

Bord na Móna

Derryadd East Bog

**Cutaway Bog Decommissioning and
Rehabilitation Plan
2023**

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 Derryadd East (This bog was also known as Derryadd-2) 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 Derryadd East Bog.

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

While this document outlines the enhanced rehabilitation measures planned for Derryadd East 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 Derryadd East 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 Derryadd East 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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NON-TECHNICAL SUMMARY

- Industrial peat harvesting is now finished at Derryadd East Bog.
- Bord na Móna is planning to rehabilitate Derryadd East Bog, located in Co. Longford in 2023.
- This is happening as Bord na Móna are obliged to carry out peatland rehabilitation via an IPC License issued by the Environmental Protection Agency. In addition, the Government has agreed to support peatland rehabilitation via the establishment of the Peatland Climate Action Scheme (PCAS). This is funded via the Government and by Bord na Móna.
- The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat (putting a “skin” back onto the peat), and minimising effects to downstream waterbodies. Derryadd East was drained in the past to allow peat production. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain-blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.
- In general, soggy ground conditions are preferred. This means the remaining peat is wet and that plants that prefer wetter conditions, like Bog Cotton will thrive.
- Some sections with deeper residual peat have the capacity to regrow *Sphagnum* moss again, where there are suitable hydrological conditions. *Sphagnum* is a key species for restoring naturally functioning raised bog conditions.
- Many parts of Bord na Móna bogs cannot be restored back to raised bog in the short-term, as so much peat has been removed and the environmental conditions have been modified. However other peatland habitats with Heather, Bog Cotton, Rushes, Purple Moor-grass, Bog-mosses and scattered trees will develop, and in time a naturalised peatland can be restored.
- The development of a range of habitats in Derryadd East Bog will support biodiversity including plants, insects, birds and mammals. This includes some species that are rare and protected in the wider landscape. It will increase the national area of native woodland. Many wetland habitats in the wider landscape have been reclaimed for agriculture and other uses and peatland rehabilitation is an opportunity to create new peatland and wetland habitats.
- Derryadd East Bog was utilised for industrial peat production from until 2020. Much of the former cutaway area currently comprises bare peat.
- Measures proposed for Derryadd East Bog include drain blocking and additional measures required to raise water levels to the surface of the peat (cell bunding for example). Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth.
- These rehabilitation measures will be planned by a team consisting of expert ecologists, hydrologists and engineers. It is a guiding principle of Bord na Móna rehabilitation planning that no actions or activities will be undertaken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the bog via the existing outlets.
- It will take some time for vegetation and habitats to fully develop at Derryadd East, and a peatland ecosystem to be restored. However, it is expected that most of the bog will be developing pioneer habitats after 5-10 years.
- This is a peatland rehabilitation plan. This plan does not consider future after-use or development. Bord na Móna continually reviews its land-bank to consider future commercial or industrial developments,

such as renewable energy. Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the bog.

- Longford County Council do have plans to develop a greenway or amenity walking/cycling track along the BnM industrial railway through Derryadd East. This would link to Derryadd bog to the west and Lough Bannow Bog to the south. This proposed amenity can be integrated into the rehabilitation plan.
- Peatland rehabilitation of this bog will bring a range of benefits to the local community via improvements to the local landscape and is also important for supporting national policies and strategies in relation to reduction of carbon emissions from these peatlands, supporting biodiversity and improvements to water quality.

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1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mount Dillon bog group (Ref. 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. Derryadd East Bog is part of the Mount Dillon bog group (and is also known as Derryadd-2, see Appendix II for details of the bog areas within the Mount Dillon Bog Group). Derryadd East Bog is located in Co. Longford.

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

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

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

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

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

It is expected that the Scheme (PCAS) will have benefits accruing from biodiversity provision, water quality and storage attenuation as well as increased carbon storage, reduced carbon emissions and acceleration towards

carbon sequestration. The Scheme will also facilitate monitoring of carbon fluxes (Greenhouse Gases and fluvial carbon) in selected areas (in addition to other established Research programmes), to monitor changes in where the interventions will accelerate the trajectory towards a naturally functioning peatland ecosystem.

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

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

These are collectively designed to optimise hydrological conditions (ideally and where possible water-levels at peat surface ± 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. It is anticipated that the combination of active enhanced rehabilitation measures and natural colonisation will quickly accelerate environmental stabilisation. Nevertheless, it will still take some time (30-50 years) for naturally functioning wetland and peatland ecosystems to fully re-establish.

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.

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

1.1 Constraints and Limitations

This document covers the area of **Derryadd East Bog**.

Industrial peat extraction at Derryadd East Bog permanently ceased in 2020. Currently the former industrial peat production area comprises largely bare peat along with some pioneering cutaway habitats, in addition to

marginal¹ habitats. Raised bog remnants occur along the northern and eastern margins of the cutaway bog. The remnant bog outside the eastern bog margin of the northern lobe have been drained and have been subject to domestic turf cutting. These remnant raised bog parcels have never been subject to commercial peat extraction.

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

The parts of Derryadd East Bog (within the areas owned and under the control of Bord na Móna) that are currently used by domestic turf cutters to harvest peat are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. It is beyond the scope of this rehabilitation plan to address turf cutting issues on Derryadd East Bog. 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 archaeological features.

There are known rights of way around the margins of Derryadd East Bog. 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.

Bord na Móna are currently developing a renewable energy project called Derryadd Wind Farm (see [Location | Derryadd Wind Farm](#)). This proposed Wind Farm project overlaps the adjacent Bord na Móna bogs of Derryadd, Derryarogue and Lough Bannow. The proposed Derryadd Wind Farm **does not** overlap with Derryadd East Bog and does not constrain PCAS rehabilitation at Derryadd East.

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

2. METHODOLOGY

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

The ecological information and site information collected during the Bord na Móna ecological baseline survey, additional confirmatory site visits (covering the period 2011 to 2022 inclusive) and monitoring and desktop analysis forms the basis for the development of the rehabilitation plan for the bog, along with:

- Experience of 40 years of research on the after-use development and rehabilitation of the Bord na Móna cutaway bogs (Clarke, 2010; Bord na Móna, 2016);
- Significant international engagement during this period with other counties in relation to best practice regarding peatland rehabilitation and after-use through the International Peat Society and the Society for Ecological Restoration (Joosten & Clarke, 2002; Clarke & Rieley, 2010; Gann *et al.*, 2019);
- Consultation and engagement with internal and external stakeholders;
- GIS Mapping;
- BNM drainage surveys;
- Bog topography and LIDAR data;
- Previous research studies on site;
- Hydrological modelling; and
- The development of a Methodology Paper outlining the Scheme (PCAS)². 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 Derryshannoge Bog optimising climate action benefits.

2.1 Desk Study

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

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

² <https://www.bnmpcas.ie/supporting-material/>

- 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. An Fóram Uisce.
- Quinty & Rochefort (2003). Peatland Restoration Guide, second edition. Canadian *Sphagnum* Peat Moss Association and New Brunswick Department of Natural Resources and Energy.
- Regan, *et al.* (2020). Ecohydrology, Greenhouse Gas Dynamics and Restoration Guidelines for Degraded Raised Bogs. EPA Research Report. Prepared for the Environmental Protection Agency by Trinity College Dublin.
- Renou-Wilson *et al.* (2011). BOGLAND - Sustainable Management of Peatlands in Ireland. STRIVE Report No 75 prepared for the Environmental Protection Agency.
- Schouten (2002). Conservation and Restoration of Raised Bogs: Geological, Hydrological and Ecological Studies. Dúchas - The Heritage Service of the Department of the Environment and Local Government, Ireland;
- Thom (2019). Conserving Bogs – Management Handbook.
- Wheeler & Shaw (1995). Restoration of Damaged Peatlands – with Particular Reference to Lowland Raised Bogs Affected by Peat Extraction.
- Wittram *et al.* (2015). A Practitioners Guide to *Sphagnum* Reintroduction. Moors for the Future Partnership.

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

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

- Historic Environment Viewer at <https://webgis.archaeology.ie/historicenvironment/>
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (www.catchments.ie);
- OPW Indicative Flood Maps (www.floodmaps.ie);
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (www.cfram.ie);
- River Basin Management Plan for Ireland 2022-2027
- Bord na Móna Annual Report 2022.
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

2.2 Consultation

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

2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this exercise, Derryadd East Bog was surveyed in 2012. An additional survey was carried out in 2023, in advance of the preparation of this rehabilitation plan. Habitat maps have been updated, where required. This rehabilitation plan is informed by the original baseline survey as well as subsequent confirmatory site walk-over surveys and visits, and updates to baseline data.

Habitat mapping followed best practice guidance from Smith *et al.* (2011). Map outputs including all habitat maps and target notes were produced using GIS software application packages (ArcGIS). General marginal habitats and other habitats that had not been modified significantly by industrial peat extraction were classified using Fossitt *et al.* (2000). Plant nomenclature for vascular plants follows Stace (2019), while moss and liverwort nomenclature follow identification keys published by the British Bryological Society (2010). A more detailed Bord na Móna classification system was previously developed for classifying pioneer cutaway habitats as Fossitt categories were deemed not to be detailed enough for cutaway bog (much of cutaway bog could be classified as Cutover Bog - PB4). Much of the pioneer cutaway vegetation is still at an early stage of its development and cannot be assigned to Fossitt Level 3 categories yet. A site visit was used to categorise any changes in habitat extent at Derryadd East Bog in 2023.

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

3. SITE DESCRIPTION

Derryadd East Bog is located in County Longford and is part of the Mount Dillon group of bogs. Killashee Bog is located immediately to the north of the site (separated by the Longford to Roscommon Road), while Derryadd bog is located to the west. A rail link connects the site with Killashee Bog to the north and Derryadd to the west.

The surrounding landscape is dominated by a mosaic of farmland, largely consisting of improved grassland, and other bogs, including Begnagh, Clooneeny, Knappoge, Derryarogue and Derryadd bogs, all owned and managed by Bord na Móna. A rail link connects Killashee with Derryadd East to the South.

Derryadd East Bog is one of a cluster of bogs that have developed along the floodplains of the River Shannon. In each of these bogs, a significant portion of the cutaway areas lie below the winter flood level of the Shannon and pumping these sites was critical to sustaining industrial peat production. Derryadd East Bog has a pumped drainage system.

The Templeton Glebe (EPA Code: 26T28) stream flows in a north-westerly direction outside the eastern bog boundary. This watercourse flows into the Ballynakill_26 watercourse which flows in a northerly direction outside the western site boundary. There are no mapped EPA watercourses within the boundary of Derryadd East Bog.

See Drawing number BNM-DR-24-13-01 titled **Derryadd East Bog: Bog Site Location**, included in the accompanying Mapbook³, which illustrates the location of Derryadd East Bog in context to the surrounding area.

Bord na Móna are currently developing a renewable energy project called Derryadd Wind Farm (see [Location | Derryadd Wind Farm](#)). This proposed Wind Farm project overlaps the adjacent bogs of Derryadd, Derryarogue and Lough Bannow. It **does not** overlap with Derryadd East Bog and **does not** constrain PCAS rehabilitation at Derryadd East.

3.1 Status and Situation

3.1.1 Site history

Derryadd East Bog was drained for industrial peat extraction in the 1960's. Peat extraction ceased in 2020. The bog was formerly used for fuel peat production for Lough Ree Power station. During this period different sections became cutaway at different times. A relatively large area in the centre of the site has been cutaway for a number of years and has now developed relatively mature Birch woodland. A small area to the east of the site was developed for industrial peat extraction at a later date.

3.1.2 Current land-use

A relatively large area is still bare peat with variable residual peat depths present. Raised bog remnants occur along the western and eastern margins of the cutaway bog. The western remnant bog parcels are undrained. The remnant bog along the eastern margin has been drained and has been subject to domestic turf cutting. Some remnant raised bog parcels have never been subject to commercial peat extraction.

Some harvested peat stock is still present on the site, but this is expected to be removed before rehabilitation has been completed.

³ Cutaway Bog Decommissioning and Rehabilitation Plan – Derryadd East Bog Map Book

The margins of the BnM property include some remnant habitats including raised bog (PB1) and Birch woodland (WN7).

An amenity track has been proposed through part of this site part of the Mid-Shannon Wilderness Park Greenway Project, led by Longford County Council (Flynn, Furney Environmental Consultants, 2021⁴). The proposed route will predominantly follow the existing railway network that bisects the site. This would link to Derryadd bog to the west and Lough Bannow bog to the south.

3.1.3. Socio-Economic conditions

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

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

In respect of Derryadd East Bog, jobs would have included those to facilitate horticultural peat and fuel peat production.

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

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

There are approximately 1400 people working in Bord na Móna at present. There are approximately 225 roles directly involved in PCAS.

3.2 Geology and Peat Depths

3.2.1 Sub-soil geology

The bog is primarily underlain by Visean Limestone with a section of Argillaceous Limestones underlying part of the eastern lobe and a small section of the bog to the south. The Visean limestone unit is classified as a regionally important aquifer as it is subject to karstification (conduit), while the Argillaceous Limestones is classified as a

⁴ Flynn, Furney Environmental Consultants, 2021, Ecological Impact Assessment, *Mid-Shannon Wilderness Park Greenway: Ecological Impact Assessment Report*, Document No: MSWP-RP-EN-0005-P02

locally important aquifer. Quaternary Sediment maps show Derryadd East underlain by peat, yet surrounded by inorganic deposits, including till derived from limestone which surrounds the entire bog as well as a small pocket of alluvium which occurs to the north-west of the bog.

3.2.2 *Peat type and depths*

The remaining peat deposits are relatively shallow across most of Derryadd East (<1.5m), except for the small lobe to the east and a section to the south-west of the bog which has a peat thickness of 2-5m. Some areas containing exposed marl and gravel. There is also a pocket of deeper residual peat in the south-west section of the site, see BNM-DR-24-12-04 *Peat Depths* in the accompanying map book.

3.3 Key Biodiversity Features of Interest

Part of the centre of the site has been cutaway for a number of years and has developed relatively mature dry cutaway habitats (mostly Birch woodland). The majority of Derryadd East Bog within the Bord na Móna boundary consists of bare peat, as this site was in industrial production until 2020. Some pioneer vegetation is developing. Habitats of biodiversity interest are therefore largely confined to older cutaway and the marginal habitats fringing the bare peat.

3.3.1 *Current habitats*

A relatively large area in the centre of the site has been cutaway for a number of years. These areas are dry and have colonised by a mixture of pioneer poor fen vegetation and scrub/woodland (eBir, oBir and cBir). The scrub is well developed in places and is comprised mainly of Birch; however a proportion of Pine (Scot's Pine and Lodge-pole Pine) is also contained within areas of scrub.

Other habitats along the margins of the site include birch woodland, wet grassland, dry heath and cutover bog.

The margins of the BnM property include some remnant habitats including raised bog (PB1) and Birch woodland (WN7) that acts as a refuge for local wildlife.

See Drawing number BNM-DR-24-13-17 titled **Derryadd East Bog: Current Habitat Map**, included in the accompanying Mapbook, which illustrates the habitats at Derryadd East Bog.

 <p><i>Railway line to the foreground and bare peat with pioneer vegetation and scrub to the background, NW of the site</i></p>	 <p><i>Pioneer Juncus effusus (pleff) in the NW of the site</i></p>
 <p><i>Pioneer Eriophorum anagrostifolium and Typha to west of site</i></p>	 <p><i>Pioneer vegetation and scrub towards the centre of the site</i></p>
 <p><i>Bog woodland to south of the site, bare peat to the foreground</i></p>	 <p><i>Bare peat in eastern lobe of the site.</i></p>

Table 1: Photos of Habitats at Derryadd East Bog (January 2023)

3.3.2 Species of conservation interest

A number of species of conservation concern utilize the habitats available at Derryadd East Bog. Multiple mammal species have been recorded on or in close proximity to the bog during BNM ecology surveys including, Badger (*Meles meles*), Irish Hare (*Lepus timidus subsp. hibernicus*), European Otter (*Lutra lutra*), Red Fox (*Vulpes vulpes*) and Pine Marten (*Martes martes*). Records of bird species include Raven (*Corvus corax*), Buzzard (*Buteo buteo*), Barn swallow (*Hirundo rustica*), along with other common passerines.

A review of the Ornithology Chapter for the proposed Derryadd Wind Farm Ecological Impact Assessment Report (EIAR)^[3] was also undertaken. The below paragraphs provide a summary of the bird species of conservation concern recorded during surveys to inform Derryadd Wind Farm planning permission. Derryadd East Bog was included in the surveys for the proposed Wind Farm project as it was an adjacent site. A full list of bird species recorded within and adjacent to the bog is provided in the EIAR. Three Amber Listed (BoCCI) species, including Black-headed Gull, Lesser-black-backed gull and Mallard were recorded within the boundary of Derryadd East during dedicated bird surveys for the proposed development. A full list of bird species recorded within and adjacent to the bog is provided in the EIAR. In addition, Whooper swan have also been recorded flying over the site during dedicated winter bird vantage point surveys (2021/2022).

Surveys in the wider study area, outside the boundary of Derryarogue bog also recorded additional Red Listed (BoCCI) species including Curlew, Redshank, Herring Gull, Grey Wagtail, Lapwing and Wigeon. The results of the breeding bird surveys (2015, 2016 and 2017) undertaken in the wider Wind Farm study area also recorded several additional Red List species (BoCCI), including; Woodcock, Curlew, Lapwing and Quail. A number of species recorded during the winter months in the Wind Farm study area are listed on Annex I of the EU Birds Directive, namely; Golden Plover, Greenland White-fronted Goose, Hen Harrier, Kingfisher, Merlin and Peregrine Falcon. Golden Plover, Hen Harrier, Merlin and Peregrine Falcon were also recorded during breeding season surveys along with Common Tern and Little Egret. Habitat is limited for many of these species at Derryadd East, however.

It should be noted that much of the wildfowl, wader and gull observations recorded as part of the ornithological study were associated with the River Shannon and associated wet grasslands to the north of the area.

3.3.3 Invasive species

There are no NBDC or BNM records for high impact invasive species recorded from the bog.

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 no European Sites, Special Areas of Conservation (SAC) or Special Protection Areas (SPA), located within or adjacent to Derryadd East Bog. The nearest EU Designated sites to Derryadd East Bog are as follows:

- Mount Jessop SAC (Site Code: 002202) – 3.4 km east of Derryadd East

^[3] Tobin, 2019, Derryadd Wind Farm Environmental Impact Assessment Report (EIAR), Volume II, EIAR Main Report.

- Lough Forbes Complex SAC (site code: 001818) - 5.5 km to the north of Derryadd East
- Ballykenny-Fisherstown Bog SPA (site code: 004101) – 5.5 km to the north of Derryadd East
- Brown Bog (site code: 002346) - 6 km to the north of Derryadd East
- Lough Ree SAC (Site Code: 000440) – 6.5 km to the west of Derryadd East
- Lough Ree SPA (Site Code: 004064) – 6.7 km to the west of Derryadd East
- Fortwilliam Turlough SAC (site code: 000448) - 7 km to the south-west of Derryadd East

A number of non-statutory designated sites also occur in the wider area around Derryadd East Bog.

Lough Ree NHA (NPWS Site Code: 002103), occurs approximately 6.5 km to the west of Derryadd East. Mount Jessop NHA (NPWS Site Code: 001450), occurs approximately 3.4 km to the east of Derryadd East. Forthill Bog NHA (NPWS Site Code: 001448), occurs approximately 7 km to the south of Derryadd East. Lisnarrigh Bog NHA (NPWS Site Code: 002072), occurs approximately 11.4 km to the west of Derryadd East.

3.4.1 Other Nature Conservation Designations

The Ramsar Convention entered into force in Ireland on 15th March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha. There are no Ramsar sites located in proximity to the Killashee.

3.5 Hydrology and Hydrogeology

Derryadd East Bog lies in the Shannon catchment (Catchment ID: 26C), as defined by the EPA under the Water Framework Directive (WFD). The majority of the bog is located in the Shannon [Upper]_SC_080 sub catchment with a small part of the site along the north-eastern boundary falling into the Shannon [Upper]_SC_060 sub catchment.

The Templeton Glebe (EPA Code: 26T28) stream flows in a north-westerly direction outside the eastern bog boundary. This watercourse flows into the Ballynakill_26 watercourse which flows in a northerly direction. There are no mapped EPA watercourses within the boundary of Derryadd East Bog.

Derryadd East Bog is one of a cluster of bogs that has developed along the floodplains of the River Shannon. Derryadd East Bog has a pumped drainage regime (1 no. is present).

Hydrological modelling (BNM-DR-24-12-09 titled **Derryadd East Bog: Depression analysis**) indicates that parts of the bog form natural basins which have a 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.

Regional hydrological data suggest that Derryadd East Bog receives average precipitation of 794mm/yr (1981-2010), with an estimated evapotranspiration rate of c. 526mm/yr, leaving an average effective precipitation of 268mm/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 268mm/yr, which equates to an annual runoff rate of c. 2,680m³/ha.

GSI data indicates that Derryadd East Bog are primarily underlain by the Visean Limestones (Undifferentiated limestone) which is classified as a Regionally Important Aquifer (Karstified (conduit)). No data exists concerning depth to bedrock.

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

Regionally important aquifers are those in which the network of fractures, fissures and joints, through which groundwater flows, is well connected and widely dispersed, resulting in a relatively even distribution of highly permeable zones. There is good aquifer storage and groundwater flow paths can be up to several kilometres in length. There is likely to be substantial groundwater discharge to surface waters ('baseflow') and large (>2,000 m³/d), dependable springs may be associated with these aquifers.

The entirety of the bog is located in an area mapped by GSI as of low-moderate groundwater vulnerability (GSI Mapviewer). Groundwater vulnerability for the area surrounding Derryadd East Bogs are generally of high vulnerability. Groundwater vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated by human activities. Groundwater vulnerability maps are based on the type and thicknesses of subsoils (sands, gravels, glacial tills (or boulder clays), peat, lake and alluvial silts and clays), and the presence of karst features. Groundwater is most at risk where the subsoils are absent or thin and, in areas of karstic limestone, where surface streams sink underground at swallow holes. These data indicate there is generally low risk of any groundwater contamination occurring at this site. Groundwater vulnerability is typically used to indicate the susceptibility to groundwater pollution, it can provide a useful proxy indication of likely groundwater flow rates in the surrounding area.

3.6 Emissions to surface-water and watercourses

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

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

Derryadd East bog has 4 treated surface water outlets from previously active peat extraction catchments. All 4 discharge to the Ballynakill River (IE_SH_26B220790 BALLYNAKILL_010).

Details of silt ponds, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed on the accompanying structures map along with water quality map. See Drawing number BNM-DR-24-12-02 titled **Derryadd East Bog: Structures and Sampling**, along with Drawing number

BNM-DR-24-12-WQ01 titled **Derryadd East Bog: Water Quality Map** included in the accompanying Mapbook, which illustrate the various drainage and water quality infrastructure present at Derryadd East.

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 Ballinakill River was not listed as being under pressure from peat extraction in the 2nd cycle of the River Basin Management Plan for Ireland and is indicated as remaining so in the third cycle. The main emission limit value (ELV) associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 1.42mg/l and COD 100mg/l. From an analysis of any results over previous five years of the IPC licence environmental monitoring of some of the discharges from this bog, these indicate that results were under the Emission Limit Value for Suspended Solids and Ammonia and broadly under the trigger level for COD. Ammonia averaged 0.253mg/l and ranged from 0.02 to 0.494 mg/l with Suspended Solids ranging from 2 to 13 mg/l and averaging 4.75 mg/l.

Bog	SW	Monitoring	pH	SS	TS	Ammonia	TP	COD	Colour
Derryadd	SW-72	Q 3 22	7.3	13	344	0.135	0.05	55	278
Derryadd	SW-72	Q1 20	7.6	2	150	0.023	0.05	37	115
Derryadd	SW-68	Q3 21	7.6	3	503	0.494	0.05	64	144
Derryadd	SW-70	Q3 21	7.7	2	402	0.227	0.05	78	221
Derryadd	SW-71	Q3 21	7.8	2	359	0.204	0.05	70	147
Derryadd	SW-68	Q1 19	7.3	5	225	0.08	0.05	90	266
Derryadd	SW-70	Q1 19	6.3	5	128	0.58	0.05	56	134
Derryadd	SW-71	Q1 19	7.5	5	252	0.26	0.05	41	189
Derryadd	SW-72	Q3 17	7.6	5	256	0.43	0.06	67	177
Derryadd	SW-68	Q1 16	7.8	5	353	0.43	0.07	40	108
Derryadd	SW-70	Q1 16	7.5	5	242	0.16	0.05	50	193
Derryadd	SW-71	Q2 16	7.7	5	350	0.02	0.05	37	159

Decommissioning and Rehabilitation Programme Water Quality Monitoring.

The licence obligation of quarterly sampling regime on a selected number of ponds to be sampled over a 3 year cycle would 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.

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

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

Initial monthly results are included in Appendix XIV for Derryadd East bog. These results cover the period from November 2020 to November 2022 and are from 3 main surface water outlets from the sections of bog to be rehabilitated in 2023. Peat extraction ceased in these bogs in 2020 and as expected some of the key water quality parameters that can impact water quality from peat extraction activities, remain on a relatively static trajectory, with suspended solids indicating a very slight upward trend, but well below any limits. During this period ammonia did not indicate any increase or decrease in trend during the 24 months of sampling, with all other parameters fluctuated slightly, most likely influenced by normal weather patterns including rainfall.

Monthly ammonia concentrations from both bogs from November 2020 to November 2022 had a range of 0.022 to .466 mg/l with an average of 0.180 mg/l.

Results for suspended solids for the same period indicate a range of 2 to 21 mg/l with an average of 3.34 mg/l.

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 aids the primary objective of stabilizing peat, as when peat is re-wetted it is not vulnerable to wind erosion. Re-wetted peat and the development of wet peatland habitats can also act as sinks for silt and mobile peat, and increases additional retention time for solids, and the peatland vegetation can quickly stabilise this material within blocked drains on site (by acting like constructed wetlands).

Water quality of water discharges from restored peatlands normally improves as a result of bog restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Bog restoration is also expected

to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Móna peatland rehabilitation is expected to have a positive impact on water quality and help the NRBMP deliver its objectives in relation to the WFD.

Water will still discharge from designated emission points when rehabilitation at Derryadd East 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 water bodies.

Decommissioning and Rehabilitation Programme Water Quality Monitoring.

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

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

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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 monitoring programme and these are included in the Water Quality Map.

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

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

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

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

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

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

Water will still discharge from designated emission points when rehabilitation at Derryadd East has been completed. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of the key water catchment (Shannon Upper_080) and is expected to support the future status of receiving waterbodies as being of Good Status.

3.7 Fugitive Emissions to air

None.

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

3.8 Carbon emissions

Irish peatlands are a huge carbon store, containing more than 75% of the national soil organic carbon (Renou-Wilson *et al.* 2012). Peatland drainage and extraction transforms a natural peatland which acts as a modest carbon sink (taking in 0.1 to 1.1 t of carbon as CO₂-C /ha/yr) into a cutaway ecosystem which is a large source of carbon dioxide (releasing 1.3 to 2.2 t of carbon as CO₂-C /ha/yr) based on Tier 1 Emission factors (Evans *et al.* 2017). Renou-Wilson *et al.* (2018) reported losses of between 0.81 – 1.51 CO₂-C /ha/yr from drained peatlands located in Ireland.

Re-wetting of dry peatlands will increase methane emissions (Gunther *et al.* 2020) as a consequence of the anoxic conditions within the peat body that provide a suitable environment for the microbial breakdown of plant litter and root exudates. Tanneberger *et al.* (2021) describes how peatland management has to choose between CO₂

emissions from drained peatlands or increased methane (CH₄) emissions from rewetted industrial peatlands. However, when radiative effects and atmospheric lifetimes of both GHG gases are considered and modelled, postponing rewetting increases the longterm warming effect of continued CO₂ emissions (Gunther et al. 2020). This means the increase in methane due to rewetting of dry peatlands is still negated by the CO₂ emissions reductions. Further, Wilson et al. (2022) confirmed the benefit of rapid rewetting to achieve strong carbon reductions and potentially altering the warming dynamics from warming to cooling depending upon the climate scenario.

It is expected that Derryadd East Bog will become a reduced carbon source following rehabilitation. The potential of any cutaway site to develop as a carbon sink in the longer-term depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich or other peat-forming habitats, the balance of carbon fluxes from different cutaway habitats and future climatic conditions. Much of this bog is expected to develop regenerating wet deep peat vegetation on deep peat areas, and wetland habitats on shallow peat with open water, reed swamp and fen habitats with alkaline emission factors. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

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

4. CONSULTATION

4.1 Consultation to date

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

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

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

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

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

4.2 Issues raised by Consultees

N/A Yet as consultation has not commenced.

4.3 Bord na Móna response to issues raised during consultation

N/A Yet as consultation has not commenced.

5. REHABILITATION GOALS AND OUTCOMES

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

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving waterbodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Optimising hydrological conditions for **climate action benefits as part of PCAS**.
- Optimising hydrological conditions for the development of reed swamp and fen on shallow more alkaline peat and other subsoils, or embryonic *Sphagnum*-rich vegetation communities on deep residual peat, where present.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.
- Supporting expected future land-uses.
- The main goal and outcome of this plan is the successful rehabilitation (environmental stabilisation) of peatlands used for industrial peat production at the bog in a manner that is acceptable to both external stakeholders and to Bord na Móna and which optimise climate action and other ecosystem service benefits.

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

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

- 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). Reducing pressures due to former peat extraction activities at Derryadd East Bog will contribute to stabilising or improving water quality status of receiving water bodies in general. Ultimately, improving the WFD status of the receiving water body will depend on reducing pressure from a range of different sources, including peatlands in general (private and Bord na Mona).
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Kilashee) in 2023, and rehabilitation has taken place in several surrounding bogs in 2021/2022, including Begnagh, Clooneeny, Knappoge, Derrycashel and Derraghan bogs. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies from rehabilitating more than one bog in the same catchment.
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features. An Archaeological Impact Assessment (AIA) is to be carried out under the PCAS scheme.

6. SCOPE OF REHABILITATION

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

- The area of Derryadd East 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. Derryadd East Bog is part of the Mount Dillon Bog group.
- The Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This scheme is designed to enhance the ecosystem services of Derryadd East Bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Derryadd East Bog mean that deep peat measures along with wetland creation is the most suitable rehabilitation approach for this site. Derryadd East Bog has a pumped drainage regime and has residual deep peat in the majority of the bog along with some small pockets of shallower peat.
- Bord na Móna have defined the key goal and outcome of rehabilitation at Derryadd East Bog as **environmental stabilisation** of the site via **optimising climate action benefits, where possible**. 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 peat-forming communities on residual deep peat, and the development of open water, Reed Swamp and fen mosaics on shallow more alkaline peat and other subsoils**.
- Rehabilitation of Derryadd East 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.
- Integrating rehabilitation measures with future potential amenity projects i.e. the Mid-Shannon Wilderness Park Greenway. It is not proposed to change any conditions around the area proposed for this project.

6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- Residual peat depths are generally < 1 m in the majority of the bog. Some deeper peat occurs in the eastern section of the site.
- **Current/future land-use.** A key future land-use is amenity. There are proposals for part of the Mid-Shannon Wilderness Park Greenway Project, led by Longford County Council, to utilise the existing railway corridor and some headlands through the site. Any proposed enhancement measures (ie. targeted drain-

blocking) will be positively aligned with future planned land-uses and will look to facilitate amenity, where possible. Re-wetting will be planned as to not to rule out potential future amenity.

- **Renewable Energy.** The proposed Derryadd Wind Farm will be developed by Bord na Móna on cutaway peatlands on Derryadd, Derryarogue and Lough Bannow bogs in south Co. Longford and to the west and south of the site. There is **no footprint overlap** with Derryadd East Bog. Bord na Móna intends to submit a planning application in early 2023 for the proposed development. There will be no expected overlap between PCAS rehabilitation in 2023 at Derryadd East and potential construction of Derryadd Wind Farm (potential starting date 2024+).
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care has to be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, any new archaeology may require rehabilitation measures will be reviewed and adapted. If this occurs, rehabilitation measures will be reviewed and adapted. An Archaeological Impact Assessment (Appendix XII) will be carried out to mitigate against any impact on found archaeology at Derryadd East Bog. In the worst-case scenario works affecting the surface and sub-surface of the bog might disturb previously unknown archaeological deposits or artefacts without preservation by record taking place. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.
- **Public Rights of Way.** There is one known right of way at Derryadd East Bog. 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.
- **Turbary.** An area of remnant raised bog close to the eastern margin is constrained as it is currently being used by domestic turf cutters to harvest peat. This area is ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. It is beyond the scope of this rehabilitation plan to address turf cutting issues on Derryadd East Bog.
- **Peat Stock.** Some peat stock is still present. This will be regraded and used for the infilling of adjacent drainage ditches during rehabilitation and decommissioning operations. The procedure for stockpile decommissioning is fully described in Appendix XIII.

6.2 Key Assumptions

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

6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

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

7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

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

Rehabilitation is generally defined by Bord na Móna as:

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

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

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

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

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

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

As the monthly monitoring program at Derryadd East Bog continues in 2023 during the rehabilitation works planned for 2023, and data from the 2022 monitoring program is compiled, further trending will be produced to verify any ongoing trends.

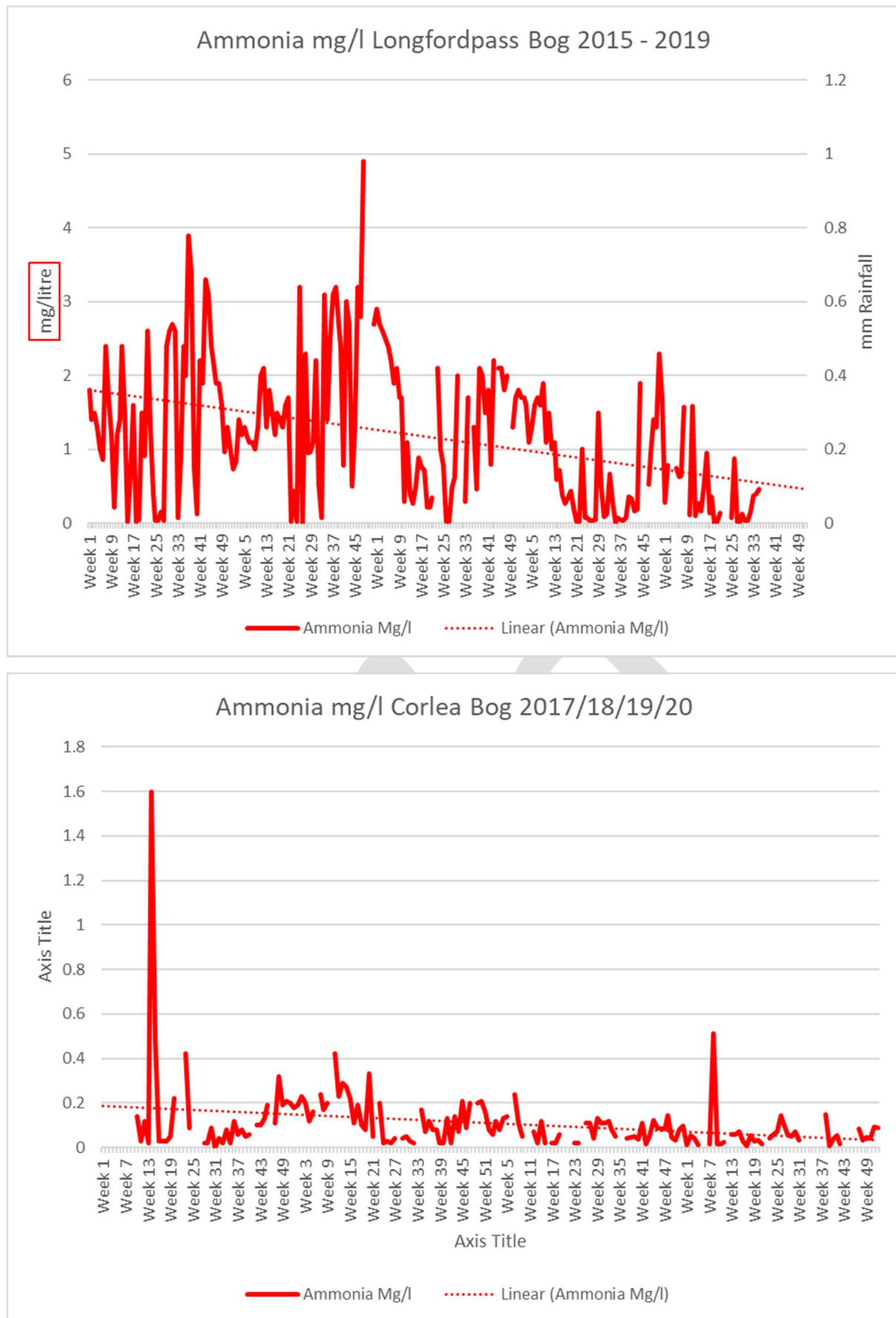


Figure 7.1. Ammonia levels over the period 2015-2019 at Longfordpass and the period 2017-2020 at Corlea.

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

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising and maximising residual peat re-wetting). This will be measured by an aerial survey after rehabilitation has been completed.
- Accelerating the trajectory of the bog towards becoming a reduced carbon source/carbon sink. This will be measured through habitat mapping and the development of cutaway bog condition assessment. This cutaway bog condition assessment will include assessment of environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Reduction in carbon emissions. This will be estimated via a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including embryonic *Sphagnum*-rich peatland communities, wetland, fen, Reed swamp, heath, scrub, poor fen, and Birch woodland (not in order of predicted percentage cover), where conditions are suitable. It will take some time for stable naturally functioning habitats to fully develop at Derryadd East Bog. This will be demonstrated and measured via aerial photography, habitat mapping and cutaway/habitat condition assessment. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Improvement in biodiversity and ecosystem services. This will be demonstrated by metrics outlined in Section 9.1 that can be used to measure changes in ecosystem services (e.g. water quality parameters, development of pioneer habitats, breeding bird monitoring). This will be measured by collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services. Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.

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

Criteria type	Criteria	Target	Measured by	Expected Timeframe
IPC validation	Rewetting in the former area of industrial peat production	Delivery of rehabilitation measures Reduction in bare peat.	Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking) Establishment of a baseline for future monitoring of bare peat, vegetation establishment and habitat condition.	2023-2025
IPC validation	Key water quality parameters Ammonia, Phosphorous, Suspended solids, pH and conductivity	Reduction or stabilisation of key water quality parameters associated with this bog	Water quality monitoring for a period after rehabilitation has been completed	2022-2024
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	Where this section of the water body, that this bog drains to, has not been identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body, confirms that its classification remains at not being at risk from peat extraction associated with activities at this bog.	EPA WFD monitoring programme	WFD schedule
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-	2023-2025

Criteria type	Criteria	Target	Measured by	Expected Timeframe
			monitored in the future and compared against this baseline.	
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a bog condition assessment and appropriate carbon emission factors.	2023-2025
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.	2023-2025

Meeting climate action verification criteria and monitoring of these criteria after the scheme has been completed is dependent on support from the Climate Action Fund or other sources of funding. Note that monitoring and verification of the overall scheme will be stratified – not all these criteria will be measured at each individual site. Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.

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

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

- **Funding to pay for resources required to deliver the planned rehabilitation (Bord na Móna and external).** Bord na Móna maintains a provision on its balance sheet to pay for these future costs when industrial peat extraction ceases. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan.
- **Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.**
- **Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.**
- **Weather conditions to be within normal limits over the rehabilitation plan timeframe.** Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.

- **Rehabilitation measures to be effective.** The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practice applied internationally in peatland management. Measures proposed in this plan have already been shown to be effective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.
- **Natural colonisation of vegetation to develop semi-natural habitats at a rate within the normal limits.** The development of naturally functioning semi-natural habitats on degraded bog takes time. It may take 30-50 years for active raised bog vegetation to re-develop on suitable cutaway that was previously bare peat. However, Bord na Móna experience has demonstrated the effectiveness of these type of measures for re-wetting bog and creating carbon sinks (Renou-Wilson et al. 2018).
- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed enhanced measures to optimise climate action. This will focus on collecting a range of scientific data that can then quickly be adapted and into metrics that can be used to measure changes in various ecosystem services.

8. REHABILITATION ACTIONS AND TIME FRAME

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

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

BNM-DR-24-12-21 titled **Derryadd East Bog: Aerial Imagery 2020**

BNM-DR-24-12-04 titled **Derryadd East Bog: PeatDepths**

BNM-DR-24-12-03 titled **Derryadd East Bog: LiDAR Map**

BNM-DR-24-12-09 titled **Derryadd East Bog: Depression Analysis**

The rehabilitation actions themselves will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in drawing titled **BNM-DR-24-12-05 titled Derryadd East Bog: Rehabilitation Measures** in the accompanying Mapbook (note that the actual distribution of these measures may be subject to change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.)

These enhanced measures for Derryadd East Bog will include (see Table 8.1):

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a part of the north of the site will develop a mosaic of wetland habitats with some permanent deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent water-courses. Pumps are expected to be decommissioned and removed at Derryadd East Bog.
- Intensive drain blocking and construction of berms in shallow peat areas/modelled depressions to create/promote the spread of wetland habitats,
- Modifying outfalls, and management of water levels with overflow pipes and blocking of internal outfalls;
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels,
- Re-alignment of piped drainage.
- Deep Peat measures including field re-profiling, resulting in bunded areas suitable for *Sphagnum* inoculation, on deeper peat;

- Intensive blocking of drains (up to 7/100m) in targeted marginal (degraded) raised bog remnants around the margins of the site and re-wetting, where possible, using an excavator to install peat blockages.
- Outfall management and/or further drain blocking in one area at least which was formerly subject to rehabilitation, as additional works;
- 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.
- Initial hydrological modelling indicates that a small part of the site will develop a mosaic of wetland habitats with the potential for some deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some small sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage.

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

Type		Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat	DPT2	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows	17.41
Deep Peat	DPT 4	Berms and field re-profiling (45x60m cell), modifying outfalls and managing overflows, drainage channels for excess water and <i>Sphagnum</i> inoculation	13.66
Wetland	WLT2	Turn off or reduce pumping to re-wet cutaway, modifying outfalls and managing water levels with overflow pipes	18.91
Wetland	WLT4	Drain blocking; Turn off or reduce pumping to re-wet cutaway, modifying outfalls and managing water levels with overflow pipes	113.04
Marginal land	MLT1	No work required	24.07
Marginal land	MLT2	More intensive drain blocking (max 7/100m)	3.56
Additional Work	AW2	Targeted Drain Blocking	40.86
Dry Cutaway	DCT1	Blocking Outfalls and managing water levels with overflow pipes	3.10
Dry Cutaway	DCT2	Regular drain blocking (3/100m) +modifying outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	72.79
Silt ponds	Silt pond	Silt ponds	0.18
Constraint	Constraint	Other Constraints (Mid-Shannon Wilderness Park Greenway, turbary)	6.91
	Constraint	Archaeology	1.17
Total			328.60

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

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise, from the EPA.
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with engineering drawings outlining how the various rehabilitation methodologies will be applied to Derryadd East Bog. This will take account of peat depths, topography, drainage and hydrological modelling (see map for an indicative view of the application of different rehabilitation methodologies).
- A drainage management assessment of the proposed enhanced rehabilitation measures will be carried out and any issues identified resolved and the rehabilitation plan adapted.
- A review of archaeology and an archaeological impact appraisal of the proposed rehabilitation will be carried out. The results of this assessment will be incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.
- A review of issues that may constrain rehabilitation such as turbary and existing land agreements is to be carried out.
- A review of remaining milled peat stocks was carried out. There are several old peat stock piles on site that will not be removed and be decommissioned. Appendix XIII provides details of the proposed decommissioning and reinstatement procedure for remaining peat stock on site.
- An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- Carry out Appropriate Assessment of the Rehabilitation Plan.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implantation of the rehabilitation plan.

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

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

8.3 Long-term (>3 years)

- Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- Delivery of a monitoring, aftercare and maintenance programme (See section 10.2 below).
- Decommissioning of silt-ponds will be assessed and carried out, where required.
- Reporting to the EPA will continue until the IPC License is surrendered.

8.4 Timeframe

- **2022-2023:** Short-term planning actions.
- **2023-2024:** Short-term practical actions.
- **2024-2025:** Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- **2025:** Decommission silt-ponds, if necessary.

8.5 Budget and costing

Bord na Móna (BnM) appreciates the Minister's intention to support Bord na Móna in developing a package of measures, 'the Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. *However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support.*

The enhanced decommissioning, rehabilitation and restoration of the peatlands funded by the Scheme will deliver benefits across climate action (GHG mitigation through reduced carbon emissions and acceleration towards carbon sequestration), enrich the State's natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation as well as developing the amenity potential of the peatlands.

Bord na Móna maintains a provision on its balance sheet to pay for the future costs of **standard** rehabilitation and decommissioning when industrial peat extraction ceases. This is updated every year - for more information see the Bord na Móna Annual Report (Bord na Móna, 2022). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

At this time, a 'standard' rehabilitation provision (sufficient to discharge the requirement of Condition 10 in the licence) has been allocated to the site based on the area of different cutaway types across the site (See Appendix I).

9. AFTERCARE AND MAINTENANCE

9.1 Programme for monitoring, aftercare and maintenance

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

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

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

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

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

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

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

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

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

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

10. REFERENCES

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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 Derryadd East 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. Derryadd East Bog are part of the Mount Dillon Bog Group.
- The current condition of Derryadd East Bog. This site has a pumped drainage regime.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- To minimise potential impacts on neighbouring land. Boundary drains around Derryadd East Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Land-use.

Rehabilitation goals and outcomes

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

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

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

Criteria for successful rehabilitation:

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

Rehabilitation targets

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

Rehabilitation measures:

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

Timeframe:

- 2023-2024. 1st phase of rehabilitation. Field drain blocking.
- 2025. 2nd phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1st phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.
- 2025-2026. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.

- 2025-2026. Decommission silt-ponds, if necessary.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + modifying outfalls and managing water levels with overflow pipes	47.8
Dry cutaway	DCT1	Modifying outfalls and managing water levels with overflow pipes	26.4
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + modifying outfalls and managing water levels with overflow pipes	132
Marginal Land	MLT1	No work required	26.5
Other	Silt Pond	Silt ponds	0.18
Additional	AW2	Targeted drain blocking	4.4
Other	Constraint	Rights of Ways and constrained areas/buffers/Archaeology	4.45
Total			328.6

See Drawing number BNM-DR-24-12-20 titled **Derryadd East Bog: Standard Rehab Measures** included in the accompanying Mapbook which illustrates the standard rehab measures to be applied.

Monitoring, after-care and maintenance

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

Validation and IPC Licence surrender

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

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

APPENDIX II: BOG GROUP CONTEXT

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

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

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

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

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

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

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

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

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
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	Finalised 2022 Rehab started in 2022
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 To be Finalised in 2023
Derraghan	289	Cutover Bog Industrial peat production commenced at Derraghan Bog in the 1940's and ceased in 2020. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derraghan is considered a shallow peat cutover bog.	Derraghan Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power Much of the former production area at Derraghan has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.	2020	Plan Finalised 2021 Rehab commenced 2022
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.	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 the proposed Derryadd Wind Farm Project (in pre-planning).	2020	Draft 2017

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		Derryadd is considered a shallow peat cutover bog.			
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 the proposed Derryadd Wind Farm Project (in pre=planning). An amenity walkway through part of Derryarogue is proposed for the Derryadd Wind Farm project	2020	Rehab Plan Draft 2022 To be Finalised in 2023
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 Rehab started in 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 Rehab started in 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	Rehab Plan Draft 2022 To be Finalised in 2023
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 Rehab started in 2021

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
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	Rehab Plan Draft 2022 To be Finalised in 2023
Killashee	110	Cutover Bog Development for industrial peat production commenced at Killashee and Derryadd East Bogs in 1985. Killashee is considered a deep peat cutover bog.	Killashee and Derryadd East Bogs formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power. The majority of Killashee and Derryadd East Bogs former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2020	Rehab Plan Draft 2022 To be Finalised in 2023
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 Rehab started in 2022
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 Wind Farm 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	Mount Dillon Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power.	2020	Draft 2017

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		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.	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.		

See Drawing number BNM-DR-24-12-24 titled **Mount Dillon Bog Group**, included in the accompanying Mapbook which illustrates the location of Derryadd East Bog and the Mount Dillon Bog Group in context to the surrounding area.

APPENDIX III: ECOLOGICAL SURVEY REPORT

Ecological Survey Report

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.

Bog Name:	<u>Derryadd 2</u>	Area (ha):	331ha
Works Name:	Mount Dillon	County:	Longford
Recorder(s):	BnM Ecology	Survey/ monitoring Date(s):	9 th August 2012

Habitats present (in order of dominance)

The most common habitats present at this site include:

- Bare peat (BP) (Codes refer BnM classification of pioneer habitats of production bog. See Appendix II).
- Pioneer dry heath communities (dHeath)
- Scrub (eBir, OBir and CBir).
- Silt Ponds (Silt) with associated habitats such as scrub, Bracken, rank grassland (GS2), dry calcareous grassland (gCal) and typical pioneer communities of disturbed areas (disTuss).

The most common habitats present around the margins at this site include:

- Birch woodland (WN7) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II)
- Scrub (WS1) (Gorse scrub and Birch scrub developing of dry high bog around margins)
- Raised bog (PB1)
- Cutover bog (PB4) (several small fragments)
- Wet grassland (GS4).

Description of site

Derryadd 2 Bog is located approximately 1km to the west of Killashee in County Longford. This site is located within one main block. Killashee Bog is located immediately to the north of the site (separated by the Longford to Roscommon Road), while Derryadd bog is located to the west. A rail link connects the site with Killashee Bog to the north and Derryadd to the west. The majority of the site is in active industrial peat production, however approximately 40% of the site is cutaway with further areas nearing the end of industrial peat production. The peat is used as fuel peat in Lough Ree Power in Lanesborough. Derryadd 2 Bog has been in full industrial peat production since the early 1960's and contains one pump in the north of the site.

A relatively large area in the centre of the site has been cutaway for a number of years. These areas are dry and have colonised by a mixture of pioneer poor fen vegetation and scrub (eBir, oBir and cBir). The scrub is well developed in places and is comprised mainly of Birch; however a proportion of Pine (Scot's Pine and Lodge-pole Pine) is also contained within the scrub.

The remainder of the site is in active industrial peat production. Small areas of the site along the margins are beginning to become colonised by pioneer poor fen vegetation, however these areas are small.

<p>At the time of the ecological survey there was one pump located in the north of the site.</p> <p>Other habitats along the margins of the site include Birch woodland, wet grassland, dry heath and cutover bog. Overall, large areas of the site contain less than 2m of peat, with some areas containing exposed marl and gravel; however some small areas of the bog, in the east of the site, are young in terms of industrial peat production and still contain some “red” or “<i>Sphagnum</i>” peat.</p>
<p>Designated areas on site (cSAC, NHA, pNHA, SPA other)</p> <p>None</p> <p>The Grand Canal NHA (site code 002103) is located within 0.5km of the site.</p>
<p>Adjacent habitats and land-use</p> <p>Adjacent habitats include lowland depositing river (FW2), wet grassland (GS4), scrub (WS1), improved agricultural grassland (GA1), cutaway bog (PB4), canal (FW3), conifer plantation (WD4) and raised bog (PB1).</p>
<p>Watercourses (major water features on/off site)</p> <ul style="list-style-type: none"> Tributaries of the River Shannon flow along the eastern and western boundaries of the site.
<p>Peat type and sub-soils</p> <p>The majority of the site contains less than 2m of peat. The most easterly section of bog contains in excess of 2.6m of peat.</p> <p>The bog is underlain with gravel and marl.</p>
<p>Fauna biodiversity</p> <p>Birds</p> <p>Several bird species were noted on the site during the survey.</p> <ul style="list-style-type: none"> Buzzard (Juvenile) Raven Other more common species include Pheasant, Blackbird, Swallow, Gold Finch and Greenfinch. <p>Mammals</p> <p>Signs of several mammal species were noted on the site during the survey.</p> <ul style="list-style-type: none"> Badger Otter Fox Pine Marten Hare

Other species

Stickleback in the drains

Butterflies

- Peacock, Green-veined White, Large White, Small Copper

References

Cross, J.R. 2006. The Potential Natural Vegetation of Ireland. Biology and Environment: Proceeding of the Royal Irish Academy, Vol. 106B, No. 2, 65-116 (2006).

European Commission (2013). Interpretation manual of European Union Habitats. European Commission DG Environment Nature ENV B.3.

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

NRA (2009). Guidelines for Assessment of Ecological Impacts of National Road Schemes (Revision 2). National Roads Authority.

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 banded 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 banded where there is the possibility of discharge to waters.
- Potential impacts caused by spillages etc. during rehabilitation will be reduced by keeping spill kits and other appropriate equipment on-site.
- Site activities will be carried out in accordance with 'best practice'. In order to ensure compliance and implementation of 'best practice', these measures will be communicated to relevant Bord na Móna staff and updated as required.

APPENDIX V. BIOSECURITY

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

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

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

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

In addition to the above, Best Practice measures around the prevention and spread of Crayfish plague⁵ will be adhered with throughout all rehabilitation measures and activities.

⁵ <https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/>

APPENDIX VI. POLICY AND REGULATORY FRAMEWORK

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

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

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

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

1 EPA IPC Licence

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

2 The Peatlands Climate Action Scheme (PCAS)

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

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

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

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

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

3 National and EU Climate and Biodiversity 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.

Peatlands rehabilitation and restoration is referenced in Section 17.3.3 of the Land Use, Land Use Change, Forestry and Marine Chapter of the National Climate Action Plan 2021 as follows:

"The rehabilitation of degraded peatlands to a condition in which they regain their ability to deliver specific ecosystem services has considerable potential for initial mitigation gains, and future carbon sequestration. Additional benefits of peatland restoration include positive socio-economic outcomes for the Midlands, increased natural capital, enriched biodiversity, improved water quality, and flood attenuation."

The scheme is included as Action 33 in the Climate Action Plan 2021 Annex of Actions - Deliver the Enhanced Decommissioning, Rehabilitation and Restoration (EDRR) Scheme for Bord na Mona Peatlands.

EDRRS is also referenced in the Climate Action Plan 2021 as a measure to deliver a Just Transition in the Midlands.

International research and scientific understanding of peatlands is now reflected in key Irish national policy and strategy documents such as the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017 - 2022 (Department of Arts, Heritage and the Gaeltacht 2017), The National Peatland Strategy (Department of Arts, Heritage and the Gaeltacht 2015), The National Biodiversity Action Plan (National Parks and Wildlife Service 2017), The River Basin Management Plan for Ireland 2018-2021 (Department of Housing, Planning and Local Government 2018), and the Biodiversity – Climate Change Sectoral Action Plan (Department of Arts, Heritage and the Gaeltacht 2019). Each of the national plans, which are also complemented with the recently published EU Green Deal communication on Biodiversity Strategy for 2030 (COM 2020) have overlapping objectives and actions that focus on the restoration of peatlands damaged by turf-cutting, drainage and other impacts, as well as the re-wetting of Bord na Móna industrial peat extraction bogs.

While not specifically identified as a restoration implementor, EDRRS objectives are in line with those of the United Nations Decade on Ecosystem Restoration 2021-2030 of Preventing, Halting and Reversing the Degradation of Ecosystems worldwide.

EDRRS is also in line with the EU Commission proposal for a Nature Restoration Law which will apply legally binding targets for nature restoration in different eco-systems to every Member State. The aim is to cover at least 20% of the EU's land and sea areas by 2030 with nature restoration measures and eventually extend these to all ecosystems in need of restoration by 2050.

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 NRBMP 2022-2027 describes how the number of waterbodies impacted by peat, industry and forestry have decreased by 10, 10 and 5 waterbodies, respectively since the second cycle. Impacts on water quality and river habitat arising from peat and peat extraction and associated drainage include the release of ammonium and

fine-grained suspended sediments, and physical alteration of aquatic habitats. Drainage of peatlands also results in changes to the hydromorphological condition of rivers.

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

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

6 National Biodiversity Action Plan 2016-2021

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

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

A new National Biodiversity Action Plan is currently being developed.

7 National Conservation Designations

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

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

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

important role that communities have to play in the conservation and restoration of raised bogs. The National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017-2022 is part of the measures being implemented in response to the on-going infringement action against Ireland in relation to the implementation of the EU Habitats Directive, with regard to the regulation of turf cutting on the Special Areas of Conservation (SACs). The then Minister for Arts, Heritage and the Gaeltacht, also published a **Review of Raised Bog Natural Heritage Area Network** in 2014.

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

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

9 All-Ireland Pollinator Plan 2021-2025

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

10 Land-use Planning Policies

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

11 National Archaeology Code of Practice

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

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

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

12 Bord na Móna Biodiversity Action Plan 2016-2021

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

One example of a key CBD target is:

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

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

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

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

13 Bord na Móna Commitments

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

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

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

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

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

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

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

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

APPENDIX VII. DECOMMISSIONING

1. Condition 10 Decommissioning

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

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

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

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

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

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

Item	Description	Derryadd East Decommissioning Plan
1	Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices	Clean-up of Bog
2	Cleaning Silt Ponds	Cleaning Silt Ponds
3	Decommissioning Peat Stockpiles	Peat Stockpile Management
4	Decommissioning or Removal of Buildings and Compounds	Decommissioning or Removal of Buildings and Compounds
5	Decommissioning Fuel Tanks and associated facilities	Where relevant
6	Decommissioning and Removal of Bog Pump Sites	Pump removal
7	Decommissioning or Removal of Septic Tanks	Where relevant

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

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

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

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

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

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

7.3.3 The ultimate destination of the waste.

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

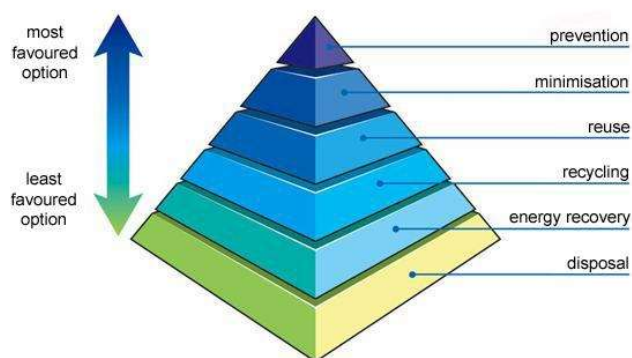
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

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

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

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



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

2. Enhanced Decommissioning.

The remaining infrastructure does not constitute a risk to the environment and would not be a requirement of condition 10 of the 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	Derryadd East Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Where Applicable
3	Decommissioning Railway Level Crossing	Where Applicable
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog
5	Removal of High Voltage Power Lines	Where Applicable

APPENDIX VIII. GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

(Minimisation, treatment, recovery and disposal)

Objective:

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

Scope:

This plan covers IPPC Licence's Ref P0504-01, Mount Dillon Group of Bogs located 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 the Mount Dillon bog group are serviced by silt lagoons/ponds. During the excavation of these silt ponds, pre IPPC Licensing in 1999 and since licensing, the excavated material is stored adjacent to the silt pond, where it either remains in situ or 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:

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

1.3 Bog Timbers:

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

2.0 P0504-01 IPPC Licence Extractive Waste Conditions

2.1 Condition 7.5 Extractive Waste Management

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

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

2.2 Condition 7.6 Waste Facility

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

2.3 Condition 7.7 Excavation Voids

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

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

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

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

3.0 Minimisation.

3.1 Silt pond excavation material and cleanings.

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

3.2 Power Station Screenings.

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

3.3 Bog Timbers.

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

4.0 Treatment

4.1 Silt pond excavation material and cleanings.

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

4.2 Power Station Screenings.

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

4.3 Bog Timbers

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

5.0 Recovery

5.1 Silt pond excavation material and cleanings.

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

5.2 Power Station Screenings.

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

5.3 Bog Timbers

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

6.0 Disposal

6.1 Silt pond excavation material and cleanings.

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

6.2 Power Station Screenings.

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

6.3 Bog Timbers

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

7.0 Extractive Waste Management Plan

5 (2a)(i)

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

5 (2a)(ii)

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

5 (2a)(iii)

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

5 (2a)(iv)

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

5 (2a)(v)

Peat mineral resources do not undergo any treatment.

5 (2b)

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

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

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

5 (3)

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

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

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

Classification in accordance Annex II.

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

Description of operations.

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

Closure plan. (Bog Rehabilitation Plan).

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

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

10.2 Cutaway Bog Rehabilitation Plan:

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

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

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

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

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

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

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

Review.

This plan will be reviewed every five years, the first review to take place in September 2017. This review will entail an inspection of these waste facilities to ensure their placing, management, maintenance and stability comply with the requirements of the Extractive Waste Management requirements and condition 7.5, 7.6 and 7.7 of the Mount Dillon IPPC Licence 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.
- 6. 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.
- 7. No fertiliser will be spread within or in proximity to European Sites. Fertiliser will not be spread within 25m of a hydraulic break (where slope indicates runoff potential); 25m of an area subject to annual winter inundation, 25m of a natural watercourse, or 25m of any drains where conveyance is to be retained through the proposed rehabilitation extent.
- 8. Fertiliser will be applied to headlands and bare fields where the surface slope indicates runoff is directed away from the above areas, and to within 2m of internal drainage channels within the cutover high field areas. These drainage channels will be blocked in advance of fertiliser application, restricting potential run-off to downstream drainage channels.

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

APPENDIX XI. CONSULTATION SUMMARIES

Table APX -1 Consultees contacted

Table APX -2 Response summary from Consultees contacted

Draft

APPENDIX XII. ARCHAEOLOGY

Role of the Archaeological Liaison Officer

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



Code of Practice

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Code of Practice

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



	Procedure: ENV017	Rev: 1
Title: Archaeological Findings	Approved: EM	Date: 13/10/2020

1) Purpose

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

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

2) Procedure

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

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

Your Archaeological Liaison Officer is

3) Records

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



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

Report For

Bord Na Móna Energy Ltd.

Author

Dr. Charles Mount

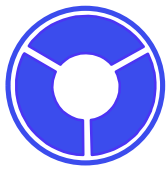
Bord Na Móna Project Archaeologist



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 lands at Derryadd East Bog, Co. Longford on the known archaeological heritage of the bog. The proposed rehabilitation actions will be a combination of measures to create wetlands and re-wet deep peat as outlined in the draft Methodology Paper for the proposed Bord na Móna Decommissioning, Rehabilitation and Restoration Scheme. These enhanced measures for Derryadd East Bog will include:

- Re-assessment of the pumping regime and removing pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a part of the north of the site will develop a mosaic of wetland habitats with some permanent deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. Some targeted bunding may be required. It is expected that a natural seasonal regime of water fluctuation will develop, with water-levels fluctuating in association with levels in the adjacent water-courses. Pumps are expected to be decommissioned and removed at Derryadd East Bog.
- Intensive drain blocking and construction of berms in shallow peat areas/modelled depressions to create/promote the spread of wetland habitats,
- Modifying outfalls, and management of water levels with overflow pipes and blocking of internal outfalls;
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels,
- Re-alignment of piped drainage.
- Deep Peat measures including field re-profiling, resulting in bunded areas suitable for Sphagnum inoculation, on deeper peat;
- Intensive blocking of drains (up to 7/100m) in targeted marginal (degraded) raised bog remnants around the margins of the site and re-wetting, where possible, using an excavator to install peat blockages.
- Outfall management and/or further drain blocking in one area at least which was formerly subject to rehabilitation, as additional works;
- 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.
- Initial hydrological modelling indicates that a small part of the site will develop a mosaic of wetland habitats with the potential for some deeper water. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some small sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage.



Derryadd East Bog is located c.4.2km north-east of the village of Keenagh, Co. Longford, and north of the R398 road. The overall rehabilitation area occupies the townlands of Cloonfinfy, Cloontamore, Derryadd, Derryart, Derryoghil, Grillagh, Killashee, Aghakeeran, and Templeton Glebe, on OS 6 inch sheet Longford No. 18.

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

- The IAWU Peatland Survey
- 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
- Archaeological monitoring
- The Excavations database
- Previous assessments

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

Desktop assessment

Peatland Survey

The rehabilitation area of Derryadd East Bog was the subject of a pilot survey carried out by Prof. Barry Raftery in 1987 and 1988 and a survey by the Irish Archaeological Wetland Unit (IAWU) in 1991 (Raftery 1996). The data in Table 1 is based on data supplied to the author and the Archaeological Survey of Ireland by the IAWU that did not include locational data. 17 sightings of archaeological material were made during the 1987-88 and 1991 surveys (see Table 1). These archaeological sightings were notified to the Archaeological Survey of Ireland. Due to the lack of locational data, it is not possible to make a concordance between all the IAWU data and the SMR data.

IAWU Cat._No.	IAWU Class	SMR No.	Townland	N.G.R. E	N.G.R. N	Depth BS m
LF-DD 1	TOGH	-	Derryad	0	0	-
LF-DD 2	TOGH	-	Derryad	0	0	-
LF-DD 3	TOGH	-	Derryad	0	0	-
LF-DD 4	TOGH	LF018-086----	Derryad	0	0	-
LF-DD 5	TOGH	-	Derryad	0	0	-
LF-DD 6	TOGH	-	Derryad	0	0	-
LF-DD 7	TOGH	-	Derryad	0	0	-
LF-DD 8	TOGH	LF018-088----	Derryad	0	0	-
LF-DD 9	TOGH	-	Derryad	0	0	-
LF-DD 10	TOGH	-	Derryad	207020	268210	-
LF-DT 1	TOGH	LF018-068----	Derryart	0	0	-
LF-D 77	TOGH	LF018-087----	Derryoghil	0	0	-
LF-D 78	TOGH	LF018-069----	Derryoghil	0	0	-
LF-CFY 1	TOGH	LF018-089----	Cloonfinfy	0	0	-
LF-CFY 2	TOGH	LF018-079003-	Cloonfinfy	208980	268580	-
LF-CFY 3	TOGH	LF018-079001-	Cloonfinfy	209010	268560	--
LF-CFY 4	TOGH	LF018-079002-	Cloonfinfy	209030	268550	-



Table 1. List of sightings recorded during the 1987 -1991 surveys.

Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Longford which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1996). This record was published by the Minister in 1995 and includes sites and monuments that were known in Derryadd Bog before that date. This review established that there are five RMPs located in the proposed rehabilitation area (see Table 2 and Fig. 1). All the sightings were notified by the IAWU following the 1987 - 1991 surveys.

RMP No.	RMP Classification	Townland	ITM E	ITM N	Irish Grid E	Irish Grid N	IAWU Cat._No.
LF018-07901-	Togher	Cloonfinfy			20900	26858	LF-CFY 3
LF018-07902-	Togher	Cloonfinfy			20903	26856	LF-CFY 4
LF018-086---	Togher	Derryadd			20797	26767	LF-DD 4
LF018-087---	Togher	Derryoghil			20823	26741	LF-D 77
LF018-088---	Togher	Derryadd			20827	26654	LF-DD 8

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

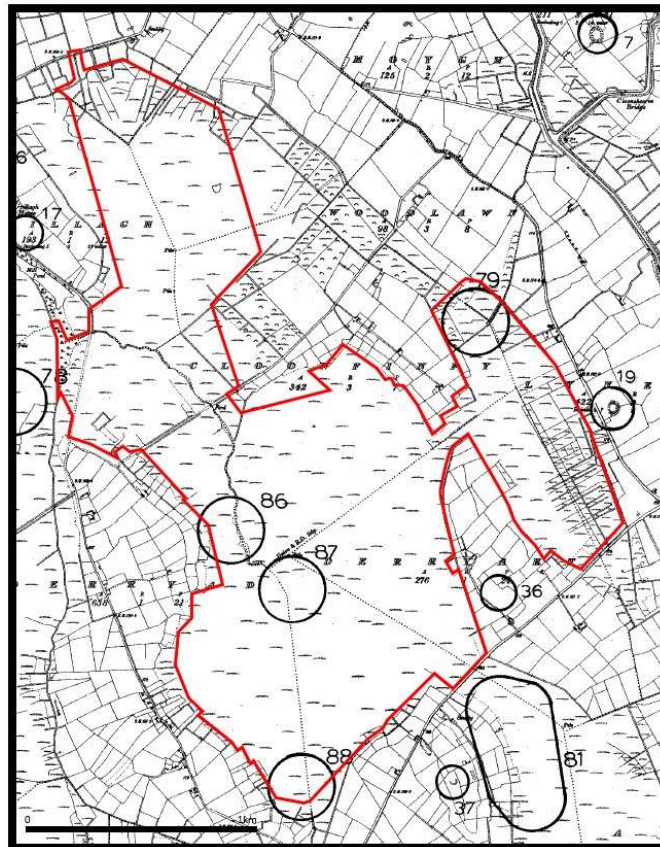
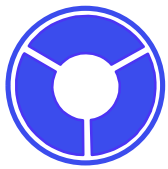


Fig. 1. Derryadd Bog, Co. Longford, detail of the Record of Monuments and Places map sheet No. 18. The proposed rehabilitation area is outlined with the red line.

Archaeological Excavations

A review of Bord na Móna reports and the Excavations Bulletin at excavations.ie indicated that there has been one licensed archaeological investigation carried out in the rehabilitation area in addition to the investigation carried out by Barry Raftery in 1988 (see below).



Derryart Togher

This togher (L 3.6m min.; Wth 1.9m min.; D 0.1m), orientated E-W, was noted in 1987 on the surface of the bog. It was composed of loosely arranged brushwood and roundwood of birch and hazel, across which a single oak plank extended. Radiocarbon dated to 376-183 BC (GrN-15485).

Derryadd Monitoring 18E0177

Monitoring of the geotechnical site investigations at Derryadd, Co. Longford was carried out over a period of three days. A total of twenty trial pits were mechanically excavated in the bogs of Derryaroge and Derryadd. No features and/or artefacts of archaeological significance were encountered during the course of monitoring. The stratigraphy encountered revealed varying levels of peat overlying a natural grey clay.

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 26th of January 2023. 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 16 entries in the SMR in the proposed rehabilitation area (see Table 3 and Fig. 2). All the entries were reported by Barry Raftery and the IAWU following the 1987-88 Pilot Survey and 1991 Peatland Survey. A full concordance with the IAWU data is not possible.

SMR No.	SMR Class	IAWU Cat._No.	Townland	ITM Easting	ITM Northing	Irish Grid Easting	Irish Grid Northing	depth BS m
LF018-079001-	Road - class 3 togher	LF-CFY 3	Cloonfinfy	608959	768579	209010	268560	-
LF018-079002-	Road - class 3 togher	LF-CFY 4	Cloonfinfy	608979	768569	209030	268550	-
LF018-079003-	Road - class 3 togher	LF-CFY 2	Cloonfinfy	608929	768599	208980	268580	-
LF018-089----	Road - class 3 togher	LF-CFY 1	Cloonfinfy	607949	767740	208000	267720	-
LF018-086----	Road - class 3 togher	LF-DD 4	Derryad	607919	767700	207970	267680	-
LF018-088----	Road - class 3 togher	LF-DD 8	Derryad	608239	766560	208290	266540	-
LF018-094----	Road - class 3 togher		Derryad	607939	767560	207990	267540	-
LF018-095----	Road - class 3 togher		Derryad	607859	767960	207910	267940	-
LF018-096----	Road - class 3 togher		Derryad	607909	767720	207960	267700	-
LF018-097----	Road - class 3 togher		Derryad	608159	766830	208210	266810	-
LF018-098----	Road - class 3 togher		Derryad	608249	766620	208300	266600	-
LF018-099----	Road - class 3 togher		Derryad	608219	766600	208270	266580	-
LF018-100----	Road - class 3 togher		Derryad	608249	766520	208300	266500	-
LF018-068----	Road - class 3 togher	LF-DT 1	Derryart	608949	767145	209000	267125	-
LF018-069----	Road - class 3 togher	LF-D 78	Derryoghil	608879	767050	208930	267030	-
LF018-087----	Road - class 3 togher	LF-D 77	Derryoghil	608179	767440	208230	267420	-

Table 3. Sightings in Derryadd East Bog listed in the SMR .

2013 Bord na Móna Re-assessment Survey

Derryadd East Bog was not included in any of the Bord na Móna re-assessment surveys.



Derryadd East 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 P0500-03. 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 4 (Pers Comm. Jane Whitaker). The assessment noted that there was a moderate potential for archaeological features to be uncovered during the course of any future development works in Derryadd East Bog.

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 P0500-03 contains a complete list of known finds from Derryadd East Bog reported to the National Museum of Ireland up to 2018 (see Table 4).

Townland	Museum No.	Description
Cloonfiny	1998:60	Bog Butter in leather container
Derryoghil	1979:76	Roughout for a wooden container

Table 4. List of archaeological finds from Derryadd East Bog reported to the National Museum of Ireland.

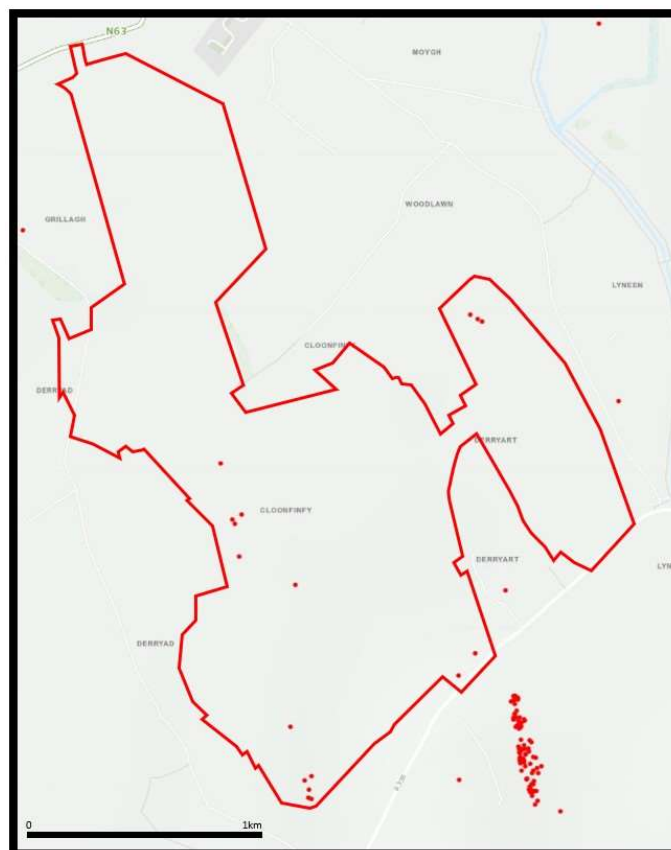


Fig. 2. Derryadd Bog, Co. Longford, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line.



Impact assessment

Seventeen sightings of archaeological material were identified and recorded in Derryadd East Bog between 1987 and 1991 and 16 of these were included in the SMR. Although the depth of the 1987-1991 sightings below the surface were not recorded it can be estimated that no archaeology would have been visible in the drain faces at a greater depth than 1.50m below the 1988-1991 surface. The LIDAR data indicates that 0.07- 1.23m of material was removed from the locations of the 1988-1991 sightings between 2008 and 2020 included in the SMR or about 0.006m – 0.1 per year (see Table 5). This suggests that between 1991 and 2020 c.0.174m -2.9m of peat was removed from the locations of the sightings included in the SMR. Based on this data, 11 sightings made in 1987-1991 may still survive in the rehabilitation area, and these are indicated in Table 6. As there was a considerable quantity of known archaeological material known from the rehabilitation area and the bog has not been surveyed for more than thirty years there is also a potential for additional material to have been exposed on the bog surfaces and in the drain faces since 1991.

SMR No.	SMR Class	IAWU Cat._No.	Townland	ITN E	ITN N	Depth BS m	Peat depth 2008	Peat depth 2020	Peat removed 2008-20	Condition
LF018-079001-	Road - class 3 togther	LF-CFY 3	Cloonfinny	608959	768579	-	2.00	1.66	0.34	May survive
LF018-079002-	Road - class 3 togther	LF-CFY 4	Cloonfinny	608979	768569	-	0.87	0.49	0.38	May survive
LF018-079003-	Road - class 3 togther	LF-CFY 2	Cloonfinny	608929	768599	-	2.25	1.56	0.69	Probably gone
LF018-089----	Road - class 3 togther	LF-CFY 1	Cloonfinny	607949	767740	-	0.99	0.92	0.07	May survive
LF018-086----	Road - class 3 togther	LF-DD 4	Derryad	607919	767700	-	1.02	0.45	0.57	May survive
LF018-088----	Road - class 3 togther	LF-DD 8	Derryad	608239	766560	-	2.14	0.97	1.17	Probably gone
LF018-094----	Road - class 3 togther		Derryad	607939	767560	-	1.01	0.97	0.04	May survive
LF018-095----	Road - class 3 togther		Derryad	607859	767960	-	0.59	0.17	0.42	May survive
LF018-096----	Road - class 3 togther		Derryad	607909	767720	-	0.74	0.98	-0.23	May survive
LF018-097----	Road - class 3 togther		Derryad	608159	766830	-	2.17	0.92	1.25	Probably gone
LF018-098----	Road - class 3 togther		Derryad	608249	766620	-	1.20	1.09	0.11	May survive
LF018-099----	Road - class 3 togther		Derryad	608219	766600	-	2.27	1.04	1.23	Probably gone
LF018-100----	Road - class 3 togther		Derryad	608249	766520	-	2.64	1.94	0.70	Probably gone
LF018-068----	Road - class 3 togther	LF-DT 1	Derryart	608949	767145	-	0.82	0.23	0.59	May survive
LF018-069----	Road - class 3 togther	LF-D 78	Derryoghil	608879	767050	-	1.29	0.70	0.59	May survive
LF018-087----	Road - class 3 togther	LF-D 77	Derryoghil	608179	767440	-	0.00	0.00	No Data	May survive

Table 5. Sightings of archaeological material in Derryadd East Bog. With depth of bog removed at each location since 2008.

Recommendations

There are 11 possible surviving sightings of archaeological material in Derryadd East Bog (see Table 6). All surviving sightings in the rehabilitation area listed in Table 6 should be avoided with a 20m buffer zone.



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.

SMR No.	SMR Class	IAWU Cat._No.	Townland	ITN E	ITN N	Depth BS m	Peat depth 2008	Peat depth 2020	Peat removed 2008-20	Condition
LF018-079001-	Road - class 3 togther	LF-CFY 3	Cloonfinny	608959	768579	-	2.00	1.66	0.34	May survive
LF018-079002-	Road - class 3 togther	LF-CFY 4	Cloonfinny	608979	768569	-	0.87	0.49	0.38	May survive
LF018-089----	Road - class 3 togther	LF-CFY 1	Cloonfinny	607949	767740	-	0.99	0.92	0.07	May survive
LF018-086----	Road - class 3 togther	LF-DD 4	Derryad	607919	767700	-	1.02	0.45	0.57	May survive
LF018-094----	Road - class 3 togther		Derryad	607939	767560	-	1.01	0.97	0.04	May survive
LF018-095----	Road - class 3 togther		Derryad	607859	767960	-	0.59	0.17	0.42	May survive
LF018-096----	Road - class 3 togther		Derryad	607909	767720	-	0.74	0.98	-0.23	May survive
LF018-098----	Road - class 3 togther		Derryad	608249	766620	-	1.20	1.09	0.11	May survive
LF018-068----	Road - class 3 togther	LF-DT 1	Derryart	608949	767145	-	0.82	0.23	0.59	May survive
LF018-069----	Road - class 3 togther	LF-D 78	Derryoghil	608879	767050	-	1.29	0.70	0.59	May survive
LF018-087----	Road - class 3 togther	LF-D 77	Derryoghil	608179	767440	-	0.00	0.00	No Data	May survive

Table 6. List of potentially surviving sightings of archaeological material in Derryadd East Bog.

Conclusion

This is a desk-based archaeological assessment that includes a collation of existing written and graphic information to identify the archaeological potential of the proposed rehabilitation area. There are potentially 11 surviving sightings of archaeological material in Derryadd East Bog (see Table 6). All surviving sightings in the rehabilitation area listed in Table 6 should be avoided with a 20m buffer zone. 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. 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.

Rafferty, B. 1996. Irish Archaeological Wetland Unit Transactions: Volume 3. Dept. of Archaeology, University College Dublin.

Dr. Charles Mount
31 January 2023

APPENDIX XIII. STOCKPILE DECOMMISSIONING PROCEDURE

Scope: All IPC licensed peatlands requiring decommissioning and rehabilitation as required by Condition 10.

Condition 10:

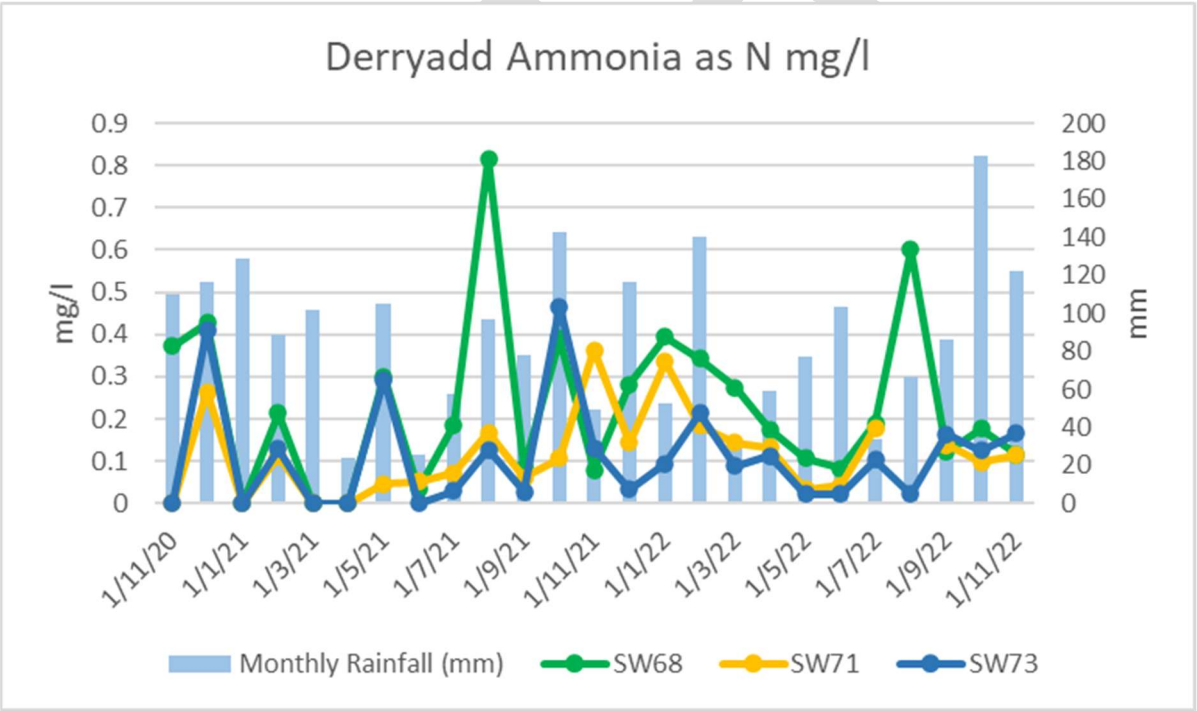
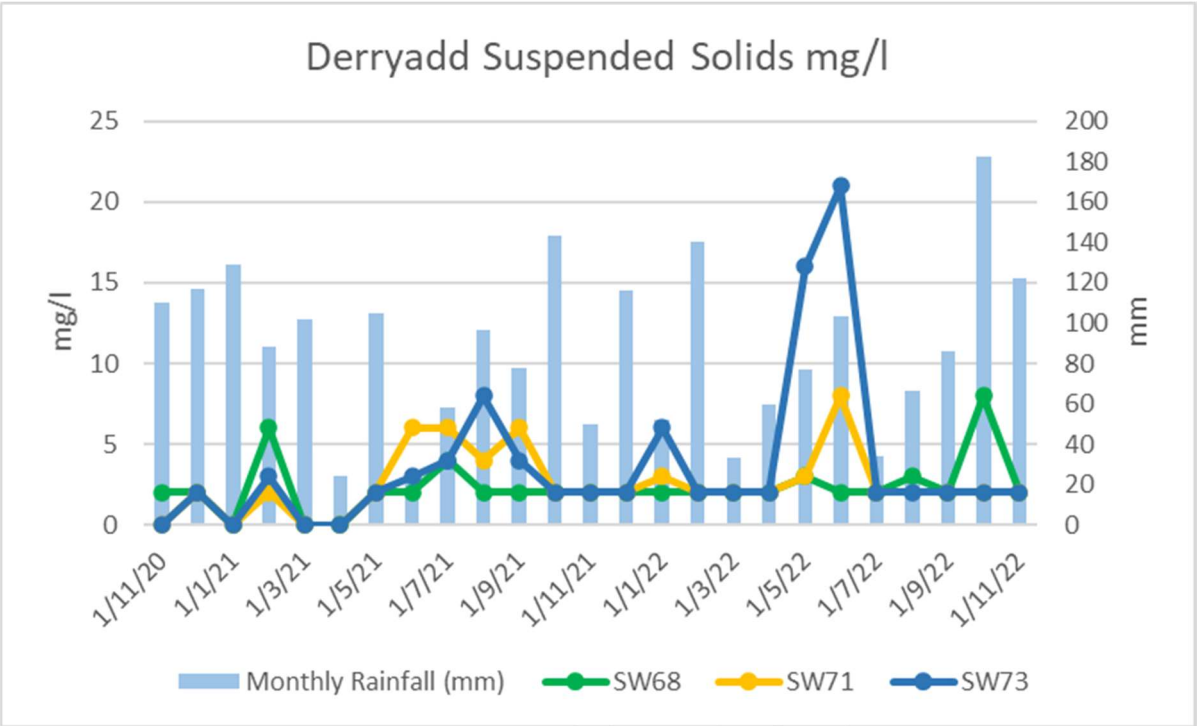
10.1 Following termination of use or involvement of all or part of the site in the licensed activity, the licensee shall:

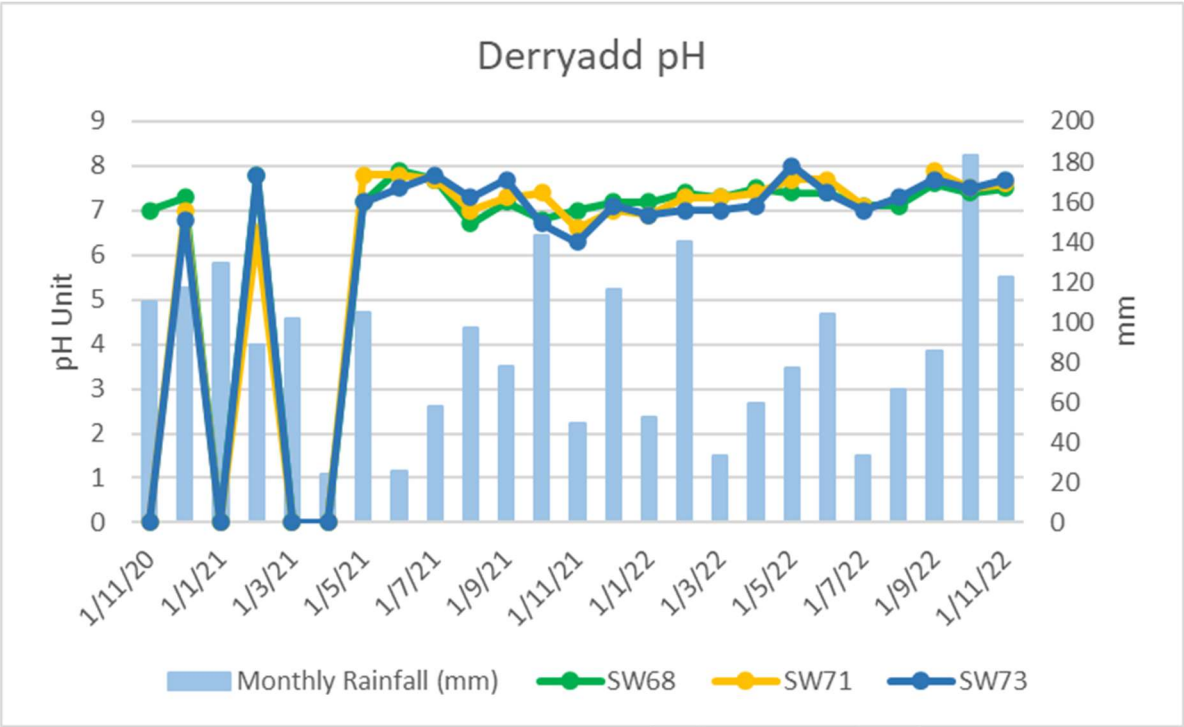
10.1.1 Decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials or substances or other matter contained therein or thereon, that may result in environmental pollution.

Procedure:

1. Ensure the silt pond servicing this pile field catchment has been cleaned within the last month, if not arrange for it to be cleaned prior to any pile decommissioning.
2. Block both pile field drains at the manholes and every 100 metres by dozing a peat blockage perpendicular to the drain, filling and compacting the blockage with the dozer until it is 300mm above the adjoining field.
3. Doze out any loose peat into the blocked drains either side ensuring an even spread.
4. Track back over each drain with the dozer to ensure good compaction.
5. Only doze out the stockpile in suitable weather and not when heavy rainfall is predicted.

APPENDIX XIV. WATER QUALITY MONITORING RESULTS FOR DERRYADD EAST BOG





PCAS SW Sampling Scheme				Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids	Supended Solids
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/1/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	2	2	NF	6	NF	NF	2	6	4	2	6	2	2	2	2	2	2	2	2	3	8	2	2	2	2
Mountdillon	P0504-01	Derryadd	SW71	NF	2	NF	2	NF	NF	2	6	4	2	6	2	2	2	2	2	2	2	2	3	8	2	2	2	2
Mountdillon	P0504-01	Derryadd	SW73	NF	2	NF	3	NF	NF	2	3	4	8	4	2	2	2	2	2	2	2	2	16	21	2	2	2	2
			Monthly Rainfall (mm)	110.2	116.8	129	88.3	102	24.2	105.1	25.7	57.8	96.9	78	143	49.6	116.4	52.4	140	33.5	59.4	76.9	103.7	33.7	66.3	85.9	182.8	122.1
PCAS SW Sampling Scheme				Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l Pt Co 1/11/20	mg/l Pt Co 1/12/20	mg/l Pt Co 1/1/21	mg/l Pt Co 1/2/21	mg/l Pt Co 1/3/21	mg/l Pt Co 1/4/21	mg/l Pt Co 1/5/21	mg/l Pt Co 1/6/21	mg/l Pt Co 1/7/21	mg/l Pt Co 1/8/21	mg/l Pt Co 1/9/21	mg/l Pt Co 1/10/21	mg/l Pt Co 1/11/21	mg/l Pt Co 1/12/21	mg/l Pt Co 1/1/22	mg/l Pt Co 1/2/22	mg/l Pt Co 1/3/22	mg/l Pt Co 1/4/22	mg/l Pt Co 1/5/22	mg/l Pt Co 1/6/22	mg/l Pt Co 1/7/22	mg/l Pt Co 1/8/22	mg/l Pt Co 1/9/22	mg/l Pt Co 1/10/22	mg/l Pt Co 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	346	312	NF	169	214	NF	334	269	335	294	300	379	285	294	83.6	287	249	271	268	376	388	159	190	237	
Mountdillon	P0504-01	Derryadd	SW71	NF	284	NF	472	NF	NF	249	202	265	380	356	252	456	317	318	280	315	263	299	222	405	NF	129	158	
Mountdillon	P0504-01	Derryadd	SW73	NF	334	NF	135	NF	NF	369	332	188	232	261	372	554	332	309	322	302	281	270	300	269	213	140	243	
PCAS SW Sampling Scheme				COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO	COO
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/1/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	85	81	NF	42	NF	NF	87	83	86	97	94	95	105	74	92	75	88	82	47	81	106	104	43	54	
Mountdillon	P0504-01	Derryadd	SW71	NF	83	NF	103	NF	NF	65	58	96	98	92	76	113	85	96	87	95	81	54	77	105	NF	43	54	
Mountdillon	P0504-01	Derryadd	SW73	NF	83	NF	35	NF	NF	92	92	68	87	79	99	129	103	109	95	94	76	44	93	84	80	38	65	
PCAS SW Sampling Scheme				pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH
Bog Group	Licence No	Bog Name	SW Code -GIS	1/11/20	1/12/20	1/1/21	1/2/21	1/3/21	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/21	1/12/21	1/1/22	1/2/22	1/3/22	1/4/22	1/5/22	1/6/22	1/7/22	1/8/22	1/9/22	1/10/22	1/11/22
Mountdillon	P0504-01	Derryadd	SW68	7	7.3	NF	7.8	NF	NF	7.2	7.9	7.7	6.7	7.2	6.8	7	7.2	7.2	7.4	7.3	7.5	7.4	7.4	7.1	7.1	7.6	7.4	7.5
Mountdillon	P0504-01	Derryadd	SW71	NF	7	NF	6.5	NF	NF	7.8	7.8	7.7	7	7.3	7.4	6.6	7	6.9	7.3	7.3	7.4	7.7	7.7	7.1	7.9	7.5	7.6	
Mountdillon	P0504-01	Derryadd	SW73	NF	6.8	NF	7.8	NF	NF	7.2	7.5	7.8	7.3	7.7	6.7	6.3	7.1	6.9	7	7	7.1	8	7.4	7	7.3	7.7	7.5	7.7
			Monthly Rainfall (mm)	110.2	116.8	129	88.3	102	24.2	105.1	25.7	57.8	96.9	78	143	49.6	116.4	52.4	140	33.5	59.4	76.9	103.7	33.7	66.3	85.9	182.8	122.1
PCAS SW Sampling Scheme				TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/11/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	0.05	0.05	NF	0.05	NF	NF	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.1	0.05	0.05	0.05	0.07	0.05	0.06	0.05	
Mountdillon	P0504-01	Derryadd	SW71	NF	0.15	NF	0.05	NF	NF	0.05	0.06	0.05	0.07	0.06	0.05	0.05	0.05	0.05	0.07	0.05	0.05	0.05	0.05	0.06	NF	0.05	0.05	
Mountdillon	P0504-01	Derryadd	SW73	NF	0.05	NF	0.05	NF	NF	0.05	0.05	0.05	0.15	0.06	0.05	0.06	0.13	0.15	0.11	0.2	0.08	0.17	0.26	0.1	0.05	0.05	0.05	
PCAS SW Sampling Scheme				TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS	TS
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/11/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	231	229	NF	283	NF	NF	214	273	268	192	177	229	187	233	245	280	317	361	249	254	253	215	317	368	230
Mountdillon	P0504-01	Derryadd	SW71	NF	317	NF	194	NF	NF	260	280	279	240	246	231	207	224	244	295	295	282	2580	308	268	NF	327	265	
Mountdillon	P0504-01	Derryadd	SW73	NF	193	NF	264	NF	NF	220	263	255	287	256	170	209	328	288	265	292	274	314	352	301	304	380	353	
PCAS SW Sampling Scheme				Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/11/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	0.373	0.427	NF	0.214	NF	NF	0.301	0.034	0.187	0.817	0.085	0.391	0.0801	0.282	0.394	0.342	0.274	0.176	0.107	0.084	0.19	0.6	0.121	0.178	
Mountdillon	P0504-01	Derryadd	SW71	NF	0.264	NF	0.113	NF	NF	0.047	0.052	0.073	0.167	0.061	0.108	0.363	0.144	0.335	0.185	0.144	0.133	0.033	0.042	0.179	0.138	0.097	0.114	
Mountdillon	P0504-01	Derryadd	SW73	NF	0.411	NF	0.129	NF	NF	0.293	0	0.029	0.127	0.028	0.466	0.131	0.033	0.094	0.214	0.089	0.112	0.022	0.022	0.103	0.022	0.165	0.126	
			Monthly Rainfall (mm)	110.2	116.8	129	88.3	102	24.2	105.1	25.7	57.8	96.9	78	143	49.6	116.4	52.4	140	33.5	59.4	76.9	103.7	33.7	66.3	85.9	182.8	122.1
PCAS SW Sampling Scheme				DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l 1/11/20	mg/l 1/12/20	mg/l 1/1/21	mg/l 1/2/21	mg/l 1/3/21	mg/l 1/4/21	mg/l 1/5/21	mg/l 1/6/21	mg/l 1/7/21	mg/l 1/8/21	mg/l 1/9/21	mg/l 1/10/21	mg/l 1/11/21	mg/l 1/12/21	mg/l 1/1/22	mg/l 1/2/22	mg/l 1/3/22	mg/l 1/4/22	mg/l 1/5/22	mg/l 1/6/22	mg/l 1/7/22	mg/l 1/8/22	mg/l 1/9/22	mg/l 1/10/22	mg/l 1/11/22
Mountdillon	P0504-01	Derryadd	SW68	36.6	34.5	NF	18.2	NF	NF	34.1	29	26.6	40.3	30.7	36.5	44.2	34.9	36.4	32.8	37	37.2	33.8	31.5	43	40.4	21.2	18.8	
Mountdillon	P0504-01	Derryadd	SW71	NF	35.2	NF	42.2	NF	NF	22.7	19.7	29.9	47.9	34.6	26.6	45.9	41.1	38.3	35.4	38.1	36.6	34.7	22.1	44.1	NF	22.2	21.1	
Mountdillon	P0504-01	Derryadd	SW73	NF	32.6	NF	13.9	NF	NF	35.4		20.6	57.6	26.2	39.3	54.9	45.4	40.1	39.7	38	35.9	30.9	30.5	34.7	30.4	20.1	23.8	

Table AP14.1. Water quality data for 24 months from Nov 2020 to November 2022 at Deryadd East Bog.