

Bord na Móna

Derraghan 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 Derraghan Bog upon cessation of peat production and compliments the licence requirement to decommission the site.

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

Industrial peat production has now fully ceased at Derraghan Bog.

In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. P0504-01, due regard was also given to the Peatlands Climate Action Scheme (PCAS) announced by the Minister. This Scheme will see the Minister support, via the Climate Action Fund and Ireland’s National Recovery and Resilience Plan, Bord na Móna in developing a package of measures, ‘the Scheme’, for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme’. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support. The additional costs of the Scheme will be supported by Government, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

While this document outlines the enhanced rehabilitation measures planned for Derraghan 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 Derraghan 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 Derraghan Bog, such as amenity, will be conducted in adherence to the relevant planning guidelines and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

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

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Non-technical Summary

- Bord na Móna is planning to rehabilitate Derraghan Bog, in Co. Longford.
- Peat harvesting is now finished at Derraghan 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 (putting a “skin” back onto the peat), and minimising effects to downstream waterbodies. Derraghan 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 cannot be restored back to raised bog in the short-term, 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. Bog woodland has already developed at Derraghan on dry elevated areas of cutaway bog.
- The development of a range of habitats in Derraghan 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.
- Derraghan Bog was utilised for industrial peat production from 1941 until 2020 and is largely cutaway. Portions of the bog still have relatively deep residual peat. Much of the area recently out of peat extraction currently comprises of bare peat. Within the former production area there are some already established pioneer peatland habitats.
- Measures proposed for Derraghan Bog include drain blocking and other measures required to raise water levels to the surface of the peat (cell bunding for example). Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth.
- Bord na Móna plan to carry out this work in 2022.
- These rehabilitation measures will be planned by a team consisting of expert ecologists, hydrologists and engineers. It is a guiding principle of Bord na Móna rehabilitation planning that no actions or activities will be undertaken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the bog via the existing outlets.
- It will take some time for vegetation and habitats to fully develop at Derraghan, and a peatland ecosystem to be restored. However, it is expected that most of the bog 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 proposed development will be 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 BnM cutaway sites (the mid-Shannon Wilderness Greenway). Any potential amenity can be integrated into the current 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.

Summary

Name of bog: Derraghan Bog

Area: 288 ha

Site description:

- Industrial peat production at Derraghan bog commenced in 1941 and ceased in 2020. The peat was formerly used as fuel peat to supply Lanesborough Power Station.
- Derraghan Bog has a pumped drainage system.
- Active drainage channels are still present.
- Approximately half of the site is bare peat and has been in recent peat extraction.
- The remainder of the site has been cutaway for some time and has developed Birch woodland.
- Residual peat depths at Derraghan on the south eastern side of the bog are deep (>2.6m) but for the most part the remaining area is shallow peat (<1m).
- An ash facility managed by ESB is located on site.

Rehabilitation goals and outcomes

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

This is defined as:

- Meeting conditions of the IPC licence;
- Stabilisation or improvement in water quality parameters (e.g. suspended solids);
- Environmental stabilisation;
- Optimising hydrological conditions for the further development of embryonic *Sphagnum*-rich peat forming communities, wetland, Reed swamp, wet woodland and fen habitats on shallow cutaway peats, along with management of existing habitats;
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Rehabilitation will support the National Policies on Climate Action Fund and Ireland's National Recovery and Resilience Plan and GHG mitigation by maintaining and enhancing the current residual peat storage capacity of the bog (locking the carbon into the ground). It is expected that the bog will have reduced emissions (reduced source) as it develops naturally functioning wetland and peatland habitats. It will also support Ireland's commitments towards Water Framework Directive and the National River Basin Management Plan 2018-2021.

Scope of rehabilitation

The principal scope of this rehabilitation plan is defined by:

- The area of Derraghan Bog.
- EPA IPC Licence - Ref. P0504-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The key objective of 'rehabilitation', as required by this licence, is achieved by the **environmental stabilisation** of the bog.
- **The Scheme (PCAS)** includes enhanced measures which are designed to exceed/meet the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Derraghan Bog, principally optimising **climate action benefits**.
- The key goals and outcomes of rehabilitation at this bog outlined above.

- To minimise potential impacts on neighbouring land, some boundary drains around Derraghan Bog will be left unblocked, as blocking boundary drains could affect adjacent land.
- Constraints include the ash facility managed by ESB and proposed Mid-Shannon Wilderness Greenway.
- Other constraints include access routes and Turbary rights.

Criteria for successful rehabilitation:

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

- Rewetting of residual peat in the former area of industrial peat production to slow water movement across the site to retain silt, encouraging development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat through management of existing wetlands, and the creation of further wetland or fen habitat (IPC Licence validation) along with embryonic *Sphagnum*-rich peat forming communities. The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed. (IPC Licence validation).
- Stabilising/improving potential emissions to water (e.g. suspended solids). This will be measured via water quality monitoring (suspended solids and ammonia) for at least 2 years after the rehabilitation has been completed. (IPC Licence validation).
- Reducing pressure from peat production on the local river catchment (WFD) (IPC Licence validation). This will be measured by the EPA WFD monitoring programme.
- Optimising the extent of suitable hydrological conditions for climate action (Climate action verification). This will be measured by an aerial survey after rehabilitation has been completed.
- Reduction in carbon emissions (Climate action verification). Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including embryonic *Sphagnum*-rich peat forming communities, fen, Reed swamp, wet woodland, heath, scrub and Birch woodland, where conditions are suitable, and eventually towards a reduced Carbon source/part Carbon sink. Some areas will naturally be dry and develop Birch woodland and other drier habitats. It will take some time for stable naturally functioning habitats to fully develop at Derraghan Bog.
- Improvement in biodiversity and ecosystem services (Climate action verification).

Summary of measures:

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

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

Timeframe:

- 2021-2022: Short-term planning actions.
- 2022: Short-term practical actions.
- 2022-2025: Any long-term practical actions; Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.

- 2025: Decommission silt-ponds, if necessary.

Monitoring, after-care and maintenance

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

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

Additional Monitoring:

- The monitoring and validation of re-vegetation via natural colonisation and changes in bog condition will be carried out using an aerial survey, after rehabilitation measures are implemented. It is proposed that sites can be monitored against this baseline in the future.
- Biodiversity Ecosystem services will be monitored using specific indicators.
- Carbon emissions monitoring will only be carried out on a small proportion of BnM sites to develop better understanding of carbon emissions and GHG emission factors from different types of BnM sites and will be developed on association with other established research programmes. Reduction in carbon emissions will be modelled by a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future.
- Monitoring as part of Climate Action Verification is dependent on support from the Climate Action Fund and Ireland's National Recovery and Resilience Plan 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 indicators are stabilising/improving.
- The site has been environmentally stabilised.

1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mountdillon bog group (Ref. P0504-01). 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. Derraghan bog is part of the Mountdillon bog group (see Appendix II for details of the bog areas within the Mountdillon bog group). Derraghan Bog is located in Co. Longford.

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

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

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

It is proposed by Government that Bord na Móna carry out a Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme on its peatlands. Note this proposal is also known colloquially as the 'Peatlands Climate Action Scheme' (PCAS). The additional costs of the Scheme will be supported by Government through the *Climate Action Fund* and Ireland's National Recovery and Resilience Plan, and Ireland's National Recovery and Resilience Plan administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator. Bord na Móna have previously identified a footprint of 33,000 ha as peatlands suitable for this scheme. This Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations (Appendix VII & IX) under existing EPA IPC licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. The Scheme commenced in 2021.

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

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

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

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

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

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

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

1.1 Constraints and Limitations

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. 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 document covers the area of **Derraghan Bog**.

Industrial peat extraction at Derraghan Bog permanently ceased in 2020 (having commenced bog development in 1941). Currently the former peat production area comprises a mosaic of largely bare peat along with Birch woodland and pioneering cutaway habitats, in addition to marginal¹ habitats. The mid section of the site, as well as the northern sections contain relatively large areas of Birch woodland. Other habitats include a number of small sections of remnant raised bog.

¹ Marginal land is defined as land around the margin of the industrial peat production area. This margin generally contains a range of habitats including scrub, Birch woodland, cutover bog and raised bog remnants.

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

Parts of Derraghan Bog (within and outside the areas owned and under the control of Bord na Móna) are possibly being used by domestic turf cutters (indications of turf cutting were noted during site visit in October 2021) for intensive private sod peat production. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. It is beyond the scope of this rehabilitation plan to address turf cutting issues on Derraghan Bog that are outside of the control of Bord na Móna. Nevertheless, Bord na Móna are aware of such issues which may constrain the proposed rehabilitation actions, and this rehabilitation plan considered potential impacts of these on the delivery of the stated objectives.

Rehabilitation in other areas of the bog may also be constrained due to other property issues or issues such as rights of way. One Right of Way exists at Derraghan to the south of the site.

The rail line on site connects to Lough Ree Power Station and will be in operation in the short term until all peat stocks have been removed from the bog. However this is also the planned route of the proposed Mid Shannon Wilderness Park Greenway, the construction of which may overlap decommissioning and rehabilitation.

2. METHODOLOGY

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

The ecological information and site information collected during the Bord na Móna ecological baseline survey, additional confirmatory site visits (covering the period 2012 to 2021 inclusive) and monitoring and desktop analysis forms the basis for the development of the rehabilitation plan for the bog, along with:

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

2.1 Desk Study

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

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- Barry, T.A. et al (1973). A survey of cutover peats and underlying mineral soils. Soil Survey Bulletin No. 30. Dublin, Bord na Móna and An Foras Taluntais.
- Bonn *et al.* (2017). Peatland restoration and ecosystem services- science, policy and practice.
- Carroll *et al.* (2009). *Sphagnum* in the Peak District. Current Status and Potential for Restoration. Moors for the Future Report No 16.
- Clark & Rieley (2010). Strategy for responsible peatland management.
- Eades *et al.* (2003). The Wetland Restoration Manual.
- Farrell & Doyle (2003). Rehabilitation of Industrial Cutaway Atlantic Blanket Bog, NW Mayo, Ireland.
- Feehan, J. (2004). A long-lived wilderness. The future of the north midlands peatland network. Department of Environmental Resource Management, UCD.

- Foss, P.J., Crushell, P. & Gallagher, M.C. (2017) Title: Counties Longford & Roscommon Wetland Study. Report prepared for Longford and Roscommon County Councils.
- 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.
- Pschenyckyj *et al.*, 2021, Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity. An Fóram Uisce.
- Quinty & Rochefort (2003). Peatland Restoration Guide, second edition. Canadian *Sphagnum* Peat Moss Association and New Brunswick Department of Natural Resources and Energy.
- Regan, *et al.* (2020). Ecohydrology, Greenhouse Gas Dynamics and Restoration Guidelines for Degraded Raised Bogs. EPA Research Report. Prepared for the Environmental Protection Agency by Trinity College Dublin.
- Renou-Wilson *et al.* (2011). BOGLAND - Sustainable Management of Peatlands in Ireland. STRIVE Report No 75 prepared for the Environmental Protection Agency.
- Schouten (2002). Conservation and Restoration of Raised Bogs: Geological, Hydrological and Ecological Studies. Dúchas - The Heritage Service of the Department of the Environment and Local Government, Ireland;
- Thom (2019). Conserving Bogs – Management Handbook.
- Wheeler & Shaw (1995). Restoration of Damaged Peatlands – with Particular Reference to Lowland Raised Bogs Affected by Peat Extraction.
- Wittram *et al.* (2015). A Practitioners Guide to *Sphagnum* Reintroduction. Moors for the Future Partnership.

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

- Ballivor Integrated Pollution Control Licence;
- Ballivor Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database (www.epa.ie);
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity;
- BirdWatch Ireland online data (including I-WeBS and CBS datasets; www.birdwatchireland.ie);
- Geological Survey of Ireland - National Draft Bedrock Aquifer map;

- Geological Survey of Ireland - Groundwater Database (www.gsi.ie);
- Historic Environment Viewer at <https://webgis.archaeology.ie/historicenvironment/>
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (www.catchments.ie);
- OPW Indicative Flood Maps (www.floodmaps.ie);
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (www.cfram.ie);
- River Basin Management Plan for Ireland 2018 – 2021;
- Bord na Móna Annual Report 2020.
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

2.2 Consultation

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

2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this exercise, Derraghan Bog was surveyed in July of 2012. Additional ecological walk-over surveys and visits have taken place at Derraghan Bog between 2012-2021 (visited during winter 2016/17, but also a final confirmatory survey took place in October of 2021). Habitat maps have been updated, where required. This rehabilitation plan is informed by the original baseline survey as well as subsequent confirmatory site walk-over surveys and visits, and updates to baseline data.

Habitat mapping followed best-practice guidance from Smith *et al.* (2011). Map outputs including all habitat maps and target notes were produced using GIS software application packages (ArcGIS). General marginal habitats and other habitats that had not been modified significantly by industrial peat extraction were classified using Fossitt *et al.* (2000). Plant nomenclature for vascular plants follows Stace (2010), while mosses and liverworts nomenclature follows identification keys published by the British Bryological Society (2010). A more detailed Bord na Móna classification system was previously developed for classifying pioneer cutaway habitats as Fossitt categories were deemed not to be detailed enough for cutaway bog (much of cutaway bog could be classified as Cutover Bog - PB4). Much of the pioneer cutaway vegetation is still at an early stage of its development and cannot be assigned to Fossitt Level 3 categories yet. A site visit was used to categorise any changes in habitat extent at Derraghan in September 2021.

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

3. SITE DESCRIPTION

Derraghan Bog is a long, relatively narrow section of bog that is located approximately 7km south east of Lanesborough along the R392 Lanesborough to Ballymahon Road. The bog is dissected in two parts by a BnM rail line that runs in an east west orientation through the site, resulting in a northern and southern section. The majority of the site is out of production and is revegetating at a steady rate.

An ash land-fill site, managed by the ESB, is located close to the middle of the site and this facility is used to store ash that was produced from the nearby power station in Lanesborough. The southern third of the site was in active peat production until recently and is bare peat. There are some small areas to the east and west of the site that were initially developed for milled peat production but have never been put fully into production and now have re-vegetated or have some remnant vegetation. These areas are rapidly developing Birch and Pine scrub and Heather is also a dominant vegetation type.

The northern section was almost entirely out of production since 1995, apart from some fields running along the eastern side of the site. These areas were used to produce mini-sod peat until recently. The majority of the northern section of the site is best described as a transition between scrub and Birch woodland (WN7).

See Drawing number BNM-DR-23_07_01 titled **Derraghan Bog: Bog Site Location**, included in the accompanying Mapbook², which illustrates the location of Derraghan Bog in context to the surrounding area.

3.1 Status and Situation

3.1.1 Site history

Derraghan bog was in industrial peat extraction from 1941 until 2020. The western boundary of the site to the north includes a small section of remnant raised bog and a section of old domestic cutover bog. The western boundary of the site to the south includes a small section of remnant raised bog also.

3.1.2 Current land-use

Industrial peat production has now permanently ceased at Derraghan Bog. The site has some remaining stock which is being removed. Approximately half of the site is bare peat. The remainder is a mixture of scrub and Birch woodland (WN7) and pioneering open habitats.

The site hosts a medicinal herbs trial (Móna Herbs www.bordnamonaherbs.com) looking at the option of sourcing Birch sap using Birch trees. This area is considered out of scope of the rehabilitation plan. The Bord na Móna herb project has been ceased.

An ash waste facility (Derraghan Ash Repository) is located in the north east corner of the site and this facility is used to store ash from the Lanesborough Power Station. This facility is managed by the ESB and is in an area that has been taken out the IPC License. A separate waste licence was granted to ESB by EPA for this facility.

Derraghan is one of the bogs proposed to be developed in partnership between Bord na Móna, local communities and Longford County Council as the Mid Shannon Wilderness Park (a tourist initiative) and the bog railway which crosses through the site is proposed to form the route of part of the Mid Shannon Wilderness Park Greenway.

² Cutaway Bog Decommissioning and Rehabilitation Plan - Derraghan Bog Map Book

Site infrastructure and structures are mapped in the accompanying Mapbook. Some marginal areas to the east and west of the Bord na Móna boundary are used for private turbary.

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 Derraghan 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 comprises Visean Limestones (undifferentiated)³. The lowest lying areas of the site are underlain by lacustrine clay (below c. 41.2mOD). Although limited site data exists further north, coring data suggests the presence of a main ridge of more elevated material (rising to >48.5mOD) trends into the bog in a south-east to north-westerly direction. This has been interpreted as glacial till (based on comparable features present in the surrounding area). Subsoils at Derraghan vary between silty clays, silty clay loams overlain by deposits of organic mud or marl deposits.

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

3.2.2 Peat type and depths

The majority of the site is cutaway and has shallow peat depths. Peat depths at Derraghan bog range from less than half a meter to greater than 2.6m and some sections of the site still contain significant areas of “Sphagnum” peat. The south eastern side of the site has the greatest peat depths of > 2.6m.

3.3 Key Biodiversity Features of Interest

Key biodiversity features at Derraghan Bog include the bog woodland that has established on site. This has established on higher ground that became cutaway some time ago. The woodland is relatively dry. The northern section of woodland is dominated by Birch with Rowan, Willow (Goat, Grey, Creeping and Eared Willow), Aspen, Lodge Pole Pine, Scot’s Pine, Blackthorn, Oak (saplings), Hawthorn, Holly, Elder, Purple Moor Grass, Raspberry, Bramble, Strawberry, Heather, Tormentil, Hard Fern, Male fern, Narrow Buckler fern, Bottle Sedge, Soft Rush, Creeping Bent Grass, Ivy, Herb Robert and Hart’s Tongue Fern, mosses included *Aulacomnium palustre*, *Polytrichum commune var. commune*, *Calliergonella cuspidata*, *Sphagnum subnitens* and *S. cuspidatum*. This section of woodland was flanked on both sides by areas that have only been taken out of production in the past few years.

Overall, this area of woodland was dominated by Birch with a ground flora that was dominated of Raspberry, Heather and Bramble. Occasional open areas consisted of dry heath (HH1) with some areas also dominated by Bramble and Raspberry. Some wetter areas consisted of Purple moor Grass and small patches of *Sphagnum cuspidatum* and *S. subnitens*. Several drainage ditches are located within this area but for the most part were infilling apart from one main drain that had a flow of water through it.

The southern section of the site contained an ash facility. To the west of the ash facility, further woodland was well established. This woodland appeared to be slightly older than the northern area and had a more defined canopy along with species such as Crab Apple and Ash that were not found in the northern section of the site. This woodland also contained more Oak saplings.

An area of potential rich fen (PF1) is located close to the western edge of the woodland, this area is small but has the potential to develop and become larger over time. Species contained within this area were Saw Sedge, Black Bog Rush, Lesser Tussock Sedge, Bottle sedge, Marsh Arrow Grass, Tormentil, Round leaved Sun Dew, Purple Moor Grass, Sweet Vernal Grass, Heather, *Aulacomnium palustre*, Bog Cotton, Royal Fern and *Sphagnum cuspidatum*.

A former Works site is located on the north east boundary of the site. This area contained old buildings that were surrounded by scrub, grassland and mature trees such as Lodge Pole Pine, Scot’s Pine, Aspen, Monterey Cypress, Sitka Spruce and Norway Spruce. A disused silt pond to the south of the old works site contained Newts.

Remnant portions of Raised bog (PB1) are located on the eastern and western boundaries of this section of the bog. The northern most remnants were in poor condition overall, dry with a dominance of tall leggy Heather throughout. However, the more southern remnant on the eastern side was in slightly better condition, wetter with a lot of *Sphagnum* species (*Sphagnum capillifolium*, *S. cuspidatum*, *S. fallax*, *S. fimbriatum*, *S. tenellum*, *S. denticulatum* and *S. magellanicum*), however there was lots more tall leggy Heather on this remnant bog area closer to the drain on the east of the remnant. The section of remnant raised bog in the north western corner of the site was being used for domestic turf cutting.

Below the woodland the remaining sections of the site have remaining stockpiles that were being removed by machinery during the site visit (October 2021). Some of the drains contained Bulrush and Soft Rush along with

two high ridges that contained Heather and scrub. A section of the site close to the south east contained some Birch scrub.

3.3.1 Current habitats

The most common habitats present at Derraghan include (in order of dominance):

- Bare peat (BP).
- Birch (*Betula spp.*) woodland (WN7) (on cutover bog dominated by Birch with Rowan, Willow (Goat, Grey, Creeping and Eared Willow), Aspen, Lodge Pole Pine, Scot's Pine, Blackthorn, Oak (saplings), Hawthorn, Holly and Elder)
- Birch *Betula spp.* -dominated scrub (WS1)
- Pioneering vegetation on cutaway including Scrub and Soft Rush dominated Poor fen (mainly in mosaic with Birch and Willow scrub but also Gorse (*Ulex europaeus*))
- Pioneering Dry Heath dominated by Heather (HH1)
- Mosaics of Willow-dominated scrub (WS1) along with open communities dominated by Soft rush (PF2) on cutaway
- Access routes (BL3) (rail lines and tracks including gravel embankments and associated habitats such as dry grassland communities (GS2) and scrub)
- Cutover Bog (PB4)
- Raised bog (PB1)
- Silt ponds (FL8)

See Drawing number BNM-DR-23-07-17 titled **Derraghan Bog: Current Habitat Map**, included in the accompanying Mapbook, which illustrates the habitats at Derraghan Bog.





	
<p><i>Pioneering vegetation on cutaway including Scrub and Soft Rush dominated Poor fen (Oct 2021)</i></p>	<p><i>Sphagnum within north western Raised Bog remnant at Derraghan (Sept 2021)</i></p>
	
<p><i>Common centaury on cutaway (Oct 2021)</i></p>	<p><i>Pioneering scrub and Birch woodland (WN7) at Derraghan Bog (Sept 2021)</i></p>

Table 1: Photos from Derraghan Bog

3.3.2 Species of conservation interest

A review of available Biodiversity records from the National Biodiversity Data Centre (hereafter NBDC) of bird records from the recent 2007-2011 Bird Atlas, found 91 species of birds have been recorded at or near Derraghan Bog.

A review of available Biodiversity records from the NBDC of flora and fauna recorded within a polygon including Derraghan Bog found 3 species of Butterfly , Green-veined White (*Pieris napi*), Marsh Fritillary (*Euphydryas aurinia*) and Small Tortoiseshell (*Aglais urticae*), and 4 species of terrestrial mammal (Eurasian Badger (*Meles meles*), Irish Hare (*Lepus timidus subsp. hibernicus*), Pine Marten (*Martes martes*), and Red Fox (*Vulpes vulpes*)).

On the most recent visit to Derraghan in October of 2021, species of bird were recorded utilising or associating with habitats onsite including Meadow pipit (*Anthus pratensis*) (Red-listed⁴), Common Kestrel (*Falco tinnunculus*) (Amber listed), Common Snipe (*Gallinago gallinago*) (Amber listed) and Wintering (Amber listed) Whooper Swan (*Cygnus cygnus*) (11 individuals flying overhead). Additionally, other species were noted such as Mallard (*Anas platyrhynchos*) and Common Pheasant (*Phasianus colchicus*). Previous surveys by Bord na Móna ecologists have recorded Chiffchaff (*Phylloscopus collybita*), Swift (*Apus apus*), Goldfinch (*Carduelis carduelis*) (Flock > 30 individuals), Kestrel (*Falco tinnunculus*), White Throat (*Sylvia communis*), Willow Warbler (*Phylloscopus trochilus*), Grasshopper Warbler (*Locustella naevia*) and Grey Heron (*Ardea cinerea*). There are reports that a pair of Barn Owls have been using the site.

Bord na Móna ecologists have recorded Green Veined White (*Pieris napi*), Small Tortoiseshell (*Aglais urticae*), Silver washed Fritillary (*Argynnis paphia*), Large Heath (*Coenonympha tullia*), Small Copper (*Lycaena phlaeas*) and Meadow Brown (*Maniola jurtina*) butterflies at Derraghan previously. Common Frog (*Rana temporaria*), Smooth Newt (*Lissotriton vulgaris*), Red Fox (*Vulpes vulpes*), Badger (*Meles meles*) and Pine Marten (*Martes martes*) were also noted during surveys previously by Bord na Móna ecologists.

3.3.3 Invasive species

Invasive alien species known to occur at the subject bog (or desktop review suggests presence is likely), and for which reasonably foreseeable source impact pathways for dispersal may result from the proposed PCAS described here. A broad range of common garden escapes are occasionally present around the margins of Bord na Móna bogs and although spatial overlap with the PCAS is expected to be limited, these are, where necessary, to be treated in line with Best Practice during PCAS activities.

3.4 Statutory Nature Conservation Designations

Derraghan Bog does not overlap any known designated sites. However, Forthill Bog NHA (Site code 001448) is ca.1km to the south west of Derraghan bog. Additionally, Lough Ree NHA (Site Code 00040) is less than 400m due west of Derraghan bog. The Royal Canal pNHA (Site code 2103) lies within 2.5km of the eastern boundary of Derrycolumb.

Lough Ree SAC (Site Code 000440) and Lough Ree SPA (Site Code 004064) are similarly connected to Derraghan via the Drumnee stream and both European Sites occur within 500m of the bog boundary.

Lough Ree SAC (and pNHA) is designated for the natural eutrophic lake as well as active raised bogs, degraded raised bogs capable of natural regeneration, bog woodland and Otter. Lough Ree SPA is designated for the assemblage of wintering wildfowl, many species of which occur in nationally important numbers, in addition to breeding Common Tern (*Sterna hirundo*) and Common Scoter (*Melanitta nigra*).

3.4.1 Other Nature Conservation Designations

The Ramsar Convention entered into force in Ireland on 15th March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha.

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

There are no Ramsar Sites in the local vicinity of Derrycolumb Bog (i.e. within 3km) The closest Ramsar Sites to Derrycolumb Bog include Mongan Bog in Co. Offaly and Lough Glen on the border of Longford and Westmeath.

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

3.5 Hydrology and Hydrogeology

Derraghan forms part of the Upper Shannon Catchment (Catchment ID : 26E ; Catchment ID : 26C) as defined by the EPA under the Water Framework Directive (WFD) and is primarily situated within the Bilberry_SC_010 sub-catchment with a small portion of the bog falling within the Shannon[Upper]_SC_080 sub-catchment. It is surrounded by flat agricultural land and additional bog land areas. The Bog is located between Lough Ree to the west and Derryhaunbeg to the east. The bog contains several drainage pathways and discharge locations, with the majority of the bog discharging to the South-west into the Drumnee River.

Derraghan Bog has a pumped drainage system and there are two pumps on site that are on (automatic). Derraghan Bog is located in the Upper River Shannon catchment. The bog is drained by the an unnamed tributary of the Drumnee Stream (EPA Code 26D08) occurs along the boundary of the mid-westernmost section of Derraghan; this watercourse flows south into the Drumnee which drains to Lough Ree, west of Saints Island. Additionally, on the northern boundary of the site the bog is drained by an unnamed tributary of the Derrygeel, which then flows north into Lough Bannow Stream (EPA Code 26L12).

Regional hydrological data suggest that Derraghan receives average precipitation of 898mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 503mm/yr. A , leaving an average effective precipitation of 395mm/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 395mm/yr, which equates to an annual runoff rate of c. 3,950m³/ha.

GSI data indicates that Derraghan Bog is underlain by Visean Limestone bedrock which is classified as a regionally important aquifer (karstified conduit). Additionally, a portion of Derraghan is underlain by several geological formations including the Meath formation, the Moathill formation, the Ballysteen formation and the Waulsortian Bedrock faults. This portion is classified as a Locally Important Aquifer (Bedrock which is Moderately Productive only in Local Zones). Geological Survey of Ireland (GSI) mapping identifies several karst features (enclosed depressions) within close proximity to the bog, with the nearest feature being located <1.7km West of the bog. Given the karstified nature of the bedrock underlying Derraghan the bedrock is considered to have potential to facilitate relatively high rates of groundwater flow. No data exists concerning depth to bedrock, however, the closest bedrock outcrop occurs 0.3km to the north-west of the central western margin of the bog.

An aquifer is an underground body of water-bearing rock or unconsolidated materials (gravel or sand) from which groundwater can be extracted in useful amounts. GSIs Aquifer classes are divided into three main groups based on their resource potential, and further subdivided based on the type of openings through which groundwater flows. There are nine aquifer categories in total. Locally important aquifers are capable of supplying locally important abstractions (e.g. smaller public water supplies, group schemes), or good yields (100-400 m³/d). This data gives an indication of sub-surface deposits (bedrock and unconsolidated materials) in terms of their groundwater resource potential and dominant groundwater flow type.

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

length. There is likely to be substantial groundwater discharge to surface waters ('baseflow') and large (>2,000 m³/d), dependable springs may be associated with these aquifers.

The bog is located in an area mapped by GSI as of low - moderate groundwater vulnerability (GSI Mapviewer). Groundwater Vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated by human activities. 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. 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. 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. These data indicate there is generally low risk of any groundwater contamination occurring at this site.

3.6 Emissions to surface-water and watercourses

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

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

Derraghan bog has two treated surface water outlets. South Derraghan discharges from the two silt ponds via a silt pond in Derrycolumb Bog to the Drumnee IE_SH_26D080850 River and eventually the Shannon Upper IE_SH_25SO21660. North Derraghan discharges through a silt pond in Derryshannogue Bog, and on to the Leherly River (IE_SH_26L120100 LOUGH BANNOW STREAM_010).

Neither of these Rivers were listed as being under pressure from peat extraction in the 2nd cycle of the River Basin Management Plan for Ireland, and they are indicated as remaining so in the third cycle which is currently out for consultation. However, the Shannon Upper 100, where these two catchments drain too, does have peat extraction as a pressure.

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-23-07-02 titled **Derraghan Bog: Structures and Sampling**, along with Drawing number BNM-DR-23-07-WQ01 titled **Derraghan Bog: Water Quality Map** included in the accompanying Mapbook, which illustrate the various drainage and water quality infrastructure present at Derraghan.

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 (ELV) associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 1.42mg/l and COD 100mg/l.

Initial monthly results are included in Appendix XIII. These results cover the period from August 2020 to December 2021 and are from SW88A in Derrycolumb, which treats the surface water runoff from Derraghan bog catchment. These results indicate the baseline water quality from a minimum of 70% of the bog's catchments. Peat extraction ceased in this bog in 2020 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. During this period, ammonia indicating an upward trend during the 17 months of sampling, however, average ammonia and general range of results from historical monitoring below, show a general reduction in ammonia during the active production years. All other parameters fluctuated slightly, most likely influenced by normal weather patterns, especially rainfall.

Monthly ammonia concentrations from August 2020 to December 2021 had a range of 0.045 to 0.335 mg/l with an average of 0.149 mg/l at Derraghan.

Results for suspended solids for the same period indicate a range of 1 to 7mg/l with an average of 3.85 mg/l.

From an analysis of any monitoring over the past 5 years (during such time where peat extraction was undertaken each Summer) of the IPC licence environmental monitoring of some of the discharges from this bog, indicates that results were under the ELV for SS and Trigger levels for Ammonia and COD.

Bog	SW	Monitoring	Sampled	pH	SS	TS	Ammonia	TP	COD	Colour
Derryshannoge (Derraghan)	SW-87	Q1 20	24/03/2020	8.1	3	366	0.09	0.05	43	115
Derrycolumb (Derraghan)	SW-88A	Q4 19	07/11/2019	7.7	12	185	0.163	0.05	43	310
Derrycolumb (Derraghan)	SW-93	Q4 19	13/11/2019	7.4	2	233	0.112	0.05	85	339
Derrycolumb (Derraghan)	SW-93A	Q4 19	13/11/2019	7.40	2	257	0.315	0.05	51	128
Derrycolumb (Derraghan)	SW-88A	Q2 17	29/05/2017	7.7	5	320	0.37	0.05	39	124
Derryshannoge (Derraghan)	SW-87	Q3 17	27/07/2017	8	5	332	0.02	0.07	46	80
Derrycolumb (Derraghan)	SW-93	Q2 17	31/05/2017	7.8	6	628	0.53	0.05	51	111
Derrycolumb (Derraghan)	SW-93A	Q2 17	31/05/2017	7.6	10	308	0.05	0.05	42	125

Table 3.1. Decommissioning and Rehabilitation Programme Water Quality Monitoring.

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

Water quality of water discharges from restored peatlands normally improves as a result of bog restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Bog restoration is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The

NRBMP outlines how key actions such as the Bord na Móna peatland rehabilitation is expected to have a positive impact on water quality and help the NWBMP deliver its objectives in relation to the WFD.

Water will still discharge from designated emission points when rehabilitation at Derraghan has been completed. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of downstream water bodies.

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 August 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 Móna 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.

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

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

3.8 Carbon Emissions

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

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

It is expected that Derraghan Bog will become a reduced Carbon source/part carbon sink following rehabilitation. The potential of any cutaway site to develop as a carbon sink in the longer-term depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich or other peat-forming habitats, the balance of carbon fluxes from different cutaway habitats and future climatic conditions. Much of this site (that isn't already woodland) is expected to develop wetland habitats with open water, Reed Swamp and fen habitats with alkaline emission factors. 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 that is bare peat can be rated as having a **low local ecological value (E)** as it is dominated milled production bog and bare peat. Some pioneer and semi-natural habitats such as birch woodland are rated higher and are deemed to be of **Local Importance (higher value)**.

4. CONSULTATION

4.1 Consultation to Date

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

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

- General consultation with range of stakeholders at annual Bord na Móna Biodiversity Action Plan review days 2010-2018.
- A social and ecological appraisal of Direachan cutaway bog, Co. Longford (2000). Compiled by the Lough Boora Parklands Group. An internal report to Bord na Móna.
- 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 greenway development (Longford County Council).
- Bird surveys and monitoring carried out by Birdwatch Ireland for Bord na Móna,

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

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

4.2 Issues raised by Consultees

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

4.2.1 Assessments of rehabilitation

To date a number of consultees including the Irish Farmer's Association (IFA), the Irish Milk and Suppliers and Creamery Association (IMSCA) and Trinity College Dublin have raised concerns during consultation regarding the duration and scope of the PCAS consultation period. Stakeholders suggested that the consultation period should be extended to allow all potential stakeholders to make submissions where required.

4.2.2 Assessments of rehabilitation

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

4.2.3 Restoration scope

Restoration/rehabilitation of marginal habitats was raised by the Irish Peatland Conservation Council (IPCC) and Butterfly Conservation Ireland (BCI) relating to the finalisation of several other PCAS bog rehabilitation plans in 2021 and 2022 as worthy of consideration within the rehabilitation measures to support carbon sequestration and biodiversity objectives.

4.2.4 Monitoring

Further details on monitoring of ecological metrics, and how and where reporting on this monitoring would take place, was raised by the IPCC, University College Dublin and Trinity College researchers in their respective submissions relating to the finalisation of several bog rehabilitation plans in 2021.

Butterfly Conservation Ireland also suggested that monitoring of Large Heath butterfly be considered to assess the success of the proposed rehabilitation actions.

Irish Water reiterated the requirement of a strong monitoring program with respect to water quality during and post rehabilitation.

4.2.5 Flooding and drainage

The Irish Farmers Association (IFA), The Department of Agriculture Food and the Marine, OPW, and ICMSA queried likely impacts relating to the finalisation of several other bog rehabilitation plans in 2021. The IFA expressed concern regarding the Derraghan Rehabilitation Plan arising from the proposed re-wetting associated with the rehabilitation, in relation to alteration of flood table, flooding/waterlogging of surrounding areas and development of new flood plains. The IFA also raised the issue of Health and Safety risks to livestock and machinery in relation to raising water levels, as well as possible impacts on land and property prices related to the above risks.

4.2.6 *Future management*

The IFA 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.

4.2.7 *Other issues*

Other issues (raised by IPCC) during the finalisation of several bog rehab plans in 2021 included after use of the bog and turf cutting on the margins of the bog (outside of the area owned by Bord na Móna). IFA expressed concerns relating to the protection of existing Turf Cutting rights at Derraghan and resolution of any issues around same.

Archaeological end of life survey of all the bogs were requested by National Museum of Ireland and National Monuments Unit. The National Museum of Ireland also requested that due diligence be taken during works to protect any archaeologically significant findings or areas, reiterated the importance of peatlands for the preservation of archaeology and requested they be consulted as part of any EIA undertaken.

ESB emphasised the need for coordination throughout the rehabilitation programme as the proposed rehabilitation works surround the ESB Ash Disposal Facility at Derraghan. The ESB expressed general support for the project, noting that the proposed wetland areas would not pose a threat to the Ash Disposal Facility, given the topography of the bog and the rehabilitation measures proposed.

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 Derraghan Bog. This is ongoing, with a dedicated Community Liaison Officer communicating with 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. Interested stakeholders will be updated on progress.

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 Derraghan 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. 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 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 amenity in the future.

As part of PCAS, one of the objectives for the rehabilitation of bogs is to promote the development of a naturally functioning peatland system. BnM would envisage benefits to biodiversity on these bog as a result of rehabilitation. The most intensive peatland re-wetting will be applied to bare peat areas. Where there are diverse habitats already present, less intensive, targeted drain-blocking will be applied. While the objective overall is to make the overall bog wetter and increase the footprint of wet peatland habitats, there will still be a mosaic of habitats present, including a transition from wet to drier areas of peat, in areas that cannot be re-wetted.

The local environmental conditions of Derraghan Bog mean that deep peat measures along with wetland creation are the most suitable rehabilitation approach for this site to optimise benefits for climate. Derraghan Bog does have residual deep peat along with shallower areas. Derraghan is a pumped bog and is likely to develop wetland habitats when pumping is stopped/reduced. Creating cutaway wetland habitats is feasible at this site.

4.3.4 *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 biodiversity monitoring is proposed as part of the monitoring and verification plan at Derraghan Bog during the period of the scheme (2021-2025). However, note that fauna typically take longer to respond to changes in vegetation colonisation and habitats arising from the proposed rehabilitation measures identified for Derraghan Bog. Significant changes in vegetation colonisation are unlikely to be observed over a short time period.

4.3.5 *Flooding, drainage or other impacts 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 be adversely affected, this will be avoided and alterations made to the rehabilitation plan. Drains around the margins of the bog will not be blocked.

External consultants have been appointed to carry a hydrological assessment to identify any potential impacts to neighbouring lands and to mitigate against any such impacts. No issues were identified. There is no potential for direct impacts on arterial drainage downstream.

The rehabilitation measures proposed at Derraghan 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.

4.3.6 Amenity

Creating amenity such as walking tracks is not part of the direct scope of PCAS. There are no current amenity developments planned for Derraghan by BnM. However, PCAS will enable and indirectly support any future amenity development by encouraging the development of a semi-natural peatlands landscape.

4.3.7 Water Quality

In general, peatland restoration and rehabilitation has been shown to demonstrate positive impacts on downstream water quality (Minayeva *et al.*, 2017). BnM expect that rehabilitation measures will 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.

4.3.8 Future Management

Bord na Móna will continue to manage their land bank into the future. As industrial 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.

Bord na Móna considers issues regarding estate security, fire risk, invasive species and water pollution of utmost importance. BnM intends to maintain security and manage fire risk over the entirety of the estate. In this regard, PCAS activities should have no detrimental impact on these issues. Regarding water pollution, BnM is regulated by the EPA and as such adheres to the strict water pollution measures laid out by the same.

4.3.9 Other Issues

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

Security: It is the intention of Bord na Móna to keep secure the estate and ensure that any anti-social behaviour or trespass that occurs within the estate is reported and dealt with by the appropriate authorities.

4.3.10 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 and property had already been accounted for during the hydrological analysis and assessment, and corresponding adaptations to incorporate the Drainage Management Plan mitigation measures.
- Marginal drains will not be blocked to avoid impacts on adjacent lands, rights of way or turf-banks. This does not change the overall rehabilitation goals and outcomes and can be integrated with the other rehabilitation measures to allow cutaway re-wetting.
- Turbary rights will remain unaffected.

- Bord na Móna intend to continue management of this site into the future and issues such as security and trespass will be addressed on an ongoing basis in association with other stakeholders.
- Bord na Móna intends to maintain a “No Shooting” policy at this site.

5. REHABILITATION GOALS AND OUTCOMES

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

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving waterbodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Optimising hydrological conditions for **climate action benefits as part of PCAS**.
- Optimising hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation communities on deep peat, or reed swamp and fen on shallow more alkaline peat and other subsoils, where present.
- Optimising hydrological conditions for the development of active raised bog on extant high bog, where possible.
- Integrating peatland rehabilitation with other infrastructure on site (ESB ash facility).
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Supporting any 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.

- It will take some time for stable naturally functioning habitats to fully develop at Derraghan 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/part Carbon sink. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- It is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). Furthermore, only a proportion of the bog has potential to develop embryonic *Sphagnum*-rich habitats in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.

- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At Risk from peatlands and from peat extraction are likely to have several contributory sources of impacts (private peat extraction and Bord na Móna). Reducing pressures due to former peat extraction activities at Derraghan will contribute to stabilising or improving water quality status of receiving water bodies in general. Ultimately, improving the WFD status of the receiving waterbody will depend on reducing pressure from a range of different sources., including peatlands in general (private and Bord na Móna).
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Derrycolumb) in 2021-2022. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the River Shannon from rehabilitating more than one bog in the same catchment.
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features. An Archaeological Impact Assessment (AIA) will be carried out under the PCAS scheme.

6. SCOPE OF REHABILITATION

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

- The area of Derraghan Bog.
- EPA IPC Licence - Ref. P0504-01. 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. Derraghan bog is part of the Mounddillon bog group.
- The Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This scheme is designed to enhance the ecosystem services of Derraghan Bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Derraghan Bog mean that deep peat measures along with wetland creation are the most suitable rehabilitation approach for this site. Derraghan Bog does have residual deep peat along with shallower areas. Derraghan is a pumped bog and is likely to develop wetland habitats when pumping is stopped/reduced.
- The key goals and outcomes of rehabilitation set by Bord na Móna. Bord na Móna have defined the key goal and outcome of rehabilitation at Derraghan Bog as **environmental stabilisation, optimising residual peat re-wetting, and the development of embryonic raised bog on deep peat along with wetlands/Reed Swamp and fen on shallow more alkaline peat and other subsoils**.
- Rehabilitation of Derraghan 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.
- It is not proposed to carry out rehabilitation on all marginal or peripheral cutover bog zones. Generally, these bog remnants are narrow, or are subject to turbary, and do not have positive bog restoration prospects.

6.1 Key Constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- **Land-use.** The area used for the medicinal herb trial is constrained from rehabilitation as it may be used in the future.
- **ESB Ash facility.** Rehabilitation will be integrated with this infrastructure and with this land-use. Some drainage infrastructure will not be blocked to support this facility.
- **Local road.** Drains will not be blocked adjacent to the local road at the northern end of the site.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care has to be taken that no active rehabilitation

management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land.

- **Turbary.** The small remnant raised bog area to the northwest of the northern part of the site. This area was never developed by BnM and has turbary rights.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, any new archaeology may require rehabilitation measures will be reviewed and adapted. If this occurs, rehabilitation measures will be reviewed and adapted. An Archaeological Impact Assessment (Appendix XII) will be carried out to mitigate against any impact on found archaeology at Derraghan Bog. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.
- **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. A right of way is located on the southern end of Derraghan Bog.

6.2 Key Assumptions

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

6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

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

7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

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

Rehabilitation is generally defined by Bord na Móna as

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

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

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

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

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

Similarly monitoring of surface water ammonia emissions from a Corlea bog in Mountdillon over the past 3 years, post cessation of peat extraction with ongoing rehabilitation, indicate downward trends. Following commencement, and as the monthly monitoring program at Derraghan 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.

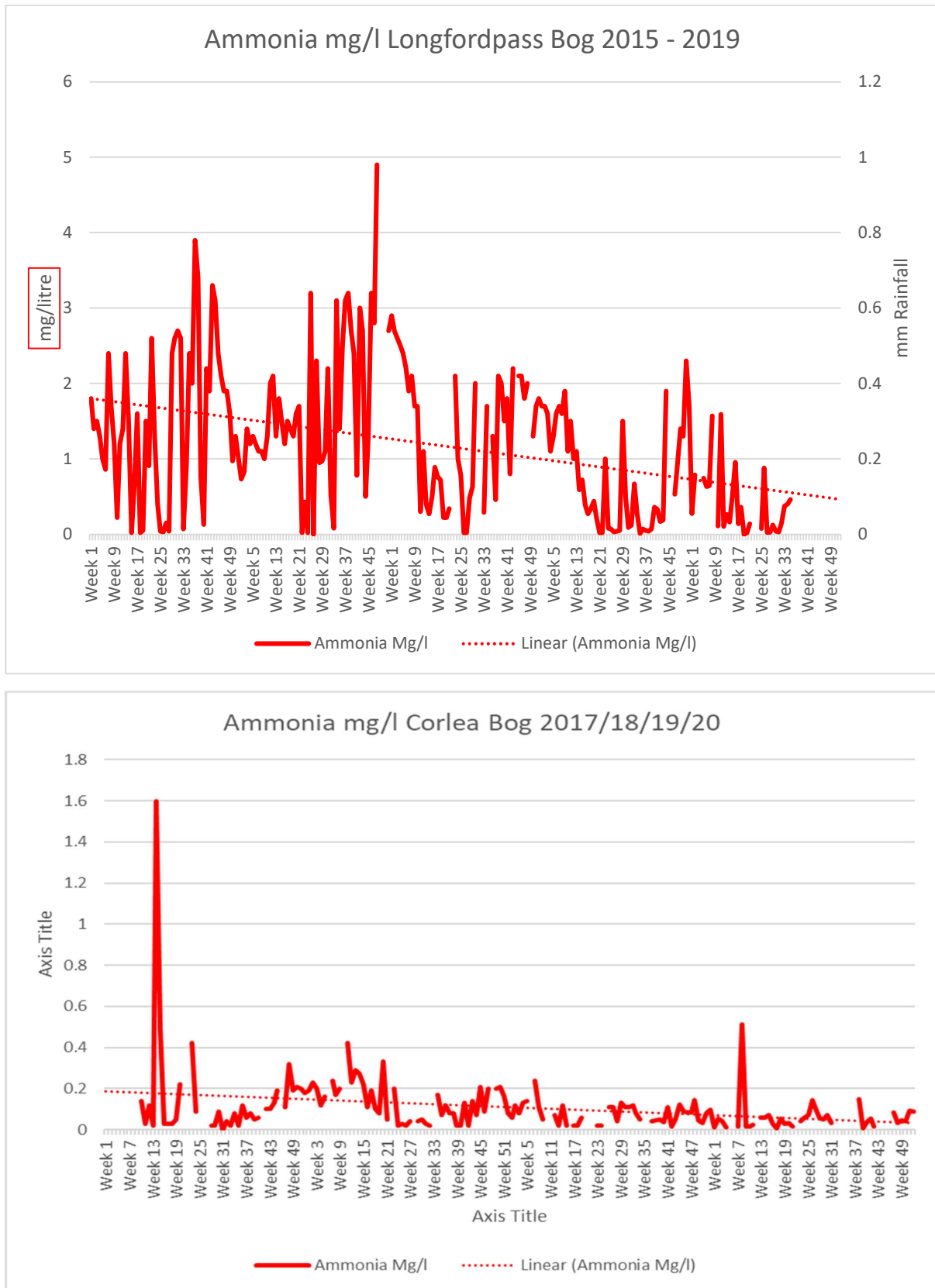


Figure 7.1. Ammonia levels over the period 2015-2019/2020 at Longfordpass and Corlea.

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

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

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

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

Criteria type	Criteria	Target	Measured by	Expected Timeframe
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action	Optimal extent of suitable hydrological conditions	Aerial photography and Habitat mapping to map extent of suitable hydrological conditions. Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2022-2025
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a bog condition assessment and appropriate carbon emission factors.	2022-2025
Climate action verification	Setting the site on a trajectory towards establishment of a mosaic of compatible habitats	Establishment of compatible cutaway habitats	Habitat map, Cutaway bog condition map Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2022-2025
Climate action verification	Biodiversity and ecosystem services. Habitat establishment Presence of key species – Sphagnum	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services Presence of key species – Sphagnum – Walkover survey	2022-2025

Meeting climate action verification criteria and monitoring of these criteria after the scheme has been completed is dependent on support from the *Climate Action Fund* and Ireland's National Recovery and Resilience Plan or

other sources of funding. Note that monitoring and verification of the overall scheme will be stratified – not all these criteria will be measured at each individual site. Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.

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

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

- **Funding to pay for resources required to deliver the planned rehabilitation (Bord na Móna and external).** Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan.
- **Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.**
- **Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.**
- **Weather conditions to be within normal limits over the rehabilitation plan timeframe.** Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.
- **Rehabilitation measures to be effective.** The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practice applied internationally in peatland management. Measures proposed in this plan have already been shown to be effective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.
- **Natural colonisation of vegetation to develop semi-natural habitats at a rate within the normal limits.** The development of naturally functioning semi-natural habitats on degraded bog takes time. It may take 30-50 years for active raised bog vegetation to re-develop on suitable cutaway that was previously bare peat. However, Bord na Móna experience has demonstrated the effectiveness of these type of measures for re-wetting bog and creating carbon sinks (Renou-Wilson et al. 2018).
- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed enhanced measures to optimise climate action. This will focus on a collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services.

8. REHABILITATION ACTIONS AND TIME FRAME

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

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

BNM-DR-23-07-22 titled **Derraghan Bog: Aerial Imagery2020**

BNM-DR-23-07-04 titled **Derraghan Bog: PeatDepths**

BNM-DR-23-07-03 titled **Derraghan Bog: LiDAR Map**

BNM-DR-23-07-09 titled **Derraghan 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-23-07-05 Derraghan Bog: Rehabilitation Measures** in the accompanying Mapbook (Note that the actual distribution of these measures may be subject to change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.)

These enhanced measures for Derraghan bog will include (see Table 8.1):

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. This will include impacts on the drainage infrastructure of the ESB Ash site. Initial hydrological modelling indicates that a significant part of the site will develop a mosaic of wetland habitats with permanent deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent River Shannon.
- Intensive drain blocking around shallow peat areas / modelled depressions on little or no peat to create/promote the spread of wetland habitats,
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels
- Intensive drain blocking (7/100m) around shallow peat areas/modelled depressions on little or no peat to create/promote the spread of wetland habitats. Measures include the blocking of outfalls, management of water levels and transplanting reeds and other rhizomes
- Deep Peat measures including field re-profiling, resulting in banded wetlands suitable for *Sphagnum* inoculation, on deeper peat. Berms and field re-profiling (45m x 60m cell) in deep peat areas, along with blocking outfalls and managing overflows with a controlled weir outfall, includes drainage channels for excess water and *Sphagnum* inoculation

- Targeted fertiliser applications to accelerate vegetation establishment on areas of **bare peat** on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Seeding of vegetation and inoculation of *Sphagnum* will be undertaken where required.

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

Type		Enhanced Rehabilitation Measure	Extent (Ha)
Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	6.7
Dry Cutaway	DCT2	Regular drain blocking (3/100m) +blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	10.1
Deep Peat	DPT 4	Berms and field re-profiling (45x60m cell), blocking outfalls and managing overflows & drainage channels for excess water & Sphagnum Inoculation	30.6
Wetland	WL2	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	27.5
Wetland	WLT3	Blocking outfalls and managing water levels with overflow pipes. Targeted blocking of outfalls within a site, constructing larger berms to re-wet cutaway and transplanting reeds and other rhizomes.	18.8
Wetland	WLT4	More intensive drain blocking (max 7/100 m), + blocking outfalls and managing overflows + transplanting Reeds and other rhizomes	57.7
Marginal land	MLT1	No work required	15.0
Marginal land	MLT2	More intensive drain blocking (max 7/100 m)	1.9
Silt ponds	Silt pond	Silt ponds	0.3
Constraint	Constraint	Other Constraints (ROW)	6.3
Additional Works	AW2	More intensive drain blocking and outfall management	114.3
Total			289.2

8.1 Short-term Planning Actions (0-1 years)

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise, from the EPA.
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with engineering drawings outlining how the various rehabilitation methodologies (The Scheme PCAS) will be applied to Derraghan 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).
- An assessment of pumping requirements to complete decommissioning is to be carried out.

- A drainage management assessment of the proposed enhanced rehabilitation measures has been carried out and any issues identified resolved and the rehabilitation plan adapted.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation has been carried out. The results of this assessment has been incorporated into the rehabilitation plan to minimise known archaeological disturbance, where needed.
- A review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements has been carried out.
- A review of remaining milled peat stocks has been carried out. There are peat stocks remaining on Kilgarvan bog that will be removed before rehabilitation commences.
- An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- An Appropriate Assessment of the Rehabilitation Plan has been carried out. (Note that the rehabilitation plan for Derraghan screened out at the Stage I.)
- See Derraghan 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 implantation of the rehabilitation plan.

8.2 Short-term Practical Actions (0-2 years)

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

8.3 Long-term (>3 years)

- Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- Delivery of a monitoring, aftercare and maintenance programme (See section 10.2 below).

- Decommissioning of silt-ponds will be assessed and carried out, where required.
- Reporting to the EPA will continue until the IPC License is surrendered.

8.4 Timeframe

- **2021-2022:** Short-term planning actions.
- **2022:** 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 different cutaway types across the site (See Appendix I).

9. AFTERCARE AND MAINTENANCE

9.1 Programme for monitoring, aftercare and maintenance

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

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

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

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

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

- Vegetation and habitat monitoring after rehabilitation is completed using a cutaway bog condition assessment (Similar to ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels. It is proposed that sites can be monitored against this baseline in the future.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated peatland habitats. This means that potential GHG emissions can be estimated from the site, as the site continues along its trajectory towards a naturally functioning peatland ecosystem.

9.2 Rehabilitation plan validation and licence surrender – report as required under condition 10.4

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

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

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

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DERRAGHAN DECOMMISSIONING AND REHABILITATION PLAN - ADDENDUM 1

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mount Dillon bog group (Ref. P0504-01). 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. Derraghan bog is part of the Mount Dillon bog group and is located in Co. Longford.

This addendum outlines the findings of the Appropriate Assessment reporting carried out in respect of proposed PCAS activities at Derraghan Bog.

Appropriate Assessment Reporting findings

An Appropriate Assessment Stage 1 Screening Report⁵ was commissioned by Bord na Móna to inform whether the proposed PCAS activities at Derraghan Bog had the potential to result in Likely Significant Effects on European Sites. The concluding statement of this report reads as follows:

“Following this initial screening of the proposed rehabilitation measures on Derraghan Bog it can be concluded that the possibility of any likely significant effects on the European Sites listed below, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

- Lough Ree SAC (000440)
- Lough Ree SPA (004064)
- Fortwilliam Turlough SAC (000418)”

Therefore following screening, Appropriate Assessment is not required for the project as it is not directly connected with or necessary to the management of any Site(s) as European Site(s) and as it can be concluded, on the basis of objective information, that the project, individually or in combination with other plans or projects is not likely to have a significant effect on any European Site(s).

⁵ JBA Consulting (2022). *Appropriate Assessment Screening Report Rehabilitation of Derraghan Bog, Co. Longford.*

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

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

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

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

Scope of rehabilitation

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

- The area of Derraghan Bog.
- EPA IPC Licence - Ref. P0504-01. 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. Derraghan bog is part of the Moundillon bog group.
- The current condition of Derraghan Bog. This site has pumped drainage.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- To minimise potential impacts on neighbouring land. Some boundary drains around Derraghan Bog will be left unblocked as blocking boundary drains could affect adjacent land.

Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Derraghan Bog is environmental stabilisation of the site via wetland creation. This is defined as:

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

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

Criteria for successful rehabilitation:

- Rewetting of residual peat and shallow cutaway in the former area of industrial peat production to offset potential run off of suspended solids and to encourage development of vegetation cover via natural colonisation and reducing the area of bare exposed peat.

- That there is a 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).
- 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

Rehabilitation targets

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat blockages and re-wetting). This will be demonstrated by a post rehab aerial survey.
- Stabilising potential emissions from the site (e.g. suspended solids). The key target will be developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be demonstrated by water quality monitoring results.

Rehabilitation measures:

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

Timeframe:

- 2022. 1st phase of rehabilitation. Field drain blocking.
- 2022. 2nd phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1st phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.
- 2024-2026. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024-2026. Decommission silt-ponds, if necessary.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	30.6
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	16.8
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	104.0
Marginal Land	MLT1	No work required	131.2
Other	Silt Pond	Silt ponds	0.3
Other	Constraint	Rights of Ways and constrained areas/buffers/Archaeology	6.3
Total			289.2

See Drawing number BNM-DR-23-07-20 titled **Derraghan Bog: Standard Rehab Measures** included in the accompanying Mapbook which illustrates the standard rehab measures to be applied.

Monitoring, after-care and maintenance

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

Validation and IPC Licence surrender

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

- The planned rehabilitation has been completed;
- Water quality monitoring demonstrates that water quality of discharge is stabilising or improving; and

- The site has been environmentally stabilised.

APPENDIX II: BOG GROUP CONTEXT

The 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. Intensive decommissioning and rehabilitation for the Mount Dillon Bog Group started in 2021 at a number of individual bogs.

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 Derrycashel 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	Draft 2021
Clooneeny	358	Cutover Bog	Clooneeny Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power	2020	Draft 2021

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		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.	Most of the former production area on site is bare peat. Some areas of cutaway on site are developing pioneer cutaway vegetation communities.		
Cloonmore	102	N/A	Never developed for industrial peat production; scattered plots.	N/A	N/A
Cloonshannagh	494	Cutover Bog 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.	Cloonshannagh Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power Restoration work has been carried out on a 38ha section of high bog within Cloonshannagh Bog. Some of the former production area on site is developing pioneer cutaway vegetation communities, the remainder of the site is bare peat.	2020	Draft 2017
Cloonshannagh Rail Link	28	Cloonshannagh rail link is a link between sites.	N/A	N/A	N/A
Corlea	163	Cutaway Bog 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.	The former production area at Corlea has already extensively colonised. Pioneer wetland and scrub development has occurred over much of the site. Some wetland and rehabilitation management was undertaken between 2016-2018. Part of site leased to local community development group to develop amenity walkway in association with Longford County Council.	2018	Draft 2019
Derraghan	289	Cutover Bog 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.	Derraghan Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power 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.	2020	Draft 2021
Derryadd	653	Cutover Bog 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.	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 Derryadd Bog will form part of the footprint of Derryadd Windfarm for which planning permissions were granted in 2020.	2020	Draft 2017
Derryadd2	328	Cutover Bog 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 the former production area has shallow peat reserves. Some	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	2020	Draft 2017

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		pockets of deep peat remain. Derriyadd 2 is considered a shallow peat cutover bog.	Derriyadd 2 Bog will form part of the footprint of Derriyadd Windfarm for which planning permissions were granted in 2020.		
Derriyarogue	895	Cutover Bog Industrial peat production commenced at Derriyarogue 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. Derriyarogue is considered a shallow peat cutover bog.	Much of the former production area at Derriyarogue has been out of production for some time. These areas have already extensively colonised with pioneer wetland, cutaway and scrub vegetation communities. Derriyarogue Bog will form part of the footprint of Derriyadd Windfarm for which planning permissions were granted in 2020. An amenity walkway through part of Derriyarogue is proposed for the Derriyadd 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 Derriyarogue 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. Rehabilitation under the PCAS scheme commenced in 2021.	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. Rehabilitation under the PCAS scheme commenced in 2021.	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	Edera Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.	2020	Finalised 2021

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		from Edera began in 2003 and ceased in 2018. Edera is considered a deep peat cutover bog.	The majority of Edera Bog former production area is bare peat. Rehabilitation under the PCAS scheme commenced in 2021.		
Erenagh	93	Cutover Bog Development for industrial peat production commenced at Erenagh Bog in 1970's. Erenagh is considered a deep peat cutover bog.	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 time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2017
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

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
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-23-07-24 titled **Mount Dillon Bog Group**, included in the accompanying Mapbook which illustrates the location of Derraghan Bog and the Mount Dillon Bog Group in context to the surrounding area

APPENDIX III: ECOLOGICAL SURVEY REPORT

Ecological Survey Report			
<i>Note: This report outlines an ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.</i>			
Bog Name:	<u>Derraghan</u>	Area (ha):	288ha
Works Name:	Mount Dillon	County:	Longford
Recorder(s):	BnM Ecology	Survey/monitoring Date(s):	20 July 2010 Field trip for the local community September 2011
Habitats present (in order of dominance)			
The most common habitats present at this site include:			
<ul style="list-style-type: none"> • (Codes refer BnM classification of pioneer habitats of production bog). • (Codes refer to Heritage Council habitat classification, Fossitt 2000) • CBir • oBir • Bare Peat • eBir • pJeff • gCal • pEang • pEqus • Exposed sand, gravel or till (ED1) • Raised bog (PB1) • Birch woodland (WN7) • Refuse and other waste (ED5) • Wet Grassland (GS4) 			
Description of site			
<p>Derraghan Bog is a long, relatively narrow section of bog that is located approximately 7km south east of Lanesborough along the R392 Lanesborough to Ballymahon Road. The bog is dissected in two parts by a BnM rail line that runs in an east west orientation through the site, resulting in a northern and southern section. The majority of the site is out of production and is revegetating at a steady rate. An ash land-fill site is located close to the middle of the site and this facility is used to store ash that is produced from the nearby power station in Lanesborough.</p> <p>The northern section is almost entirely out of production apart from some fields running along the eastern side of the site. These areas were used to produce mini-sod peat. The majority of the northern section of the site is best described as a transition between scrub and Birch woodland (WN7). This woodland is dominated by Birch with Rowan, Willow (Goat, Grey,</p>			

Creeping and Eared Willow), Aspen, Lodge Pole Pine, Scot's Pine, Blackthorn, Oak (saplings), Hawthorn, Holly, Elder, Purple Moor Grass, Raspberry, Bramble, Strawberry, Heather, Tormentil, Hard Fern, Male fern, Narrow Buckler fern, Bottle Sedge, Soft Rush, Creeping Bent Grass, Ivy, Herb Robert and Hart's Tongue Fern, mosses included *Aulacomnium palustre*, *Polytrichum commune var. commune*, *Calliergonella cuspidata*, *Sphagnum subnitens* and *S. cuspidatum*. This area has been out of production since 1995.

Overall this area of woodland was dominated by Birch with a ground flora that was dominated of Raspberry, Heather and Bramble. Occasional open areas consisted of dry heath (HH2) with some areas also dominated by Bramble and Raspberry. Some wetter areas consisted of Purple moor Grass and small patches of *Sphagnum cuspidatum* and *S. subnitens*. Several drainage ditches are located within this area but for the most part were infilling apart from one main drain that had a flow of water through it.

An area of potential rich fen (PF1) is located close to the western edge of the woodland, this area is small but has the potential to develop and become larger over time, species contained within this area were Saw Sedge, Black Bog Rush, Lesser Tussock Sedge, Bottle sedge, Marsh Arrow Grass, Tormentil, Round leaved Sun Dew, Purple Moor Grass, Sweet Vernal Grass, Heather, *Aulacomnium palustre*, Bog Cotton, Royal Fern and *Sphagnum cuspidatum*. Rich fen indicator species such as Brown Mosses were searched for but none were located within this area.

The northern section of woodland was flanked on both sides by areas that have only been taken out of production in the past few years. These areas were becoming more vegetated with time and were a mosaic of pJeff, Bare Peat, pTrig, pEang, dHeath and eBir. Occasional fields of bare peat were still located within the northern section of the site as a result of machinery using these areas as access routes.

A dis-used Works site is located on the north east boundary of the site, part of this area is within the site. This area contained old buildings that were surrounded by scrub, grassland and mature trees such as Lodge Pole Pine, Scot's Pine, Aspen, Monterey Cypress, Sitka Spruce and Norway Spruce. An un-used silt pond to the south of the old works site contained Newts.

Remnant portions of Raised bog (PB1) are located on the eastern and western boundaries of this section of the bog. These remnants were in poor condition overall and were dry with a dominance of tall leggy Heather throughout. A section of remnant raised bog in the north western corner of the site was being used for domestic turf cutting.

A railway line dissects the site into a northern and southern section; this rail line was bordered on both sides by a mixture of gCal, BP and eBir.

The southern section of the site contained an ash dump in the north east corner of the site. To the west of the ash dump further woodland was well established. This woodland had a similar composition as the woodland already described in the northern section, the difference being that this woodland appeared to be slightly older than the northern area and had a more defined canopy along with species such as Crab Apple and Ash that were not found in the northern section of the site. This woodland also contained more Oak saplings. A section, close to the southern end of the woodland, had been cleared recently in order to create a railway line across the site.

Below the woodland the remaining sections of the site were in production. Some of the drains contained PTyp, PPhrag, eBir and pJeff along with two high ridges that contained dHeath and scrub. A section of the site close to the south east contained some oBir, to the north of this area a section of the bog had revegetated with grasses and rushes. Some marginal habitats in this section include degraded raised bog (PB1), dHeath and eBir.

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

There are no designations within or adjoining the site at Derryadd.

Adjacent habitats and land-use

Habitats adjacent to the site include improved agricultural land (GA1), wet grassland (GS4), raised bog (PB1) and cutaway bog (PB4).

Watercourses (major water features on/off site)

- A small stream starts along the western edge of the site and flows directly into Lough Ree. This watercourse is part of the Shannon catchment.

Fauna biodiversity

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

- Chiffchaff
- Swift
- Gold finch (Flock > 30 individuals)
- Kestrel
- White Throat
- Willow Warbler
- Grasshopper Warbler
- Grey Heron
- There are reports that a pair of Barn Owls has been using the site.
- Other more common species included (Gray Crow, Magpie, Blackbird, Robin, Wood Pigeon, Thrush and Swallows).

Mammals

- Fox
- Badger (Numerous signs in the areas of woodland)
- Pine Marten

Invertebrates

- Silver washed Fritillary
- Large Heath
- Meadow Brown
- Small Tortoiseshell
- Small Copper
- Green-veined White

Amphibians

- Frog
- Newt

Fungal biodiversity

- Brown Birch Bolete
- Bleached Brittlegill

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

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

APPENDIX V: BIOSECURITY

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

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

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

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

In addition to the above, Best Practice measures around the prevention and spread of Crayfish plague⁶ will be adhered with throughout all rehabilitation measures and activities.

⁶ <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 Mountdillon Bog Group (Ref. PO-501-01). 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 Mountdillon group. This regulatory requirement is the main driver of the development of this rehabilitation plan.

2 The Peatlands Climate Action Scheme (PCAS)

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

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

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

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

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

3 National Climate Policy

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

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

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

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

4 National Peatlands Strategy

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

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

In line with a National Peatlands Strategy recommendation, a Peatlands Strategy Implementation Group (PSIG), was established, assisted in the finalisation of the Strategy, is overseeing subsequent implementation and will report to Government on an annual basis on the implementation of the actions and principles contained within the Strategy.

Bord na Móna is a key stakeholder in the National Peatlands Strategy and the Peatlands Strategy Implementation Group. The strategy recognises the potential for some Bord na Móna sites to be restored and to contribute to the national SAC and NHA network of protected raised bog sites. The strategy (agreed in 2015) also recognises the various different values of cutaway bog and developed six key principles (with Bord na Móna) for the after-use of cutaway bog.

- Bord na Móna will continue to assess and evaluate the potential of the company's land bank, using a land use review system. The assessment will help prepare a set of evidence-based management plans for the various areas of peatland. These plans will also inform its cutaway bog rehabilitation.
- The policy of Bord na Móna is not to open up any undrained new bogs for peat production.
- Lands identified by Bord na Móna as having high biodiversity value and/or priority habitats will be reserved for these purposes as the proposed 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 2nd National Biodiversity Action Plan outlines the main policies, strategies, actions and targets in relation to biodiversity. This plan has several Bord na Móna specific objectives and actions including implementing the BnM Biodiversity Action Plan 2016-2021 and overlaps with both the National Peatlands Strategy and the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.

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

7 National Conservation Designations

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

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

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

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

Bord na Móna has also responded to the needs of the NRBMP and provided several sites to the government for the relocation of turf-cutters from SACs. This is part of a suite of ongoing bog conservation measures in the NRBMP to manage turf-cutting in protected sites. Bord na Móna and the National Parks and Wildlife Service continues to engage regarding the ongoing relocation of turf-cutters from protected raised bog sites.

9 All-Ireland Pollinator Plan 2021-2025

The All-Ireland Pollinator Plan 2021-2025 outlines key objectives and actions to protect and support pollinating insects and the habitats they rely on. A Bord na Móna specific action in this plan includes the adoption of pollinator-friendly management within the Bord na Móna network of sites. One action to help achieve this objective is habitat rehabilitation and restoration, where possible, of pollinator-friendly habitats, including peatland habitats.

10 Land-Use Planning Policies

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

11 National Archaeology Code of Practice

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

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

- BNM must ensure that any monuments or archaeological objects discovered during peat extraction are protected in an appropriate manner by following the Archaeological Protection Procedures.
- BNM must ensure that any newly discovered monuments on Bord na Móna lands are reported in a timely manner to the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht.
- BNM must ensure that any archaeological objects discovered on Bord na Móna lands are reported immediately to the Duty Officer of the National Museum of Ireland.
- Bord na Móna will adhere to the Archaeology Code of Practice relating to management of any archaeological finds that may arise during cutaway peatland rehabilitation and decommissioning.

12 Bord na Móna Biodiversity Action Plan 2016-2021

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

One example of a key CBD target is:

- *“Restore at least 15% of degraded areas through conservation and restoration activities.”*

The EU's headline target for progress by 2020 is to:

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

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

13 Bord na Móna Commitments

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

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

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

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

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

14 Bord na Móna Strategic Framework for the Future Use of Cutaway Peatlands 2020 (Draft)

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

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

APPENDIX VII: DECOMMISSIONING

1. Condition 10 Decommissioning

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

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

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

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

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

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

Item	Description	Derraghan Decommissioning Plan
1	Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices	Clean-up of Bog
2	Cleaning Silt Ponds	Cleaning Silt Ponds
3	Decommissioning Peat Stockpiles	Peat Stockpile Management
4	Decommissioning or Removal of Buildings and Compounds	Not relevant
5	Decommissioning Fuel Tanks and associated facilities	Not relevant
6	Decommissioning and Removal of Bog Pump Sites	Where feasible
7	Decommissioning or Removal of Septic Tanks	De-sludge Septic Tank, if needed

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

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

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

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

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

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

7.3.3 The ultimate destination of the waste.

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

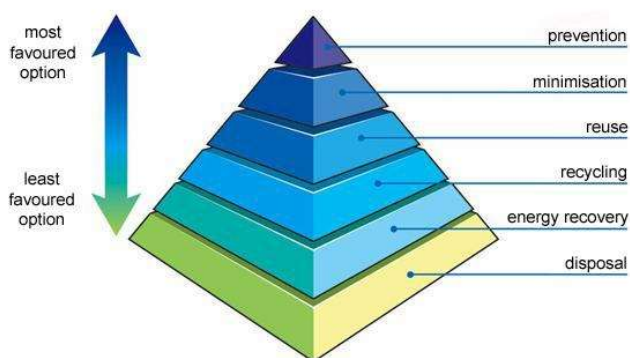
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

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

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

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



The validation of the success of condition 10.1 is carried out through an Independent Closure Audit (ICA), followed by 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 after-use 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	Derraghan Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Not Applicable
3	Decommissioning Railway Level Crossing	Not Applicable
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog
5	Removal of High Voltage Power Lines	If feasible

APPENDIX VIII: GLOSSARY

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

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

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

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

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

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

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

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

Restoration: Ecological restoration is defined as the process of re-establishing to the extent possible the structure, function and integrity of indigenous ecosystems and the sustaining habitats they provide" (SER 2004). Defined in this way, restoration encompasses the repair of ecosystems (Whisenant 1999) and the **improvement of ecological conditions in damaged wildlands** through the **reinstatement of ecological processes**. In general, Bord na Móna cutaway peatlands cannot be restored back to raised bog in a reasonable timeframe as their environmental conditions 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, Mountdillon Group of Bogs 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 are serviced by a silt lagoons/ponds. During the excavation of these silt ponds, pre IPPC Licensing in 1999 and since licensing, the excavated material is stored adjacent to the silt pond, where it either remains in situ or levelled out. As required by condition 6.6, these silt lagoons are cleaned twice per annum or more often if inspections dictate. These silt cleanings are also deposited on the same location, adjacent to the silt pond, where they may be levelled periodically to allow room for subsequent cleanings. These mounds of silt pond excavation material and cleanings are generally no higher than 2-3 metres.

1.2 Power Station screenings:

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

1.3 Bog Timbers:

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

2.0 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 31st December 2012. The Plan shall be reviewed at least once every five years thereafter in a manner agreeable to the Agency and amended in the event of substantial changes to the operation of a waste facility or to the waste deposited. Any amendments shall be notified to the Agency.

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

2.2 Condition 7.6 Waste Facility

- (i) No new waste facility may be developed or an existing waste facility modified unless agreed by the Agency.
- (ii) The licensee shall ensure that all existing waste facilities are managed and maintained to ensure their physical stability and to prevent pollution or contamination of soil, air, surface water or groundwater.
- (iii) The licensee shall ensure that all new waste facilities are constructed, managed and maintained to ensure their physical stability and to prevent pollution or contamination of soil, air, surface water or groundwater.
- (iv) Operational measures shall be continuously employed to prevent damage to waste facilities from personnel, plant or equipment.
- (v) The licensee shall establish and maintain a system for regular monitoring and inspection of waste facilities.
- (vi) All records of monitoring and inspection of waste facilities, as required under the licence, shall be maintained on-site in order to ensure the appropriate handover of information in the event of a change of operator or relevant personnel.

2.3 Condition 7.7 Excavation Voids

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

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

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

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

3.0 Minimisation.

3.1 Silt pond excavation material and cleanings.

IPPC Licence conditions require all production areas to be serviced by an appropriately designed silt pond based on storage volume and retention time. Condition 6.6 requires all ponds to be cleaned bi-annually and more often if inspections dictate, so the only opportunity for minimisation of same is

through Standard Operating Procedures. These are required under condition 2.2.2 (i) regarding minimisation of suspended solids, and are in-place to minimise the generation of silt, which in-turn will minimise the generation of silt pond waste.

3.2 Power Station Screenings.

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

3.3 Bog Timbers.

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

4.0 Treatment

4.1 Silt pond excavation material and cleanings.

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

4.2 Power Station Screenings.

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

4.3 Bog Timbers

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

5.0 Recovery

5.1 Silt pond excavation material and cleanings.

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

5.2 Power Station Screenings.

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

5.3 Bog Timbers

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

6.0 Disposal

6.1 Silt pond excavation material and cleanings.

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

6.2 Power Station Screenings.

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

6.3 Bog Timbers

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

7.0 Extractive Waste Management Plan

5 (2a)(i)

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

5 (2a)(ii)

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

5 (2a)(iii)

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

5 (2a)(iv)

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

5 (2a)(v)

Peat mineral resources do not undergo any treatment.

5 (2b)

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

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

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

5 (3)

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

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

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

Classification in accordance Annex II.

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

Description of operations.

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

Closure plan. (Bog Rehabilitation Plan).

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

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

10.2 Cutaway Bog Rehabilitation Plan:

- 10.2.1 The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands within the licensed area. This plan shall be submitted to the Agency for agreement within eighteen months of the date of grant of this licence.

- 10.2.2 The plan shall be reviewed every two years and proposed amendments thereto notified to the Agency for agreement as part of the AER. No amendments may be implemented without the written agreement of the Agency.

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

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

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

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

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

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

Review.

This plan will be reviewed every five years, the first review to take place in September 2017. This review will entail an inspection of these waste facilities to ensure their placing, management, maintenance and stability comply with the requirements of the Extractive Waste Management requirements and condition 7.5, 7.6 and 7.7 of the Mountdillon IPPC Licence P0504-01.

APPENDIX X: MITIGATION MEASURES FOR THE APPLICATION OF FERTILISER

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

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

APPENDIX XI: CONSULTATION SUMMARIES**Table APX -1 Consultees contacted**

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Statutory Bodies						
Derraghan	Dept of Agriculture Food & the Marine	General Email Contact	23/11/2021	Email		
Derraghan	Department of Housing, Local Government and Heritage NPWS	Multiple Staff Members	23/11/2021	Email		
Derraghan	National Museum of Ireland	Multiple Staff Members	23/11/2021	Email	24/11/2021	Email
Derraghan	Department of Housing, Local Government and Heritage	General Email Contact	23/11/2021	Email		
Derraghan	Department of Environment, Climate and Communications	Multiple Staff Members	23/11/2021	Email		
Derraghan	Dept of Rural and Community Development	General Email Contact	23/11/2021	Email		
Derraghan	Department of Housing Local Government and Heritage	Minister Malcolm Noonan - Minister of State at the Department of Housing, Local Government and Heritage	23/11/2021	Email	25/01/2022	Email
Derraghan	Minister for Environment,	Minister - Eamon Ryan	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
	Climate and Communications					
Derraghan	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Pippa Hackett Minister of State for Land Use and Biodiversity)	23/11/2021	Email		
Derraghan	Oireachtas	Danielle McDonnell (Minister Malcolm Noonan Secretary)	23/11/2021	Email	25/01/2022	Email
Derraghan	An Taisce	General Email Contact	23/11/2021	Email		
Derraghan	Environmental Protection Agency	Multiple Staff Members	23/11/2021	Email		
Derraghan	Electricity Supply Board	Multiple Staff Members	23/11/2021	Email	21/01/22	Email
Derraghan	Inland Fisheries Ireland	General Email Contact	23/11/2021	Email		
Derraghan	Local Authority Waters Programme	Multiple Staff Members	23/11/2021	Email		
Derraghan	Teagasc	General Email Contact	23/11/2021	Email		
Derraghan	The Heritage Council	General Email Contact	23/11/2021	Email		
Derraghan	Waterways Ireland	General Email Contact	23/11/2021	Email		
Derraghan	An Forum Uisce (The Water Forum)	General Email Contact	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Derraghan	Coillte	Multiple Staff Members	23/11/2021	Email		
Derraghan	Irish Water	General Email Contact	23/11/2021	Email		
Derraghan	Office of Public Works	Multiple Staff Members	23/11/2021	Email		
NGOs						
Derraghan	CARO (Climate Action Regional Office) Eastern and Midlands	General Email Contact	23/11/2021	Email		
Derraghan	Bat Conservation Ireland	General Email Contact	23/11/2021	Email		
Derraghan	Birdwatch Ireland	General Email Contact	23/11/2021	Email		
Derraghan	Butterfly Conservation Ireland	General Email Contact	23/11/2021	Email		
Derraghan	County Longford Shooting & Conservation Council	General Email Contact	23/11/2021	Email		
Derraghan	Eastern and Midland Regional Assembly	General Email Contact	23/11/2021	Email		
Derraghan	Fisheries Ireland	General Email Contact	23/11/2021	Email		
Derraghan	Friends of the Earth	General Email Contact	23/11/2021	Email		
Derraghan	Friends of the Irish Environment	General Email Contact	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Derraghan	ICMSA (Irish Creamery Milk Suppliers Association)	General Email Contact	23/11/2021	Email		
Derraghan	ICSA (Irish Cattle and Sheep Farmers Association)	General Email Contact and Multiple Staff Members	23/11/2021	Email		
Derraghan	Irish Farmers Association	General Email Contact and Multiple Staff Members	23/11/2021	Email	02/02/2022	Email
Derraghan	Irish Peatlands Conservation Council	General Email Contact	23/11/2021	Email		
Derraghan	Irish Raptor Study Group	General Email Contact	23/11/2021	Email		
Derraghan	Irish Rural Link (Community Wetlands Forum)	General Email Contact	23/11/2021	Email		
Derraghan	Irish Rural Link	General Email Contact	23/11/2021	Email		
Derraghan	Irish Wildlife Trust	General Email Contact and Multiple Staff Members	23/11/2021	Email	10/02/2022	Email
Derraghan	The Inland Waterways Association of Ireland (IWAI)	General Email Contact	23/11/2021	Email		
Derraghan	Longford Wilderness Park (Clandillon Civil Consulting)	General Email Contact	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Derraghan	Longford Wilderness Park (Longford County Council)	General Email Contact	23/11/2021	Email		
Derraghan	National Association of Regional Game Councils	General Email Contact	23/11/2021	Email		
Derraghan	NPWS Rangers North Midlands	Multiple Staff Members	23/11/2021	Email		
Derraghan	NUIG Galway	Multiple Staff Members	23/11/2021	Email		
Derraghan	PPN Longford Public Participation Network	General Email Contact	23/11/2021	Email		
Derraghan	Ranger Association Committee	General Email Contact	23/11/2021	Email		
Derraghan	Shannon Flood Risk State Agency Co-ordination Working Group	General Email Contact	23/11/2021	Email		
Derraghan	Sustainable Water Action Network (SWAN)	General Email Contact	23/11/2021	Email		
Derraghan	Trinity College Dublin	Multiple Staff Members	23/11/2021	Email		
Derraghan	Turf Cutters and Contractors Association	General Email Contact	23/11/2021	Email		
Derraghan	UCD / Irish Rural Link	General Email Contact	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Derraghan	University College Dublin	General Email Contact	23/11/2021	Email		
Derraghan	Waterways Ireland	Multiple Staff Members	23/11/2021	Email		
Derraghan	Woodlands of Ireland	General Email Contact	23/11/2021	Email		
Derraghan	Longford County Council	Multiple Staff Members	23/11/2021	Email		
Derraghan	Longford County Council - Director of Services (Strategic Infrastructure and Climate Change)	John Brannigan	23/11/2021	Email		
Derraghan	Longford County Councillor - Ballymahon District	Colm Murray	23/11/2021	Email		
Derraghan	Longford County Councillor - Ballymahon District	Mick Cahill	23/11/2021	Email		
Derraghan	Longford County Councillor - Ballymahon District	Paul Ross	23/11/2021	Email		
Derraghan	Longford County Councillor - Ballymahon District	Mark Casey	23/11/2021	Email		
Derraghan	Longford County Councillor - Ballymahon District	Gerard Farrell	23/11/2021	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Derraghan	Longford County Councillor - Ballymahon District	Pat O'Toole	23/11/2021	Email		
Derraghan	All Land- owners in vicinity of bog	Leaflet Drop		Leaflet		
Derraghan	All those with turbary rights	Leaflet Drop		Leaflet		

Table APX -2 Response summary from Consultees contacted

Organisation	Summary of Response by Stakeholder	BnM Response
Electricity Supply Board (ESB)	<p>The ESB made a submission on Derraghan Bog and raised the following points:</p> <ol style="list-style-type: none"> 1) Emphasised the need for coordination throughout the rehabilitation programme as the proposed rehabilitation works surround the ESB Ash Disposal Facility at Derraghan. 2) Queried the exclusion of a small area of cutaway that had been identified in the rehabilitation plan as being leased by ESB to develop additional water treatment for the discharge from the site. Clarified that plans to develop this proposed treatment facility have since been halted, due to boundary difficulties. 3) ESB welcomed the rehabilitation plans proposal to reassess the pumping regime and to remove pumps if desired, if doing so would have no significant external impact. 4) ESB welcomed the clarity that the rehabilitation plan provided, noting that the maps indicate that the proposed wetland areas would not pose a threat to the Ash Disposal Facility, given the topography of the bog and the rehabilitation measures proposed. 5) ESB also noted that the effects of the rehabilitation measures will be negligible, apart from the effects it may have on the surface water drainage from the Ash Disposal facility. 	<p>BnM responded on the 27/01/2022 and acknowledged the submission from ESB and responded to the queries raised within the same.</p>
Irish Farmers Association	<p>The IFA made a submission on Derraghan Bog 02/02/2022 raising the following points:</p> <ol style="list-style-type: none"> 1) Acknowledging need to protect the environment and manage national peatlands 2) Expressing concern about possible impact of peatland rehabilitation on surrounding farmlands, specifically around the following: <ol style="list-style-type: none"> a. Alteration of flood table, flooding/waterlogging of surrounding areas and development of new flood plains. Recommendation for a hydrological assessment prior to work to gauge long term impact of rewetting the bog. b. Health and Safety risks if water levels in drains and depressions rise then these could become a hazard for livestock, machinery operation and farmer access. Recommendation for a health and safety assessment. c. Negative impact on property values due to accumulation of risks outlined above. d. Contingency Planning for potential future ownership of designated bogs in ensuring no negative impacts on property from any new ownership. 	<p>BnM responded on 02/09/2022 to address the concerns raised by the IFA.</p> <p>Dialogue is ongoing between BnM and the IFA.</p>

Organisation	Summary of Response by Stakeholder	BnM Response
	<p>e. Protection of existing Turf Cutting rights and resolution of any issues around same.</p> <p>The IFA made a number of proposals to be considered as potential solutions to queries raised.</p>	
National Museum of Ireland	<p>Response received 24/11/2021 acknowledging receipt of email and thanking us for making the opportunity to respond. Responded through e-mail throughout 2020/21 in relation to all PCAS bogs. Issues raised were;</p> <ol style="list-style-type: none"> 1) The request that due diligence be taken during works to protect any archaeologically significant findings or areas. 2) The NMI reiterated the importance of peatlands for the preservation of archaeology and requested they be consulted as part of any EIA undertaken. 	BnM acknowledged on 25/11/2021. Dialogue is ongoing.
Danielle McDonnell Private Secretary to Minister Malcolm Noonan T.D. Office of the Minister of State for Heritage and Electoral Reform	Acknowledgement e-mail from department received 25/01/2022 to inform BnM of receipt of consultation and advised that Officials of this Department would be in contact with you in relation to the PCAS scheme, should it be required.	No response required.
The Irish Wildlife Trust	Responded on the 10/02/22, to acknowledge the receipt of the of PCAS rehabilitation plan, however they advised that they do not have the capacity to make a submission but will keep it on file.	No response required.

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.



	Procedure: ENV017	Rev: 1
Title: Archaeological Findings	Approved: EM	Date:

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			
2			



**Archaeological Impact Assessment of Proposed Bog
Decommissioning and Rehabilitation at Derraghan 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.x hectares at Derraghan 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 Derraghan Bog will include:

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. This will include impacts on the drainage infrastructure of the ESB Ash site. Initial hydrological modelling indicates that a significant part of the site will develop a mosaic of wetland habitats with permanent deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent River Shannon.
- Intensive drain blocking around shallow peat areas / modelled depressions on little or no peat to create/promote the spread of wetland habitats,
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels
- Intensive drain blocking (7/100m) around shallow peat areas/modelled depressions on little or no peat to create/promote the spread of wetland habitats. Measures include the blocking of outfalls, management of water levels and transplanting reeds and other rhizomes
- Deep Peat measures including field re-profiling, resulting in bunded wetlands suitable for Sphagnum inoculation, on deeper peat. Berms and field re-profiling (45m x 60m cell) in deep peat areas, along with blocking outfalls and managing overflows with a controlled weir outfall, includes drainage channels for excess water and Sphagnum inoculation
- Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Seeding of vegetation and inoculation of Sphagnum will be undertaken where required.

Derraghan Bog is located c.5.6km west of the village of Keenagh, Co. Longford, and south-west of the R392 road. The overall rehabilitation area occupies the townlands of Derraghan Beg and More, Derryagran, Derryglash, Derrygowna, Derrymanny on OS 6 inch sheet Longford No. 22.



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

- The IAWU Peatland Survey 1991
- 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

Early Investigations

In 1957 a class 1 togher (RMP LF022-055008-) in Derraghan More townland consisting of large transverse oak planks, supported by longitudinal runners and secured by pegs was excavated by Rynne (Raftery 1996, 94-104). Although largely destroyed by peat-milling, a surviving portion of this togher that was close to the surface was excavated by Raftery in 1989 exposed a surviving portion of the togher (L 14m; Wth 4.5m max.). Dendrochronological dating revealed a date of 156±9 BC (Q7931M). (Raftery 1996).

Peatland 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). 51 sightings of archaeological material were made (see Table 1). These archaeological sightings were notified to the Archaeological Survey of Ireland and 52 sightings were included in the Sites and Monuments Record.

IAWU Cat._No.	IAWU Class	Townland	ITN E	ITN N	Irish Grid E	Irish Grid N	SMR No.	Depth BS m
LF-DNM 5	TOGH	Derraghan More	606477	763337	206528	263316	LF022-055001-	-
LF-DNM 7	TOGH	Derraghan More	606459	763351	206510	263330	LF022-055002-	-
LF-DNM 8	TOGH	Derraghan More	606437	763388	206488	263367	LF022-055003-	-
LF-DNM 9	TOGH	Derraghan More	606432	763401	206483	263380	LF022-055004-	-
LF-DNM 10	TOGH	Derraghan More	606370	763585	206421	263564	LF022-055005-	-
LF-DNM 11	TOGH	Derraghan More	606277	763253	206328	263232	LF022-055006-	-
LF-DNM 12	WOW O	Derraghan More			207165	261075	-	-
LF-DNM 13	TOGH	Derraghan More	-	-	-	-	-	-
LF-DNM 1	TOGH	Derraghan More, Derrygowna	606608	763143	206659	263122	LF022-055008-	-
LF-DNM 6	TOGH	Derraghan More	606459	763345	206510	263324	LF022-055009-	-
LF-DGN 11	TOGH	Derrynagran	607049	761231	207100	261210	LF022-062010-	-
LF-DGN 12	TOGH	Derrynagran	607049	761231	207100	261210	-	-
LF-DGN 13	TOGH	Derrynagran	607034	761283	207085	261262	LF022-062011-	-
LF-DGN 14	TOGH	Derrynagran	607064	761226	207115	261205	LF022-062012-	-
LF-DGN 15	TOGH	Derrynagran	607071	761213	207122	261192	LF022-062013-	-
LF-DGN 16	TOGH	Derrynagran	607074	761211	207125	261190	LF022-062014-	-
LF-DGN 17	TOGH	Derrynagran	607074	761201	207125	261180	LF022-062015-	-



LF-DGN 18	TOGH	Derrynagran	607067	761221	207118	261200	LF022-062016-	-
LF-DGN 19	TOGH	Derrynagran	607064	761259	207115	261238	LF022-062017-	-
LF-DGN 20	TOGH	Derrynagran	607067	761258	207118	261237	LF022-062018-	-
LF-DGN 22	TOGH	Derrynagran	607055	761288	207106	261267	LF022-062020-	-
LF-DGN 23	TOGH	Derrynagran	607052	761281	207103	261260	LF022-062021-	-
LF-DGN 24	TOGH	Derrynagran	607049	761286	207100	261265	LF022-062022-	-
LF-DGN 25	TOGH	Derrynagran	607067	761317	207118	261296	LF022-062023-	-
LF-DGN 26	TOGH	Derrynagran	607114	761313	207165	261292	LF022-062024-	-
LF-DGN 27	TOGH	Derrynagran	607074	761300	207125	261279	LF022-062025-	-
LF-DGN 28	TOGH	Derrynagran	607069	761296	207120	261275	LF022-062026-	-
LF-DGN 29	TOGH	Derrynagran	607066	761283	207117	261262	LF022-062027-	-
LF-DGN 30	TOGH	Derrynagran	607157	761240	207208	261219	LF022-062028-	-
LF-DGN 31	TOGH	Derrynagran	607079	761261	207130	261240	LF022-062029-	-
LF-DGN 32	TOGH	Derrynagran	607079	761261	207130	261240	LF022-062030-	-
LF-DGN 35	TOGH	Derrynagran	607089	761241	207140	261220	LF022-062033-	-
LF-DGN 36	WWIS	Derrynagran	607107	761279	207158	261258	LF022-062034-	-
LF-DGN 37	WWIS	Derrynagran	607114	761271	207165	261250	LF022-062035-	-
LF-DGN 38	WWIS	Derrynagran	607117	761269	207168	261248	LF022-062036-	-
LF-DGN 39	TOGH	Derrynagran	607117	761269	207168	261248	LF022-062036-	-
LF-DGN 40	TOGH	Derrynagran	607167	761246	207218	261225	LF022-062037-	-
LF-DGN 41	TOGH	Derrynagran	607110	761203	207161	261182	LF022-062039-	-
LF-DGN 42	TOGH	Derrynagran	607099	761196	207150	261175	LF022-062040-	-
LF-DGN 43	TOGH	Derrynagran	607129	761201	207180	261180	LF022-062041-	-
LF-DGN 45	TOGH	Derrynagran	607129	761201	207180	261180	LF022-062041-	-
LF-DGN 49	TOGH	Derrynagran	607032	761201	207083	261180	LF022-062048-	-
LF-DY 6	TOGH	Derrymany	607080	761340	207131	261319	LF022-062051-	-
LF-DY 7	TOGH	Derrymany	607081	761331	207132	261310	LF022-062052-	-
LF-DY 8	TOGH	Derrymany	607082	761328	207133	261307	LF022-062053-	-
LF-DY 9	TOGH	Derrymany	607104	761299	207155	261278	LF022-062054-	-
LF-DY 10	TOGH	Derrymany	607101	761302	207152	261281	LF022-062055-	-
LF-DY 11	TOGH	Derrymany, Derrynagran	607089	761293	207140	261272	LF022-062056-	-
LF-DY 13	TOGH	Derrymany	607074	761329	207125	261308	LF022-062057-	-
LF-DY 15	TOGH	Derrymany	607107	761294	207158	261273	LF022-062058-	-
LF-DGN 33	TOGH	Derrynagran	607078	761261	207129	261240	LF022-062066-	-
LF-DGN 34	TOGH	Derrynagran	607074	761259	207125	261238	LF022-062067-	-
LF-DY 12	WWIS	Derrymany	607109	761289	207160	261268	LF022-062070-	-
LF-DY 14	WWIS	Derrymany	607102	761293	207153	261272	LF022-062071-	-
LF-DY 18	TOGH	Derrymany	-	-	-	-	-	-
LF-DY 19	TOGH	Derrymany	607039	761236	207090	261215	-	-
LF-DY 21	TOGH	Derrymany	607159	761176	207210	261155	-	-

Table 1. List of sites recorded by the IAWU in the rehabilitation area 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 Derraghan Bog before that date. This review established that there are 47 RMPs located in the proposed rehabilitation area (see Table 2 and Fig. 1). All the sightings were notified by the IAWU following the 1991 survey.

RMP No.	RMP Classification	Townland	ITM E	ITM N	Irish Grid E	Irish Grid N	IAWU Cat. No.
LF022-055001-	Togher	Derraghan More	606477	763337	206528	263316	LF-DNM 5
LF022-055002-	Togher	Derraghan More	606459	763351	206510	263330	LF-DNM 7
LF022-055003-	Togher	Derraghan More	606437	763388	206488	263367	LF-DNM 8
LF022-055004-	Togher	Derraghan More	606432	763401	206483	263380	LF-DNM 9
LF022-055005-	Togher	Derraghan More	606370	763585	206421	263564	LF-DNM 10
LF022-055006-	Togher	Derraghan More	606277	763253	206328	263232	LF-DNM 11
LF022-055007-	Togher	Derraghan More	606509	763227	206560	263206	LF-DNM 12



LF022-055008-	Togher	Derraghan More, Derrygowna	606608	763143	206659	263122	LF-DNM 1
LF022-062010-	Togher	Derrynagran	607049	761231	207100	261210	LF-DGN 11
LF022-062011-	Togher	Derrynagran	607034	761283	207085	261262	LF-DGN 13
LF022-062012-	Togher	Derrynagran	607064	761226	207115	261205	LF-DGN 14
LF022-062013-	Togher	Derrynagran	607071	761213	207122	261192	LF-DGN 15
LF022-062014-	Togher	Derrynagran	607074	761211	207125	261190	LF-DGN 16
LF022-062015-	Togher	Derrynagran	607074	761201	207125	261180	LF-DGN 17
LF022-062016-	Togher	Derrynagran	607067	761221	207118	261200	LF-DGN 18
LF022-062017-	Togher	Derrynagran	607064	761259	207115	261238	LF-DGN 19
LF022-062018-	Togher	Derrynagran	607067	761258	207118	261237	LF-DGN 20
LF022-062020-	Togher	Derrynagran	607055	761288	207106	261267	LF-DGN 22
LF022-062021-	Togher	Derrynagran	607052	761281	207103	261260	LF-DGN 23
LF022-062022-	Togher	Derrynagran	607049	761286	207100	261265	LF-DGN 24
LF022-062023-	Togher	Derrynagran	607067	761317	207118	261296	LF-DGN 25
LF022-062024-	Togher	Derrynagran	607114	761313	207165	261292	LF-DGN 26
LF022-062025-	Togher	Derrynagran	607074	761300	207125	261279	LF-DGN 27
LF022-062026-	Togher	Derrynagran	607069	761296	207120	261275	LF-DGN 28
LF022-062027-	Togher	Derrynagran	607066	761283	207117	261262	LF-DGN 29
LF022-062028-	Togher	Derrynagran	607157	761240	207208	261219	LF-DGN 30
LF022-062029-	Togher	Derrynagran	607074	761263	207125	261242	LF-DGN 31
LF022-062030-	Togher	Derrynagran	607079	761261	207130	261240	LF-DGN 32
LF022-062033-	Togher	Derrynagran	607089	761241	207140	261220	LF-DGN 35
LF022-062034-	Worked Wood	Derrynagran	607107	761279	207158	261258	LF-DGN 36
LF022-062035-	Worked Wood	Derrynagran	607114	761271	207165	261250	LF-DGN 37
LF022-062036-	Worked Wood	Derrynagran	607117	761269	207168	261248	LF-DGN 38
LF022-062037-	Togher	Derrynagran	607167	761246	207218	261225	LF-DGN 39
LF022-062038-	Togher	Derrynagran	607110	761203	207161	261182	LF-DGN 40
LF022-062039-	Togher	Derrynagran	607110	761203	207161	261182	LF-DGN 41
LF022-062040-	Togher	Derrynagran	607099	761196	207150	261175	LF-DGN 42
LF022-062041-	Togher	Derrynagran	607129	761201	207180	261180	LF-DGN 43
LF022-062045-	Togher	Derrynagran	607032	761201	207083	261180	LF-DGN 48
LF022-062046-	Togher	Derrynagran	607038	761232	207089	261211	LF-DGN 49
LF022-062051-	Togher	Derrymany	607080	761340	207131	261319	LF-DY 6
LF022-062052-	Togher	Derrymany	607081	761331	207132	261310	LF-DY 7
LF022-062053-	Togher	Derrymany	607082	761328	207133	261307	LF-DY 8
LF022-062054-	Togher	Derrymany	607104	761299	207155	261278	LF-DY 9
LF022-062055-	Togher	Derrymany	607101	761302	207152	261281	LF-DY 10
LF022-062056-	Togher	Derrymany, Derrynagran	607089	761293	207140	261272	LF-DY 11
LF022-062057-	Togher	Derrymany	607074	761329	207125	261308	LF-DY 13
LF022-062058-	Togher	Derrymany	607107	761294	207158	261273	LF-DY 15

Table 2. List of sites included in the Record of Monuments and Places in the rehabilitation area.

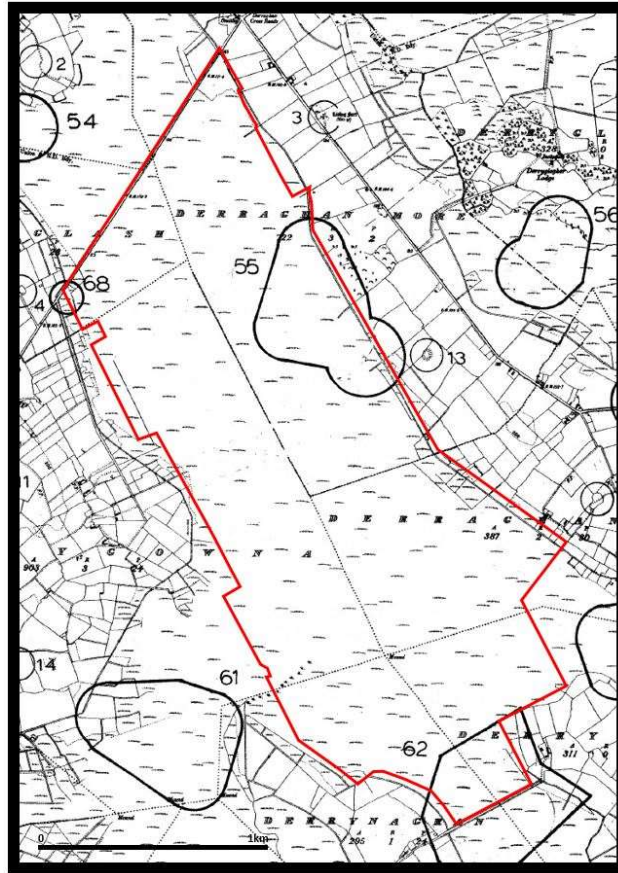


Fig. 1. Derraghan Bog, Co. Longford, detail of the Record of Monuments and Places map sheet No. 22. The proposed rehabilitation area is outlined with the red line. There are a several Recorded Monuments in the rehabilitation area.

1999 Bord na Móna Re-assessment Survey

Derraghan Bog was surveyed (unlicensed) by ADS Ltd in 1999 as part of the Bord na Móna re-assessment survey. The survey work identified 31 sightings of archaeological material in the rehabilitation area (see Table 3). The depths of the sightings is not recorded although the text refers to 29 sightings as exposed which suggests they were on the surface or close to the surface.

1999 Code	SMR_NO	SMR Class	Townland	ITM E	ITM N	Irish Grid E	Irish Grid N
99DNSE0010A	LF022-138----	Redundant record	Derrymany	607075	761306	207126	261285
99DNSE0034A	LF022-139----	Platform - peatland	Derrymany	607128	761348	207179	261327
99DNSE 030A-B	LF022-140----	Road - class 1 togher	Derrymany	607101	761350	207152	261329
99DNSE0033A	LF022-141----	Platform - peatland	Derrymany	607117	761368	207168	261347
99DNSE0035A	LF022-142----	Road - unclassified togher	Derrymany	607138	761329	207189	261308
99DNSE0032A	LF022-143----	Platform - peatland	Derrymany	607108	761355	207159	261334
99DNSE0006A	LF022-147----	Platform - peatland	Derrynagran	607073	761257	207124	261236
99DNSE0072A	LF022-148----	Platform - peatland	Derrynagran	607155	761267	207206	261246
99DNSE0073A	LF022-149----	Platform - peatland	Derrynagran	607114	761275	207165	261254
99DNSE0078A	LF022-150----	Platform - peatland	Derrynagran	607094	761292	207145	261271
99DNSE0081A	LF022-151----	Road - unclassified togher	Derrynagran	606998	761330	207049	261309
99DNSE0085A	LF022-152----	Platform - peatland	Derrynagran	607038	761322	207089	261301
99DNSE 005A	LF022-156----	Platform - peatland	Derrynagran	607077	761250	207128	261229
99DNSE0063A	LF022-157----	Platform - peatland	Derrynagran	607150	761273	207201	261252



99DNSE004A	LF022-158001-	Platform - peatland	Derrynagran	607080	761244	207131	261223
99DNSE004A	LF022-158002-	Road - class 3 togher	Derrynagran	607080	761244	207131	261223
99DNSE0003A	LF022-159----	Platform - peatland	Derrynagran	607083	761238	207134	261217
99DNSE0007A	LF022-167----	Platform - peatland	Derrynagran	607066	761269	207117	261248
99DNSE0011A	LF022-168----	Road - class 1 togher	Derrynagran	607076	761312	207127	261291
99DNSE 014A	LF022-171----	Road - class 2 togher	Derrynagran	607096	761239	207147	261218
99DNSE0016A	LF022-172----	Structure - peatland	Derrynagran	607081	761242	207132	261221
99DNSE0017A-C	LF022-173----	Road - class 2 togher	Derrynagran	607110	761233	207161	261212
99DNSE0023A-B	LF022-174----	Road - class 3 togher	Derrynagran	607130	761279	207181	261258
99DNSE0026A	LF022-175----	Platform - peatland	Derrynagran	607116	761306	207167	261285
99DNSE0028A-B	LF022-176001-	Structure - peatland	Derrynagran	607110	761309	207161	261288
99DNSE0070A	LF022-177----	Platform - peatland	Derrynagran	607139	761263	207190	261242
99DNSE 028 & 65A	LF022-179----	Platform - peatland	Derrynagran	607109	761320	207160	261299
99DNSE 036A	LF022-184----	Platform - peatland	Derrynagran	607125	761321	207176	261300
99DNSE0037A	LF022-185----	Platform - peatland	Derrynagran	607124	761323	207175	261302
99DNSE0046A	LF022-186----	Platform - peatland	Derrynagran	607064	761403	207115	261382
99DNSE0038A	LF022-188----	Platform - peatland	Derrymany, Derrynagran	607121	761332	207172	261311

Table 3. Sightings identified by the 1999 Bord na Móna Re-assessment Survey.

Archaeological Excavations

Following the 1999 re-assessment survey of Derraghan Bog 10 sightings (5 toghers, 3 platforms and 1 archaeological wood) were chosen for excavation by the National Monuments Service and the National Museum and the work was carried out by Jane Whitaker of ADS Ltd, see Table 4 (Whitaker 2009) .

SMR No.	Townland	License No.	1999 Cat No.	ITM E	ITM N	Irish Grid E	Irish Grid N	Class
LF022-158001-, LF022-158002-	Derrynagran	02E0967	99DNSE004A	607080	761244	207131	261223	Platform/Togher
LF022-156----	Derrynagran	02 E 0968	99DNSE 005A	607077	761250	207128	261229	Togher
LF022-171----	Derrynagran	02 E 0971	99DNSE 014A	607096	761239	207147	261218	Togher
LF022-172----	Derrynagran	02 E 0972	99DNSE 016A	607081	761242	207132	261221	Archaeological Wood
LF022-179----	Derrynagran	02 E 0973	99DNSE 028 & 65A	607109	761320	207160	261299	Togher
LF022-140----	Derrynagran	02 E 0974	99DNSE 030A-B	607101	761350	207152	261329	Togher
LF022-184----	Derrynagran	02 E 0976	99DNSE 036A	607125	761321	207176	261300	Platform
LF022-177----	Derrynagran	02 E 0978	99DSNE 070A	607139	761263	207190	261242	Platform

Table 4. Licensed excavations carried out in Derraghan 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 10th of January 2022. 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 90 entries in the SMR in the proposed rehabilitation area (see Table 5). Fifty-two of the sightings reported by the IAU following the 1991 Peatland Survey. Survey are included. Thirty-one of the sightings were notified by ADS following the 1999 Peatland survey. Seven sightings cannot be referenced to either survey.

SMR_NO	SMR Class	Townland	ITM E	ITM N	Irish Grid E	Irish Grid N	Survey Ref
LF022-062010-	Road - class 3 togher	Derrynagran	607049	761231	207100	261210	LF-DGN 11
LF022-062011-	Road - class 3 togher	Derrynagran	607034	761283	207085	261262	LF-DGN 13
LF022-062012-	Road - class 3 togher	Derrynagran	607064	761226	207115	261205	LF-DGN 14
LF022-062013-	Road - class 3 togher	Derrynagran	607071	761213	207122	261192	LF-DGN 15



LF022-062014-	Road - class 3 togher	Derrynagran	607074	761211	207125	261190	LF-DGN 16
LF022-062015-	Road - class 3 togher	Derrynagran	607074	761201	207125	261180	LF-DGN 17
LF022-062016-	Road - class 3 togher	Derrynagran	607067	761221	207118	261200	LF-DGN 18
LF022-062017-	Road - class 3 togher	Derrynagran	607064	761259	207115	261238	LF-DGN 19
LF022-062018-	Road - class 3 togher	Derrynagran	607067	761258	207118	261237	LF-DGN 20
LF022-062020-	Road - class 2 togher	Derrynagran	607055	761288	207106	261267	LF-DGN 22
LF022-062021-	Road - class 3 togher	Derrynagran	607052	761281	207103	261260	LF-DGN 23
LF022-062022-	Road - class 3 togher	Derrynagran	607049	761286	207100	261265	LF-DGN 24
LF022-062023-	Road - class 3 togher	Derrynagran	607067	761317	207118	261296	LF-DGN 25
LF022-062024-	Road - class 3 togher	Derrynagran	607114	761313	207165	261292	LF-DGN 26
LF022-062025-	Road - class 3 togher	Derrynagran	607074	761300	207125	261279	LF-DGN 27
LF022-062026-	Road - class 2 togher	Derrynagran	607069	761296	207120	261275	LF-DGN 28
LF022-062027-	Road - class 3 togher	Derrynagran	607066	761283	207117	261262	LF-DGN 29
LF022-062028-	Road - class 3 togher	Derrynagran	607157	761240	207208	261219	LF-DGN 30
LF022-062029-	Road - class 3 togher	Derrynagran	607074	761263	207125	261242	LF-DGN 31
LF022-062030-	Road - class 3 togher	Derrynagran	607079	761261	207130	261240	LF-DGN 32
LF022-062066-	Road - class 3 togher	Derrynagran	607078	761261	207129	261240	LF-DGN 33
LF022-062067-	Road - class 3 togher	Derrynagran	607074	761259	207125	261238	LF-DGN 34
LF022-062033-	Road - class 3 togher	Derrynagran	607089	761241	207140	261220	LF-DGN 35
LF022-062034-	Redundant record	Derrynagran	607107	761279	207158	261258	LF-DGN 36
LF022-062035-	Structure - peatland	Derrynagran	607114	761271	207165	261250	LF-DGN 37
LF022-062036-	Structure - peatland	Derrynagran	607117	761269	207168	261248	LF-DGN 38
LF022-062037-	Road - class 3 togher	Derrynagran	607167	761246	207218	261225	LF-DGN 39
LF022-062038-	Road - class 3 togher	Derrynagran	607110	761203	207161	261182	LF-DGN 40
LF022-062039-	Road - class 3 togher	Derrynagran	607110	761203	207161	261182	LF-DGN 41
LF022-062040-	Road - class 3 togher	Derrynagran	607099	761196	207150	261175	LF-DGN 42
LF022-062041-	Road - class 3 togher	Derrynagran	607129	761201	207180	261180	LF-DGN 43
LF022-062045-	Road - class 2 togher	Derrynagran	607032	761201	207083	261180	LF-DGN 48
LF022-062046-	Road - class 3 togher	Derrynagran	607038	761232	207089	261211	LF-DGN 49
LF022-055008-	Road - class 1 togher	Derraghan More, Derrygowna	606608	763143	206659	263122	LF-DNM 1
LF022-055005-	Road - class 3 togher	Derraghan More	606370	763585	206421	263564	LF-DNM 10
LF022-055006-	Road - class 3 togher	Derraghan More	606277	763253	206328	263232	LF-DNM 11
LF022-055007-	Road - class 3 togher	Derraghan More	606509	763227	206560	263206	LF-DNM 12
LF022-055001-	Road - class 3 togher	Derraghan More	606477	763337	206528	263316	LF-DNM 5
LF022-055009-	Road - class 3 togher	Derraghan More	606459	763345	206510	263324	LF-DNM 6
LF022-055002-	Road - class 3 togher	Derraghan More	606459	763351	206510	263330	LF-DNM 7
LF022-055003-	Road - class 3 togher	Derraghan More	606437	763388	206488	263367	LF-DNM 8
LF022-055004-	Road - class 3 togher	Derraghan More	606432	763401	206483	263380	LF-DNM 9
LF022-062055-	Road - class 3 togher	Derrymany	607101	761302	207152	261281	LF-DY 10
LF022-062056-	Road - class 2 togher	Derrymany, Derrynagran	607089	761293	207140	261272	LF-DY 11
LF022-062070-	Structure - peatland	Derrymany	607109	761289	207160	261268	LF-DY 12
LF022-062057-	Road - class 3 togher	Derrymany	607074	761329	207125	261308	LF-DY 13
LF022-062071-	Structure - peatland	Derrymany	607102	761293	207153	261272	LF-DY 14
LF022-062058-	Road - class 3 togher	Derrymany	607107	761294	207158	261273	LF-DY 15
LF022-062051-	Road - class 3 togher	Derrymany	607080	761340	207131	261319	LF-DY 6
LF022-062052-	Road - class 3 togher	Derrymany	607081	761331	207132	261310	LF-DY 7
LF022-062053-	Road - class 3 togher	Derrymany	607082	761328	207133	261307	LF-DY 8
LF022-062054-	Road - class 3 togher	Derrymany	607104	761299	207155	261278	LF-DY 9
LF022-062068-	Road - class 3 togher	Derrynagran	607058	761262	207109	261241	?
LF022-062075-	Platform - peatland	Derrynagran	606999	761521	207050	261500	?
LF022-098----	Platform - peatland	Derraghan More	607061	762336	207112	262315	?



LF022-099----	Road - class 2 togher	Derraghan More	606459	763393	206510	263372	?
LF022-100----	Road - class 3 togher	Derraghan More	606428	763435	206479	263414	?
LF022-103----	Post row - peatland	Derraghan More	606605	763148	206656	263127	?
LF022-105----	Platform - peatland	Derraghan More	606627	763071	206678	263050	?
LF022-138----	Redundant record	Derrymany	607075	761306	207126	261285	99DNSE0010A
LF022-139----	Platform - peatland	Derrymany	607128	761348	207179	261327	99DNSE0034A
LF022-140----	Road - class 1 togher	Derrymany	607101	761350	207152	261329	99DNSE 030A-B
LF022-141----	Platform - peatland	Derrymany	607117	761368	207168	261347	99DNSE0033A
LF022-142----	Road - unclassified togher	Derrymany	607138	761329	207189	261308	99DNSE0035A
LF022-143----	Platform - peatland	Derrymany	607108	761355	207159	261334	99DNSE0032A
LF022-147----	Platform - peatland	Derrynagran	607073	761257	207124	261236	99DNSE0006A
LF022-148----	Platform - peatland	Derrynagran	607155	761267	207206	261246	99DNSE0072A
LF022-149----	Platform - peatland	Derrynagran	607114	761275	207165	261254	99DNSE0073A
LF022-150----	Platform - peatland	Derrynagran	607094	761292	207145	261271	99DNSE0078A
LF022-151----	Road - unclassified togher	Derrynagran	606998	761330	207049	261309	99DNSE0081A
LF022-152----	Platform - peatland	Derrynagran	607038	761322	207089	261301	99DNSE0085A
LF022-156----	Platform - peatland	Derrynagran	607077	761250	207128	261229	99DNSE 005A
LF022-157----	Platform - peatland	Derrynagran	607150	761273	207201	261252	99DNSE0063A
LF022-158001-	Platform - peatland	Derrynagran	607080	761244	207131	261223	99DNSE004A
LF022-158002-	Road - class 3 togher	Derrynagran	607080	761244	207131	261223	99DNSE004A
LF022-159----	Platform - peatland	Derrynagran	607083	761238	207134	261217	99DNSE0003A
LF022-167----	Platform - peatland	Derrynagran	607066	761269	207117	261248	99DNSE0007A
LF022-168----	Road - class 1 togher	Derrynagran	607076	761312	207127	261291	99DNSE0011A
LF022-171----	Road - class 2 togher	Derrynagran	607096	761239	207147	261218	99DNSE 014A
LF022-172----	Structure - peatland	Derrynagran	607081	761242	207132	261221	99DNSE0016A
LF022-173----	Road - class 2 togher	Derrynagran	607110	761233	207161	261212	99DNSE0017A-C
LF022-174----	Road - class 3 togher	Derrynagran	607130	761279	207181	261258	99DNSE0023A-B
LF022-175----	Platform - peatland	Derrynagran	607116	761306	207167	261285	99DNSE0026A
LF022-176001-	Structure - peatland	Derrynagran	607110	761309	207161	261288	99DNSE0028A-B
LF022-177----	Platform - peatland	Derrynagran	607139	761263	207190	261242	99DNSE0070A
LF022-179----	Platform - peatland	Derrynagran	607109	761320	207160	261299	99DNSE 028 & 65A
LF022-184----	Platform - peatland	Derrynagran	607125	761321	207176	261300	99DNSE 036A
LF022-185----	Platform - peatland	Derrynagran	607124	761323	207175	261302	99DNSE0037A
LF022-186----	Platform - peatland	Derrynagran	607064	761403	207115	261382	99DNSE0046A
LF022-188----	Platform - peatland	Derrymany, Derrynagran	607121	761332	207172	261311	99DNSE0038A

Table 5. Sightings in Derraghan Bog listed in the SMR in 2021. Coordinates are ITM.

Previous assessments

Derraghan Bog has been the subject of an Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01. This assessment included a review of the topographical files and finds registers of the National Museum of Ireland intended to identify all finds from the bog reported to the Museum by that date and these finds are included below in Table 6 (Pers Comm. Jane Whitaker). The assessment noted that there was a high potential for archaeological features to be uncovered during the course of any future development works in Derraghan Bog.

Reported finds

As noted above the Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy LTD in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01 contains a complete list of known finds from Noggusboy Bog reported to the National Museum of Ireland up to 2018 (see Table 6).



Townland	Museum No.	Description
Derraghan	NMI 1944	Bog Butter in wooden vessel
Derraghan	NMI 1954:61	Bog Butter in animal bladder
Derraghan	S.1650	wedge-shaped fragment of elm found beside the Road-Class 1 togher LF022-055008
Derrymany	92E148:02	Carved wooden perforated oak shaft recovered during the IAWU survey in Derrynagran townland.
Derrygowna	1967:191-2	Stone quernstone

Table 6. List of archaeological finds from Derraghan Bog reported to the National Museum of Ireland.

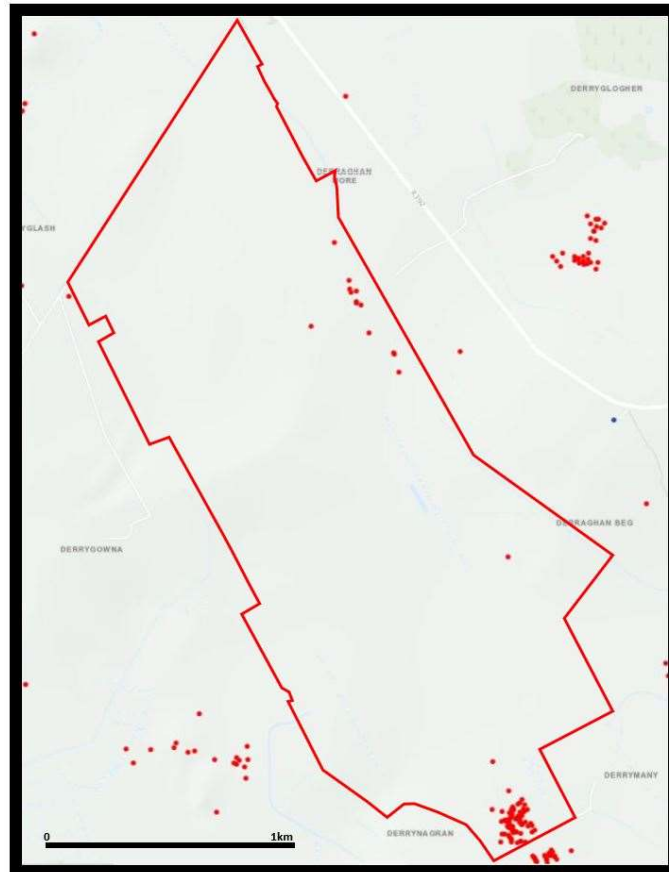


Fig. 2. Derraghan Bog, Co. Longford, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line. There are a large number of SMRs in the rehabilitation area.

Archaeological investigations

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

Impact assessment

Ninety sightings of archaeological material were identified and recorded in Derraghan Bog between 1991 and 1999 by the IAWU and the Bord na Móna Re-assessment Survey. All of the sightings were included in the SMR. All recorded sightings of archaeological material in Derraghan Bog are included in Table 7.



Although the depth of the 1991 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 1991 surface. Twenty-nine of the 1999 sightings are described as exposed which suggests they were on the surface or close to the surface. The LIDAR data indicates that about 0.76m of material was removed from the locations of the 1991-9 sightings between 2008 and 2020 or about 0.063m per year. This suggests that between 1991 and 2020 c.1.84m of peat was removed from the locations of the sightings made in the surveys. Therefore none of the sightings made in the 1991-1999 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	ITM E	ITM N	Survey Ref	Depth BS m	Peat Removed since 2008	Status
LF022-062010-	Road - class 3 togher	Derrynagran	607049	761231	LF-DGN 11	-	0.00	Gone
LF022-062011-	Road - class 3 togher	Derrynagran	607034	761283	LF-DGN 13	-	0.02	Gone
LF022-062012-	Road - class 3 togher	Derrynagran	607064	761226	LF-DGN 14	-	0.16	Gone
LF022-062013-	Road - class 3 togher	Derrynagran	607071	761213	LF-DGN 15	-	0.05	Gone
LF022-062014-	Road - class 3 togher	Derrynagran	607074	761211	LF-DGN 16	-	0.44	Gone
LF022-062015-	Road - class 3 togher	Derrynagran	607074	761201	LF-DGN 17	-	0.09	Gone
LF022-062016-	Road - class 3 togher	Derrynagran	607067	761221	LF-DGN 18	-	0.00	Gone
LF022-062017-	Road - class 3 togher	Derrynagran	607064	761259	LF-DGN 19	-	0.22	Gone
LF022-062018-	Road - class 3 togher	Derrynagran	607067	761258	LF-DGN 20	-	0.07	Gone
LF022-062020-	Road - class 2 togher	Derrynagran	607055	761288	LF-DGN 22	-	0.60	Gone
LF022-062021-	Road - class 3 togher	Derrynagran	607052	761281	LF-DGN 23	-	0.59	Gone
LF022-062022-	Road - class 3 togher	Derrynagran	607049	761286	LF-DGN 24	-	0.67	Gone
LF022-062023-	Road - class 3 togher	Derrynagran	607067	761317	LF-DGN 25	-	0.36	Gone
LF022-062024-	Road - class 3 togher	Derrynagran	607114	761313	LF-DGN 26	-	0.39	Gone
LF022-062025-	Road - class 3 togher	Derrynagran	607074	761300	LF-DGN 27	-	0.22	Gone
LF022-062026-	Road - class 2 togher	Derrynagran	607069	761296	LF-DGN 28	-	0.60	Gone
LF022-062027-	Road - class 3 togher	Derrynagran	607066	761283	LF-DGN 29	-	0.51	Gone
LF022-062028-	Road - class 3 togher	Derrynagran	607157	761240	LF-DGN 30	-	0.56	Gone
LF022-062029-	Road - class 3 togher	Derrynagran	607074	761263	LF-DGN 31	-	1.22	Gone
LF022-062030-	Road - class 3 togher	Derrynagran	607079	761261	LF-DGN 32	-	0.63	Gone
LF022-062066-	Road - class 3 togher	Derrynagran	607078	761261	LF-DGN 33	-	0.26	Gone
LF022-062067-	Road - class 3 togher	Derrynagran	607074	761259	LF-DGN 34	-	0.76	Gone
LF022-062033-	Road - class 3 togher	Derrynagran	607089	761241	LF-DGN 35	-	1.58	Gone
LF022-062034-	Redundant record	Derrynagran	607107	761279	LF-DGN 36	-	1.00	Gone
LF022-062035-	Structure - peatland	Derrynagran	607114	761271	LF-DGN 37	-	0.79	Gone
LF022-062036-	Structure - peatland	Derrynagran	607117	761269	LF-DGN 38	-	0.42	Gone
LF022-062037-	Road - class 3 togher	Derrynagran	607167	761246	LF-DGN 39	-	0.91	Gone
LF022-062038-	Road - class 3 togher	Derrynagran	607110	761203	LF-DGN 40	-	0.65	Gone
LF022-062039-	Road - class 3 togher	Derrynagran	607110	761203	LF-DGN 41	-	0.57	Gone
LF022-062040-	Road - class 3 togher	Derrynagran	607099	761196	LF-DGN 42	-	0.61	Gone
LF022-062041-	Road - class 3 togher	Derrynagran	607129	761201	LF-DGN 43	-	0.71	Gone
LF022-062045-	Road - class 2 togher	Derrynagran	607032	761201	LF-DGN 48	-	0.87	Gone
LF022-062046-	Road - class 3 togher	Derrynagran	607038	761232	LF-DGN 49	-	1.00	Gone
LF022-055008-	Road - class 1 togher	Derraghan More, Derrygowna	606608	763143	LF-DNM 1	-	1.05	Gone
LF022-055005-	Road - class 3 togher	Derraghan More	606370	763585	LF-DNM 10	-	0.38	Gone
LF022-055006-	Road - class 3 togher	Derraghan More	606277	763253	LF-DNM 11	-	0.38	Gone
LF022-055007-	Road - class 3 togher	Derraghan More	606509	763227	LF-DNM 12	-	0.53	Gone
LF022-055001-	Road - class 3 togher	Derraghan More	606477	763337	LF-DNM 5	-	0.62	Gone
LF022-055009-	Road - class 3 togher	Derraghan More	606459	763345	LF-DNM 6	-	0.34	Gone
LF022-055002-	Road - class 3 togher	Derraghan More	606459	763351	LF-DNM 7	-	0.47	Gone
LF022-055003-	Road - class 3 togher	Derraghan More	606437	763388	LF-DNM 8	-	1.00	Gone
LF022-055004-	Road - class 3 togher	Derraghan More	606432	763401	LF-DNM 9	-	0.97	Gone



LF022-062055-	Road - class 3 togther	Derrymany	607101	761302	LF-DY 10	-	0.97	Gone
LF022-062056-	Road - class 2 togther	Derrymany, Derrynagran	607089	761293	LF-DY 11	-	0.87	Gone
LF022-062070-	Structure - peatland	Derrymany	607109	761289	LF-DY 12	-	0.96	Gone
LF022-062057-	Road - class 3 togther	Derrymany	607074	761329	LF-DY 13	-	0.66	Gone
LF022-062071-	Structure - peatland	Derrymany	607102	761293	LF-DY 14	-	0.71	Gone
LF022-062058-	Road - class 3 togther	Derrymany	607107	761294	LF-DY 15	-	0.86	Gone
LF022-062051-	Road - class 3 togther	Derrymany	607080	761340	LF-DY 6	-	0.55	Gone
LF022-062052-	Road - class 3 togther	Derrymany	607081	761331	LF-DY 7	-	0.76	Gone
LF022-062053-	Road - class 3 togther	Derrymany	607082	761328	LF-DY 8	-	0.57	Gone
LF022-062054-	Road - class 3 togther	Derrymany	607104	761299	LF-DY 9	-	0.77	Gone
LF022-062068-	Road - class 3 togther	Derrynagran	607058	761262	?	-	0.99	Gone
LF022-062075-	Platform - peatland	Derrynagran	606999	761521	?	-	1.36	Gone
LF022-098----	Platform - peatland	Derraghan More	607061	762336	?	-	0.97	Gone
LF022-099----	Road - class 2 togther	Derraghan More	606459	763393	?	-	0.00	Gone
LF022-100----	Road - class 3 togther	Derraghan More	606428	763435	?	-	0.00	Gone
LF022-103----	Post row - peatland	Derraghan More	606605	763148	?	-	0.23	Gone
LF022-105----	Platform - peatland	Derraghan More	606627	763071	?	-	0.00	Gone
LF022-138----	Redundant record	Derrymany	607075	761306	99DNSE0010A	-	0.98	Gone
LF022-139----	Platform - peatland	Derrymany	607128	761348	99DNSE0034A	-	1.33	Gone
LF022-140----	Road - class 1 togther	Derrymany	607101	761350	99DNSE 030A-B	-	0.96	Gone
LF022-141----	Platform - peatland	Derrymany	607117	761368	99DNSE0033A	-	1.39	Gone
LF022-142----	Road - unclassified togther	Derrymany	607138	761329	99DNSE0035A	-	1.33	Gone
LF022-143----	Platform - peatland	Derrymany	607108	761355	99DNSE0032A	-	1.17	Gone
LF022-147----	Platform - peatland	Derrynagran	607073	761257	99DNSE0006A	-	1.35	Gone
LF022-148----	Platform - peatland	Derrynagran	607155	761267	99DNSE0072A	-	1.44	Gone
LF022-149----	Platform - peatland	Derrynagran	607114	761275	99DNSE0073A	-	0.99	Gone
LF022-150----	Platform - peatland	Derrynagran	607094	761292	99DNSE0078A	-	0.76	Gone
LF022-151----	Road - unclassified togther	Derrynagran	606998	761330	99DNSE0081A	-	0.56	Gone
LF022-152----	Platform - peatland	Derrynagran	607038	761322	99DNSE0085A	-	0.46	Gone
LF022-156----	Platform - peatland	Derrynagran	607077	761250	99DNSE 005A	-	1.12	Gone
LF022-157----	Platform - peatland	Derrynagran	607150	761273	99DNSE0063A	-	1.32	Gone
LF022-158001-	Platform - peatland	Derrynagran	607080	761244	99DNSE004A	-	0.65	Gone
LF022-158002-	Road - class 3 togther	Derrynagran	607080	761244	99DNSE004A	-	0.65	Gone
LF022-159----	Platform - peatland	Derrynagran	607083	761238	99DNSE0003A	-	0.73	Gone
LF022-167----	Platform - peatland	Derrynagran	607066	761269	99DNSE0007A	-	1.68	Gone
LF022-168----	Road - class 1 togther	Derrynagran	607076	761312	99DNSE0011A	-	0.96	Gone
LF022-171----	Road - class 2 togther	Derrynagran	607096	761239	99DNSE 014A	-	0.64	Gone
LF022-172----	Structure - peatland	Derrynagran	607081	761242	99DNSE0016A	-	0.73	Gone
LF022-173----	Road - class 2 togther	Derrynagran	607110	761233	99DNSE0017A- C	-	0.77	Gone
LF022-174----	Road - class 3 togther	Derrynagran	607130	761279	99DNSE0023A- B	-	1.44	Gone
LF022-175----	Platform - peatland	Derrynagran	607116	761306	99DNSE0026A	-	1.33	Gone
LF022-176001-	Structure - peatland	Derrynagran	607110	761309	99DNSE0028A- B	-	1.31	Gone
LF022-177----	Platform - peatland	Derrynagran	607139	761263	99DNSE0070A	-	1.70	Gone
LF022-179----	Platform - peatland	Derrynagran	607109	761320	99DNSE 028 & 65A	-	1.36	Gone
LF022-184----	Platform - peatland	Derrynagran	607125	761321	99DNSE 036A	-	1.22	Gone
LF022-185----	Platform - peatland	Derrynagran	607124	761323	99DNSE0037A	-	1.23	Gone
LF022-186----	Platform - peatland	Derrynagran	607064	761403	99DNSE0046A	-	1.14	Gone
LF022-188----	Platform - peatland	Derrymany, Derrynagran	607121	761332	99DNSE0038A	-	1.40	Gone

Table 7. Sightings of archaeological material in Derraghan Bog. With depth of bog removed at each location since 2008.



Recommendations

There is no known surviving archaeological material in Derraghan Bog. There was a considerable quantity of known archaeological material from previous surveys 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 Derraghan Bog. There was a considerable quantity of known archaeological material from previous surveys, 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
12 January 2022

APPENDIX XIII: INITIAL WATER QUALITY DATA FROM DERRAGHAN

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

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	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	1	2	2	2	NS	4	NS	NS	7	7	2	2	4	7	2	7	5	
				ELV	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35
PCAS SW Sampling Scheme					Colour	Colour	Colour	Colour	Colour	Colour	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	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	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	197	64	197	160	NS	158	NS	NS	136	144	102	107	87	222	197	276	122	
PCAS SW Sampling Scheme					COD	COD	COD	COD	COD	COD	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	59	22	59	49	NS	48	NS	NS	39	45	53	42	29	89	66	66	51	
PCAS SW Sampling Scheme					pH	pH	pH	pH	pH	pH	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	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	7.7	7.7	7.7	7.7	NS	7.6	NS	NS	7.8	8	7.8	7.9	8	7.3	7.4	7.5	7.8	
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	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	0.05	0.05	0.05	0.05	NS	0.05	NS	NS	0.05	0.05	0.05	0.05	0.05	0.08	0.05	0.05	0.05	
PCAS SW Sampling Scheme					TS	TS	TS	TS	TS	TS	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	294	293	294	512	NS	442	NS	NS	108	109	136	955	992	619	450	291	737	
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	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	0.049	0.045	0.049	0.199	NS	0.124	NS	NS	0.335	0.294	0.224	0.117	0.113	0.131	0.188	0.109	0.118	
PCAS SW Sampling Scheme					DOC	DOC	DOC	DOC	DOC	DOC	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	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Derraghan	331	SW93	1/8/20	1/9/20	1/10/20	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	
Mountdillon	P0504-01	Derraghan	332	SW93A																		
Mountdillon	P0504-01	Derrycolumb	360	SW88A	22.9	9.85	22.9	20.7	NS	19.1	NS	NS	15.9	17.5	16	14.7	10.9	25	23.7	26.9	17.8	

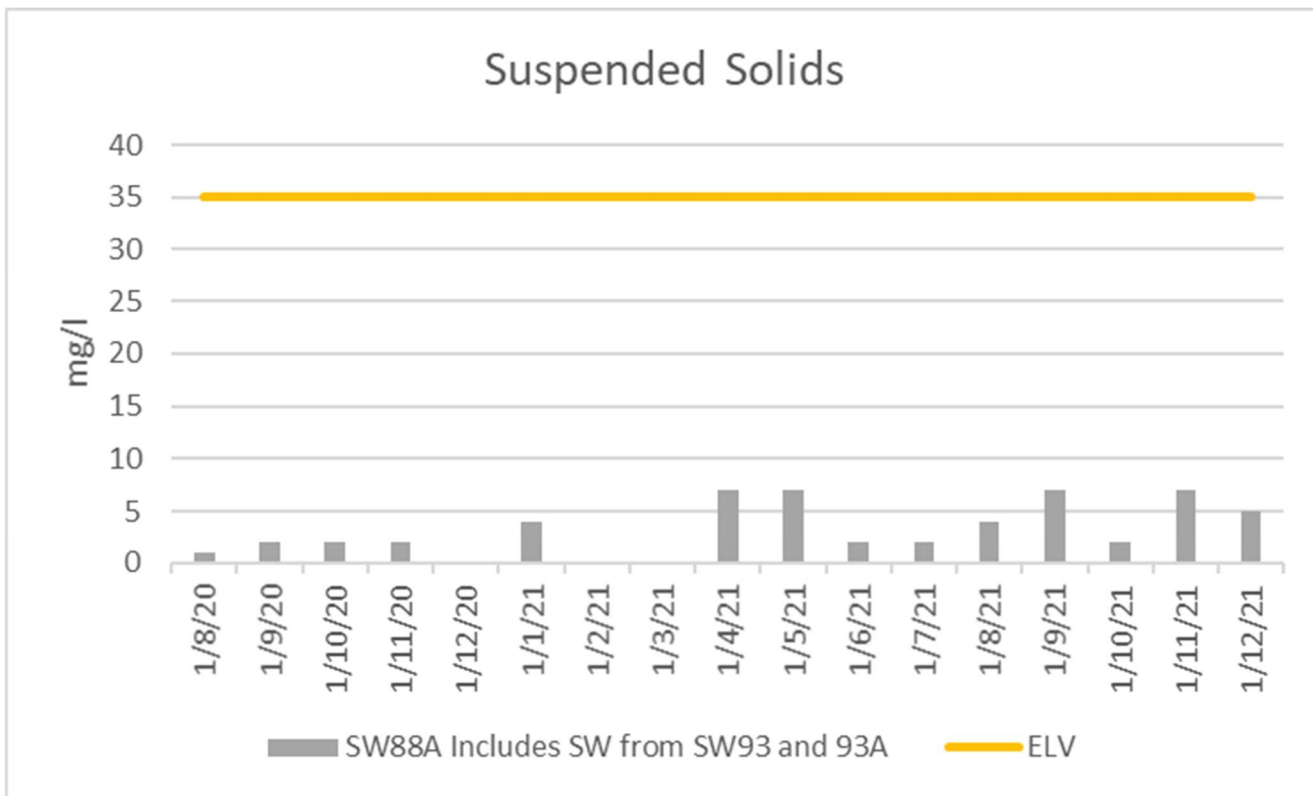


Figure AP13.1. Suspended solids in water sampling at Derraghan from different discharge points. 35 mg/l is the emission limit value.

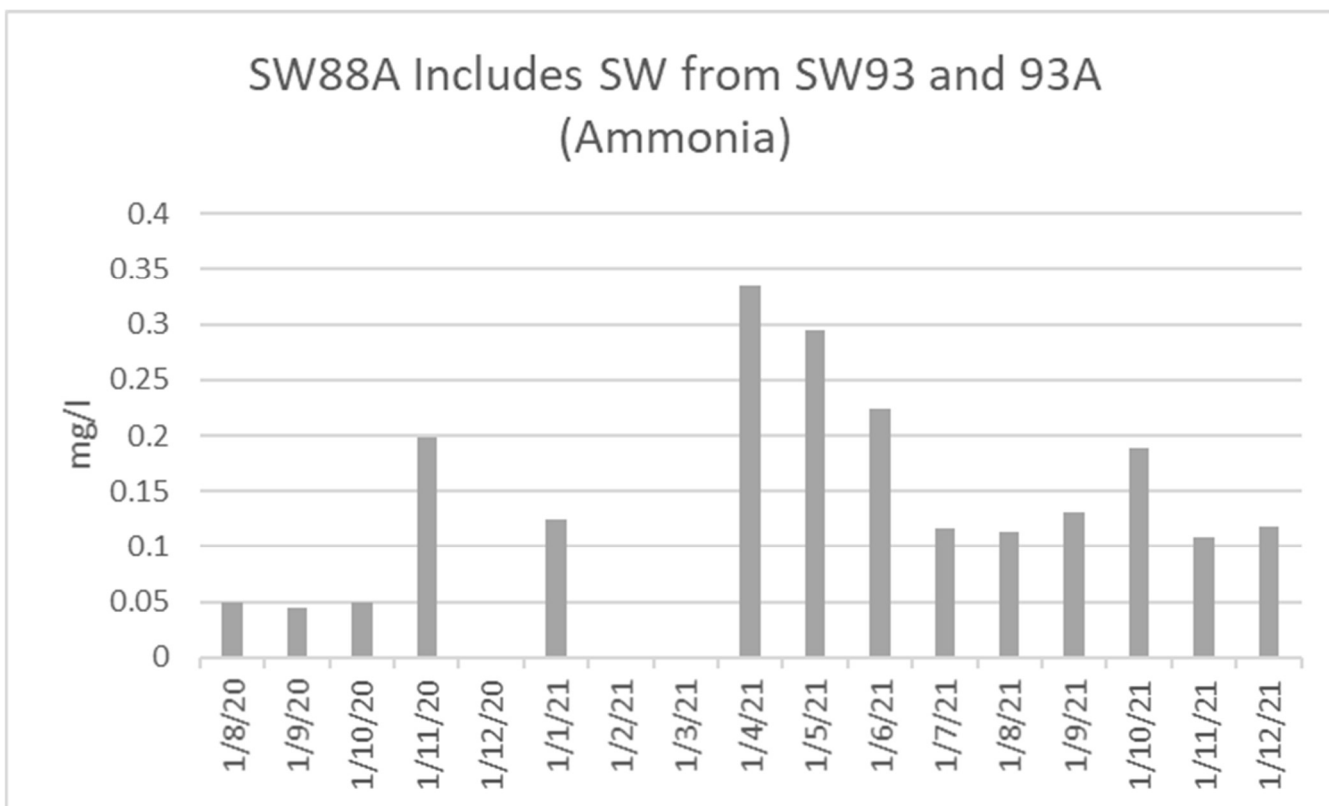


Figure AP13.2. Ammonia concentrations in water sampling from Derraghan from different discharge points. The main trigger level for ammonia is 1.42mg/l for reporting to EPA.