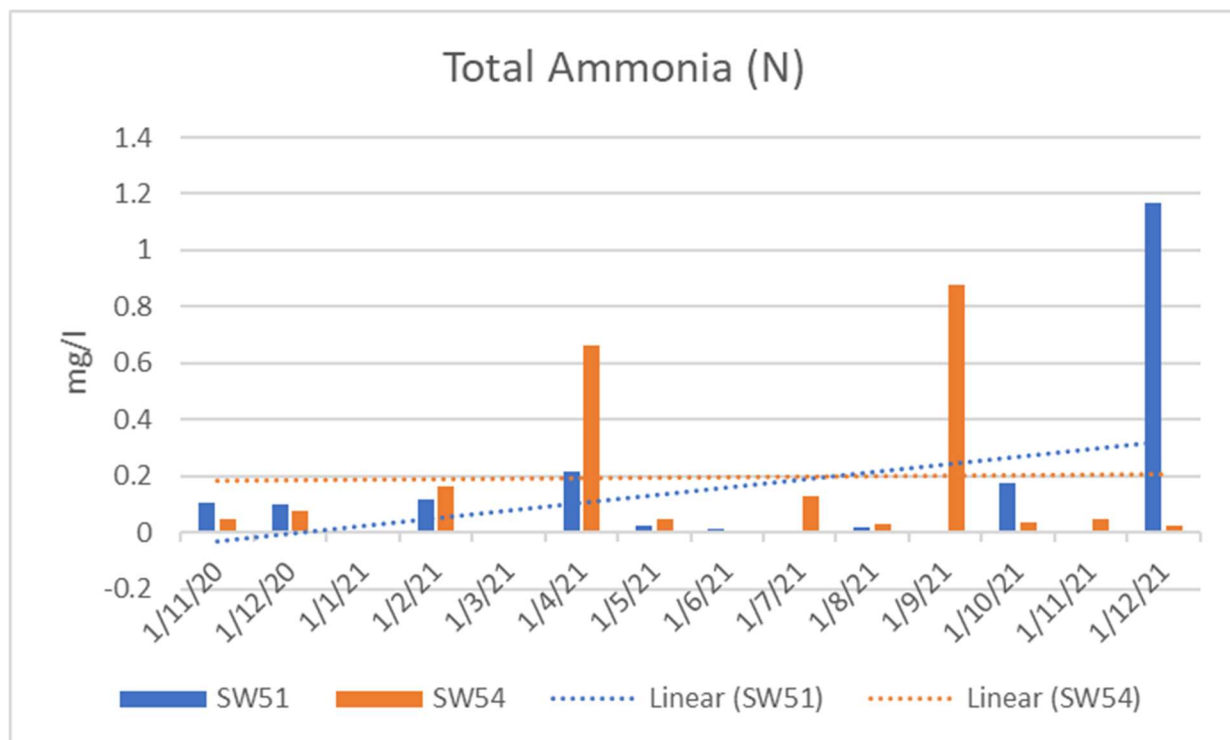


Figure AP13.2. Ammonia concentrations in water sampling from Begnagh from different discharge points. The main trigger level for ammonia is 1.42mg/l for reporting to EPA.