

# **Bord na Móna**

## **Glenlough Bog**

### **Cutaway Bog Draft 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 Glenlough 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 Glenlough 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 through the Climate Action Fund and Ireland’s National Recovery and Resilience Plan, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.*

*While this document outlines the enhanced rehabilitation measures planned for the Glenlough 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 Glenlough 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 Glenlough Bog 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 Glenlough Decommissioning and Rehabilitation Plan – Addendum 1 for more details.

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## NON-TECHNICAL SUMMARY

- Bord na Móna is planning to rehabilitate Glenlough Bog, 5 km south of Edgeworthstown in Co. Longford.
- Industrial peat harvesting is now finished at Glenlough 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 the establishment habitats and vegetation back onto bare peat, and minimising impacts to downstream waterbodies. The bog was drained in the past to allow peat production. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain-blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.
- The key objective is to **restore** Glenlough raised bog and to encourage Annex I active raised bog development (peat-forming habitat).
- 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 *Sphagnum* moss will thrive.
- Re-wetting peat is also better for climate action. This reduces carbon emissions as re-wetting the remaining peat reduces carbon losses such as the production of Carbon Dioxide, the main Greenhouse Gas. The site is expected to still be a reduced carbon source for some time, but eventually the carbon sink function can re-establish as peat-forming conditions are restored. This will take some time.
- The development of a range of habitats in Glenlough 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 and peatland habitats in the wider landscape have been reclaimed for agriculture and other uses and peatland restoration is an opportunity to improve formerly degraded sites.
- Glenlough Bog was ditched, drained and developed for industrial peat production in the 1980s. The majority of the bog was drained in anticipation for peat extraction, but it was never developed fully.
- Parts of the site (in the south east and north east) were used for horticultural peat harvesting but the majority of the site was not harvested.
- Measures proposed for Glenlough Bog include internal drain blocking and other measures required to raise water levels to the surface of the peat.
- Bord na Mona plan to carry out this work in 2022.
- These rehabilitation measures will be planned by a team consisting of ecologists, hydrologists and engineers. It is a principle of Bord na Móna rehabilitation planning that no actions will be taken that would negatively impact on adjacent land. No external boundary drains will be blocked. Water will still leave the site via the existing outlets.
- This is a peatland rehabilitation plan. This plan does not consider future after-use or development.
- Peatland rehabilitation of the Bord na Móna 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:** Glenlough      **Area:** 328.3 ha

### Site description:

- Glenlough Bog is located in Co. Longford, approximately 5km south of Edgeworthstown.
- Glenlough Bog was originally drained for peat harvesting in the 1980s. It was re-drained in 2003-2005. These drains remain active.
- The bog still retains original (but degraded) raised bog vegetation.
- Only a small portion of the bog was brought into commercial peat production for horticultural sod-peat. Trenches were cut in these sections to extract sod moss.
- The former production area is now inactive and is recolonising with pioneering cutover vegetation communities.
- The former production area is dominated by bare peat and pioneering heather vegetation communities. The remainder of the bog is dominated by degraded high bog vegetation.

### 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 across the site to encourage active raised bog development and improving the overall condition of the raised bog.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Rehabilitation will support the National Policies on Climate Action and GHG mitigation by maintaining and enhancing the current residual peat storage capacity of the bog (locking the carbon into the ground). It is expected that the bog will have reduced emissions (reduced source/part carbon sink) as it develops naturally functioning restored bog 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 Glenlough 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 Glenlough Bog optimising **climate action benefits**.
- The local environmental conditions of this bog. Some of the bog has been cutaway, while some other areas have begun to re-colonise with pioneer cutover vegetation communities.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- To minimise potential impacts on neighbouring land, some boundary drains around Glenlough Bog will be left unblocked, as blocking boundary drains could affect adjacent land.
- Other constraints including archaeology and rights of way.



- Part of the Glenlough Bog property was sold to Klasmann Deilmann Ireland Limited. This area is outside the scope of this rehabilitation plan and within the context of this rehabilitation plan will be treated as a neighbouring landholding.

**Criteria for successful rehabilitation:**

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

- Rewetting of residual deep peat in the former area of industrial peat production to slow water movement across the site to retain any silt, encouraging development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat (IPC Licence validation). The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed. (IPC Licence validation).
- Stabilising/improving key 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 (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 raised bog restoration, where conditions are suitable, and eventually towards a reduced Carbon source/partial carbon sink (Climate action verification).
- Improvement in biodiversity and ecosystem services (Climate action verification).

Meeting climate action verification criteria and monitoring of these criteria after the Scheme is completed is dependent on support from the Climate Action Fund and Ireland's National Recovery and Resilience Plan or other sources of funding.

**Summary of measures:**

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

- Planning actions, including developing a detailed site plan and carrying out a hydrology and drainage assessment.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation.
- Carry out proposed measures, which will be a combination of drain blocking, targeted drain-blocking within stabilised areas and fertiliser applications targeting bare peat in targeted areas.
- 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.
- 2023-2024: Any Long term practical actions; Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- 2024: Decommission silt-ponds, if necessary.

**Budget and Costing**

- The rehabilitation plan outlined in this document is predicated on the understanding that it is the Minister's intention to support, via the Climate Action Fund and Ireland's National Recovery and Resilience Plan, Bord na Móna in developing a package of measures, 'the Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. *However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support.*
- In relation to the pre-existing Condition 10 IPC Licence requirement to carry out what can be termed the 'standard' decommissioning and rehabilitation, Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. This is updated every year. For more information see the Bord na Móna Annual Report (Bord na Móna 2020). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

### Monitoring, after-care and maintenance

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

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

### Additional Monitoring:

- The monitoring and validation of re-vegetation via natural colonisation and changes in bog condition will be carried out using an aerial survey, after rehabilitation measures are implemented. It is proposed that sites can be monitored against this baseline in the future.
- Biodiversity Ecosystem services will be monitored using specific indicators.
- Carbon emissions monitoring only be carried out on a small proportion of BnM sites to develop better understanding of carbon emissions and GHG emission factors from different types of BnM sites and will be developed on association with other established research programmes. Reduction in carbon emissions will be modelled by a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the Scheme). It is proposed that sites can be monitored against this baseline in the future.

### Validation and IPC Licence surrender

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

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

## 1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mountdillon bog group (Ref. P0504-01). As part of Condition 10.2 of this licence, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Glenlough bog is part of the Mountdillon Bog Group (see Appendix II for details of the bog areas within the Mountdillon Bog Group). Glenlough Bog is located on the border of counties Westmeath and Longford.

This document seeks to address the requirements of Condition 10.2 of IPC Licence 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 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 actions;
- Budget and Costings; and
- Associated aftercare, maintenance and monitoring.

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

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

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

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

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

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

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

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

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

## 1.1 Constraints and Limitations

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

This rehabilitation plan takes account of the **current land-uses** of Glenlough Bog. Industrial peat extraction at Glenlough Bog permanently ceased in 2018. A portion of land to the south east of the site, was sold Klasmann Deilmann Ireland Limited and has been used for industrial peat extraction. This area is outside the scope of this rehabilitation plan.

Bord na Móna will continue to review the future after-use of its land-bank. Any consideration of any other future after-uses for Glenlough Bog, will be conducted in adherence to the relevant planning legislation and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

The areas in recent peat production are a mosaic of bare peat and pioneering heather vegetation communities. Parts of Glenlough Bog that were drained but never commercially harvested contain degraded raised bog vegetation communities.

It is anticipated that the combination of active enhanced rehabilitation measures and further natural colonisation will quickly support the further development of pioneer vegetation. Nevertheless, it will take some time (30-50 years) for naturally functioning peatland ecosystems to fully re-establish across the entirety of Glenlough Bog.

Parts of Glenlough Bog (outside the areas owned and under the control of Bord na Móna) are currently used by domestic turf cutters to harvest peat. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. 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. There are a small number of “rights of way” routes located in the western and southern boundaries of the bog. There are no known archaeology records on Glenlough Bog. All rehabilitation measures proposed at Glenlough Bog will consider the sensitivity of any archaeology.

## 2. METHODOLOGY

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

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

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

### 2.1 Desk Study

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

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

- Lindsay (2010). Peatbogs and Carbon: a Critical Synthesis to Inform Policy Development in Oceanic Peat Bog Conservation and Restoration in the Context of Climate Change.
- Mackin *et al.* (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service,
- McBride *et al.* (2011). The Fen Management Handbook (2011), Scottish Natural Heritage.
- McDonagh (1996). Drain blocking by machines on Raised Bogs. Unpublished report for National Parks and Wildlife Service.
- NPWS (2017a). National Raised Bog Special Areas of Conservation management plan. Department of Arts, Heritage and the Gaeltacht.
- Pschenyckyj *et al.*, 2021, Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity, Report produced for An Fóram Uisce, Online, Available at: [https://thewaterforum.ie/app/uploads/2021/04/Peatlands\\_Full\\_Report\\_Final\\_March2021b.pdf](https://thewaterforum.ie/app/uploads/2021/04/Peatlands_Full_Report_Final_March2021b.pdf), Accessed 17.08.2021.
- 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:

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

- River Basin Management Plan for Ireland 2018 – 2021;
- Bord na Móna Annual Report 2020.
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

## 2.2 Consultation

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

## 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, Glenlough Bog was surveyed in 2012. Additional ecological monitoring and visits have taken place at Glenlough Bog between 2013-2021 to inform rehabilitation planning, where required.

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

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



### 3. SITE DESCRIPTION

Glenlough Bog is located along the border of counties Longford and Westmeath, 5km south of Edgeworthstown in Co. Longford (see mapbook drawing no. BNM-DR-23-17-01: Bog Site Location). This bog is part of the Mountdillon (Mostrim) group of bogs and is located several kilometres south of the next nearest Bord na Móna bog, Clonwhelan Bog. There is access to the bog via the local L1096 road to the south east, and from a number of tracks from surrounding farmland.

Part of the Comoge Stream occurs in close proximity to the north of the bog and flows north-eastwards and into Glen Lough SPA. The Clontymullan stream drains the site and merges with the River Inny (Shannon) ca.2.5km south east of the perimeter boundary of Glenlough Bog.

Glenlough is located in close proximity to the River Inny [Shannon]<sup>1</sup> and in close proximity to several designated conservation sites including: Glen Lough SPA (Site Code 004045), Lough Iron SPA (Site Code 004046), Garriskil Bog SAC (Site Code 000679) and Lough Owel SAC (Site code 000678).

The surrounding landscape is a mosaic primarily consist of low-lying agricultural land (pasture) interspersed with other raised bogs, many of which have also been managed by Bord na Móna for peat production with some areas utilised for domestic turf-cutting.

#### 3.1 Status and Situation

##### 3.1.1 Site history

Glenlough Bog was drained for peat production in the early 1980's. A small part of the site was used for horticultural peat or sod moss peat during 2000-2018.

Glenlough Bog can broadly be assigned two separate sections (northern and southern); which are separated by a large drainage channel. The northern section has been ditched and partially used for horticultural peat 'sod moss'. Part of southern section has been ditched and harvested for 'sod moss' since the 1990's.

##### 3.1.2 Current land-use

A large portion of the site is dominated by degraded, drained, raised bog habitat.

The former industrial production area of the site is dominated by a mosaic of heather dominated pioneer vegetation communities and bare peat land.

There are several marginal areas dominated by woody vegetation communities including heather, scrub, immature woodland and mature birch dominated woodland.

##### 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

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<sup>1</sup> EPA Code: IE\_SH\_26I011000 see <https://gis.epa.ie/EPAMaps/>

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. These job numbers have now declined with the cessation of peat extraction.

In respect of Glenlough Bog, jobs included in the above study would have included those to facilitate extraction of peat at Glenlough, and associated processing and transfer to the relevant power station, in addition to staff employment at workshops and the main Bord na Móna facility located at Coolnagun.

As the primary employer in many Midland counties, Bord na Móna played a central role in building communities through a number of 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.

## **3.2 Geology and Peat Depths**

### **3.2.1 Sub-soil geology**

The underlying geology at Glenlough Bog is variable. GSI data indicates that the north-western section of Glenlough Bog is underlain by the Lucan Formation, while the south-eastern section is underlain by Waulsortian Limestone. Geological Survey of Ireland (GSI) mapping does not identify any karst features within the surrounding area.

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

Combining the two datasets reveals the lowest lying areas of the site to be underlain by lacustrine clay (below c. 62mOD), while the remainder of the site appears to be underlain by glacial till based on the presence of clayey material and the presence of comparable features present in the surrounding area. The lacustrine deposits encountered would be expected to limit vertical losses to depth in areas where this occurs.

Subsoils underlying extant peat are significantly lacustrine calcareous marls with glacial sub-soil mounds and ridges (see mapbook drawing no DR23\_17\_04\_PeatDepths).

### **3.2.2 Peat type and depths**

Commercial peat extraction has been undertaken at Glenlough Bog only in parts and even in those areas, commercial peat extraction has been a short term process. Most of the site retains relatively deep peat reserves of *Sphagnum* peat with some smaller pockets of shallow residual peat depths where the peat has been cutaway (see mapbook drawing no. BNM-DR23-17-04- Peat Depths). Peat depths of 3-6 m occur across most of the bog.

### 3.3 Key Biodiversity Features of Interest

Glenlough bog can be sub-divided into two main sections for the purpose of reporting, north and south. These sections are divided by a drainage channel that runs east west through the central area of the site.

The southern section is situated to the south of the dividing drainage channel that is orientated east-west through Glenlough bog. This area was ditched by BnM in preparation of peat extraction. The eastern portion of the southern section has been subject to sod moss or horticultural peat extraction. Large trench drains 2-4.5m width are a legacy of the peat extraction techniques used in this area. The western portion of the southern section contains standard bog drains. The area to the west is dominated by degraded raised bog vegetation communities. The area to the east containing trench drains is a mosaic of bare peat and pioneering heather vegetation dominated communities. There is some open water in the larger drains. There is moderate to strong *Sphagnum* cover throughout the southern section of Glenlough Bog.

The northern section is largely dominated by degraded raised bog vegetation communities. This area contains a large extent of high bog that has been ditched but still retains typical raised bog characteristics (that qualifies as the Annex I EU Habitats Directive habitat – ‘degraded raised bogs still capable of regeneration’ (7120)). However, to the east of this section, horticultural peat extraction has created trench drains. This area is a mosaic of bare peat and pioneering heather vegetation communities and some open water areas in the large drains. In the extreme northern portion of the northern section, an area where no ditching has taken place persists. This area is quite wet, and is currently in good condition with *Sphagnum* lawns, pools and hummocks present. This area could be considered analogous to Annex I Active raised bog (7110). (*Sphagnum fuscum*), Long leaved Sundew (*Drosera anglica*) and Northern Clubmoss (*Huperzia selago*) are present in this area.

The central area of the Glenlough bog contains an active drainage channel that divides the north and south of the site. The drainage channel runs east from the extreme west of the bog, through the middle of the site before turning south and taking water to the central area between the 2 southern lobes of the bog. The vegetation close to this drainage channel can be characterised as flushed. Willow *Salix spp.*, Birch (*Betula spp.*) and Gorse (*Ulex europaeus*) are frequent. Heather (*Calluna vulgaris*), Bog Myrtle (*Myrica gale*), Purple Moor-grass (*Molinia caerulea*) and Wood Rush (*Luzula spp.*) dominate the ground cover in this area.

The margins of the BnM property include some habitat areas including remnant raised bog (PB1), scrub (WS1) and Birch woodland (WN7).

#### 3.3.1 Current habitats

##### Glenlough North

The northern section of Glenlough Bog is dominated by degraded raised bog habitats (Annex I habitat Degraded raised bogs still capable of regeneration (7120)). In the east of the section, trench drains have resulted in small waterbodies developing between mosaics of pioneering heather vegetation and bare peat. There is also an area of un-ditched high bog in relatively good condition, analogous to Annex I Active raised bog (7110). The margins of the northern section of Glenlough bog are dominated by scrub, immature woodland and some more mature woodland habitats. Some small, degraded bog remnants exist in parts of the margins of the eastern lobe of Glenlough Bog.

##### Glenlough South

The south west of the bog is dominated by degraded raised bog habitat. Part of the south east section was harvested for horticultural peat leaving large trench drains in place. This area has developed a number of small waterbodies between mosaics of pioneering heather vegetation and bare peat habitat. The margins of the southern section of Glenlough bog are dominated by scrub, immature woodland and some more mature woodland habitats. Some small, degraded bog remnants exist in parts of the margins of the southern lobe of Glenlough Bog.

#### Central Area

The central area of Glenlough bog is dominated by flush vegetation and a large drainage channel. At the time of visit in October 2021 a strong flow of water through this drain was observed. The areas surrounding the flush show signs of old turf cutting activity that have since been abandoned.

A habitat map of Glenlough Bog is shown in Glenlough Mapbook drawing ref. no. BNM-DR-23-17-17- Current Habitat Map).





*Figure 3.1. View of large trench drain present in Glenlough*





Figure 3.2. View of *Drosera anglica* and *Sphagnum* in pools on unditched area of Glenlough Bog





*Figure 3.3. View of drains and degraded raised bog habitat at Glenlough*





*Figure 3.4. View of trench drain blocked by machine pass, water flow has been reduced to a trickle that has overtopped the machine pass at Glenlough.*



### 3.3.2 Species of conservation interest

A number of species of conservation concern have been recorded at Glenlough Bog. The following is a summary of the records of these species available within both BnM records and those of the National Biodiversity Centre.

Multiple mammal species have been recorded on or within 1Km of the bog; Irish Hare (*Lepus timidus subsp. hibernicus*), West European Hedgehog (*Erinaceus europaeus*), Eurasian Badger (*Meles meles*) and Pine Marten (*Martes martes*). Badger, hare and deer species field signs were observed throughout the bog by BnM ecologists during a walkover survey in September 2021. No recordings for bat species on Glenlough Bog were found in the NDBC records.

Regarding lepidopteran species, records exist for Green-veined White *Pieris napi*, Marsh Fritillary (*Euphydryas aurinia*), Meadow Brown (*Maniola jurtinal*), Orange-tip (*Anthocharis cardamines*), Peacock (*Inachis io*), Small Tortoiseshell (*Aglais urticae*), Small White (*Pieris rapae*) and Wall (*Lasiommata megera*). Moth records include: Broom Moth (*Melanchra pisi*), Fox Moth (*Macrothylacia rubi*) and Wormwood (*Cucullia absinthii*).

White tailed bumblebee (*Bombus lucorum* agg.), Garden Bumblebee (*Bombus hortorum*) and Common Darter (*Sympetrum striolatum*) were also recorded on Glenlough Bog by BnM ecologists.

Records for Common Frog (*Rana temporaria*) were found in the NDBC database. The species was also recorded on Glenlough Bog by BnM ecologists during walkover surveys in September 2021.

Numerous bird species are known to use the cutover bogs in Ireland's midlands as breeding grounds, Wintering grounds or both. Records for bird species of immediate conservation concern at Glenlough Bog or within 1Km of the site include;

Breeding Season records - House Martin (*Delichon urbicum*), Sand Martin (*Riparia riparia*), Barn Swallow (*Hirundo rustica*), Black-headed Gull (*Larus ridibundus*), Common Kingfisher (*Alcedo atthis*), Common Grasshopper Warbler (*Locustella naevia*), Common Linnet (*Carduelis cannabina*), Common Kestrel (*Falco tinnunculus*), Common Redshank (*Tringa tetanus*), Common Sandpiper (*Actitis hypoleucos*), Common Snipe (*Gallinago gallinago*), Starling (*Sturnus vulgaris*), Common Swift (*Apus apus*), Little Grebe (*Tachybaptus ruficollis*), Eurasian Woodcock (*Scolopax rusticola*), House Sparrow (*Passer domesticus*), Meadow Pipit (*Anthus pratensis*), Peregrine Falcon (*Falco peregrinus*), Sky Lark (*Alauda arvensis*) and Spotted Flycatcher (*Muscicapa striata*). There are also breeding season records for Eurasian Curlew (*Numenius arquata*). However, the last record of breeding curlew at Glenlough Bog is from 2011. Bord na Móna have surveyed the bog for Curlew in recent years (Copland & Donaghy, 2015)(Copland 2016) but no more observations of Curlew have been made.

Winter season bird records - include Teal (*Anas crecca*), Wigeon (*Anas penelope*), Gadwall (*Anas strepera*), Tufted Duck (*Aythya fuligula*), Whooper Swan (*Cygnus cygnus*), Hen Harrier (*Circus cyaneus*), Common Goldeneye (*Bucephala clangula*), Common Coot (*Fulica atra*), Common Pochard (*Aythya farina*), Northern Pintail (*Anas acuta*), Northern Shoveler (*Anas clypeata*) and Water Rail (*Rallus aquaticus*).

### 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 rehabilitation are 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

There are a number of European Sites (SAC's or SPA's) in close proximity (i.e. within a 5km radius at minimum) to Glenlough Bog. A number of NHA's (Natural Heritage Areas) and pNHA's (Proposed Natural Heritage Areas) also occur within 5km of Glenlough Bog (see map book drawing no. BNM-DR-23-17-23: Proximity Designated Sites).

Garriskil Bog SAC (Site Code: 000679) and SPA (Site Code: 004102) is situated approximately 7.5Km west of the Glenlough site boundary. Qualifying interests for Garriskil Bog SPA are; Greenland White-fronted Goose *Anser albifrons flavirostris* while the qualifying interests of the SAC include; Active raised bogs, Degraded raised bogs still capable of natural regeneration, Depressions on peat substrates of the Rhynchosporion.

Glen Lough SPA (Site Code: 004045) is situated directly east and adjacent to the bog boundary. The qualifying interests of Glen Lough SPA are: Whooper Swan.

Lough Iron SPA (Site Code: 004046) is located approximately 4Km south east of Glenlough Bog. The qualifying interests of Lough Iron SPA include: Whooper Swan, Wigeon, Teal, Shoveler, Coot, Golden Plover, Greenland White-fronted Goose and Wetland and Waterbirds.

The following NHA's and pNHA's are also situated within 5Km of Glenlough Bog; Lough Garr NHA and Glen Lough pNHA.

### 3.4.1 Other Nature Conservation Designations

The Ramsar Convention entered into force in Ireland on 15<sup>th</sup> March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha. Lough Glen Wetland (Ramsar Site No. 416) situated directly west and adjacent to the Glenlough Bog boundary. It is an internationally important Wintering ground for Whooper Swan.

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

### 3.5 Hydrology and Hydrogeology

Glenlough forms part of the Upper Shannon Catchment (Catchment ID : 26F) as defined by the EPA under the Water Framework Directive (WFD) and is primarily situated within the Inny [Shannon]\_SC\_050 sub-catchment. The bog is located approximately 5km to the South of Edgeworthstown, on the border of counties Longford and Westmeath. The bog contains several drainage pathways and discharge locations, with the majority of the bog discharging to the Clontymullan River to the South of the bog.

Part of the Comoge Stream (EPA Code: 26C12) is situated adjacent and to the north of the bog and flows north-eastwards and into Glen Lough SPA. The Clontymullen (EPA Code: 26C25) stream drains the site and merges with the River Inny (EPA Code: 26I01) ca.2.5km south east of the perimeter boundary of Glenlough Bog.

Regional hydrological data suggest that Glenlough receives average precipitation of 956mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 499mm/yr., leaving an average effective precipitation rate of 457mm/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 457mm/yr, which equates to an annual runoff rate of c. 4,570m<sup>3</sup>/ha.

Glenlough Bog currently has a gravity-based drainage regime. Depression analysis (Figure 8.2 & 8.3) indicates that parts of the bog are natural basin with significant potential for re-wetting, with the assumption that all drains would be blocked. It is likely that a portion of the basins in target areas will re-wet with deeper water, creating a mosaic of wetland habitats, when drains are blocked.

GSI data indicates that the north-western section of Glenlough Bog is underlain by the Lucan Formation, while the south-eastern section is underlain by Waulsortian Limestone. Both units are classified as locally important aquifers as they are moderately productive in local zones only. Geological Survey of Ireland (GSI) mapping does not identify any karst features within the surrounding area. No data exists concerning depth to bedrock, however, there are areas of bedrock in close proximity to the bog.

Quaternary Sediment maps show Glenlough underlain by peat, yet surrounded by inorganic deposits, including Sandstone till (Lower Palaeozoic/Devonian) to the North and east. Sandstone till (Devonian/Carboniferous) also dominates the subsoil deposits to west and south. While Groundwater Vulnerability is typically used to indicate the susceptibility to groundwater pollution, it can provide a useful proxy indication of likely groundwater flow rates in the surrounding area. Groundwater vulnerability for the surrounding areas is generally moderated to high, with some areas of extreme vulnerability mapped in areas where bedrock outcrop occurs.

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

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

Drainage is an important feature of industrial peat production and there were extensive field drains maintained throughout bog areas to facilitate industrial peat production. While the bog was drained initially in the 1980's, Bord na Mona never brought this bog fully into peat extraction. The majority of the bog was never stripped of

vegetation for production. However, as the majority of Glenlough Bog was never in commercial peat production, a silt pond network was not established, and no discharges were monitored.

A small portion of the bog was used for sod moss extraction. Industrial peat production has now permanently ceased at Glenlough Bog.

Part of the original bog extent was transferred to the ownership of a separate commercial peat production company and has been managed by this company for some time.

Glenlough bog has surface water outlets to the Clontymullan River (IE\_SH\_26C250420 CLONTYMULLAN\_010), The Black River (IE\_SH\_26B050180 BLACK (WESTMEATH)\_0200 and the Comoge (IE\_SH\_26C120700 COMOGE\_010)

The Clontymullan River which feeds the River Inny, is indicated as under pressure from various activities including peat extraction, in the third cycle of the River Basin Management Plan, currently under preparation. However this is not the case with the associated section of the River Inny its self, (IE\_SH\_26I011000 INNY\_080), 3.6 km downstream of the connectivity of the bog with the Clontymullan river, which is not indicated as being under pressure from peat.

Details of water quality, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed on the attached water quality map.

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

The main emission limit value associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 1.42mg/l and COD 100mg/l. There is no history of water sampling at Glenlough, but given that the bogs was never in traditional milled peat extraction and was subject to limited sod moss production, it is expected that suspended solids will not have been any significant impact from the bog on the receiving waters.

The licence obligation of quarterly sampling regime on a selected number of discharges 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. Suitable outlets representing the majority of the bog catchment are being assessed for monthly water quality sampling.

This new sampling programme will be commenced in February 2022 and will enabling a baseline to be established, with sampling to progress during the scheduled works, and for a period of up to 2 years post rehabilitation. Depending on the period required to confirm that the main two parameters, suspended solids and ammonia as remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration, the monitoring programme and intensity will be periodically reviewed and amended.

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

This is necessary to ensure that there is alignment with the WFD monitoring programme and that where possible, the monitoring programme will enable any improvements in water quality or establishing trends to be quantified against any available WFD monitoring data. It will also enable the periodic sharing of data which will inform the monitoring reports, success criteria and enable LAWPRO under the Water Framework Directive to track any changes in pressures and be aware of changes in water chemistry.

This enhanced monitoring programme will aim to include a minimum of 70% of a bog's drainage catchments, whatever number of surface water outlets these include.

Monitoring results will be maintained, trended every six months and reported on each year and as required, as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, and will be provided to LAWPRO and the EPA as required to inform progress and national monitoring requirements under the WFD. These results will also be available in April each year as a requirement of the Annual Environmental Report at [www.epa.ie](http://www.epa.ie).

The parameters to be included as per condition 6.2 of the IPC Licence include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour & COD. In addition, DOC has been included as a parameter to try and identify any changes in carbon in the surface water, and where required by LAWPRO, to assist in investigating other changes in water chemistry, the series of parameters can be reviewed and amended.

Rehabilitation of cutaway peatland is closely linked with control of emissions. One of the criteria for successful rehabilitation is stabilisation through re-vegetation, which will stabilise all substrates and in turn remove the need for further silt control measures. Re-wetted peat also aid the primary objective of stabilizing peat, as when peat is re-wetted it minimises risk to wind erosion. Re-wetted peat and the development of wet peatland habitats can also act as sinks for any 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 because of bog rehabilitation and restoration measures and the restoration of natural peatland processes (Bonn et al., 20017). Peatland rehabilitation is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva et al., 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Móna raised bog restoration programme 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 Glenlough Bog 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 watercourses.

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

None.

The bog is no longer in industrial peat production. Rehabilitation of the 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 has large sections of drained (degraded) peatland with currently active drainage, which facilitates the oxidation of peat, areas planted with conifer forestry, areas developing Birch woodland and scrub, and areas re-wetted but developing fen and wetland habitats. Peat extraction generally transforms a natural raised bog which acts as a modest carbon sink into a cutaway ecosystem which is a large source of carbon dioxide (2–5 t C/ha/year) (Waddington & McNeil, 2002; Alm *et al.*, 2007; Wilson *et al.*, 2007, Wilson *et al.*, 2015). Furthermore, they are also a significant source of methane (Huttunen *et al.*, 2003; Laine *et al.*, 2007a) as a consequence of the conditions within the peat body that provide a suitable environment for the microbial breakdown of plant litter and root exudates. Degraded peatlands also release carbon/GHG emissions via the fluvial/aquatic pathway (Dissolved Organic Carbon – DOC, Suspended Solids/Particulate Matter, degassing of GHGs from water).

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

It is expected that Glenlough Bog can become a reduced carbon source/part carbon sink following rehabilitation. The potential of any bog to develop as a reduced carbon source/carbon sink in the longer-term depends on land-use, the success of the rehabilitation measures, the extent of optimal re-wetting and hydrological conditions, 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. Glenlough has potential for **raised bog restoration** and is expected to have the same trajectory as Moyarwood Bog, developing **active raised bog** and becoming a **carbon sink in part** soon after drains are blocked.

### 3.9 Current ecological rating

The majority of Glenlough bog can be rated as having a National ecological value (B) as it is dominated by a relatively large area of degraded raised bog (ditched) with potential for restoration.

Glenlough Bog is also listed in NPWS (2014) and was reviewed as part of the potential raised bog NHA network. The site is expected to be considered for NHA designation in the future.

## 4. CONSULTATION

### 4.1 Consultation to date

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

There has been ongoing consultation about rehabilitation and other general issues over the years about Glenlough Bog with various stakeholders in relation to:

- General consultation with range of stakeholders at annual Bord na Mona Biodiversity Action Plan review days 2010-2018.
- 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).
- Consultation with NPWS during the review of the NHA network (NPWS 2014).
- Bird surveys and monitoring carried out by Birdwatch Ireland at Glenlough for Bord na Móna, particularly in relation to the status of Curlew on the site.
- Consultation with local NPWS regional staff in relation to proposed bog restoration on site in 2018.
- Ongoing general consultation with Klasmann-Deilmann.
- Consultation for route selection of the N4 national road (2020).

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

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

Further to the above, as a means of further notification for those based near to any proposed PCAS activities, a leaflet detailing PCAS plans for Glenlough Bog, contact details and the PCAS website address was delivered to each house within a 1Km radius of the bog.

## **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 Glenlough Bog – these are summarised below. Issues raised below include responses received as part of general consultation in relation to PCAS plans in 2021.

### *4.2.1 Assessments of rehabilitation*

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

### *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 rehab 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 IPCC and BCI relating to the finalisation of several bog rehab plans in 2021 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 the IPCC, University College Dublin and Trinity College researchers in their respective submissions relating to the finalisation of several bog rehab plans in 2021. 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*

In response to consultation carried out in regard to several bog rehab plans in 2021, the IFA, Department of Agriculture Food and the Marine, and ICMSA queried the likely impacts of the proposed rewetting on adjoining lands, specifically, with regards to the maintenance of drains.

The IFA also raised the issue of Health and Safety in relation to raising water levels as well as possible impacts on land and property prices.

### *4.2.6 Future management*

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



A local resident expressed support for the proposed rehabilitation and queried whether the site would be used for a renewable wind energy project.

#### *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).

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

Several responses were received requesting further information on the Glenlough rehabilitation plan.

For a complete summary of submissions received with regard to Glenlough Bog 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 Glenlough Bog. This is ongoing with a dedicated Community Liaison Officer communicating to affected and interested parties. A website has been developed to make information available. This will be continually updated. It is expected that some PCAS Bogs will become demonstration sites so that interested stakeholders can come to visit and observe the measures on the ground.

#### *4.3.2 Assessments of rehabilitation*

AA screening will be undertaken on all the bogs as part of PCAS and this is currently being undertaken by external consultants for Glenlough Bog. Where required, Natura Impact Statements shall be completed and submitted to the Minister in accordance with 42(9) and 42(10) of the Habitats Regulation, noting that Bord na Móna is prescribed as a 'public authority' under this legislation. In relation to the SEA Directive and EIAR Directive, this has been considered and the legal advice to date is that the scheme does not come under these Directives.

An Archaeological Impact Assessment (AIA) has been undertaken on all the bogs in PCAS (Appendix XII). The aim for known archaeology on these bogs is to accomplish preservation in situ and we are taking steps to identify and avoid all known archaeology.

Bord na Móna aim to achieve this through including all known archaeology in the planning process of rehabilitation works and implementing an exclusion or buffer zone around these features. These measures should sufficiently protect any archaeology in these areas, during any ground works in the final plan. It is anticipated that any archaeology will benefit from the ultimate remit of the rehabilitation, in that water tables will be raised thereby preserving in-situ. There is also an identified procedure for managing reports of stray finds that may arise during rehabilitation works.

#### *4.3.3 Restoration scope*

As part of the PCAS, all restoration/rehabilitation options have been developed to support climate action and biodiversity objectives. Other issues such as existing amenity, social impacts, industrial history, archaeology were not part of the direct scope of PCAS but were considered when developing the rehabilitation plan. After use of

the bog is outside the scope of PCAS. Rehabilitation will lead to the development of a stable diverse re-wetted cutaway landscape that will have added benefits for amenity in the future.

#### 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 fauna monitoring and habitat monitoring is proposed as part of the monitoring and verification at Glenlough Bog during the period of the scheme (2021-2025). However, note that fauna typically take longer to respond to the changes in vegetation colonisation and habitats arising from the proposed rehabilitation measures identified for Glenlough Bog.

#### 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. In general, drains around the margins of the bog will not be blocked.

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

The rehabilitation measures proposed at Glenlough 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 *Future management*

Bord na Móna confirmed that there are no plans for wind turbines or any other renewable infrastructure at Glenlough Bog.

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

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.

#### 4.3.7 *Other issues*

Other issues, including after-use and management issues outside the boundary of Glenlough 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 that occurs within the estate is reported and dealt with by the appropriate authorities.

#### 4.3.8 *Concluding statement.*

- The majority of Glenlough bog is largely stabilised, as it has been drained but never developed for peat extraction. Drain-blocking will improve conditions and support raised bog restoration.
- No specific issues were raised during consultation that required significant changes to the substance of the rehabilitation plan.
- Issues raised by several consultees in relation to potential impacts on adjacent land had already been accounted for during the hydrological analysis and assessment, and corresponding adaptations to incorporate Drainage Management Plan mitigation measures.
- Several 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.

## 5. REHABILITATION GOALS AND OUTCOMES

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

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving water-bodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Optimising hydrological conditions for **climate action benefits as part of PCAS**.
- Carrying out an intensive rehabilitation measures in including drain-blocking to encourage bog restoration and the development of active raised bog habitat.
- Optimising hydrological conditions for the development of embryonic *Sphagnum*-rich raised bog vegetation communities areas used for sod moss extraction, where possible.
- Integrating rehabilitation measures with current land-use (e.g. turf-cutting).
- Optimising hydrological conditions for the protection of any exposed archaeological structures, their retention in situ and preservation into the future, where possible.
- The main goal and outcome of this plan is the successful rehabilitation (environmental stabilisation) of peatlands used for industrial peat production at the bog in a manner that is acceptable to both external stakeholders and to Bord na Móna and which optimise climate action and other ecosystem service benefits.

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

- It will take some time for stable naturally functioning habitats to fully develop across the entirety of Glenlough Bog. This will happen over a longer time-frame than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (See Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- Glenlough Bog has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). However, only a proportion of the bog has potential to develop *Sphagnum*-rich habitats and active raised bog (about 40 ha based on hydrological modelling) in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of the whole bog.
- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction, but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At

Risk from peatlands and from peat extraction are likely to have several contributory sources of impacts (private peat extraction and Bord na Mona).

- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features.
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Begnagh, Clooneeny, Knappoge) in 2021/2022. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies such as the Shannon from rehabilitation to more than one bog in the same catchment.

## 6. SCOPE OF REHABILITATION

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

- The area of Glenlough Bog (see mapbook drawing no. BNM-DR-23-17-22: Aerial Imagery 2020)
- 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. Glenlough Bog is part of the Mountdillon Bog Group, sub group Mostrim.
- 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 Glenlough Bog, in particular, optimising **climate action benefits of the area recently out of industrial peat extraction**. 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 Glenlough Bog identify raised bog restoration as the most suitable rehabilitation approach for the area recently out of peat production at this site.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog. Bord na Móna have defined the key goal and outcome of rehabilitation at Glenlough Bog as **environmental stabilisation** of the site via **optimising climate action benefits, where possible**, and integrating rehabilitation with the existing land-uses. The re-wetting of residual peat in the area recently out of peat extraction will be optimised, **setting the site on a trajectory towards the development of active raised bog and embryonic *Sphagnum*-rich peat-forming habitats in the cutover areas**.
- Enhanced Rehabilitation of Glenlough 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.
- Current land-uses. Boundary drains will be maintained to act as a hydrological break between Glenlough Bog and adjoining lands.

### 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, like Glenlough, 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).
- Furthermore, there are local factors (such as topography and drainage) that will influence the future trajectory of this bog. At Glenlough Bog, some areas were drained but never harvested. Other areas were used to extract horticultural peat. The variation in drainage regime across these land use types will create unique hydrological conditions that create differing rehabilitation requirements.
- **Current land-use.** Much of Glenlough Bog was drained but never subject to peat harvesting. In two areas of Glenlough Bog, the north east and the south east, horticultural peat or “sod moss” peat production occurred. Peat production ceased in 2018.

- **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, as well as potential changes to the hydrology of surrounding designated sites. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. If this occurs, rehabilitation measures will be reviewed and adapted. An archaeological impact assessment of the proposed rehabilitation at Glenlough Bog will be carried out (Appendix XII). Rehabilitation in areas of archaeological interest will be avoided or amended (e.g. buffers in line with Best Practice) to avoid or minimise impact to any archaeological features ( See drawing no. BNM-DR-23-17-05: Enhanced Rehab Measures & Appendix XII).
- **Public Rights of Way.** Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remain intact where possible. In some instances, depending upon previous land uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies during the consultation work associated with the decommissioning and rehabilitation work described here. There are a number of rights of way on the western margins of Glenlough Bog.

## 6.2 Key Assumptions

- It is assumed that Bord na Móna will have all resources required to deliver this project. 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 only the ‘standard’ decommissioning and rehabilitation required under Condition 10, and for which financial provisions have been made, to comply with that element of the Licence.
- 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 raised bog restoration trajectory of the site. The plan covers the short-term rehabilitation **actions** and a **monitoring and after-care programme** to monitor the rehabilitation during the Scheme and to respond to any needs. It is expected that this rehabilitation plan will set the site on an enhanced and accelerated trajectory towards stabilisation and raised bog restoration. The plan does not set any goals or outcomes, for example, the extent (specific area) of active raised bog habitat (ARB) that may develop at this site in the long-term. This is beyond the scope of this rehabilitation plan.
- The area used for industrial peat extraction by a neighbouring peat producer is not considered as part of this rehabilitation plan.
- This plan is not intended to be an after-use or future land-use plan for Glenlough Bog.

- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future.



## 7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

The key objective of this 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 potential key emissions (e.g. suspended solids).

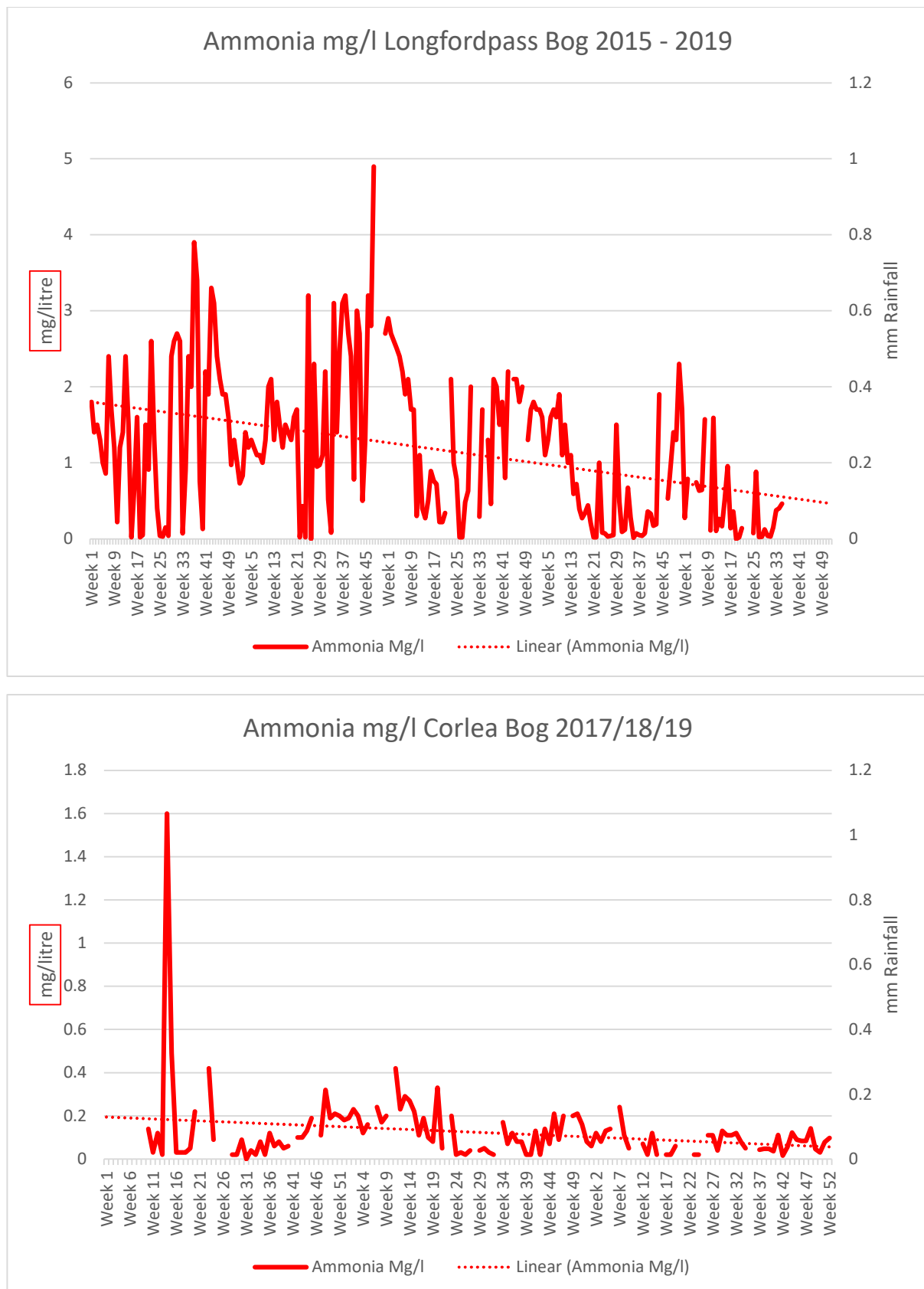
### 7.1. Criteria for successful rehabilitation to meet EPA IPC licence conditions:

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

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

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

As the monthly monitoring program at Glenlough continues in 2022 during the rehabilitation works, and data from the 2020 monitoring program is compiled, further trending will be produced to verify any ongoing trends.



**Figure 7.1. Ammonia trends at Longfordpass and Corela 2015-2019.**

**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 deep peat re-wetting). This will be measured by an aerial survey after rehabilitation has been completed.
- Accelerating the trajectory of the former area of industrial peat extraction towards becoming a reduced carbon source/carbon sink. This will be measured through habitat mapping and the development of cutaway bog condition assessment. This cutaway bog condition assessment will include assessment of environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels (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 raised bog restoration and the development of active raised bog and embryonic *Sphagnum*-rich peat-forming habitats, where possible. These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning habitats to fully develop at Glenlough 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. These metrics will be defined in the context of the overall Scheme resources and after consultation with stakeholders.

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

Criteria type	Criteria	Target	Measured by	Expected Time-frame
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,	2022-2025

			vegetation establishment and habitat condition.	
IPC validation	Key water quality parameters Ammonia, Phosphorous, Suspended solids, pH and conductivity	Reduction or stabilisation of key water quality parameters	Water quality monitoring. Started in advance of the proposed rehabilitation.	2022-2024
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	No decline in the WFD status of the local river catchment related to this bog	EPA WFD monitoring programme	WFD schedule
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action	Optimal extent of suitable hydrological conditions	Aerial photography and Habitat mapping to map extent of suitable hydrological conditions.  Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2022-2025
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a high bog condition assessment and appropriate carbon emission factors.	2022-2025
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  Breeding birds	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services (to be defined).  Presence of key species – Sphagnum – Walkover survey  Breeding birds – Breeding bird survey	2022-2025
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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.

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

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

- **Funding to pay for resources required to deliver the planned rehabilitation (Bord na Móna and external).** Bord na Móna maintains a Provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan.
- **Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.**
- **Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.**
- **Weather conditions to be within normal limits over the rehabilitation plan timeframe.** Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.
- **Rehabilitation measures to be effective.** The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practise applied internationally in peatland management. Measures proposed in this plan have already been shown to be effective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.
- **Natural colonisation of vegetation to develop semi-natural habitats at a rate within the normal limits.** The development of naturally functioning semi-natural habitats on cutaway peatland takes time. Pioneer vegetation can develop relatively quickly (3-10 years) and wetland habitats can develop relatively quickly. Birch woodland may take 20-30 years to develop. However, it may take 50 years for active raised bog vegetation to re-develop on ground that was previously cutaway. Different environmental conditions will

have a significant impact on the rate of natural colonisation, and as a result of the combination of different environmental conditions and the application of different rehabilitation measures, there will be a variety of habitat outcomes.

- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed 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 depression analysis/hydrological modelling (see Drawing ref. no. BNM-DR-23-17-03: LiDAR Map) will be important in planning the future peatland landscapes and planning the use of the most appropriate rehabilitation methodologies to maximise climate action benefits. Hydrological modelling (BNM-DR-23-17-03 LiDAR Map) indicates those areas that are likely to re-wet when drains are blocked, based on the current topography, and areas where water levels may have to be modified, where needed. Enhanced rehabilitation measures will look to optimise hydrological conditions for re-wetting peat in other areas. This planning is also essential for matching the most sustainable rehabilitation methodology to the most suitable cutaway environment to maximise the benefits of the resource outlay (maximising cost/benefit).

The rehabilitation actions will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in the enhanced rehab measures drawing (See mapbook drawing ref. no. BNM-DR-23-17-05: Enhanced Rehab Measures) (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 areas out of recent peat extraction at Glenlough bog will include:

- Re-wetting some deep peat areas of the bog through field drain blocking using an excavator to create peat barriers (up to seven every 100 m along each field drain);
- Re-alignment of any piped drainage;
- Re-wetting the deep peat in the cutover areas and some shallow peat areas of the bog using berms and peat dams. This enhanced measure seeks to create large (c. 45m x 60m) flat areas or cells of shallow (< 10 cm) water conditions on bare peat, across multiple fields that are enclosed by shallow berms to retain shallow surface water;
- Management of water levels in these areas with overflow pipes;
- Regular drain blocking (3/100) on cutover bog, along with the management of outfalls and management of water levels;
- Inoculation of *Sphagnum* on compatible residual bare deep peat areas, where needed.
- Silt ponds and silt control measures will be retained and maintained during the rehabilitation phase. During the monitoring and verification phase silt ponds and silt control measures will be continually inspected and maintained, where appropriate. When it is deemed that silt ponds are not required, as the bog has been successfully stabilised and water quality parameters meet targets the condition of the silt ponds will be reviewed. Silt ponds will either be de-watered (water levels lowered to a level where the silt pond will naturally develop as a small wetland feature), left in situ, or infilled (where discharges do not require silt control).

An indication of the areas for these various measures is shown in Table 8.1 and in mapbook ref. no. BNM-DR-23-17-05: Enhanced Rehab Measures.

**Table 8.1** *Enhanced rehabilitation measures and target area at Glenlough Bog. 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.*

Type	Code	Description	Area (Ha)
Deep peat cutover bog	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	0
	DPT2	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows	217.6
	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling with screw leveller + drain infilling + cross berms + blocking outfalls and managing overflows	0
	DPT4	Berms and field re-profiling (45m x 60m cell) + blocking outfalls and managing overflows + drainage channels for excess water + <i>Sphagnum</i> inoculation	0
	DPT5	Cut and Fill cell bunding (30m x 30m cell) + blocking outfalls and managing overflows + drainage channels for excess water + <i>Sphagnum</i> inoculation	0
	DPT6	Trench drain Block (max 3/100)	45.8
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	0
	DCT2	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	0
	DCT3	More intensive drain blocking (max 7/100 m) + blocking outfalls and managing overflows + targeted fertiliser treatment	0
Wetland cutaway	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	0
	WLT2	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site	0
	WLT3	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes	0
	WLT4	More intensive drain blocking (max 7/100 m), + blocking outfalls and managing overflows + transplanting Reeds and other rhizomes	0
	WLT5	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows + transplanting Reeds and other rhizomes	0
Marginal land	MLT1	No work required	9.3
	MLT2	More intensive drain blocking (max 7/100 m)	0
Additional Work	AW2	Targeted Drain Blocking	54.6
Other		Largely rehabilitated. Assessment will consider additional enhancement measures that align with current land-use, amenity and constraints	0
Other		Silt-ponds	0
Other		Constrained Areas	3.3
Other		Archaeology Constrained Areas	0
<b>Total</b>			<b>330.65</b>



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

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise, from the EPA;
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator;
- Develop a detailed site plan with detailed site drawings outlining how the various rehabilitation methodologies will be applied to Glenlough Bog. This will take account of peat depths, topography, drainage and hydrological modelling. (See map book ref. no. BNM-DR-23-17-05: Enhanced Rehab Measures for an indicative view of the application of different rehabilitation methodologies);
- A hydrology and drainage management assessment of the proposed enhanced rehabilitation measures was carried out.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation was carried out. The results of this assessment have been incorporated into the rehabilitation plan to minimise known archaeological disturbance, where needed.
- A review of issues that may constrain rehabilitation such as amenity, forestry, other land-uses, known rights of way, archaeology, turbary, and existing land agreements was carried out and incorporated into the rehabilitation plan, where needed;
- An ecological appraisal of the potential impacts of the planned rehabilitation such as the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) or larval webs of Marsh Fritillary butterfly, etc was carried out;
- Review silt control measures and establish suitable silt control, where needed;
- 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 Glenlough screened out at the Stage I.)
- See Glenlough Decommissioning and Rehabilitation Plan – Addendum 1 for more details.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) (where required), and other environmental control measures during the implantation of the rehabilitation plan.

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

- Carry out proposed measures as per the detailed site plan. This will include a combination of drain blocking, peat field re-profiling, cell-bunding and fertiliser applications targeting headlands, high fields and other areas. All rehabilitation will be carried out with regard to 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 and silt control measures will be monitored during this period and there will be continued maintenance and cleaning to prevent suspended solids run-off from the site during the rehabilitation phase; and
- 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; and
- 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.
- **2023-2024:** Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- **2024:** Decommission silt-ponds, if necessary

### 8.5 Budget and costing

Bord na Móna (BnM) understand that it is the Minister's intention to impose an obligation on Bord na Móna to develop a package of measures, 'the Scheme', for the enhanced decommissioning, rehabilitation and restoration of cutaway peatlands (PCAS). It is understood that additional costs of the Scheme will be supported by the Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e, measures which go beyond the existing 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 2020). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

At this time, a '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 types of cutaway 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.
- **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.
- This new sampling programme commenced in November 2020 and is enabling a baseline to be established, with sampling to progress during the scheduled works, and for a period of up to 2 years post rehabilitation. Depending on the period required to confirm that the main two parameters, suspended solids and ammonia as remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration, the monitoring programme and intensity will be periodically reviewed and amended.
- In the preparation of this monitoring programme, Bord na Mona have been providing the Local Authority Water Programme (LAWPRO) with details of the surface water emissions points associated with this bog and will be amending some of the proposed monitoring locations on foot of this engagement. LAWPRO have in turn provided details of their 2021 monitoring programme and these are included in the Water Quality Map.
- This is necessary to ensure that there is alignment with the WFD monitoring programme and that where possible, the monitoring programme will enable any improvements in water quality or establishing trends to be quantified against any available WFD monitoring data. It will also enable the periodic sharing of data which will inform the monitoring reports, success criteria and enable LAWPRO under the Water Framework Directive to track any changes in pressures and be aware of changes in water chemistry.
- This enhanced monitoring programme will aim to include a minimum of 70% of a bog's drainage catchments, whatever number of surface water outlets these include.

- Monitoring results will be maintained, trended every six months and reported on each year and as required, as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, and will be provided to LAWPRO and the EPA as required to inform progress and national monitoring requirements under the WFD. These results will also be available in April each year as a requirement of the Annual Environmental Report at [www.epa.ie](http://www.epa.ie).
- The parameters to be included as per condition 6.2 of the IPC Licence include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour & COD. In addition, DOC has been included as a parameter to try and identify any changes in carbon in the surface water, and where required by LAWPRO, to assist in investigating other changes in water chemistry, the series of parameters can be reviewed and amended.
- 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 appropriate assessment process and planning procedures.

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

- Vegetation and habitat monitoring will be carried out using a condition assessment (ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated

peatland habitats. This means that potential GHG emissions can be estimated from the site, as the site continues along its trajectory towards a naturally functioning peatland ecosystem.

- It is proposed to monitor the improvement of some biodiversity ecosystem services. To be defined in relation to monitoring of the overall Scheme and after consultation with stakeholders.

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

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

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

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

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

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

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

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

### Scope of rehabilitation

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

- The area of Glenlough Bog (BNM-DR-23-17-22: Aerial Imagery 2020)
- 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. Glenlough Bog is part of the Mountdillon Bog group.
- The current condition of Glenlough Bog. Pioneer cutaway vegetation is developing across parts of the site, whilst some parts have already been stabilised/rehabilitated whilst other remain unvegetated .
- 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 Glenlough Bog will be left unblocked as blocking boundary drains could affect adjacent land.

### Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Glenlough Bog is environmental stabilisation of the site via wetland creation and deep peat re-wetting. This is defined as:

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

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

### Criteria for successful rehabilitation:

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

- That there is a stabilising/improving concentration of suspended solids and ammonia associated with the measures undertaken to stabilise the peat surface by the blocking of the internal drainage system and the maximised rewetting of the peat surface. This will be demonstrated by developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be measured via water quality monitoring (suspended solids and ammonia).
- Receiving water bodies have been classified under the River Basin Management Plan and this classification includes waters that are At Risk from peatlands and peat extraction. The success criteria will be that the At Risk classification will see improvements in the associated pressures from this peatland or if remaining At Risk, that there is an improving trajectory in the pressure from this peatland.

### Rehabilitation indicators

- 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 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). This will be demonstrated by water quality monitoring results.

### Rehabilitation measures: (see Mapbook drawing no. BNM-DR-23-17-20: Standard Rehab Measures)

- Blocking field drains in the former industrial production area to create regular peat blockages (three blockages per 100 m) along each field drain;
- 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. 1<sup>st</sup> phase of rehabilitation. Field drain blocking and water-level management.
- 2023. 2<sup>nd</sup> phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1<sup>st</sup> phase re-wetting, ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.
- 2023-2024. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2023-2024. Decommission silt-ponds, if necessary.

**Table AP-1. Rehabilitation measures and target area.**

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	263.36
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	0
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	0
<b>Marginal Land</b>	MLT1	No work required	63.92
Other	Silt Pond	Silt ponds	0.02
Other	Completed	Rehabilitation Complete	0
Other	Constraint	Rights of Ways and constrained areas/buffers/Archaeology	3.35
<b>Total</b>			<b>330.65</b>

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

### Validation and IPC Licence surrender

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

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

## APPENDIX II: BOG GROUP CONTEXT

The 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 2020. Both power stations ceased using peat by the end of 2020. All remaining horticultural peat stocks were removed during 2020. Intensive decommissioning and rehabilitation for the Mount Dillon Bog Group has commenced in 2020/2021. Remaining milled peat stocks are being transported to various customers (Edenderry Power, Derrinlough Brickette Factory).

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. At these sites 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. These areas are also outlined on Figure Ap-2 (Map of the Mount Dillon Bog Group).

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 Dillion and Garryduff have been mostly cutaway to the fen peat layers or in some cases to expose the underlying gravel/sub-soil. Several bogs in the Mostrim group have only been partially developed or have had no industrial peat production, and have relatively deep peat depths

A breakdown of the component bog areas for the Mountdillon Bog Group IPC License Ref. P0504-01 is outlined in Table Ap-2.

*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 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.	Clooneeny Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power  Most of the former production area on site is bare peat.  Some areas of cutaway on site are developing pioneer cutaway vegetation communities.	2020	Draft 2021
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.	Derraghan Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power	2020	Draft 2021



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

Derryshannoge	452	Cutover Bog Industrial peat production commenced at Derryshannoge Bog in 1985 and ceased in 2020. Deep peat reserves remain across most of the site. Derryshannoge is considered a deep peat cutover bog.	Derryshannoge Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  Much of the former production area at Derryshannoge has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2017
Edera	281	Cutover Bog  Development for industrial peat production commenced at Edera Bog in 1990's. Active extraction from Edera began in 2003 and ceased in 2018. Edera is considered a deep peat cutover bog.	Edera Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.  The majority of Edera Bog former production area is bare peat.	2020	Finalised 2021
Erenagh	93	Cutover Bog  Development for industrial peat production commenced at Erenagh Bog in 1970's. Erenagh 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
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

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

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Clonwhelan	212	Development Bog. Clonwhelan Bog was drained in the 1980's but never brought into commercial peat production. Clonwhelan is a deep peat development bog.	Rehabilitation complete  Raised bog restoration completed 2019	N/A	Finalised 2018
Clynan	402	Development Bog. Clynan Bog was drained in the 1980's. Sod peat production occurred around the margins and over a portion of the site.	Clynan Bog formerly supplied horticultural peat (sod moss) & fuel turf.  Some rehabilitation work has been carried out on Clynan bog East already to buffer an undrained bog remnant.  Raised bog restoration potential.	2020	Draft 2017
Coolcraff	412	Cutover Bog  Industrial peat production commenced at Coolcraff Bog in the 1980's. The site was developed for milled peat production 2015-2018. Deep peat reserves remain over the majority of the former production area.	Coolcraff Bog formerly supplied a range of commercial functions including; horticultural peat.  Much of the former production area at Coolcraff is bare peat.  One section of high bog to the north of site was excluded from production and so never developed on the basis of high conservation value raised bog habitat.	2020	Draft 2017
Coolnagun	668	Cutaway Bog  Industrial peat production commenced at Coolnagun Bog in 1941. Coolnagun is considered a deep peat cutover bog with areas of shallow cutaway.	Coolnagun Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.  Much of the former production area at Coolnagun is bare peat. Some small patches of pioneer cutaway vegetation communities are developing.  Some bog restoration work was undertaken already along the eastern margin.	2020	Draft 2017

Glenlough	328	<p>Development bog</p> <p>Glenlough Bog was first developed in the 1980's. It was re-ditched in 2003-2005. Only a small part of the bog was fully brought into peat production for sod peat. Deep peat reserves remain over the majority of the former production area. Some of the bog has never been subject to commercial peat extraction.</p>	<p>Glenlough Bog formerly supplied a range of commercial functions including; horticultural peat.</p> <p>Degraded high bog vegetation remains over the majority of the bog. The former production area is a mosaic of vegetation.</p> <p>This site has raised bog restoration potential.</p>	2020	Draft 2021
Milkernagh	627	<p>Cutover Bog</p> <p>Industrial peat production commenced at Milkernagh Bog in 1950. Long-term peat extraction has created shallow cutaway in places. Deep peat reserves remain in parts on the former production area. Milkernagh is considered cutover bog with variable peat depths. Milkernagh has a pumped drainage regime.</p>	<p>Milkernagh Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.</p> <p>Much of the former production area at Milkernagh is bare peat. Pioneer cutaway vegetation communities are developing in places.</p>	2020	Draft 2017
Mostrim	442	<p>Development Bog/Cutover Bog</p> <p>The majority of Mostrim was drained but never developed. Industrial peat production commenced in parts of Mostrim Bog in the 1980's. Peat extraction has significantly affected parts of this bog but deep peat reserves remain on the former production area.</p>	<p>Mostrim Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.</p> <p>Raised bog restoration at Mostrim is ongoing with &gt; 50% completed in Jan 2021.</p>	2020	Finalised 2020

See Drawing number BNM-DR-23-17-24 titled **Mount Dillon Bog Group**, included in the accompanying Mapbook which illustrates the location of Glenlough Bog and the Mount Dillon Bog Group in context to the surrounding area.

## APPENDIX III: ECOLOGICAL SURVEY REPORT

<b>Ecological Survey Report</b> <i>Note: This report outlines an ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.</i>			
<b>Bog Name:</b>	<u>Glenlough</u>	<b>Area (ha):</b>	335ha
<b>Works Name:</b>	Mostrim	<b>County:</b>	Longford
<b>Recorder(s):</b>	MMC & DF	<b>Survey Date(s):</b>	02/03/2010
<b>Habitats present (in order of dominance)</b> <p>The most common habitats present at this site include:</p> <ul style="list-style-type: none"> <li>• Raised bog (PB1) (Codes refer to Heritage Council habitat classification, (Fossitt 2000), See Appendix II.)</li> <li>• Cutover Bog (PB4)</li> <li>• Pioneer dry heath (dHeath) (in the inactive recolonising sod-peat area)</li> <li>• Scrub (WS1) (on cutover bog)</li> <li>• Birch woodland (WN7) (on cutover bog)</li> <li>• Poor fen and flush (PF2) (part of high bog)</li> <li>• Wet grassland (GS4) (around margins)</li> <li>• Improved grassland (GA1) (around margins)</li> <li>• Conifer plantation (WD4) (small area planted on cutover bog around margins – Coillte owned)</li> <li>• Buildings and artificial surfaces (BL3) (roads, tracks and hard surfaces – gun club)</li> <li>• Drainage ditches (FW4)</li> </ul>			
<b>Description of site</b> <p>Glenlough Bog is located along the Co Longford-Westmeath border, 5 km south of Edgeworthstown in Co. Longford. This bog is part of the Mostrim group of bogs and is one of the outliers, being located several kilometres south of Clonwhelan. Like some of the other bogs in the Mostrim group it was originally ditched in the 1980s and re-ditched in 2003-2005 with only a small part of it gone into production for commercial sod-peat. This production area is now inactive and is recolonising with mainly Heather. One notable feature of Glenlough is that not all the peatland is owned by Bord na Móna and that a large area of bog adjacent to the BnM property is also in commercial production for horticultural peat and is managed by a company called Klasmann-Deilmann</p> <p>The majority of this bog is ditched and there are frequent signs of drying-out and deterioration. A small area at the north end of the site was not ditched as it was probably too wet at the time, containing an extensive pool complex. This area has also deteriorated but there are still some good quality pools present that could be considered 'active raised bog'. The main area of bog can be divided into two main sections for ease of description, as they are divided by a large old drainage channel through the centre of the bog. The Glenlough property also contains several other small isolated parcels of land. One is part of a neighbouring intact raised bog at Aghnavealogue and the other is adjacent to the banks of the Inny River.</p>			
<b>Northern section</b> <p>This area is dominated by ditched raised bog of generally poor quality. The majority of the ditched area has active drains that are fully functioning and there are few signs that drains are infilling. Part of the northern section has</p>			

also been damaged by a fire in the recent past and the vegetation is still recolonising bare peat in places. This bog is generally quite firm. The *Cladonia* lichen cover is less than 5%.

The wettest section is within a relative large area that was never ditched. Some of the surrounding drains also contain connected water and some infilling of *Sphagnum*. This area formerly contained an extensive pools complex. However, there are frequent indicators that the surrounding ditching has caused a drop in water levels within this area and many of the pools have deteriorated in quality. The majority of the area is now moderately firm or spongy and there are only a few small quaking areas. The majority of this unditched section is sub-marginal in quality and only a few small areas (of a scale of 5 x 5 m) would be considered sub-central in quality or 'active'. Some of the pools formerly were an interconnecting central pools complex with large well-developed 'island' hummocks in-between the pools. These pools are generally infilling with White beak-sedge, Carnation Sedge and Bog Asphodel. Other pools are dry with bare peat or contain algae. Some still contain moderate cover of *S. cuspidatum* and lawns of *S. magellanicum* and *S. papillosum* and other positive indicators such as Bogbean and Round-leaved Sundew are present. Hummocks of *S. imbricatum* are also present but many were damaged by the recent fire.

Other pools toward the northern end of the unditched area are tear pools and are relatively linear and orientated E-W. These pools have a very high *Sphagnum* cover and are filled with *S. cuspidatum* and *S. magellanicum*. However, some are 'sunken' in appearance and there are indicators that the water level is dropping. The inter-pool areas are generally quite firm and dominated by Bog Asphodel and Carnation Sedge. Clubmoss is present (*Huperzia selago*). White beak-sedge is more prominent in some hollows and infilling pools, creating lawns with *S. papillosum* and *S. capillifolium*. Some sections are quite spongy where there seems to have been secondary growth of *Sphagnum* spp cover or high *Sphagnum* cover in the inter-pool areas, but these areas are also deteriorating.

The main topographical features of the northern section are the two large flushes towards either end of the bog. Both flushes are mapped as Poor flush (PF2) and are characterised by the appearance of Purple Moorgrass and the development of some Birch scrub. The large central drainage channel that divides the site into two sections may have also crossed an old flush. This old drain followed a townland boundary. This area is now quite disturbed and both sides of the drain have typical poor flush vegetation dominated by Purple Moorgrass and frequent Bog Myrtle. Scrub with Birch and some Pine is also colonising both sides of the drain. There are also some indications of old cutover bog along the southern side of this drain with several old ridges and possible face-banks evident.

The northern flush is quite wet in places and still has a natural central drainage channel with some flowing water. The flush flows north down a relatively steep slope with a northern aspect. This flush is within the unditched section. Birch trees are scattered along this flush, forming small pockets of scrub in places. Pine is also present. Some of the Birch is multi-stemmed from damage by previous fires. This flush still has some exceptional *Sphagnum* cover and cover of other bryophytes, although this has now deteriorated. Some of the flush is still quaking. Some large hummocks of *Aulacomnium palustre* are present on either side of the flush as well as hummocks of *Polytrichum* spp. Hummocks of *S. palustre* are present in the central zone. Cranberry is growing on the hummocks of *Aulacomnium palustre* and Crowberry is present. Several pools within the flush are completely infilled with rotting *Sphagnum* or algae. Other species present include Bramble, Bracken and Broad Buckler Fern. The flush probably would have been considered 'active' (part of the active raised bog) prior to ditching. Heather on both sides of the flush is somewhat taller and leggier. The head of the flush is still quite wet with some high cover of *Sphagnum* spp. Bog Myrtle is present in this area.

The high bog is surrounded by some old inactive cutover bog around its margins. This cutover bog has been partially planted by Coillte along the western side and by private conifer forestry along the northern side. The eastern side contain older cutover bog that is starting to develop secondary habitats and some of this cutover bog is regenerating quite well with frequent cover of *Sphagnum* spp. (*S. capillifolium*, *S. papillosum* and *S. palustre*). Some diverse wet grassland communities are also developing in places on the cutover bog.

### Southern section

The majority of the southern section is made up of intact raised bog (PB1) that has been drained and cutover bog (PB4). The former habitat can be divided into domestic turf cutover and industrial peat cutover. Domestic cutover bog is found around the edges of the bog, the majority of domestic turf cutover was old and inactive although a section at the south of the site had been used in the previous season and was mostly bare peat with little vegetation. The production bog was substantial on this section accounting for approximately 40% of the entire southern section. This area was initially harvested for horticultural peat in the 1990's. The method employed to extract peat on this site involved digging wide drains and removing the top layers of peat from the bog in the form of sods. The northern section of the production area had been recolonised by Heather while the southern section

appeared to have been harvested more recently and was mainly bare peat with some areas becoming revegetated with Heather.

An area of poor flush is located along the northern boundary of the southern section, this area also contains some old sections of domestic turf cutover bog, a stream flows through this section of the site. Heather, Purple Moorgrass, Bog Myrtle, *Cladonia* spp. lichens, Cranberry, Bilberry and *Sphagnum cuspidatum* were all recorded here; small amounts of Birch and Willow were also present. Some old piles of sod peat had been left at this point from previous year's harvests. There were no evident signs of regeneration or enrichment along this section. This area of the site containing old cutover, drainage ditch and poor flush follows a line along the middle of the bog before dividing into two close to the eastern edge of the bog, with one narrow section going east and a wider section turning south.

A small section of remnant Raised Bog (PB1) is located in the middle eastern section of the bog. This section of high bog has been ditched but was never used for industrial peat production (a small section of old domestic cutover is located in the north eastern corner of the site), however immediately to the south of this area, on the same raised bog, a private peat production company called Klasmann-Deilmann has been harvesting peat on an industrial scale for the production of horticultural products.

The western side of the southern section is comprised of Raised Bog (PB1) with a small amount of old Cutover Bog (PB4) located along the western boundary of the bog. The high bog area has been ditched in the past and for the most part the high bog was dry and severely degraded with heather dominating. However an area towards the south west of this section was wetter than the surrounding areas and had actively infilling drains. No active pools were present on this section but old inactive pools were still visible. *Sphagnum cuspidatum* was found in the drains and also on some of the high bogs wettest areas.

Cattle had access to the eastern side of this section.

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

None

Glen Lough pNHA (NPWS site code 001687) and SPA (NPWS site code 4045) is located close to the site (, 1 km from northern boundary). This designated area is a seasonal lake that has been significantly affected by drainage by the OPW in the past to lower water levels. It now contains a variety of wetland habitats and attracts significant numbers of waterfowl. Its main conservation value was initially in attracting internationally important numbers of Whooper Swans and occasional Greenland White-fronted Geese (both Annex I Birds Directive species). Since the drainage operations, the Greenland White-fronted Geese are not using the area (preferred site at Lough Iron) but it still remains important for Whooper Swan (up to 200 counted at the site in Winter 2010: pers. communication Padraig O'Donnell NPWS). Some remedial works has been carried out on the lake to offset previous drainage works and they seem to be having a positive impact at the site.

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

Habitats around the margins of the site include:

- Typical marginal peatland habitats including remnant high bog (PB1), cutover bog (PB4), scrub (WS1) and Birch woodland (WN7).
- A large area of peatland adjacent to the site is not in Bord na Móna ownership and is being commercially harvested for horticultural peat by Klasmann-Deilmann  
<http://www.drt.com.tr/Eng/Growing.aspx?page=substrate>
- Commercial conifer forestry on cutover bog and marginal land around the northern end – partly managed by Coillte.
- Improved grassland (GA1) and wet grassland (GS4) that are both grazed by cattle. Much of this grassland is grazed during the summer and fodder is also cut.

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

- A small channelised stream drains one section of the site. This stream and several other streams in the area flow east and are part of the Inny River catchment.

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

As this bog has only been ditched and not significantly developed the main peat present is horticultural peat.

#### **Fauna biodiversity**

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

- Some large wooden fence-posts that may have been markers in the past are used as 'pecking posts'. There are frequent signs that the posts are used by bird of prey (possibly Merlin) to pluck kills.
- Other more common birds were noted on the site. These included Robin (using scrub along the edge of the bog), Pheasant (using surrounding cutover bog, Meadow Pipit (in scrub on high bog and cutover bog and Wren (on high bog).

#### **Mammals**

- Mammal tracks criss-cross the intact high bog.
- Signs of Hare were noted on the high bog. No hare were noted on the industrial section of cutover possibly as a result of the wide drainage preventing access.
- Badger tracks found on a section of cutover.

#### **Fungal biodiversity**

The ecological survey was not carried out at an appropriate time of year for a fungal survey.

### **HABITAT DESCRIPTIONS**

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

### **HABITAT DESCRIPTIONS**



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

- 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 bowzers. Only dedicated trained and competent personnel will carry out refuelling operations.
- Mobile storage such as fuel bowzers will be bunded to 110% capacity to prevent spills. Tanks for bowzers and generators shall be double skinned. When not in use, all valves and fuel trigger guns from fuel storage containers will be locked. All pumps using fuel or containing oil will be locally and securely bunded where there is the possibility of discharge to waters.
- Potential impacts caused by spillages etc. during rehabilitation will be reduced by keeping spill kits and other appropriate equipment on-site.
- Site activities will be carried out in accordance with 'best practice'. In order to ensure compliance and implementation of 'best practice', these measures will be communicated to relevant Bord na Móna staff and updated as required.

## APPENDIX V. BIOSECURITY

Invasive flora species have been recorded in the vicinity of Glenlough Bog, including *Elodea canadensis*. All measures taken to ensure the prevention of spread on invasive species will follow Best Practice.

The potential for importation or introduction of other, 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 Practise measures around the prevention and spread of Crayfish plague<sup>2</sup> /other aquatic invasive species such as Parrots Feather will be adhered with throughout all rehabilitation measures and activities.

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<sup>2</sup> <https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/>

## APPENDIX VI. POLICY AND REGULATORY FRAMEWORK

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

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

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

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

### 1 EPA IPC Licence

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the 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. 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 (a subset of the BnM estate that has been used for energy production). This Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations under existing EPA IPC licence conditions. Interventions and measures supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. However,

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

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

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

### **3 National Climate Policy**

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

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

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

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

### **4 National Peatlands Strategy**

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

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

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

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

- Bord na Móna will continue to assess and evaluate the potential of the company's land bank, using a land use review system. The assessment will help prepare a set of evidence-based management plans for the various areas of peatland. These plans will also inform its cutaway bog rehabilitation.
- The policy of Bord na Móna is not to open up any undrained new bogs for peat production.
- Lands identified by Bord na Móna as having high biodiversity value and/or priority habitats will be reserved for these purposes as the principal future land use.
- Generally, Bord na Móna cutaway bogs that flood naturally will be permitted to flood unless there is a clear environmental and/or economic case to maintain pumped drainage.
- In deciding on the most appropriate afteruse of cutaway peatlands, consideration shall be given to encouraging, where possible, the return to a natural functioning peatland ecosystem.
- This will require re-wetting of the cutaway peatlands which may lead in time to the restoration of the peatland ecosystem.
- Environmentally, socially and economically viable options should be analysed to plan the future use of industrial cutaway peatlands, in conjunction with limiting factors as outlined in Bord na Móna's Strategic Framework for the Future Use of Peatlands.

The National Peatlands Strategy highlights the importance and value of developing peatland rehabilitation plans for Bord na Móna cutaway sites and implementing this peatland rehabilitation. Some of these principles have now been superseded by the company's decision to cease industrial peat extraction. The National Peatlands Strategy is currently being reviewed by Government.

## **5 Draft National River Basin Management Plan 2022-2027 (Water Framework Directive)**

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

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

The development of site rehabilitation plans and the delivery of peatland rehabilitation by Bord na Móna was expected to have a positive impact on water quality and will help the NRBMP 2018-2021 deliver its objectives in relation to the Water Framework Directive and is one of the five key principle actions.

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

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

The cessation of industrial peat extraction by Bord na Móna in 2021 was expected to have a significant positive impact on water quality of receiving water courses by reducing the impact of peat extraction as a key pressure on particular water courses. This is now being supported by the results and conclusions of the draft NWBMP 2022-2027.

## **6 National Biodiversity Action Plan 2016-2021**

The National Biodiversity Action Plan 2016-2022 has a vision that biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally. Ireland's 2<sup>nd</sup> National Biodiversity Action Plan outlines the main policies, strategies, actions and targets in relation to biodiversity. This plan has several Bord na Móna specific objectives and actions including implementing the BnM Biodiversity Action Plan 2016-2021 and overlaps with both the National Peatlands Strategy and the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.

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

## **7 National conservation designations**

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

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

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

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

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

## **9 All-Ireland Pollinator Plan 2021-2025**

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

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

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

Glenlough Bog is located in an area zoned by Longford and Westmeath County Councils as open countryside.

## 11 National Archaeology Code of Practise

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

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

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

## 12 Bord na Móna Biodiversity Action Plan 2016-2021

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

One example of a key CBD target is:

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

The EUs headline target for progress by 2020 is to:

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



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

### **13 Bord na Móna commitments**

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

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

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

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

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

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

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

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

## APPENDIX VII. DECOMMISSIONING

### 1. Condition 10 Decommissioning

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

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

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

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

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

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

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

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

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

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

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

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

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

7.3.3 The ultimate destination of the waste.

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

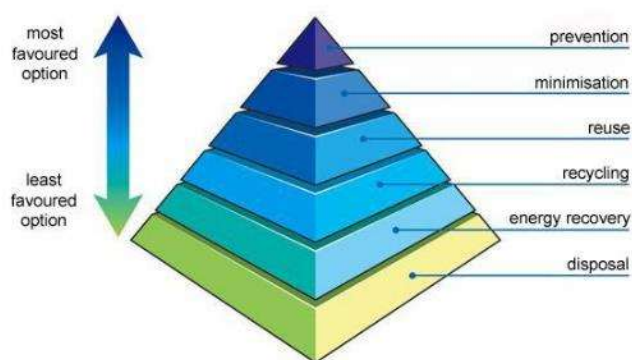
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

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

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

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



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

## 2. Enhanced Decommissioning.

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

Item	Enhanced Decommissioning Type	Glenlough Bog Decommissioning Plan
1	Removal of Railway Lines	Not applicable
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	Not applicable

## APPENDIX VIII. GLOSSARY

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

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

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

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

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

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

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

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

**Restoration:** Ecological restoration is defined as the process of re-establishing to the extent possible the structure, function and integrity of indigenous ecosystems and the sustaining habitats they provide" (SER 2004). Defined in this way, restoration encompasses the repair of ecosystems (Whisenant 1999) and the **improvement of ecological conditions in damaged wildlands** through the **reinstatement of ecological processes**. In general, Bord na Móna cutaway peatlands cannot be restored back to raised bog in a reasonable timeframe as their environmental conditions has changed so radically (with the removal of the acrotelem – the living layer and much of the peat mass). However, they can be returned to a **trajectory** towards a naturally functioning peatland system (Renou-Wilson 2012). **Raised bog restoration** is an objective of some BnM sites where there is residual natural raised bog vegetation and where the majority of the peat is still intact.

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

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

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

## APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

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

#### Objective:

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

#### Scope:

This plan covers IPPC Licence's P0504-01, Mountdillon Group of Bogs in Counties Roscommon, Longford and Westmeath.

#### 1.0 Extractive Waste:

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

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

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

##### 1.2 Power Station screenings:

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

##### 1.3 Bog Timbers:

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

### 2.0 P0504-01 IPPC Licence Extractive Waste Conditions

#### 2.1 Condition 7.5 Extractive Waste Management

The licensee shall draw up a Waste Management Plan (to be known as an Extractive Waste Management Plan) for the minimisation, treatment, recovery and disposal of extractive waste. This Plan shall meet the requirements of regulation 5 of the Waste Management (Management of Waste from the Extractive Industries) Regulations, 2009. The Plan shall be submitted for agreement by the Agency by the 31<sup>st</sup> December 2012. The Plan shall be reviewed at least once every five years thereafter in a manner agreeable to the Agency and amended in the event of substantial changes to the operation of a waste facility or to the waste deposited. Any amendments shall be notified to the Agency.

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

#### 2.2 Condition 7.6 Waste Facility

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

#### 2.3 Condition 7.7 Excavation Voids

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

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

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

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

#### 3.0 Minimisation.

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

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

**3.2 Power Station Screenings.**

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

**3.3 Bog Timbers.**

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

**4.0 Treatment****4.1 Silt pond excavation material and cleanings.**

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

**4.2 Power Station Screenings.**

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

**4.3 Bog Timbers**

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

**5.0 Recovery****5.1 Silt pond excavation material and cleanings.**

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

**5.2 Power Station Screenings.**

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

**5.3 Bog Timbers**

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

**6.0 Disposal****6.1 Silt pond excavation material and cleanings.**

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

**6.2 Power Station Screenings.**

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

**6.3 Bog Timbers**

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

**7.0 Extractive Waste Management Plan****5 (2a)(i)**

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

**5 (2a)(ii)**

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

**5 (2a)(iii)**

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

**5 (2a)(iv)**

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



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

Peat mineral resources do not undergo any treatment.

**5 (2b)**

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

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

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

**5 (3)**

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

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

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

**Classification in accordance Annex II.**

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

**Description of operations.**

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

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

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

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

**10.2 Cutaway Bog Rehabilitation Plan:**

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

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

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

10.4 A final validation report to include a certificate of completion for the Rehabilitation Plan, for all or part of the site as necessary, shall be submitted to the Agency within six months of execution of the plan. The licensee shall carry out such tests, investigations or submit certification, as requested by the Agency, to confirm that there is no continuing risk to the environment. This plan including maps and ecological classifications are available on file at the Boora 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 Glenlough Bog 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 <sup>3</sup> or more of water per day, or serving 500 or more people	200 metres (or as little as 30 metres where a local authority allows)
Any water supply source providing 10m <sup>3</sup> or more of water per day, or serving 50 or more people	100 metres (or as little as 30 metres where a local authority allows)
Any other water supply for human consumption	25 metres (or as little as 30 metres where a local authority allows)
Lake shoreline	20 metres
Exposed cavernous or karstified limestone features (such as swallow holes or collapse features)	15 metres
Any surface watercourse where the slope towards the watercourse exceeds 10%	10 metres
Any other surface waters	5 metres*

## APPENDIX XI. CONSULTATION SUMMARIES

**Table APXI -1 Consultees contacted**

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Dept of Agriculture Food & the Marine	Multiple Staff Members	25/02/2022	Email		
Glenlough	Department of Housing, Local Government and Heritage NPWS	Multiple Staff Members	25/02/2022	Email		
Glenlough	National Museum of Ireland	Multiple Staff Members	25/02/2022	Email		
Glenlough	Department of Housing, Local Government and Heritage NPWS	General Email Contact	25/02/2022	Email		
Glenlough	Department of Environment, Climate and Communications	Multiple Staff Members	25/02/2022	Email		
Glenlough	Dept of Rural and Community Development	General Email Contact	25/02/2022	Email		
Glenlough	Department of Housing Local Government and Heritage	Minister Malcolm Noonan - Minister of State at the Department of Housing, Local Government and Heritage	25/02/2022	Email	03/02/2022	Email
Glenlough	Minister for Environment, Climate and Communications	Minister - Eamon Ryan	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Pippa Hackett Minister of State for Land Use and Biodiversity)	25/02/2022	Email		
Glenlough	Oireachtas	Danielle McDonnell (Minister Malcolm Noonan Secretary)	25/02/2022	Email		
Glenlough	An Taisce	General Email Contact	25/02/2022	Email		
Glenlough	Environmental Protection Agency	Multiple Staff Members	25/02/2022	Email		
Glenlough	Inland Fisheries Ireland	General Email Contact & Multiple Staff Members	25/02/2022	Email		
Glenlough	Local Authority Waters Programme	Multiple Staff Members	25/02/2022	Email		
Glenlough	Teagasc	General Email Contact	25/02/2022	Email		
Glenlough	The Heritage Council	General Email Contact	25/02/2022	Email		
Glenlough	Waterways Ireland	General Email Contact	25/02/2022	Email		
Glenlough	An Forum Uisce (The Water Forum)	General Email Contact	25/02/2022	Email		
Glenlough	Coillte	Multiple Staff Members	25/02/2022	Email		
Glenlough	Irish Water	Multiple Staff Members	25/02/2022	Email		
Glenlough	Office of Public Works	Multiple Staff Members	25/02/2022	Email		
Glenlough	CARO (Climate Action Regional Office) Eastern and Midlands	General Email Contact	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Bat Conservation Ireland	General Email Contact	25/02/2022	Email		
Glenlough	Birdwatch Ireland	General Email Contact	25/02/2022	Email		
Glenlough	Butterfly Conservation Ireland	General Email Contact	25/02/2022	Email		
Glenlough	County Longford Shooting & Conservation Council	General Email Contact	25/02/2022	Email		
Glenlough	Eastern and Midland Regional Assembly	General Email Contact	25/02/2022	Email		
Glenlough	Fisheries Ireland	General Email Contact	25/02/2022	Email		
Glenlough	Friends of the Earth	General Email Contact	25/02/2022	Email		
Glenlough	Friends of the Irish Environment	General Email Contact	25/02/2022	Email		
Glenlough	ICMSA (Irish Creamery Milk Suppliers Association)	General Email Contact and Multiple Staff Members	25/02/2022	Email	28/02/22	Email
Glenlough	ICSA (Irish Cattle and Sheep Farmers Association)	General Email Contact	25/02/2022	Email		
Glenlough	Irish Farmers Association	General Email Contact and Multiple Staff Members	25/02/2022	Email		
Glenlough	Irish Peatlands Conservation Council	General Email Contact	25/02/2022	Email		
Glenlough	Irish Raptor Study Group	General Email Contact	25/02/2022	Email		
Glenlough	Irish Rural Link (Community Wetlands Forum)	General Email Contact	25/02/2022	Email		
Glenlough	Irish Rural Link	General Email Contact	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Irish Wildlife Trust	General Email Contact and Multiple Staff Members	25/02/2022	Email		
Glenlough	The Inland Waterways Association of Ireland (IWAI)	General Email Contact	25/02/2022	Email		
Glenlough	Klasmann-Deilmann Ireland Ltd.	General Email Contact	25/02/2022	Email	12/05/2022	Email
Glenlough	Longford Wilderness Park (Clandillon Civil Consulting)	General Email Contact	25/02/2022	Email		
Glenlough	Longford Wilderness Park (Longford County Council)	General Email Contact	25/02/2022	Email		
Glenlough	National Association of Regional Game Councils (NARGC)	General Email Contact	25/02/2022	Email		
Glenlough	NPWS Rangers North Midlands	Multiple Staff Members	25/02/2022	Email	14/03/22	Telephone
Glenlough	NUIG Galway	Multiple Staff Members	25/02/2022	Email		
Glenlough	PPN Longford Public Participation Network	General Email Contact	25/02/2022	Email		
Glenlough	PPN Westmeath Public Participation Network	General Email Contact	25/02/2022	Email		
Glenlough	Ranger Association Committee	General Email Contact	25/02/2022	Email		
Glenlough	Shannon Flood Risk State Agency Co-ordination Working Group	General Email Contact	25/02/2022	Email		
Glenlough	Sustainable Water Action Network (SWAN)	General Email Contact	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Trinity College Dublin	Multiple Staff Members	25/02/2022	Email		
Glenlough	Turf Cutters and Contractors Association	General Email Contact	25/02/2022	Email		
Glenlough	UCD / Irish Rural Link	General Email Contact	25/02/2022	Email		
Glenlough	University College Dublin	General Email Contact	25/02/2022	Email		
Glenlough	Waterways Ireland	Multiple Staff Members	25/02/2022	Email		
Glenlough	Woodlands of Ireland	General Email Contact	25/02/2022	Email		
<b>County councils</b>						
Glenlough	Longford County Council	Multiple Staff Members	25/02/2022	Email		
Glenlough	Longford County Council - Director of Services (Strategic Infrastructure and Climate Change)	John Brannigan	25/02/2022	Email		
Glenlough	Longford County Councillor - Ballymahon District	Colm Murray	25/02/2022	Email		
Glenlough	Longford County Councillor - Ballymahon District	Mick Cahill	25/02/2022	Email		
Glenlough	Longford County Councillor - Ballymahon District	Paul Ross	25/02/2022	Email		
Glenlough	Longford County Councillor - Ballymahon District	Mark Casey	25/02/2022	Email		
Glenlough	Longford County Councillor - Ballymahon District	Gerard Farrell	25/02/2022	Email		



Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Longford County Councillor - Ballymahon District	Pat O'Toole	25/02/2022	Email		
Glenlough	Longford County Councillors - Granard District	Garry Murtagh	25/02/2022	Email		
Glenlough	Longford County Councillors - Granard District	Turlough McGovern	25/02/2022	Email		
Glenlough	Longford County Councillors - Granard District	Paraic Brady	25/02/2022	Email		
Glenlough	Longford County Councillors - Granard District	Colin Dalton	25/02/2022	Email		
Glenlough	Longford County Councillors - Granard District	PJ Reilly	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	Peggy Nolan	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	Uruemu Adejinmi	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	John Browne	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	Seamus Butler	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	Gerry Hagan	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Longford County Councillors - Longford	Martin Monaghan	25/02/2022	Email		
Glenlough	Longford County Councillors - Longford	Gerry Warnock	25/02/2022	Email		
Glenlough	TD/Longford	Peter Burke	25/02/2022	Email		
Glenlough	TD/Longford	Sorca Clarke	25/02/2022	Email		
Glenlough	TD/Longford	Joe Flaherty	25/02/2022	Email		
Glenlough	TD/Longford	Robert Troy	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Chief Exec	Pat Gallagher	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Director of Service	Barry Kehoe	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Director of Service	Mark Keaveney	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Deirdre Reilly	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	John Shaw	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Emily Wallace	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Andrew Duncan	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Michael Dollard	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Aoife Davitt	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Denis Leonard	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Ken Glynn	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Hazel Smyth	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Billy Collentine	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Frank McDermott	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Mullingar-Kinnegad	Paddy Hill	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	John Dolan	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Tom Farrell	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Frankie Keena	25/02/2022	Email		

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Glenlough	Westmeath County Councillors - Athlone - Moate	Johnny Penrose	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Vinny McCormack	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Aengus O'Rourke	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Liam McDaniel	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Jamie Moran	25/02/2022	Email		
Glenlough	Westmeath County Councillors - Athlone - Moate	Louise Heavin	25/02/2022	Email		
Glenlough	Minister of State at the Department of Housing, Local Government and Heritage	Peter Burke (Longford- Westmeath)	25/02/2022	Email		
Glenlough	Minister of State at the Department of Enterprise, Trade and Employment	Robert Troy (Longford- Westmeath)	25/02/2022	Email		
<b>Local Residents and Landowners</b>						
Glenlough	All Land- owners in vicinity of bog	Leaflet Drop		Leaflet	09/03/22	One response via email
Glenlough	All those with turbary rights	Leaflet Drop		Leaflet		

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

Organisation	Summary of Response by Stakeholder	BnM Response
Klasmann-Deilmann Ireland Ltd.	Sent a request for information on the 12/05/22 looking for general information on rewetting of the Glenlough and requesting a call back.	BnM responded on the 14/03/2022 with more information on the rehabilitation plan.
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 03/02/2022 to inform BnM of receipt of consultation and advised that Officials of this Department would be in contact in relation to the PCAS scheme, should it be required.	No response required.
ICMSA	Responded on the 28/02/22, to ask for the plan to be sent on to the Chair, Secretary and National Council members in Longford and Westmeath.  Virtual meeting/PCAS presentation organised for 03/03/2021.	BnM responded to the query on 04/03/2022, and sought email addressed for circulation of the plan as requested.  A meeting was held by BnM on 03/03/2021 to present details on PCAS to the ICMSA and members. Dialogue is ongoing.
IPCC	Responded to consultation regarding the PCAS project at large to express support for the project and list a number of comments on how the project might be improved. 1) The cost of amenity development in land use space and its impacts on overall carbon fluxes at various BnM bogs 2) The IPCC requested that marginal Bog Remnants be considered for full rehabilitation 3) IPCC suggested that the inclusion of local community/education groups in the monitoring aspect of PCAS would improve the community outreach of PCAS as a whole. 4) Requested information on where Sphagnum for inoculation would be harvested.	BnM acknowledged and responded via e-mail. BnM advised that going forward BnM will give due cognisance to all points raised in the submission by IPCC in the rehabilitation plan for PCAS projects. An on-site demonstration of PCAS rehabilitation was provided for IPCC in 14/09/2021. Dialogue is ongoing.

Organisation	Summary of Response by Stakeholder	BnM Response
	<p>5) Biosecurity and Invasive Species.</p> <p>6) request for further information on Environmental Controls section of Draft Rehab Plan.</p>	
The Irish Wildlife Trust	<p>Responded to consultation via e-mail on 01/02/2021 to acknowledge receipt of PCAS plans and indicate desire to make a submission. Submission received on 23/03/2021 supporting the PCAS scheme and specifically requesting:</p> <ol style="list-style-type: none"> <li>1. Consideration of statutory protection for rehabilitated bogs;</li> <li>2. Consideration for re-wilding in determining future habitats and species presence, including species re-introductions;</li> <li>3. Appropriate monitoring is established.</li> </ol> <p>Further consultation took place throughout 2021/2022 to discuss the rehabilitation of IWT controlled land at particular PCAS sites.</p>	<p>BnM responded via email and phone throughout February and March. A virtual meeting/PCAS presentation was held for IWT on 17/02/2021. Dialogue is ongoing.</p>
NPWS Ranger - Longford	<p>Responded on the 14/03/22 by telephone to request further information on the PCAS rehabilitation plan for Glenlough.</p>	<p>BNM followed up on the initial phone call via email on 14/03/2022, with links to the Draft Glenlough Bog Rehabilitation Plan and accompanying map book and a link to the Peatlands Climate Action Scheme (PCAS) website.</p>

Organisation	Summary of Response by Stakeholder	BnM Response
National Museum of Ireland (NMI)	<p>The NMI responded on 24/11/2021 acknowledging receipt of our email and thanking us for the opportunity to comment. They advised they would shortly issue a collective response.</p> <p>Responded through e-mail throughout 2020/21 in relation to all PCAS bogs. Issues raised were;</p> <p>1) The request that due diligence be taken during works to protect any archaeologically significant findings or areas</p> <p>2) The NMI reiterated the importance of peatlands for the preservation of archaeology and requested they be consulted as part of any EIA undertaken</p>	Dialogue is ongoing.
Local Resident A	Responded on the 09/03/22, to acknowledge the receipt of a letter regarding the rehabilitation of Glenlough. Welcomed the restoration of the bog and wetlands and sought assurance that no wind turbines would be installed.	BNM responded to the query on 15/03/22 confirming that Bord na Móna have no plans for wind turbines or any other renewable infrastructure at Glenlough Bog.

## APPENDIX XII. ARCHAEOLOGY

### Role of the Archaeological Liaison Officer

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



Code of Practice



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# Code of Practice

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



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

**1) Purpose**

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

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

**2) Procedure**

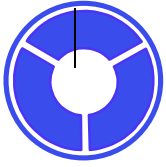
1. Check whether there are any known archaeological monuments in your area.
2. Be vigilant at all times - objects or traces of structures can be found on the field surfaces, in the drain faces, on the bog margins or caught within the mechanics of machinery.
3. If an object is found leave it in place,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

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

Your Archaeological Liaison Officer is .....

**3) Records**

Revision Index			
Revision	Date	Description of change	Approved
1	13/19/2020	First release	EMcD
2			



# **Archaeological Impact Assessment of Proposed Bog Decommissioning and Rehabilitation at Glenlough Bog, Cos. Longford and Westmeath**

**Draft**

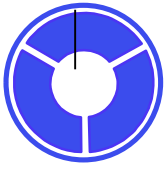
**Report For**

**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.331 hectares at Glenlough Bog, Cos. Longford and Westmeath 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 Glenlough Bog will include:

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

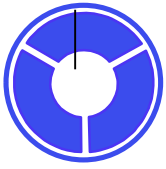
Glenlough Bog is located c.4.4km south-west of Rathowen [village](#), Co. Westmeath, and south-west of the L5077 road. The overall rehabilitation area occupies the townlands of Aghnavealoe, Carnan, Carrigeen, Clontymullan, Crossea South, Killeen and Sleenhaun Co. Longford, and Killinagh, Co. Westmeath on OS 6 inch sheets Longford Nos. 20 and 24 and Westmeath No. 5.

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

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

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



## Desktop assessment

### Recorded Monuments

The Record of Monuments and Places (RMP) for Cos. Longford and Westmeath which were established under Section 12 of the National Monuments (Amendment) Act, 1994 were examined as part of the assessment (DAHGI 1996 and 1997). These records were published by the Minister in 1996 and 1997 include sites and monuments that were known in Glenlough Bog before that date. This review established that there are no RMPs located in the proposed rehabilitation area (see Fig. 1).

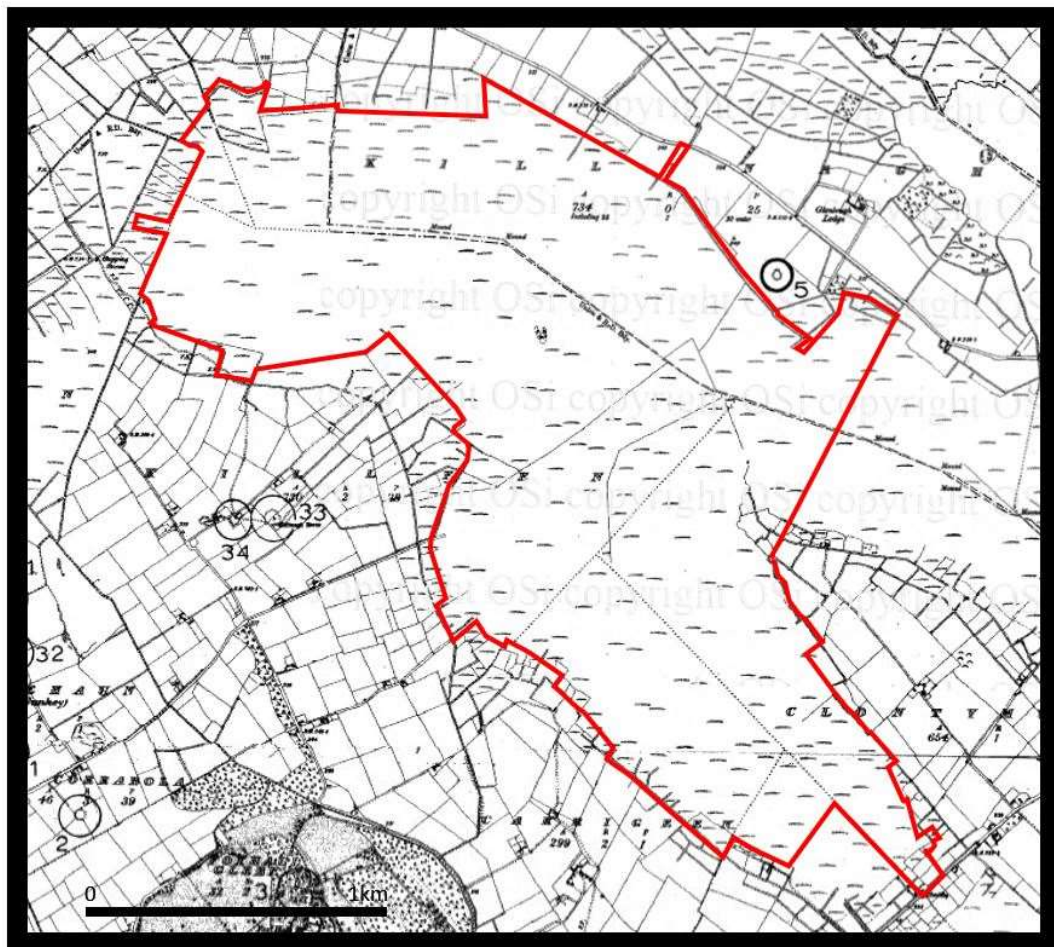


Fig. 1. Glenlough Bog, Cos. Longford and Westmeath. Detail of the RMP map sheets Longford Nos. 20 and 24 and Westmeath No. 5. The proposed rehabilitation area is outlined with the red line. There are no RMPs in the rehabilitation area.

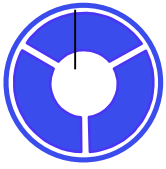
### Peatland Survey

Glenlough Bog has not been the subject of a peatland survey.

### 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 8th of December 2021. The SMR consists of records included in the RMP and sites and monuments notified to the Dept. since the





publication of the RMP. This review established that there are no entries in the SMR in the proposed rehabilitation area (see Fig 2).

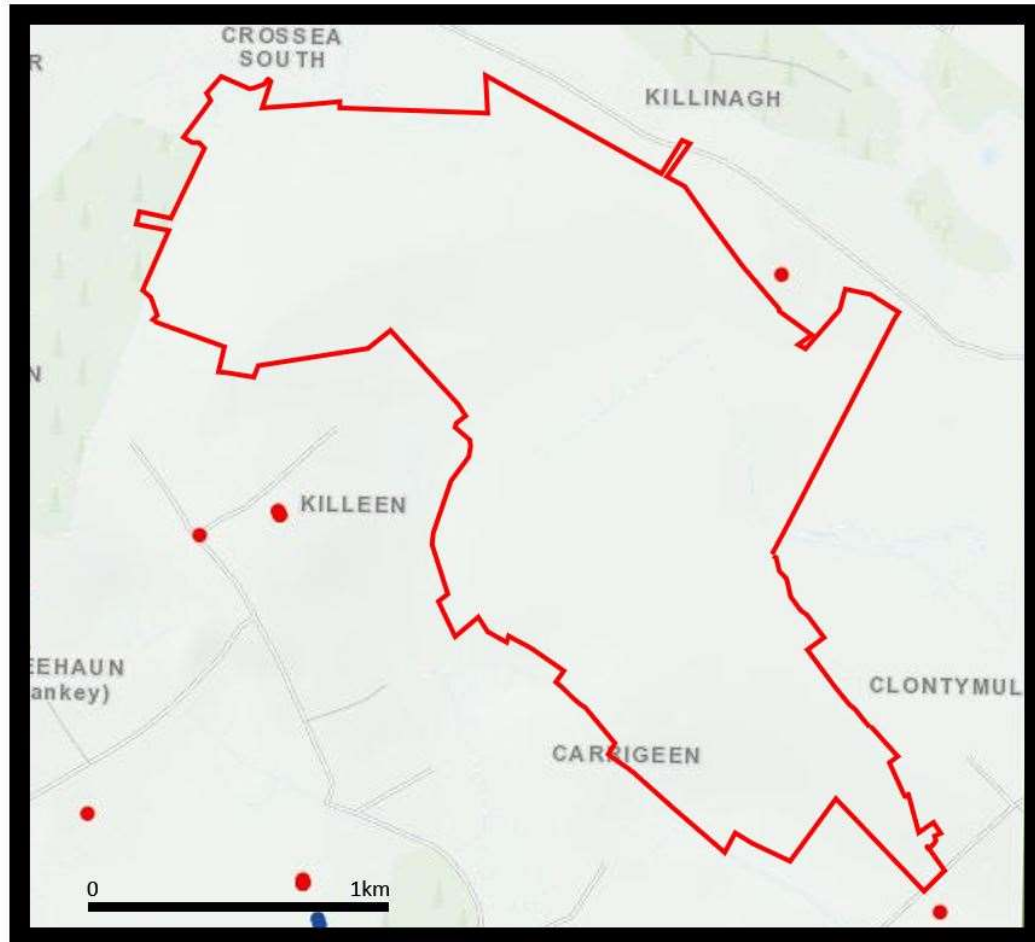


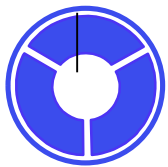
Fig. 2. Glenlough Bog, Cos Longford and Westmeath, detail of the SMR. The proposed rehabilitation area is outlined with the red line. There are no SMRs in the rehabilitation area.

### Previous assessments

Glenlough 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 [12](#) (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 Glenlough 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 Glenlough Bog reported to the National Museum of Ireland up to 2018. The stray finds recorded from Glenlough are included in Table 1.



Townland	Museum No.	Description
Carrigeen	2003:38	Bronze spearhead
Killinagh	E499:20 & 21	Iron Spearheads
Killinagh	1942:1840	Bog butter
Sleehaun	1987: 121, 122	2 quern stones

Table 1. List of archaeological finds from Glenlough Bog reported to the National Museum of Ireland.

### Archaeological investigations

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

### Impact assessment

There are no known items of archaeological heritage in the rehabilitation area. The proposed rehabilitation will have no impact on any known archaeological material in the application area or the vicinity. In the worst-case scenario works affecting the surface and sub-surface of the bog might disturb previously unknown archaeological deposits or artefacts without preservation by record taking place.

### Recommendations

There are no known items of archaeological heritage in the rehabilitation area. 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 are no known items of archaeological heritage in the rehabilitation area. The proposed rehabilitation will have no impact on any known archaeological material in the application area or the vicinity. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

### References

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

DAHGI 1997. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Westmeath.

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

Dr. Charles Mount  
8 December 2021