



**Mountdillon Bog**

**Cutaway Bog Draft Decommissioning  
and Rehabilitation Plan  
2025**

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

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

*This licence condition requires Bord na Móna agree with the EPA the measures that will provide for rehabilitation, i.e., stabilisation of Mountdillon Bog upon cessation of peat production and complements 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 Mountdillon 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 Mountdillon 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 Mountdillon 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 Mountdillon Bog will be conducted in adherence to the relevant planning guidelines and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.*

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

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## NON-TECHNICAL SUMMARY

- Bord na Móna is planning to rehabilitate Mountdillon Bog, located in Co. Roscommon.
- Industrial peat harvesting has now finished at Mountdillon Bog.
- Mountdillon Bog was in industrial peat production from the early 1940's until 2020. The peat harvested on the site was used as fuel peat in Lough Ree Power in Lanesborough, Co. Longford.
- Mountdillon Bog has a pumped drainage regime with a series of pumps located across the bog.
- Bord na Móna are obliged to carry out peatland rehabilitation via an IPC Licence issued by the Environmental Protection Agency. In addition, the Government has agreed to support peatland rehabilitation via the establishment of the Peatlands 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. Mountdillon 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 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 Mountdillon 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.
- Measures proposed for Mountdillon Bog include drain blocking modifying outfalls and managing overflows, required to raise water levels to the surface of the peat. Some fertiliser will be spread on headlands and other dry areas to encourage vegetation growth.
- Bord na Móna plan to carry out this work in 2025.
- 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.
- A large portion of Mountdillon is already developing pioneer vegetation. It will take some time for vegetation and habitats to fully develop at the most recently peat harvested areas of Mountdillon, and a wetland/peatland ecosystem to be restored. However, it is expected that most of these areas 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.
- The majority of Mountdillon Bog is under consideration for a potential renewable energy project. The PCAS rehabilitation footprint is limited to three discrete areas in the north, south and eastern part of the bog and does not overlap the potential renewable energy development footprint. In advance of this review of renewable energy potential, it is planned to rehabilitate the area of Mountdillon Bog that is not constrained under PCAS in 2025. The remaining area of Mountdillon Bog will be rehabilitated in future as part of a proposed renewable energy development or when the renewable energy review process is complete. Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site.
- 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.

## 1. INTRODUCTION

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

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

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

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

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 announced the complete cessation of industrial peat production across its estate in 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

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

These measures are designed to encourage the development of peat-forming habitats, where possible. They are also designed to further slow the movement of water across the site (with the site acting similarly to a constructed wetland), slowing the release of water (improving local water attenuation) and water quality is also expected to improve as the site returns to a naturally functioning peatland ecosystem. 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.

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

## 1.1 Constraints and Limitations

This document covers the area of Mountdillon Bog shown in drawing number *BNM-DR-26-04-RP-01: Site Location*.

The majority of Mountdillon Bog is under consideration for a potential renewable energy project. The PCAS rehabilitation footprint is limited to three discrete areas in the north, south and eastern part of the bog and does not overlap the potential renewable energy development footprint.

In advance of this review of renewable energy potential, it is planned to rehabilitate the area of Mountdillon Bog that is not constrained under PCAS in 2025. The remaining area of Mountdillon Bog will be rehabilitated in future as part of a proposed renewable energy development or when the renewable energy review process is complete.

Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site.

Any other proposed development will be planned in adherence to relevant planning guidelines and will consider the rehabilitation and the condition of the site. It is expected that Bord na Móna will revise and update the rehabilitation plan for Mountdillon when this renewable energy review is complete. Bord na Móna remain fully committed to rehabilitating the whole bog and meeting the conditions of the IPC Licence. Any consideration of any other future after-uses for Mountdillon Bog, such as renewable energy, 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.

Parts of Mountdillon Bog (within the areas owned and under the control of Bord na Móna) are currently used by domestic turf cutters to harvest peat. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. Bord na Móna are aware of such issues which may constrain the proposed rehabilitation actions, and this rehabilitation plan considered potential impacts of turf cutting on the delivery of the stated objectives.

There are known rights of way around the margins of Mountdillon Bog, which do not overlap any areas where rehabilitation is proposed. Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remains intact where possible. In some instances, depending upon previous land uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies during the consultation work associated with the decommissioning and rehabilitation work described here.

There are some areas of agricultural grassland along the margins of Mountdillon Bog. These areas will not be subject to rehabilitation and have been identified as constrained land. Rehabilitation in other areas of the bog may also be constrained due to other property issues.

## 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, *'Guidance on the Process of Preparing and Implementing a Bog Rehabilitation Plan'* (EPA, 2020).

The ecological information and site information collected during the Bord na Móna ecological baseline survey, additional confirmatory site visits (covering the period 2011 to 2024 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). 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 Mountdillon Bog, in particular, optimising climate action benefits.

## 2.1 Desk Study

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

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- Barry, T.A. *et al.* (1973). A survey of cutover peats and underlying mineral soils. Soil Survey Bulletin No. 30. Dublin, Bord na Móna and An Foras Taluntais.
- Bonn *et al.* (2017). Peatland restoration and ecosystem services- science, policy and practice.
- Carroll *et al.* (2009). *Sphagnum* in the Peak District. Current Status and Potential for Restoration. Moors for the Future Report No 16.
- Clark & Rieley (2010). Strategy for responsible peatland management.
- Eades *et al.* (2003). The Wetland Restoration Manual.
- Farrell & Doyle (2003). Rehabilitation of Industrial Cutaway Atlantic Blanket Bog, NW Mayo, Ireland.
- Gann *et al.* (2019). International Principles and Standards for the practice of Ecological Restoration.
- Hinde *et al.* (2010). *Sphagnum* re-introduction project: A report on research into the re-introduction of *Sphagnum* mosses to degraded moorland. Moors for the Future Research Report 18.
- Joosten & Clarke (2002). Wise Use of mires and peatlands – Background and Principles including a framework for Decision-making.
- Lindsay (2010). Peatbogs and Carbon: a Critical Synthesis to Inform Policy Development in Oceanic Peat Bog Conservation and Restoration in the Context of Climate Change.
- Mackin *et al.* (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service,
- McBride *et al.* (2011). The Fen Management Handbook (2011), Scottish Natural Heritage.
- McDonagh (1996). Drain blocking by machines on Raised Bogs. Unpublished report for National Parks and Wildlife Service.
- NPWS (2017a). National Raised Bog Special Areas of Conservation management plan. Department of Arts, Heritage and the Gaeltacht.
- 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:

- Mountdillon Integrated Pollution Control Licence
- Mountdillon Annual Environmental Reports
- Review of the National Biodiversity Data Centre (NBDC) webmapper
- Inland Fisheries Ireland (IFI) Reports
- Environmental Protection Agency database ([www.epa.ie](http://www.epa.ie))
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity
- Birdwatch Ireland online data (including I-WeBS and CBS datasets; [www.birdwatchireland.ie](http://www.birdwatchireland.ie))
- Geological Survey of Ireland - National Draft Bedrock Aquifer map
- Geological Survey of Ireland - Groundwater Database ([www.gsi.ie](http://www.gsi.ie))
- Historic Environment Viewer at <https://webgis.archaeology.ie/historicenvironment/>
- National Parks & Wildlife Services Public Map Viewer ([www.npws.ie](http://www.npws.ie))
- Water Framework Directive catchments.ie/maps/ Map Viewer ([www.catchments.ie](http://www.catchments.ie))
- OPW Indicative Flood Maps ([www.floodmaps.ie](http://www.floodmaps.ie))
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps ([www.cfram.ie](http://www.cfram.ie))
- River Basin Management Plan for Ireland 2022-2027
- Bord na Móna Annual Report 2024
- 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, Mountdillon Bog was surveyed in April 2011, with wintering bird monitoring carried

out through 2012-14. Habitat maps were updated in 2017. A survey also took place in November 2024, 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 detailed ecological survey report for Mountdillon Bog is contained in Appendix III.

### 3. SITE DESCRIPTION

Mountdillon Bog is located approximately two kilometres north of Lanesborough in County Roscommon. It is part of the Mountdillon group (Lough Ree sub-group) of bogs.

Industrial peat extraction ceased across Mountdillon Bog on a phased basis. The majority of Mountdillon Bog is dominated by bare peat, with some developing pioneer vegetation, in areas more recently out of industrial peat production. Areas that been out of peat production for longer (20-40 years) have well developed wetland, scrub and woodland vegetation.

The surrounding landscape is dominated by a mosaic of farmland, largely consisting of improved grassland, and other bogs, many owned and managed by Bord na Móna such as Derrycashel Bog located immediately to the north, with a minor road separating the two bogs. Rail lines within Mountdillon Bog connect the bog with Derryarogue to the southeast, while a northern rail link connects the site with Derrycashel. Erenagh Bog is located to the west of Mountdillon bog, separated by the R371. Erenagh and Mountdillon Bogs are also connected by rail lines.

Mountdillon Bog is one of a cluster of bogs that has developed along the floodplains of the River Shannon and frequently floods in the winter. The River Shannon [Upper] (EPA Code: 26S02) flows in a southerly direction outside the eastern boundary of the bog. A narrow buffer zone of wet grassland separates the bog from the River Shannon. Two unnamed EPA watercourses (EPA River waterbody code: IE\_SH\_26S021600: 26\_1485 and IE\_SH\_26S021600: 26\_1499) flow in an easterly direction through Mountdillon Bog. Both of these watercourses are tributary streams of the River Shannon. Mountdillon Bog has a pumped drainage regime, with six active pumps across the bog.

Bord na Móna propose to rehabilitate Mountdillon Bog in 2026. See Drawing number *BNM-DR-26-04-RP-01: Site Location*, included in the accompanying Mapbook<sup>1</sup>, which illustrates the location of Mountdillon Bog in context to the surrounding area.

The PCAS rehabilitation footprint is limited to three discrete areas in the north, south and eastern part of the bog. The remainder of Mountdillon Bog is under consideration for a potential renewable energy project and has been mapped as a constraint.

#### 3.1 Status and Situation

##### 3.1.1 Site history

This bog was originally brought into production in the early 1940's and continued until 2020. The bog was used to produce sod peat originally and after a number of years production shifted to milled peat and was used as fuel peat in Lough Ree Power in Lanesborough, Co. Longford.

An area of 63 ha in the northern section of the bog was re-wetted in November 2016. The rehabilitation measures involved re-profiling, berms and drain blocking the main outfall locations in order to enhance the establishment of wetland vegetation. A proportion of the bog has revegetated with pioneer vegetation, maturing and developing a mosaic of typical cutaway habitats. Natural re-colonisation of the cutaway so far has been quite effective.

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<sup>1</sup> Cutaway Bog Decommissioning and Rehabilitation Plan – Mountdillon and Erenagh Bog Map Book

### 3.1.2 *Current land-use*

Industrial peat extraction completely ceased in 2020. The majority of the Mountdillon Bog former production area is bare peat, recolonising bare peat, and emergent scrub/woodland and open water in areas that came out of peat production earlier.

Mountdillon Bog still has some remaining peat stockpiles in the eastern part of the bog. The peat stock on the bog will be subject to decommissioning as part of the rehabilitation measures. This process is described fully in Appendix XIV. In summary, the remaining stockpiles will be reduced in height and reprofiled, with the material deposited into the adjoining pile field drains that will have been previously subject to drain blocking.

Sections of intact raised bog are present along the margins of the site, some of which are currently used by domestic turf cutters to harvest peat and been constrained from the rehabilitation plan due to landownership considerations that are being investigated.

A series of pumps and power lines are located across the bog. A network of railway lines occurs in Mountdillon. It is anticipated that the rail lines will be decommissioned post rehabilitation.

### 3.1.3 *Socio-Economic conditions*

Bord na Móna has historically been a vital employer for the rural communities in the Irish Midlands. 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 in these areas at the time.

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

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

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

Employment numbers have now declined following 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, with approximately 135 roles directly involved in PCAS.

## 3.2 Geology and Peat Depth

### 3.2.1 Sub-soil geology

The underlying geology<sup>2</sup> at Mountdillon Bog comprises Ballysteen Formation (Dark muddy limestone, shale), Agrillaceous Limestones (Visean) (Dark limestone & shale, chert) and Visean Limestones (undifferentiated).

Quaternary sediment mapping identifies the Mountdillon area as predominantly as cut peat, with areas of till derived from Devonian and Carboniferous sandstones in most of the surrounding areas. In addition, the area along the River Shannon is underlain by alluvium.

### 3.2.2 Peat type and depths

Peat depths have been mapped across the bog using GPR and are provided in figure *BNM-DR-26-04-RP-04: Peat depths*.

A significant portion of Mountdillon has relatively shallow peat remaining (0-1m), with several areas where subsoil is exposed. The northern lobe where rehabilitation is proposed generally has thin peat deposits (<1m); although there are localised areas of deeper peat (up to 2m). Peat is generally deep in the eastern section of Mountdillon (2-4m), although the low-lying basin to the west of this section is shallow. The southern section of Mountdillon is generally shallow (<1.5m), although there are some pockets that are deeper (up to 2m).

## 3.3 Key Biodiversity Features of Interest

### 3.3.1 Current Habitats

The most common vegetation communities/habitats<sup>3</sup> present in the former production areas at Mountdillon include:

- Bare peat (0-50% cover) (BP) (Plate 3-1)
- Pioneer *Juncus effusus* community (pJeff) also containing pioneer *Eriophorum angustifolium* (pEang) and pioneer *Carex rostrata* (pRos) (Plate 3-3)
- Birch scrub - emergent Birch (eBir), open Birch (oBir) and closed Birch (cBir)
- Pioneer Willow-dominated scrub (eWill)
- Birch woodland (BrWD)
- Exposed gravel
- Mosaics of wetlands with *Phragmites*-dominated community (Reedbed) (pPhrag), pioneer *Juncus effusus* (pJeff), *Typha*-dominated community (Reedbed) (pTyph) and *Eriophorum angustifolium* (pEang), open water (OW) and scrub of Birch and Willow (Plate 3-2)
- Purple Moorgrass-dominated vegetation (gMol)
- Heather dominated vegetation (dHeath)
- Pioneer dry calcareous grassland (gCal) (with emergent Birch scrub)

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<sup>2</sup> <https://www.gsi.ie/en-ie/data-and-maps/Pages/Bedrock.aspx>

<sup>3</sup> Codes refer BnM classification of pioneer habitats of production bog



- Riparian zones (Rip)
- Access zones (rail lines and access routes for machinery)
- Silt ponds (silt)

The most common habitats found around the margins include:

- Scrub (WS1)
- Birch woodland (WN7)
- Wet grassland (GS4)
- Remnant sections of raised bog along the edges of the site (PB1)
- Cutover bog (areas that have been used for sod peat for domestic use) (PB4)
- Treeline (WL2) (along roadway to the works area)
- Improved grassland (GA1) around the boundary extending into adjacent fields.

See Drawing number *BNM-DR-26-04-RP-17: Current Habitat Map*, included in the accompanying Mapbook, which illustrates the habitats at Mountdillon Bog. See also Table 3.1 for photographic plates of habitats (taken in 2024).



### Photos of Habitats at Mountdillon (2024)



Plate 3-1 Eastern section of the PCAS rehab footprint (view looking north), dominated by bare peat (0-50% cover) (BP).



Plate 3-2 Northern section of PCAS rehab footprint (view looking south). Mosaics of wetlands with *Phragmites*-dominated community (Reedbed) (pPhrag), pioneer *Juncus effusus* (pJeфф), *Typha*-dominated community (Reedbed) (pTyph) and *Eriophorum angustifolium* (pEang) and open water (OW).





Plate 3-3 Southern Section of PCAS footprint (view looking north), with bare peat, open water and pioneer vegetation beginning to develop along the drains.

Table 3-1: Photos of Habitats at Mountdillon Bog (November 2024).

### 3.3.2 Species of Conservation Interest

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

- Waders including the BOCCI red-listed<sup>4</sup> species Snipe (*Gallinago gallinago*), Lapwing (*Vanellus vanellus*), Golden Plover (*Pluvialis apricaria*), Curlew (*Numenius arquata*) and amber listed species Ringed Plover (*Charadrius hiaticula*) have been recorded on wetlands on the bog.
- Waterfowl including the amber listed species Whooper Swan (*Cygnus cygnus*), Greenland White-fronted Geese (*Anser albifrons flavirostris*), Teal (*Anas crecca*), Mallard (*Anas platyrhynchos*) and Wigeon (*Mareca penelope*) have also been recorded on the bog's wetlands.
- Other species of conservation interest previously recorded at Mountdillon Bog include the red listed species Meadow Pipit (*Anthus pratensis*), Kestrel (*Falco tinnunculus*), Woodcock (*Scolopax rusticola*) and amber listed species Kingfisher (*Alcedo atthis*), Hen Harrier (*Circus cyaneus*), Lesser Black-backed gull (*Larus fuscus*), Sand Martin (*Riparia riparia*) and Skylark (*Alauda arvensis*).
- Multiple mammal species have been recorded on or in close proximity to the bog including Badger (*Meles meles*), Red Fox (*Vulpes vulpes*), Irish Hare (*Lepus timidus* subsp. *hibernicus*) and Pine Marten (*Martes martes*).

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

- Butterflies recorded at Mountdillon include Orange Tip (*Anthocharis cardamines*), Green-veined White (*Pieris napi*) and Small Tortoiseshell (*Aglais urticae*). Marsh Fritillary (*Euphydryas aurinia*) was recorded in the northwestern margins of Mountdillon bog in 2020 (outside of the PCAS footprint). Marsh Fritillary is a species of significant conservation interest and is protected under Annex II of the European Union Habitats Directive.

Peatland rehabilitation may result in positive quality effects on the relative abundance or proportion of species of conservation concern utilising bogs post rehabilitation. This may include Red or Amber listed species of breeding waders along with wintering species including Swans and other wildfowl.<sup>5</sup>

### 3.3.3 Invasive Species

The invasive species American Mink (*Mustela vison*) has previously been recorded from Mountdillon Bog. There are no other BNM records for high impact invasive species recorded from the bog.

The invasive species Pitcherplant (*Sarracenia purpurea*) has been previously recorded in marginal remnant raised bog at Mountdillon (in the constrained area, outside of the PCAS rehabilitation footprint).

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

## 3.4 Statutory Nature Conservation Designations

There are a number of European Sites in close proximity (i.e. within a 5km radius at minimum) to Mountdillon Bog. The nearest EU Designated sites to Mountdillon Bog are as follows:

- Lough Ree SAC (site code 000440) - 2.4km south
- Lough Ree SPA (site code 004064) - 2.6km south
- Ballykenny-Fisherstown Bog SPA (site code: 004101) - 4.9km northeast
- Lough Forbes Complex SAC (site code 001818) - 4.9km northeast

A number of NHA's (Natural Heritage Areas) and pNHA's (Proposed Natural Heritage Areas) also occur within 5km of Mountdillon Bog including:

- Lough Ree pNHA (site code: 001642) - 2.6km south
- Lough Bannow pNHA (site code: 000449) - 3.3km southeast
- Royal Canal pNHA (site code: 002103) - 4.5km east
- Lough Forbes Complex pNHA (site code: 001818) - 4.9km northeast

### 3.4.1 Other Nature Conservation Designations

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

There are no Ramsar sites in close proximity to Mountdillon Bog.

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<sup>5</sup> [https://www.bnmecas.ie/wp-content/uploads/sites/18/2023/08/Annual-Monitoring-Report\\_Final-Rev-A\\_Redacted.pdf](https://www.bnmecas.ie/wp-content/uploads/sites/18/2023/08/Annual-Monitoring-Report_Final-Rev-A_Redacted.pdf)

### 3.5 Hydrology and Hydrogeology

Mountdillon Bog forms part of the Upper Shannon Catchment (Catchment ID: 26C) as defined by the EPA under the Water Framework Directive (WFD) and is primarily situated within the Shannon [Upper]\_SC\_070 sub-catchment, which flows to the River Shannon to the east via the Erenagh, Curraghroe and two unnamed streams.

Mountdillon Bog has a pumped drainage regime, with six active pumps across the bog, which allow water to move through and discharge from the bog.

Hydrological modelling (*BNM-DR-26-04-RP-09: Depression analysis*) indicates that parts of the bog are in natural basins with significant potential for re-wetting, with the assumption that all drains would be blocked. It is likely that a portion of the basins in target areas will re-wet with deeper water, creating a mosaic of wetland habitats, when drains are blocked.

Regional hydrological data suggest that Mountdillon receives average precipitation of 959mm/yr (1981-2010), with an estimated annual effective rainfall rate of 592mm/yr based on GSI data. The GSI also estimate an annual average recharge rate of 23-24mm/year for Mountdillon. In areas underlain by lacustrine clay, this is anticipated to be a reasonable estimate of recharge rate (although some groundwater contributions could be expected in some of the low-lying basins). However, in areas underlain by more permeable glacial material this is likely to be an underestimate, particularly where there are elevated mounds of glacial till combined with shallow peat deposits. A higher recharge rate is expected in areas where shallow peat underlain by glacial till, which would lead to increased losses of water to depth. In these areas an estimated recharge rate of 50-100mm/yr would be considered a reasonable estimate, with a higher recharge rate expected where peat is shallow (<1m).

GSI data indicates that Mountdillon Bog is underlain three different bedrock units, Ballysteen formation, Argillaceous limestones and Visean limestones. The Visean limestone layer beneath the southern and eastern regions of Mountdillon is classified as a regionally important aquifer (Rkc) as it is subject to karstification (conduit). The remainder of the bedrock units are classed as locally important aquifers (LI), as they are moderately productive only in local zones.

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

Regionally important aquifers are those in which the network of fractures, fissures and joints, through which groundwater flows, is well connected and widely dispersed, resulting in a relatively even distribution of highly permeable zones. There is good aquifer storage and groundwater flow paths can be up to several kilometres in length. There is likely to be substantial groundwater discharge to surface waters ('baseflow') and large (>2,000 m<sup>3</sup>/d), dependable springs may be associated with these aquifers.

The entirety of the bog is located in an area mapped by GSI as of low groundwater vulnerability (GSI Map Viewer). Groundwater vulnerability for the area surrounding Mountdillon Bog ranges from low to extreme vulnerability in places. 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 bog. Groundwater Vulnerability is typically used to indicate the susceptibility to groundwater pollution.

### 3.6 Emissions to surface-water and watercourses

Mountdillon Bog has six treated surface water outlets from a previously active peat extraction catchments, all of which discharge to the Curraghroe Stream (IE\_SH\_26C150180 Curraghroe Stream\_010) and the River Shannon Upper (IE\_SH\_26S021600 Shannon (Upper)\_100). Both the Curraghroe Stream and the River Shannon Upper are classed as having poor water quality status (Ecological Status or Potential SW 2016-2021) – Water Framework Directive.

The locations of silt ponds, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed on the attached water quality map (*BNM-DR-26-04-RP-13: General Drainage Map*).

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

Peat extraction is identified as a pressure in the third cycle of the river basin management plan (Water Action Plan for Ireland) in both receiving water bodies.

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 a number of 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 96% of the period, same level of compliance for COD and under the trigger level for Ammonia.

In Mountdillon, Ammonia averaged 0.45mg/l and ranged from 0.02 to 0.3mg/l with Suspended Solids ranging from 2 to 16 mg/l and averaging 5.06mg/l.

Bog	SW	Monitoring	pH	SS	TS	Ammonia	TP	COD	Colour
Mountdillon	SW-18	Q4 13	7.3	5	250	0.57	0.05	76	193
Mountdillon	SW-18A	Q4 13	7.3	5	309	0.56	0.05	50	133
Mountdillon	SW-19	Q4 13	7	5	162	3	0.05	62	142
Erenagh	SW-24	Q1 14	7.4	8	219	0.75	0.05	58	114
Mountdillon	SW-17	Q3 14	7.8	10	378	0.08	0.05	47	68
Mountdillon	SW-17A	Q3 14	8	5	398	0.1	0.05	30	66
Mountdillon	SW-18B	Q3 14	7.2	5	172	0.92	0.05	63	231
Erenagh	SW-25	Q3 14	7.5	5	258	0.09	0.06	50	148
Mountdillon	SW-39	Q1 15	7.6	5	336	1.3	0.05	29	73
Mountdillon	SW-18	Q4 17	7.7	6	287	0.19	0.05	92	191
Mountdillon	SW-18A	Q4 17	7.7	5	310	0.17	0.07	61	125
Mountdillon	SW-19	Q4 17	7.5	5	180	0.09	0.05	116	376
Erenagh	SW-24	Q4 17	7.4	5	184	0.06	0.05	96	212
Erenagh	SW-25	Q4 17	7.8	5	370	0.02	0.05	74	129
Mountdillon	SW-17	Q2 18	7.4	5	264	0.24	0.74	118	310
Mountdillon	SW-17A	Q2 18	7.7	5	262	0.19	0.07	117	314
Mountdillon	SW-18B	Q2 18	7.8	5	294	0.55	0.05	43	129
Mountdillon	SW-18	Q2 20	7.5	2	295	0.2	0.05	82	344
Mountdillon	SW-18A	Q2 20	7.8	2	339	0.116	0.05	52	161
Mountdillon	SW-19	Q2 20	7.9	2	402	0.025	0.05	43	124
Erenagh	SW-24	Q2 20	7.4	2	244	0.74	0.05	49	165
Erenagh	SW-25	Q2 20	7.5	2	266	0.562	0.05	38	126
Mountdillon	SW-17	Q4 20							
Mountdillon	SW-17A	Q4 20	5.6	2	30	0.407	0.05	53	227
Mountdillon	SW-18B	Q4 20	7.5	5	322	0.214	0.05	44	163
Mountdillon	SW-18	Q4 22	7.5	6	277	0.221	0.05	64	264
Mountdillon	SW-18A	Q4 22	7.5	4	319	0.183	0.05	69	296
Mountdillon	SW-19	Q4 22	6.8	2	269	0.056	0.15	73	319
Erenagh	SW-24	Q4 22	No Flow						
Erenagh	SW-25	Q4 22	7.2	4	215	0.055	0.07	56	223
Mountdillon	SW-17	Q2 23	7.4	2	288	0.028	0.05	109	218
Mountdillon	SW-17A	Q2 23	7.2	4	171	0.059	0.07	100	374
Mountdillon	SW-18B	Q2 23	6.8	16	178	0.216	0.05	104	482

Table 3.1 Decommissioning and Rehabilitation Programme Water Quality Monitoring. Note: the data presented in the above table also includes the water quality monitoring results for Erenagh Bog.

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

Water quality of water discharges from restored peatlands normally improves as a result of bog restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Bog restoration is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The draft National River Basin Management Plan (NRBMP) 2022-2027 (DHPCLG, 2022) 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 Mountdillon 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. While water quality improvements assist in meeting water frameworks directive ambitions and targets,



they can also improve drinking water sources in applicable catchments with drained peatlands and the potential for associated reduction in treatment requirements at drinking water treatment facilities.

### **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 monthly.

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

Initial monthly results are included in Appendix XIII. These results cover the period from April 2021 to December 2024 and are from some of the surface water outlets from the sections of bog to be rehabilitated in 2025 (note that the data presented in Appendix XIII includes the water quality monitoring results for Erenagh Bog and Mountdillon Bog combined).

Peat extraction ceased in this bog in 2020 and as expected some of the key water quality parameters that can impact water quality from peat extraction activities, remain on a relatively static trajectory, with suspended solids indicating a level trend from all outlets during the period, all well below any limits of concern. During this same period there was a slight downward trend in Ammonia for emission points, with all other parameters fluctuating slightly, most likely influenced by normal weather patterns, including rainfall.

Monthly Ammonia concentrations from emission points from April 2021 to December 2024, in Mountdillon averaged 0.170mg/l and ranged from 0.026 to 0.364mg/l. Results for Suspended Solids for the same period ranged from 2 to 11 mg/l and averaged 3.21mg/l.

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

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



These results will also be available in April each year as a requirement of the Annual Environmental Report at [www.epa.ie](http://www.epa.ie).

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

### 3.7 Fugitive Emissions to air

None.

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

### 3.8 Carbon emissions

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 CO<sub>2</sub>-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 CO<sub>2</sub>-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 CO<sub>2</sub>-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 CO<sub>2</sub> emissions from drained peatlands or increased methane (CH<sub>4</sub>) emissions from rewetted industrial peatlands. However, when radiative effects and atmospheric lifetimes of both GHG gases are considered and modelled, postponing rewetting increases the long-term warming effect of continued CO<sub>2</sub> emissions (Gunther *et al.* 2020). This means the increase in methane due to rewetting of dry peatlands is still negated by the CO<sub>2</sub> 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 Mountdillon 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 wetland habitats on shallow peat with open water, reed swamp and fen habitats with alkaline emission factors and a smaller proportion will develop as regenerating wet deep peat vegetation on deep peat areas. Birch woodland is expected to develop on the drier mounds and along peripheral headlands.

### 3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

The majority of this site can be rated as **Local Importance (Lower Value)** as it is dominated by postproduction bog and comprising bare peat. Some pioneer habitats such as scrub and poor fen have higher ecological ratings and are deemed to be of **Local Importance (Higher Value)**.

## 4. CONSULTATION

### 4.1 Consultation to date

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

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

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

To inform the current Plan, both national and local stakeholders, including neighbours whose land adjoins Mountdillon Bog and local representatives of national bodies (such as Regional National Parks and Wildlife Service staff) and relevant offices in County Councils (such as the Heritage or Environmental Offices) have been contacted. Any identified local interest groups has been 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 Mountdillon Bog or the programme in general (see Appendix XI).

All correspondence received has been acknowledged and reviewed and evaluated against the rehabilitation work proposed.

### 4.2 Issues raised by Consultees

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

#### 4.2.1 Consultation

During the initial commencement of PCAS, a number of consultees including: the Irish Farmers Association (IFA), the Irish Creamery Milk Suppliers Association (ICMSA) and Trinity College Dublin have raised concerns regarding

the duration and scope of consultation period. Stakeholders suggested that the consultation period should be extended to allow all potential stakeholders to make submissions where required.

#### *4.2.2 Assessments of rehabilitation*

Queries on pre-rehabilitation assessments were raised by NPWS and the National Museum of Ireland relating to the finalisation of several bog rehab plans in 2021 in relation to Appropriate Assessment, Environmental Impact Assessment and Strategic Environmental Assessment. Further queries regarding AIA were made during consultation with the National Monuments Service. Similar such queries were raised by Ciaran Mullooly MEP in 2025 relating to bogs within the Mountdillon area.

#### *4.2.3 Restoration scope*

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

#### *4.2.4 Monitoring*

Further details on monitoring of ecological metrics, and how and where reporting on this monitoring would take place, was raised by the IPCC, University College Dublin and Trinity College researchers in their respective submissions relating to the finalisation of several bog rehab plans in 2021. Uisce Éireann (formerly Irish Water) reiterated the requirement of a strong monitoring program with respect to water quality during and post rehabilitation.

#### *4.2.5 Flooding, drainage or other impacts on adjacent land.*

The Irish Farmers Association (IFA), The Department of Agriculture Food and the Marine, individual local residents and ICMSA queried likely impacts relating to the finalisation of several bog rehabilitation plans in 2021 and 2022. They raised concerns based on the proposed re-wetting in relation to flooding on adjoining lands and, specifically, with regards to the maintenance of drains. In previous submissions, the IFA also raised the issue of Health and Safety in relation to raising water levels as well as possible impacts on land and property prices. Ciaran Mullooly MEP and Michael Fitzmaurice TD raised concerns regarding maintenance of drains in 2025 relating to bogs within the Mountdillon area.

#### *4.2.6 Amenity*

Since the beginning of consultation by BnM relating to Peatlands Climate Action Scheme funded, several consultees including various politicians, have requested information regarding the development of amenities on BnM bogs. Further queries regarding the walkways and accessibility onto the bog post rehabilitation was made in a submission by a local homeowner.

#### *4.2.7 Water Quality*

A number of consultees have contacted BnM to express their concerns regarding the potential impact of PCAS related activities on water quality within waterbodies that are hydrologically connected to BnM bogs. Uisce

Éireann have expressed their support for PCAS in general but have also requested information regarding the potential hydrological repercussions of PCAS.

#### *4.2.8 Future management*

In submissions made on earlier PCAS plans the Irish Farmers Association (IFA) expressed concerns regarding the future ownership of the BnM bogs subject to rehabilitation. They expressed a desire for contingency planning for potential future ownership of designated bogs so as to ensure no negative impacts arise on adjacent properties from any new ownership.

#### *4.2.9 Other issues*

Other issues (raised by IPCC) during the finalisation of several bog rehab plans in 2021, 2022 and in 2023 included after use of the bog and turf cutting on the margins of the bog (outside of the area owned by BnM). The IPCC have also requested information regarding the resilience of rehabilitation measures to climate change induced climatic alterations.

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

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

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

#### *4.3.1 Consultation*

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

#### *4.3.2 Assessments of rehabilitation*

Appropriate Assessment screening will be undertaken on all the bogs as part of PCAS. This was undertaken by external consultants for Mountdillon Bog.

Implementation of rehabilitation measures including machine access across the bog will be carried out in conjunction with BnM Ecology Department. Seasonal and other restrictions will be put in place to mitigate against any impacts on biodiversity.

An Archaeological Impact Assessment (AIA) has been undertaken on Mountdillon Bog (Appendix XII). The aim for known archaeology on these bogs is to accomplish preservation in situ and we are taking steps to identify and avoid all known archaeology. BnM aim to achieve this through including all known archaeology in the planning process of rehabilitation works and implementing an exclusion or buffer zone around these features. These measures should sufficiently protect any archaeology in these areas, during any ground works in the final plan. It is anticipated that any archaeology will benefit from the ultimate remit of the rehabilitation, in that water tables

will be raised thereby preserving in-situ. There is also an identified procedure for managing reports of stray finds that may arise during rehabilitation works.

#### 4.3.3 Restoration scope

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

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

The local environmental conditions of Mountdillon Bog means that a combination of wetland measures and dry cutaway measures, combined with some and deep peat and additional works measures are the most suitable rehabilitation approach for this site to optimise benefits for desirable climate-based emissions reductions. Mountdillon Bog is predominantly a shallow, revegetating bog with some areas of bare peat. At present, there is developing pioneer cutaway habitats including wetlands and scrub within the main PCAS area of the bog, with areas dominated by bare peat. Some pioneering vegetation occurs on shallower peat within the south of the site. The majority of area proposed for rehabilitation is expected to develop as wetland and shallow peat habitats. A key expected habitat is a mosaic of wetland and damp/wet woodland habitats on shallow peat, with open heather dominated vegetation and some raised bog type vegetation on residual deeper residual peat. Peatland habitats within the site will improve in overall condition. Mountdillon Bog has a gravity-based drainage system.

#### 4.3.4 Monitoring

As part of the PCAS, a monitoring and verification plan has been developed to support climate action and biodiversity objectives. This will include stratified monitoring of bog condition, habitats and biodiversity at several different scales. It is proposed to monitor the improvement of some biodiversity ecosystem services. The appearance of key species such as *Sphagnum* moss will be monitored during walk-over surveys and general monitoring visits. It is not proposed to carry out any additional monitoring of biodiversity ecosystem services at this site. Biodiversity monitoring for PCAS planned for a stratified approach with different targeted monitoring at different sites based on the site characteristics.

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

An overview of the Water Quality Monitoring plan is provided to relevant stakeholders, including that water flow and dissolved organic carbon (DOC) is being monitored.

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

Rehabilitation of bogs in the same catchment is likely to result in beneficial impacts on water quality in the catchment. This will be captured by the results from EPA monitoring stations in the vicinity of the bogs.

#### *4.3.5 Flooding, drainage or other impacts on adjacent land.*

It is the intention of BnM that the re-wetting of the bogs will be carried out in such a manner that does not impact on third party lands. Where it is deemed that blocking of a shared drain would cause any adjoining lands to be adversely affected, this will be avoided, and alterations made to the rehabilitation plan. In general, drains around the margins of the bog will not be blocked.

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

The rehabilitation measures proposed at Mountdillon Bog will generally result in increased water attenuation across the site and reduce the speed of drainage from the existing peat fields through a mixture of techniques including drain blocking, cell bunding and re-profiling. This will arrest active drainage systems and enable the return of the peatland to its natural, water retention functionality. It is intended that these measures will not significantly alter the existing topographical catchments and that the spine of the drainage networks, those which the upstream catchments drain through, will be retained by BnM.

BnM community liaison officer has met with any concerned landowners adjoining Mountdillon Bog, Erenagh and other bogs, regarding the perceived potential of increased flood risk arising due to PCAS activities.

#### *4.3.6 Amenity*

Creating amenity developments such as walking tracks is not included within the scope of PCAS. However, PCAS rehabilitation will enable and support potential amenity future amenity developments, and this was reiterated to a local homeowner expressing concern about the future accessibility onto the bog following rewetting.

#### *4.3.7 Water Quality*

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

#### *4.3.8 Future management*

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

BnM considers issues regarding estate security, fire risk, invasive species and water pollution of utmost importance. BnM intends to maintain security and manage fire risk over the entirety of the estate. In this regard,

PCAS activities, should have no detrimental impact on these issues. Regarding water pollution, BnM is regulated by the EPA and as such adheres to the strict water pollution measures laid out by the same.

#### 4.3.9 *Other issues*

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

As part of the consultation process, The National Museum of Ireland (NMI) and the National Monuments Service (NMS) were included in the stakeholder consultation process. The Archaeological Impact Assessment (AIA) was in preparation at the time of the submission of the rehabilitation packages to NPWS, it was subsequently provided. The NMS acknowledged that AIA desk-based process and associated outputs designed to ensure any known archaeology was identified and protected during the implementation process, and the Project Archaeologist's recommendations regarding buffering and ongoing vigilance and reporting of any stray finds to NMS. NMS requested that the AIA be supplemented with walking field surveys and that monitoring of rehabilitation measures was undertaken when the work commences.

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

A number of local landowners expressed a variety of concerns, within submissions on Mountdillon Bog (see above and Appendix XI). These queries were addressed through contact with the BnM land liaison officer.

#### 4.3.10 *Concluding statement*

- No specific issues were raised during consultation that required significant changes to the substance of the rehabilitation plan.
- Marginal drains will not be blocked to avoid impacts on adjacent lands or lands under the ownership of third parties or turf-banks. This does not change the overall rehabilitation goals and outcomes and can be integrated with the other rehabilitation measures to allow cutaway re-wetting.
- Turbary rights, if present, will remain unaffected.
- BnM intend to continue management of this site into the future and issues such as security and trespass will be addressed on an ongoing basis in association with other stakeholders.
- BnM intends to maintain a "No Shooting" policy on Mountdillon Bog.



## 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 *Sphagnum*-rich regenerating wet deep peat vegetation communities on deep residual peat, where present.
- Supporting a potential future renewable energy project. Integrating rehabilitation measures with planned renewable energy, where needed.
- 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 Mountdillon Bog. This will happen over a longer timeframe than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (See Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- It is not expected that the cutover bog in the former production area 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). The majority of the cutaway area has shallow peat remaining in the southern and northern sections (<1 m), with deeper peat in the eastern section (2-4 m). Deep peat areas have potential to develop embryonic bog communities and possibly *Sphagnum*-rich habitats in this timeframe. Re-wetting across the entire bog, as part of the Scheme, will improve the habitat condition of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.
- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as 'At Risk' from peatlands and from peat extraction are likely to have several contributory sources of impacts

(private peat extraction and Bord na Móna). Reducing pressures due to former peat extraction activities at Mountdillon Bog will contribute to stabilising or improving water quality status of receiving water bodies in general. Ultimately, improving the WFD status of the receiving water body will depend on reducing pressure from a range of different sources, including peatlands in general (private and Bord na Móna).

- Proposed land uses, such as renewable energy infrastructure, and the need to constrain part of the site for this land-use. Part of Mountdillon Bog, in the northern extent, is under consideration for a potential renewable energy project. This area is currently constrained. The PCAS rehabilitation footprint does not overlap the potential renewable energy development footprint.
- 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 Mountdillon Bog within the PCAS rehabilitation footprint.
- EPA IPC Licence - Ref. P0504-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area.
- The Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This scheme is designed to enhance the ecosystem services of Mountdillon 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 majority of the cutaway area has shallow peat (<1m) remaining in the southern and northern sections, with deeper peat in the eastern section (2-4m). The local environmental conditions of Mountdillon Bog mean that a combination of dry cutaway measures and wetland creation are the most suitable rehabilitation approach for shallow peat areas. Deep peat measures will be applied to areas of deeper peat.
- Bord na Móna have defined the key goal and outcome of rehabilitation at Mountdillon as **environmental stabilisation** of the site via **optimising climate action benefits, where possible**. The re-wetting of residual peat in the cutaway will be optimised, **setting the site on a trajectory towards the development of wetlands/Reed Swamp and fen on shallow more alkaline peat and other subsoils, and the development of peat-forming communities on residual deep peat, where possible**.
- The BnM review of a potential renewable energy project at Mountdillon Bog is a temporal constraint on the scope of rehabilitation. It is expected that the decision to develop a renewable energy project at Mountdillon Bog will take place within 1-2 years.
- Rehabilitation of Mountdillon Bog will support multiple national strategies of climate action, biodiversity action and other key environmental strategies such as the Water Framework Directive.
- The time frame for the delivery of the planned rehabilitation will be undertaken according to available resources and appropriate constraints.

### 6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction, and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- The majority of Mountdillon is cutaway with has shallow peat (<1m) remaining in the southern and northern sections, with deeper peat in the eastern section (2-4m).
- Mountdillon also has a pump-based drainage regime, therefore wetland habitats (fen, wetland, reedswamp) are the most likely habitats to develop in areas of shallow peat in topographical depressions in response to re-wetting. Elevated, shallow peat areas are likely to develop dry cutaway habitats (birch

woodland, scrub and heath). Residual deeper peat in the eastern part of the site is likely to develop more typical bog vegetation communities in time.

- **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. The rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future. Any newly discovered archaeology may require rehabilitation measures to be reviewed and adapted. An Archaeological Impact Assessment (Appendix XII) will be carried out to mitigate against any impact on archaeology that may be found at Mountdillon Bog. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it will be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.
- **Public Rights of Way.** There are known rights of way around the margins of Mountdillon Bog, which do not overlap any areas where rehabilitation is proposed. Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that these 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.
- **Turf-cutting.** There are areas of active turf cutting around the margins of Mountdillon Bog which have been mapped as a constraint. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned.
- **Future Development.** The majority of Mountdillon Bog is under consideration for a potential renewable energy project. The PCAS rehabilitation footprint is limited to three discrete areas in the north, south and eastern part of the bog and does not overlap the potential renewable energy development footprint. In advance of this review of renewable energy potential, it is planned to rehabilitate the area of Mountdillon Bog that is not constrained under PCAS in 2025.
- Bord na Móna remain committed to rehabilitating **all** of Mountdillon Bog and to meeting IPC Licence conditions for this bog. The peatland rehabilitation of the remaining area will **either** be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, **or** will be completed in the future in the absence of any proposed renewable energy project. Phasing rehabilitation in way has the potential to support additional climate action measures (integrating renewable energy).

## 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:

- Areas subject to turf cutting.
- The longer-term development of stable naturally functioning habitats at Mountdillon 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 Mountdillon 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.

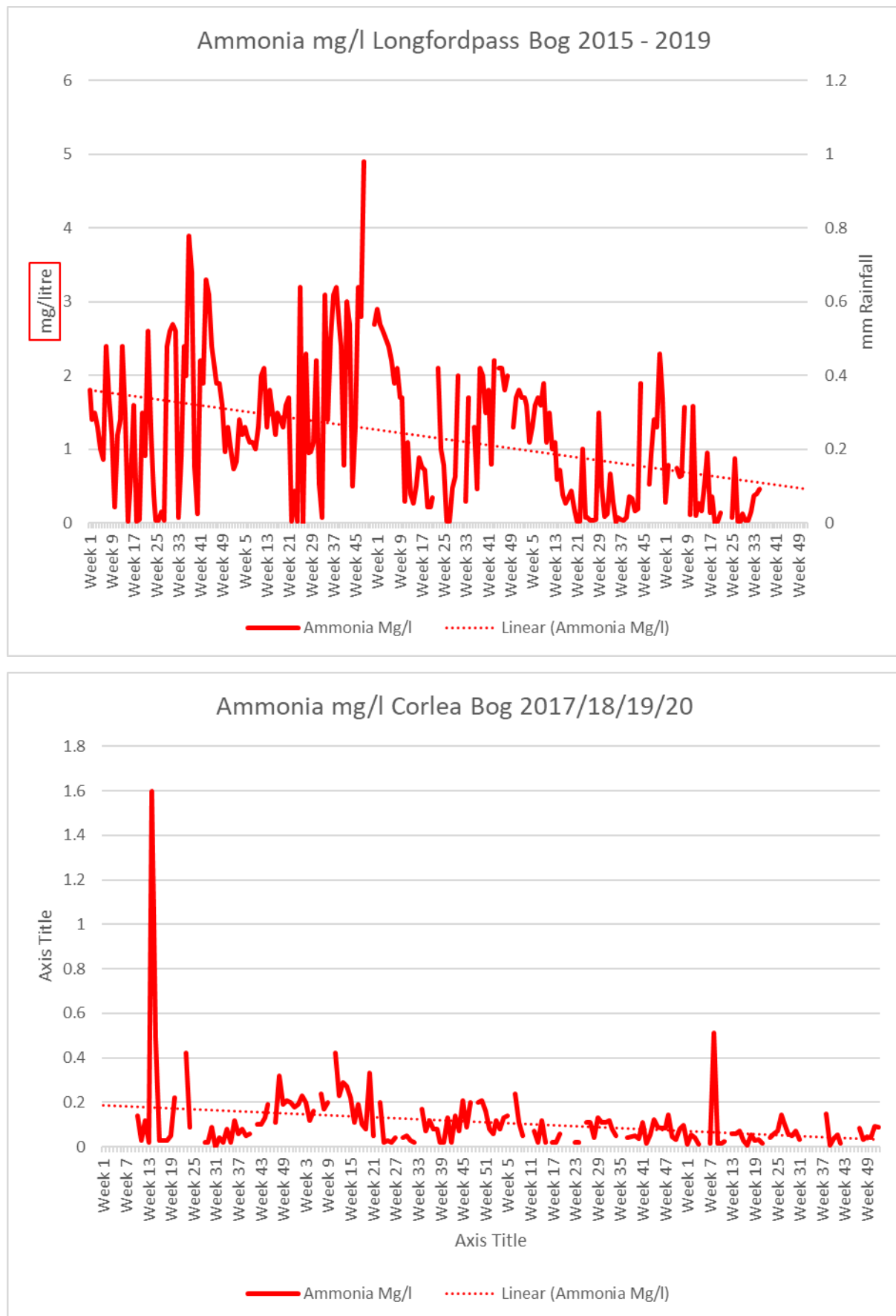
### 7.1 Criteria for successful rehabilitation to meet EPA IPC licence conditions:

- 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 years, post cessation of peat extraction with ongoing rehabilitation, were considered. These are indicating a downward trend in Ammonia concentrations (Figure 7.1).

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

As the monthly monitoring program at Mountdillon Bog continues during the rehabilitation measures planned for 2025, and data from the 2024/2025 monitoring program is compiled, further analysis will be completed to identify any ongoing trends.



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

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

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising and maximising residual peat re-wetting). This will be measured by an aerial survey after rehabilitation has been completed.
- Accelerating the trajectory of the bog towards becoming a reduced carbon source/carbon sink. This will be measured through habitat mapping and the development of cutaway bog condition assessment. This cutaway bog condition assessment will include assessment of environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels (similar to ecotope mapping). Baseline monitoring will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Reduction in carbon emissions. This will be estimated via a combination of habitat condition assessment and application of appropriate carbon emission factors derived from other sites. Baseline monitoring (habitat condition) will be carried after rehabilitation is completed (during the scheme). It is proposed that sites can be monitored against this baseline in the future.
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including *Sphagnum*-rich regenerating wet deep peat vegetation communities, wetland, fen, reed swamp, heath, scrub, poor fen, and birch woodland, where conditions are suitable. Some of these habitats have already in part established as pioneer vegetation/wetlands. It will take some time for stable naturally functioning habitats to fully develop at Mountdillon 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.	2025-2027
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	2025-2027
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-monitored in the future and compared against this baseline.	2025-2027

Criteria type	Criteria	Target	Measured by	Expected Timeframe
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a bog condition assessment and appropriate carbon emission factors.	2025-2027
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.	2025-2027

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. Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence. It is expected that additional costs of enhanced rehabilitation will be supported by Government through the Climate Action Fund and Ireland's National Recovery and Resilience Plan.
- **Bord na Móna to have sufficient resources (staff and training) to deliver the planned rehabilitation with required associated skills and competencies.**
- **Bord na Móna to have sufficient resources (suitable machinery) and staff to maintain this machinery.**
- **Weather conditions to be within normal limits over the rehabilitation plan timeframe.** Long periods of wet weather have the capacity to significantly affect ground conditions and constrain the delivery of rehabilitation. The potential impact of wet weather on ground conditions can be reduced by appropriate planning and management. Bord na Móna have significant experience of managing these issues through 70 years of working in these peatland environments.
- **Rehabilitation measures to be effective.** The rehabilitation measures proposed in this plan are based on 40 years of Bord na Móna experience of peatland management and best practice applied internationally

in peatland management. Measures proposed in this plan have already been shown to be effective at other sites. Bord na Móna will apply a flexible and adaptable approach to the more innovative rehabilitation measures proposed in this plan. If measures are not initially effective, Bord na Móna will review any requirement for additional practical rehabilitation.

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

## 8. REHABILITATION ACTIONS AND TIME FRAME

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

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

*BNM-DR-26-04-RP-22: Aerial Imagery 2020*

*BNM-DR-26-04-RP-04: Peat Depths*

*BNM-DR-26-04-RP-03: LiDAR Map*

*BNM-DR-26-04-RP-09: 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-26-04-RP-05: 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 Mountdillon will include (see Table 8.1):

- Deep Peat measures including field re-profiling, on deeper peat; intensive drain blocking (max 7/100 m) and 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, along with organic fertiliser application.
- 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.
- Intensive drain blocking around the existing wetlands or standing water to create/promote the spread of wetland habitats.
- Re-assessment of the pumping regime. There are currently six functional pumps located on Mountdillon, the two most northerly pumps will be decommissioned as part of the rehabilitation plan, while the other pumps are to be retained at present, subject to finalisation of a proposed renewables project within the footprint of Mountdillon/Erenagh.
- Initial hydrological modelling indicates that a part of the bog will remain as wetland and 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 nearby River Shannon.

- Additional work will include targeted drain blocking in areas where mature scrub/vegetation has developed.

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

Type*	Rehab Code	Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat	DPT2	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows.	10.7
	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows.	8.4
Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes.	16.6
	DCT2	Regular drain blocking (3/100m), modifying outfalls and managing water levels with overflow pipes and targeted fertiliser treatment.	9.1
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway, blocking outfalls and managing water levels with overflow pipes.	3.5
	WLT2	Turn off or reduce pumping to re-wet cutaway, blocking outfalls and managing water levels with overflow pipes, targeted blocking of outfalls within a site.	51.8
	WLT4	More intensive drain blocking (max 7/100 m), modifying outfalls and managing overflows, transplanting Reeds and other rhizomes.	34.4
Marginal land	MLT1	No work required.	11.4
Additional Work	AW2	Targeted Drain Blocking.	20.9
Constraint	Constraint	Other constraints (potential renewable energy development, rights of way, turf cutting, access tracks, extant high bog).	451.8
<b>Total</b>			<b>618.7</b>

*\*Note that the types of rehab and areas of rehab may change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.*

## 8.1 Completed and ongoing

- An area of 63 ha in the northern section of the bog was re-wetted in November 2016. The rehabilitation measures involved re-profiling, berms and drain blocking the main outfall locations in order to enhance the establishment of wetland vegetation. A proportion of the bog has revegetated with pioneer vegetation, maturing and developing a mosaic of typical cutaway habitats. Natural re-colonisation of this section of cutaway so far has been quite effective.
- Areas of the bog that came out of industrial peat production 20-40 years ago have more established habitats and are developing a mosaic of typical cutaway Birch woodland, peatland and wetland habitats.

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

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise from the EPA.
- Agree an *ex-ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with engineering drawings outlining how the various rehabilitation methodologies (The Scheme PCAS) will be applied to Mountdillon Bog. This will take account of peat depths, topography, drainage, and hydrological modelling (see map for an indicative view of the application of different rehabilitation methodologies).
- A drainage management assessment of the proposed enhanced rehabilitation measures will be carried out and any issues identified resolved and the rehabilitation plan adapted.
- A review of known archaeology and an archaeological impact assessment (AIA) 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 known rights of way, turbary and existing land agreements is to be carried out.
- A review of remaining milled peat stocks is to be carried out.
- 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 implementation of the rehabilitation plan.

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

- Carry out proposed measures as per the detailed site plan. This will include a combination of bunding and drain blocking on deep peat, and fertiliser application 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 has commenced since peat production ceased, 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.
- 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.

## 8.4 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 Licence is surrendered.

## 8.5 Timeframe

- **2025:** Short-term planning actions.
- **2025-2026:** Short-term practical actions.
- **2026-2027:** Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- **2028:** Decommission silt-ponds, if necessary.

## 8.6 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. This is updated every year - for more information see the Bord na Móna Annual Report (Bord na Móna, 2024). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

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



## 9. AFTERCARE AND MAINTENANCE

### 9.1 Programme for monitoring, aftercare and maintenance

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

- There will be **initial quarterly monitoring assessments** of the site to determine the general status of the site, the condition of the silt ponds, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbours land, general land security, boundary management, dumping and littering.
- The number of these site visits will reduce after 2 years to bi-annually and then after 5 years to annual visits.
- These monitoring visits will also consider any requirements for further practical rehabilitation measures.
- The **baseline condition of the site will be established** post-rehabilitation implementation by using an aerial survey to take an up-to-date aerial photo, when rehabilitation is completed. This will be used to verify completion of rehabilitation measures. The extent of bare peat will be assessed using this baseline data, and habitat maps will be updated, if needed. It is proposed that sites can be monitored against this baseline in the future.
- **Water quality monitoring** at the bog will be established. The main objective of this water quality monitoring will be to establish a baseline and then monitor the impact of peatland rehabilitation on water quality from the bog.
- In order to assist in monitoring surface water quality from this bog, it is planned to increase the existing licence monitoring requirements to sampling for the same parameters to every month during the scheduled activities and for a period up to two years post rehabilitation, depending on the period required to confirm that the main two parameters, suspended solids and ammonia are remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration.
- Enhanced water quality monitoring will aim to include up to 70% of a bog's drainage catchments.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at [www.epa.ie](http://www.epa.ie).
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, 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 Licence 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 Licence 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 have been achieved and key targets have been met.
- Water quality monitoring demonstrates that water quality of discharge is stabilising or improving.
- The site has been environmentally stabilised.

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## ADDENDUM 1- APPROPRIATE ASSESSMENT REPORT FINDINGS

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mountdillon bog group (Ref. P0502-01). 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. Mountdillon Bog is located approximately 2.4km north of Ballyleague town and 2.8km northwest of Lanesborough in County Roscommon.

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

An Appropriate Assessment Report<sup>6</sup> was commissioned by Bord na Móna to inform whether the proposed PCAS activities at Mountdillon Bog had the potential to result in Likely Significant Effects on European Sites.

The concluding statement of this report reads as follows:

*'It is concluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European Sites, that the proposed Decommissioning and Rehabilitation at Mountdillon Bog, individually or in combination with other plans and projects, will not have a significant effect on any European Site.'*

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

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<sup>6</sup> MKO (2025). Mountdillon Bog Decommissioning and Rehabilitation Plan 2025, Article 6 (3) Appropriate Assessment Screening Report.



## 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 Mountdillon Bog.
- EPA IPC Licence - Ref. P0504-01. As part of Condition 10.2 of this licence, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Mountdillon Bog is part of the Mountdillon (Lough Ree) Bog Group.
- The current condition of Mountdillon Bog.
- 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 Mountdillon Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Future land-use: Bord na Móna are reviewing the potential to develop a potential renewable energy project at Mountdillon Bog. It is expected that this review will be completed in 1-2 years. In advance of this review of renewable energy potential, it is planned to rehabilitate part of Mountdillon Bog in 2025 that is not constrained. The remaining area will be rehabilitated after the renewable energy review is complete. The peatland rehabilitation will **either** be in association with a potential renewable energy project, with peatland rehabilitation integrated into the proposed project, **or** will be completed in the absence of any proposed renewable energy project.

### Rehabilitation goals and outcomes

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

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

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



**Criteria for successful rehabilitation:**

- Rewetting of residual peat and shallow cutaway in the former area of industrial peat production to offset potential 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.
- Reassess pumping regime.
- 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:**

- 2025. 1<sup>st</sup> phase of rehabilitation. Field drain blocking.
- 2026. 2<sup>nd</sup> phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1<sup>st</sup> phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.

- 2027-2028. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2027-2028. Decommission silt-ponds, if necessary.

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

Type	Code	Description	Area (Ha)
Dry cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	25.6
Deep peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	19.1
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	89.8
Marginal Land	MLT1	No work required	11.4
Additional Works	AW2	Targeted drain blocking	20.9
Other	Constraint	Rights of ways, turf cutting, amenity, potential renewable energy development footprint	451.8
<b>Total</b>			<b>618.7</b>

See Drawing number *BNM-DR-26-04-RP-20: Standard Rehab Measures* included in the accompanying Mapbook which illustrates the standard rehab measures to be applied.

### Monitoring, after-care and maintenance

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

**Validation and IPC Licence surrender**

Reporting to the EPA will continue until the IPC Licence 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 Mountdillon Bog Group IPC Licenced area is made up of two sub-groups (Lough Ree- the Mountdillon Energy Peat Group) and Mostrim) and the bog units within the group have been in industrial peat production for several decades. There are 28 defined bog units covering a total area of 11,322 ha. Of the 28 units, 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 former 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 Mountdillon Bog Group finally ceased in 2021. Peat stockpiles which were harvested within the Bog Group continued to be delivered to Lough Ree Power Station until its closure in 2020. The removal of harvested peat stocks from the Mountdillon Bog Group to supply other customers finally ceased in 2024. Intensive decommissioning and rehabilitation for the Mountdillon Bog Group started in 2020/2021.

One bog site, Cloonmore, was never used for industrial peat production. Several bogs in the Mostrim group were 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 has been 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 Mountdillon Bog Group encompasses all areas involved in industrial peat production including former 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 Mountdillon Bog Group IPC Licence Ref. PO-504-01 is outlined in Table Ap-2.

Industrial peat production history varies across the Mountdillon 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. Several sites such as Mountdillon and Derrycashel have been mostly cutaway to the fen peat layers or in some cases to expose the underlying gravel/sub-soil. Several bogs in the Mostrim group have only been partially developed or have had no industrial peat production, and have relatively deep peat depths.

*Table Ap-2: Mountdillon Bog Group names, area and indicative status (Mountdillon 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 remains 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.  A greenway through Begnagh has been proposed as part of an amenity project with	2020	Finalised 2022  Rehab started in 2022

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
			Fáilte Ireland and Longford County Council (Midlands Trail Network).		
Clooneeny	358	Cutover Bog  Industrial peat production commenced at Clooneeny Bog in 1985 and ceased in 2020. Deep peat remains 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
Moher	494	Cutover Bog  Industrial peat production commenced at Moher Bog in 1985 and ceased in 2020. Deep peat remains across the former production area. Moher is considered a deep peat cutover bog.	Moher 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 Moher Bog.  Some of the former production area on site is developing pioneer cutaway vegetation communities, the remainder of the site is bare peat.  A greenway through Moher has been proposed as part of an amenity project with Fáilte Ireland and Roscommon County Council (Midlands Trail Network).	2020	Finalised 2025  Rehab to start in 2025
Moher Rail Link	28	Moher 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 depths 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. This greenway has been constructed.	2018	Finalised in 2023  Rehab started 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 remaining. 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 1964 and ceased in 2019. Long-term peat extraction has reduced peat depths on this bog. Most of the former production area has shallow peat remaining. Some pockets of deep peat remain. Derryadd is considered a shallow peat cutover bog.	Much of the former production area at Derryadd has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities  Derryadd Bog will form part of the footprint of the proposed Derryadd Wind Farm Project (in pre-planning).	2019	Draft 2025

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
			An amenity walkway through part of Derryadd Bog is proposed for the Derryadd Wind Farm project		
Derryadd2	328	Cutover Bog Industrial peat production commenced at Derryadd 2 Bog in 1960 and ceased in 2020. Long-term peat extraction has reduced peat depths on this bog. Most of the former production area has shallow peat remaining. Some pockets of deep peat remain. Derryadd 2 is considered a shallow peat cutover bog.	Much of the former production area at Derryadd 2 has been out of peat production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities	2020	Finalised 2023  Rehab started 2023
Derryarogue	895	Cutover Bog Industrial peat production commenced at Derryarogue Bog in 1952 and ceased in 2019. Long-term peat extraction has reduced peat depth on this bog. Most of the former production area has shallow peat remaining. 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. Additional greenway through Derryarogue is in construction as part of an amenity project with Longford County Council. A further section of greenway has been proposed as part of an amenity project with Fáilte Ireland and Longford County Council (Midlands Trail Network).	2019	Derryarogue West Finalised in 2023  Rehab started in 2023  Derryarogue Draft 2024 (remainder of site)
Derrycashel	388	Cutover Bog Industrial peat production commenced at Derrycashel Bog in 1951 and ceased in 2018. Long-term peat extraction has reduced peat depth on this bog. Most of the former production area has shallow peat remaining. 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. 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.  A greenway through Derrycolumb has been constructed as part of an amenity project with Longford County Council.	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 depth on this 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	To be finalised 2024

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		Derrymoylin is considered a shallow peat cutover bog.	A greenway through Derrymoylin has been proposed as part of an amenity project with Fáilte Ireland and Roscommon County Council (Midlands Trail Network).		
Derryshannoge	452	Cutover Bog Industrial peat production commenced at Derryshannoge Bog in 1985 and ceased in 2020. Deep peat remains 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	Finalised 2023  Rehab started in 2024
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
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 2025  Rehab to start in 2025
Granaghan	212	Cutover Bog  Development for industrial peat production commenced at Granaghan Bog in 1980's. Long-term peat extraction has reduced peat depths on this bog but deep peat remains 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	Finalised 2023  Rehab to start in 2024
Killashee	110	Cutover Bog  Development for industrial peat production commenced at Killashee Bog in 1985. Killashee is considered a deep peat cutover bog.	Killashee Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power.  The majority of Killashee Bog former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2020	Finalised 2023  Rehab started in 2024
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.  A greenway through Knappogue has been constructed as part of an amenity project with Longford County Council.	2018	Finalised 2021  Rehab started in 2022

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
			An additional section has been proposed as part of an amenity project with Fáilte Ireland and Longford County Council (Midlands Trail Network).		
Lough Bannow	739	Cutaway Bog Peat Production at Lough Bannow bog commenced in 1964 and finished in 2019. 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 proposed Derryadd Wind Farm Project (in pre-planning).  An amenity walkway through part of Lough Bannow is proposed for the Derryadd Wind Farm project	2019	Draft 2025
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 2025  Rehab to start 2025
Mountdillon	592	Cutaway Bog Peat Production at Mountdillon bog commenced in the 1940's and finished in 2020. Peat depths on the former production largely shallow and the peat is considered cutaway. Some deep peat remains on the west of the site. Mountdillon is considered a shallow peat cutaway bog.	Mountdillon Bog formerly supplied a range of commercial functions including fuel peat for Lough Ree Power.  Much of the former production area at Mountdillon has been out of production for some time. These areas have already extensively colonised with pioneer cutaway, wetland and scrub vegetation communities.	2020	Draft 2025  Rehab to start 2025

See Drawing number *BNM-DR-26-04-RP-24: Bog Group*, included in the accompanying Mapbook which illustrates the location of Mountdillon Bog and the Mountdillon Bog Group in context to the surrounding area.



## APPENDIX III: ECOLOGICAL SURVEY REPORT

*Note this ecological survey report refers to the entirety of Mountdillon Bog including the area which is under consideration for a renewable energy project and mapped as a constraint in the PCAS rehabilitation mapping.*

<b>Ecological Survey Report</b>  <i>Note: This report outlines an ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.</i>			
<b>Bog Name:</b>	<u>Mountdillon</u>	<b>Area (ha):</b>	599ha
<b>Works Name:</b>	Mountdillon	<b>County:</b>	Roscommon
<b>Recorder(s):</b>	DF	<b>Survey Date(s):</b>	7 <sup>th</sup> and 8 <sup>th</sup> April 2011 Winter monitoring 2012, 2013 and 2014
<b>Habitats present (in order of dominance)</b>  The most common habitats present at this site include: <ul style="list-style-type: none"> <li>• Bare peat (BP)</li> <li>• Pioneer Soft Rush-dominated poor fen (pJeff) but also containing Bog Cotton (pEang). Small areas dominated by Bottle Sedge (pRos) were also observed.</li> <li>• Birch scrub (eBir, oBir and cBir)</li> <li>• Pioneer Willow-dominated scrub (eWill)</li> <li>• Birch woodland (BrWD)</li> <li>• Exposed gravel</li> <li>• Mosaics of Wetlands with pPhrag, pJeff, pTyp and pEang, Open water (OW)</li> <li>• Purple Moorgrass-dominated vegetation (gMol)</li> <li>• Dry heath (dHeath)</li> <li>• Pioneer dry calcareous grassland (gCal) (with emergent Birch scrub (eBir))</li> <li>• Riparian zones (Rip)</li> <li>• Access zones (rail lines and access routes for machinery)</li> <li>• Silt ponds (silt)</li> </ul> The most common habitats found around the margins of the site include: <ul style="list-style-type: none"> <li>• Scrub (WS1)</li> <li>• Birch woodland (WN7)</li> <li>• Wet grassland (GS4)</li> <li>• Remnant sections of raised bog along the edges of the site (PB1)</li> <li>• Cutover bog (areas that have been used for sod peat for domestic use) (PB4)</li> </ul>			

- Conifer plantation (WD4) (at works and along western boundary)
- Treeline (WL2) (along roadway to the works area)
- Mixed broadleaved/conifer woodland (WD2)
- Ornamental scrub (large area of Laurel beside the works) (WS3)
- Improved grassland (GA1)

#### Description of site

Mountdillon Bog is situated approximately two kilometres north of Ballyleague in Co Roscommon. The Mountdillon works area is located just south of the small village of Cloontuskert. The works area is located approximately 200m from the main road and has a tree lined avenue leading up to it. The R371 Ballyleague to Rooskey Road passes along the western edge of the site, while the River Shannon passes close to the eastern edge of the site. Several small secondary roads allow access to the north of the site. Derrycashel bog is located immediately to the north of the site, with a minor road separating the two sites.

The works area consists of active machinery sheds, some small sections that have been planted with conifers, and a machinery yard. A tree-lined avenue leads up to the works area. Trees in the avenue include Monterey Pine, Poplar and Lawson Cypress. A tea centre is located along the northern end of the site.

This bog was originally brought into production in the early 1940's and was used to produce sod peat originally. After a number of years production shifted to milled peat.

A series of pumps and power lines are located across the site. However large areas towards the centre of the site appear to flood significantly during the winter months. If these pumps are turned off, a significant part of the site will flood significantly on a permanent basis.

The site is bisected by the main railway that is orientated roughly north-south and is an important link between the production bogs to the north, over the River Shannon, with the rest of the Mountdillon bog group. There are additional railways towards the centre of the site that are orientated roughly east-west. The rail network crosses the Shannon to the east of the site via a BnM bridge. The railway lines are raised above the level of the surrounding bog. The production fields are also orientated roughly north-south in the main section of the site and are arranged into groups that are separated by high fields with travel paths that generally are positioned along large deep drains that also flow roughly north-south. These are further sub-divided into blocks by travel paths that are orientated perpendicular to these drains. Some 'blocks' are quite uniform in their development of cutaway habitats as their topography is also uniform and the whole block seems to have come out of production at the same time. Some of these blocks are developing Birch scrub or more mature Birch woodland on higher ground.

The topography of the bog is quite variable with some relatively high areas or large mounds, and frequent smaller mounds and ridges through the site that now have exposed gravel. There are also low hollows and depressions that tend to flood in the winter. Some of these depressions have been developed into basins by the positions of high fields, travel paths and the railways, and are prone to flooding

Overall, the majority of the bog, especially towards the centre, has re-vegetated. Travel paths are still active throughout the areas developing cutaway habitats and were mostly bare peat. A mixture of open and emerging Birch scrub, dry heath and pioneer poor fen vegetation formed the majority of the vegetation communities on the site. These are the main habitats seen on the largest mound towards the north-east of the site. Open Birch scrub is mainly found in mosaic with poor fen dominated by Soft Rush. This habitat type tends to dominate where there is no flooding. Some sections have a greater influence of calcareous grassland species such as Knapweed and Wild Strawberry where there is more gravel exposed. The best-developed scrub (developing to woodland) is found along the riparian zones on the banks of the old major drains.

The oldest established areas of scrub were located in the central section and mainly comprised of Birch and Willow although some Hawthorn, Elder, Hazel and Ash were also scattered amongst the scrub. Some of this vegetation was mapped as Birch

woodland (BrWD) as it was relatively well-developed. However, the scrub/woodland has not developed into the various typical layers of woodland and the ground cover is generally dominated by a thick tangle of Brambles intermingled with the Birch and Willow. Much of the more mature scrub is impenetrable. Some 'blocks' containing mature scrub have also been cleared in recent years by the scrub-miller for sod-peat/milled industrial peat production (similar to Derrycashel). These 'blocks' are located along the main railway.

Large parts of the central area are low-lying and floods during the winter when the pumps are unable to deal with the larger amounts of water on the site. At the time of the ecological survey there were still some areas of open water present along with flooded wet fen vegetation. Much of the flooded sections had mosaics of Soft Rush and bare peat with other less frequent species such as Jointed Rush, Creeping Bentgrass, Bottle Sedge and Bog Cotton. Bottle Sedge did not dominate significant areas. Some sections were mapped as Temporary open water that will probably dry out to expose bare peat with scattered poor fen vegetation. The north-west section has several areas that were flooded during the winter. Some of these areas were vegetated with open scrub and poor fen dominated by Soft Rush. Much of the Soft Rush was standing dead (probably due to prolonged flooding) and the scrub was dominated by Willow rather than Birch. Other sections were more open with much less scrub and only initial poor fen colonisation. The vegetation in this area has the appearance (like similar areas of Derrycashel) of being in recent transition, most likely due to more prolonged flooding during the last few years.

Dry heath/Ling Heather dominated vegetation also appears in places in mosaic with the Birch scrub. Much of this is dominated by scattered Ling Heather and also contains typical species such as Birch, Bramble, Broad Buckler Fern, Purple Moorgrass, *Campylopus introflexus*, *Hypnum spp.*, and *Polytrichum spp.* Much of this habitat is relatively dry and is found on mounds. However, there are several small areas where the drainage is impeded and there is greater cover of Bog Cotton. There is also some development of various *Sphagnum* spp. such as *Sphagnum palustre*, *S. subnitens*, *S. papillosum* and *S. capillifolium*. Other more typical raised bog species present in this community (see photos) included White Beak-sedge, *Aulacomnium palustre*, Bog Rosemary and Hair's-tail Bog Cotton. Some of this area may have been ditched but may not have been in full milled-industrial peat production and are probably associated with deeper peat or with thin acidic peat that was never in full production. Species such as *S. papillosum* and Bog Rosemary are rarely found on more typical cutaway. These small areas may be described as pioneer embryonic bog communities and may develop some peat forming systems in the future (however there is some potential that when the pumps are turned off on this site these areas may be under water permanently or flooded to some degree).

Several areas of cutaway have emerging gravel hills and mounds and are vegetated with drier, more calcareous vegetation such as Glaucous Sedge, Creeping Bent-grass, Wild Strawberry and Knapweed. These areas were dry and on the older areas of exposed gravel Birch scrub had begun to become established.

There is a large section of remnant raised bog (PB1) in the south-eastern corner of the site close to the bridge over the Shannon. This area of the site is relatively large section of remnant raised bog (11.91ha) and is all that remains of the bog that once covered the entire site. There may be some potential to carry out some restoration works on this section. There is no turf cutting in this area and the main damage to it is a result of drainage work along its western and northern boundaries. Some old drains (predating BnM) are still visible on the site but were mainly filling in with *Sphagnum* mosses. This area was drying out and there are no pools remaining on the site. Vegetation in this section included *Sphagnum capillifolium*, *S. magellanicum*, *S. austinii* (small amounts of the latter), Heather, Deer Grass, Bog Rosemary, Bog Asphodel and *Cladonia* spp.

A section of the site along the eastern edge runs down to the Shannon. This area consists of a silt pond, a small section of Birch woodland and an area of wet grassland. The woodland consisted of Birch mainly but there was also some Hawthorn present along with Wood Anemone and Bramble. The area of wet grassland was prone to seasonal flooding and had occasional trees present, the silt pond had recently been cleaned out and a Kingfisher was observed in this area.

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

None. The stretch of the River Shannon at this location is not designated as a Natura 2000 site.

Ballykenny-Fisherstown Bog SPA (site code: 004101) is located approximately 4.9km to the northeast of the site and has been designated due to the use of the site by Greenland white Fronted Geese (*Anser albifrons*). Lough Forbes Complex SAC (site code 001818) is also located approximately 4.9km to the northeast of the site. The site comprises a complex of raised bog, woodland and lacustrine habitats. Lough Ree SPA (site code 004064) is located approximately 2.6km to the south of the site and has been designated due to the use of the site by various wetland bird species such as Lapwing (*Vanellus vanellus*), Whooper Swan (*Cygnus cygnus*) and Common Tern (*Sterna hirundo*). Lough Ree SAC (site code 000440) is also located approximately 2.4km south of the site. This site comprises of raised bog, fen, woodland, grassland and lacustrine habitats.

A number of NHA's (Natural Heritage Areas) and pNHA's (Proposed Natural Heritage Areas) also occur within 5km of Mountdillon Bog including:

- Lough Ree pNHA (site code: 001642) lies 2.6km south.
- Lough Bannow pNHA (site code: 000449) lies 3.3km southeast.
- Royal Canal pNHA (site code: 002103) lies 4.5km east.
- Lough Forbes Complex pNHA (site code: 001818) 4.9km northeast.

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

Adjacent habitats include improved agricultural grassland (GA1), lowland depositing river (FW2), riparian woodland (WN5), Oak-Ash-Hazel woodland (WN2), wet grassland (GS4), raised bog (PB1), cutaway bog (PB4), mixed conifer /broadleaf woodland (WD2), Birch woodland (WN7) and scrub (WS1).

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

- The River Shannon flows along the eastern edge of the site. A narrow buffer zone of wet grassland separates the bog from the River Shannon.
- Two tributaries of the Shannon occur adjacent to the boundaries of the site located to the south and southeast respectively.

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

There is somewhat more detailed knowledge of peat types and sub-soils at Mountdillon due to older survey work carried out by Barry *et al.*, (1973) (see Feehan 2004 – A long-lived wilderness).

The exposed peat at this site is black fen peat, which is mostly reed fen peat, and minor cover of forest peat/woody fen peat (Barry *et al.*, 1973).

Gravel has also been exposed at several locations through the site where there are ridges and mounds. Sapropel, an organic-rich layer of mud that was deposited as a river sediment, underlies much of the basal peat in Mountdillon.

#### **Fauna biodiversity**

##### **Birds**

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

- Snipe (4)
- Ringed Plover (2 – possible breeders)
- Raven (possibly nesting on or close to the site)
- Lesser Black-backed gulls
- Kingfisher (also has been recorded using some of the drains on the site)

- Mallard (7) (breeds on site)
- Golden Plover (11) flying over site)
- Curlew (73)
- Blackcap
- Sand Marten (nesting along the western boundary)
- Heron
- Chiffchaff (using more mature Birch woodland)
- Other more common species recorded during the site visit include Chaffinch, Blue Tit, Swallow, Meadow Pipit, Mute Swan, Rook, Robin, Skylark, Magpie, Grey Crow, Wood Pigeon, Long Tailed Tit, Pheasant, Kestrel, House Martin, Reed Bunting, Willow Warbler, Blackcap (using more mature Birch woodland) and Redpoll.
- Winter bird surveys in February 2011 revealed 238 Whooper Swans, four White-fronted Geese and numerous wildfowl. Wildfowl such as Teal, Mallard and Wigeon are attracted to the wetlands in winter.
- Other species like Lapwing and Cuckoo are known to breed on the site. Woodcock have been recorded in winter. Hen Harrier and Buzzard have also been recorded from the site.

**Mammals**

Signs of several mammal species were noted on the site during the survey.

- Pine Marten
- Fox
- Badger
- Mink
- Hare
- Rabbit
- Although no signs of Otter were observed on the site during the ecological survey it would have to be assumed that they use some sections of the site that run along the Shannon.

**Other species**

- Common Frog
- Butterflies included Small White, Small Tortoiseshell and Orange Tip
- Stickle back in drains
- Bumble Bee

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

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

## APPENDIX V: BIOSECURITY

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 plague<sup>7</sup> will be adhered with throughout all rehabilitation measures and activities.

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<sup>7</sup> <https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/>

## APPENDIX VI: POLICY AND REGULATORY FRAMEWORK

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

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

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

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

### 1 EPA IPC Licence

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mountdillon bog group (Ref. P0-504-01). As part of Condition 10.2 of this licence, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Mountdillon group. This regulatory requirement is the main driver of the development of this rehabilitation plan.

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

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

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



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

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

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

### **3 National Climate Policy**

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

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

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

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

### **4 National Peatlands Strategy**

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

The strategy recognises that Ireland's peatlands will continue to contribute to a wide variety of human needs and to be put to many uses. It aims to ensure that Ireland's peatlands are sustainably managed so that their benefits

can be enjoyed responsibly. It aims to inform appropriate regulatory systems to facilitate good decision making in support of responsible use. It also aims to inform the provision of appropriate incentives, financial supports and disincentives where required. The strategy attempts to strike an appropriate balance between different needs, including local stakeholders like turf-cutters and semi-state bodies such as Bord na Móna.

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

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

- Bord na Móna will continue to assess and evaluate the potential of the company's land bank, using a land use review system. The assessment will help prepare a set of evidence-based management plans for the various areas of peatland. These plans will also inform its cutaway bog rehabilitation.
- The policy of Bord na Móna is not to open up any undrained new bogs for peat production.
- Lands identified by Bord na Móna as having high biodiversity value and/or priority habitats will be reserved for these purposes as the 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 National River Basin Management Plan 2022-2027 (Water Framework Directive)**

The River Basin Management Plan for Ireland 2022-2027 (Department of Housing, Local Government and Heritage, 2024) 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 2022-2027 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 (2022-2027) programme of measures. The NRBMP 2022-2027 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 2022-2027 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 2022-2027 deliver its objectives in relation to the Water Framework Directive and is one of the five key principal actions.

The NRBMP 2022-2027 (DHLGH 2024) 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 NRBMP 2022-2027 (DHLGH 2024) 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 NRBMP 2022-2027.

## **6 4<sup>th</sup> National Biodiversity Action Plan 2023-2030**

Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature. The 4th NBAP has been developed with the support, advice and input of the interdepartmental Biodiversity Working Group and the independent Biodiversity Forum. Ireland's 2nd National Biodiversity Conference was held to gather insights and recommendations for the development of the NBAP and a public consultation process was held to provide further opportunities to engage with the Plan.

The 4th NBAP strives for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to "act for nature".

The delivery of rehabilitation via PCAS is expected to significantly contribute in the future to actions and targets of the 4<sup>th</sup> National Biodiversity Action Plan 2023-2030, particularly in relation to peatland restoration, nature restoration and creation of new habitats such as wetlands and woodlands.

## **7 EU Nature Restoration Law**

The EU Nature Restoration Law is a key element of the EU Biodiversity Strategy, which sets binding targets to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural disasters. The regulation combines an overarching restoration objective for the long-term recovery of nature in the EU's land and sea areas with binding restoration targets for specific habitats and species. These measures should cover at least 20% of the EU's land and sea areas by 2030, and ultimately all ecosystems in need of restoration by 2050.

This regulation has now been adapted and it is expected that all Member States will be required to produce a National Restoration Plan within two years of adoption. This will be led by the National Parks and Wildlife Service and will comprise a broad and deep public participation process, informed by robust ecological and socio-economic impact assessments. Bord na Móna are working with NPWS to identify bog restoration and other re-wetted cutaway sites that can contribute towards Ireland's targets for the Nature Restoration Law.

## **8 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, pNHAs) 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.

## **9 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.

## **10 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.

## **11 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.

## **12 National Archaeology Code of Practice**

Bord na Móna operated under an agreed Code of Practice (COP) regarding archaeology with the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland which provided 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>)

Under the Code, Bord na Móna, the Minister and Director worked together to ensure that appropriate archaeological survey and mitigation was carried out in advance of peat extraction.

As peat extraction ceased in 2019, the remaining elements of the COP that are still applicable include:

- Bord na Mona 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.
- Bord na Mona 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.

Under the Peatlands Climate Action Scheme, an Archaeological Impact Assessments is prepared for each bog in advance, from a review of historical data and desk-based searches of:

- The IAWU Peatland Survey
- Bord na Móna Re-assessment survey 2009
- The Sites and Monuments Record that is maintained by the Dept of Housing, Local Government and Heritage
- The topographical files of the National Museum of Ireland.
- The Excavations database
- Previous assessments
- Field survey

The Draft AIA determines and advises on any known archaeology and its required protection and determines what is required to be undertaken if archaeology is found during the rehabilitation.

### 13 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.

### 14 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.

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. These initial targets have been achieved.

The company announced the cessation of industrial peat production in 2021 and that it would rehabilitate a target of 33,000 ha between 2021-2026. Rehabilitation measures will 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 Nature Restoration Law, the Climate Action Plan,

the Water Framework Directive, etc.) and rehabilitation guidelines set down by the Environmental Protection Agency. Bord na Móna has now transitioned to a Climate Solutions company with a key commercial and development focus being the delivery of renewable energy to support Ireland's Climate Action Plan. In general, Bord na Móna will seek to balance and optimise commercial, social, and environmental value of its bogs, and develop integrated land-uses, while taking account of the need for sustainability and their biodiversity value.

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.

## APPENDIX VII: DECOMMISSIONING

### 1. Condition 10 Decommissioning

Decommissioning 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	Mountdillon 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	Where relevant
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.

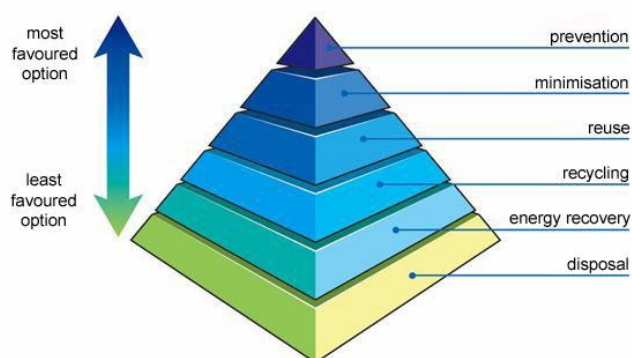
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

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 reused or recycled ahead of disposal.



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

## 2. Enhanced Decommissioning.

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

Item	Enhanced Decommissioning Type	Mountdillon 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 acrotelm – the living layer and much of the peat mass). However, they can be returned to a **trajectory** towards a naturally functioning peatland system (Renou-Wilson, 2012). **Raised bog restoration** is an objective of some BnM sites where there is residual natural raised bog vegetation and where the majority of the peat is still intact.

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

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

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

## **APPENDIX IX: EXTRACTIVE WASTE MANAGEMENT PLAN**

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

### **Objective:**

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

### **Scope:**

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

### **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 Mountdillon 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:**

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

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

## **2.2 Condition 7.6 Waste Facility**

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

## **2.3 Condition 7.7 Excavation Voids**

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

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

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

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

### **3.0 Minimisation.**

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

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

#### **3.2 Power Station Screenings.**

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

### **3.3 Bog Timbers.**

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

## **4.0 Treatment**

### **4.1 Silt pond excavation material and cleanings.**

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

### **4.2 Power Station Screenings.**

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

### **4.3 Bog Timbers**

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

## **5.0 Recovery**

### **5.1 Silt pond excavation material and cleanings.**

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

### **5.2 Power Station Screenings.**

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

### **5.3 Bog Timbers**

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

## **6.0 Disposal**

### **6.1 Silt pond excavation material and cleanings.**

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

### **6.2 Power Station Screenings.**

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

### **6.3 Bog Timbers**

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

## **7.0 Extractive Waste Management Plan**

### **5 (2a)(i)**

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

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

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

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

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

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

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

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

Peat mineral resources do not undergo any treatment.

### **5 (2b)**

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

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

These three extractive wastes, stored on the bog for reuse or recovery during the bog rehabilitation phase, do not require any management or monitoring during the operation of these bogs. Silt pond excavations and cleanings are stored adjacent to the silt pond and quickly revegetated and stabilise, the screenings are graded



back into the bog at the agreed locations upon disposal and the bog timbers do not prevent any water or airborne danger to the environment.

### 5 (3)

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

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

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

#### Classification in accordance Annex II.

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

#### Description of operations.

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

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

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

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

#### 10.2 Cutaway Bog Rehabilitation Plan:

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

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

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

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

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

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

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

#### **Review.**

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

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

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

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

## APPENDIX XI: CONSULTATION SUMMARIES

**Table APX -1 Consultees contacted (Note that consultation was undertaken simultaneously for both Mountdillon bog and Erenagh bog given their close proximity. For this reason, the consultation responses have been combined in the below Tables APX-1 and APX-2).**

Bog Name	Contact Organisation	Contact Name	Date of Issue	Format	Date Response Received	Response Format
Mountdillon/Erenagh	Department of Housing, Local Government and Heritage NPWS	General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Department of Agriculture, Food and the Marine	General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Department of Agriculture, Food and the Marine	General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Head of Ecological Advisory Unit - NPWS Department of Housing, Local Government and Heritage NPWS	General email contact	01/04/2025	Email		

Mountdillon/Erenagh	National Monuments Service	General email contact	01/04/2025	Email		
		General email contact				
Mountdillon/Erenagh	Department of Housing, Local Government and Heritage	General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Department of Housing, Local Government and Heritage	General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Dept of Agriculture Food & the Marine	General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Department of Climate, Energy and the Environment	General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh		General email contact	01/04/2025	Email		
Mountdillon/Erenagh	Dept of Rural and Community Development	Minister Dara Calleary	01/04/2025	Email		
Mountdillon/Erenagh	Department of the Housing Local Government and Heritage	(Minister of State at the Department of Housing, Local Government and Heritage) Minister James Browne	01/04/2025	Email		
Mountdillon/Erenagh	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Senator Pippa Hackett Minister of State for	01/04/2025	Email		

		Land Use and Biodiversity)				
Mountdillon/Erenagh	Minister of State with responsibility for Nature, Heritage and Biodiversity	Christopher O'Sullivan TD	01/04/2025	Email		
Mountdillon/Erenagh	An Taisce	General email	01/04/2025	Email		
Mountdillon/Erenagh	Environmental Protection Agency (EPA)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Inland Fisheries Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Local Authority Waters Programme (West and Border Region)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Local Authority Waters Programme	General email	01/04/2025	Email		
Mountdillon/Erenagh		General email	01/04/2025	Email		
Mountdillon/Erenagh	Local Authority Waters Programme (Midlands and Eastern Region)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Northern and Western Regional Assembly (NWRA)	General email	01/04/2025	Email		
Mountdillon/Erenagh	National Museum of Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Teagasc	General email	01/04/2025	Email		
Mountdillon/Erenagh	The Heritage Council	General email	01/04/2025	Email		
Mountdillon/Erenagh	Waterways Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	An Forum Uisce (The Water Forum)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Coillte	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Water- Water Supply Project Eastern and Midlands Region	General email	01/04/2025	Email		

Mountdillon/Erenagh	Uisce Éireann (formerly Irish Water)	General email	01/04/2025	Email	23/04/2025	Email
Mountdillon/Erenagh	Office of Public Works (OPW)	General email	01/04/2025	Email		
Mountdillon/Erenagh	CARO (Climate Action Regional Office) Eastern and Midlands	General email	01/04/2025	Email		
Mountdillon/Erenagh	Bat Conservation Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Birdwatch Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Butterfly Conservation Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Eastern and Midland Regional Assembly	General email	01/04/2025	Email		
Mountdillon/Erenagh	Friends of the Irish Environment	General email	01/04/2025	Email		
Mountdillon/Erenagh	ICMSA (Irish Creamery Milk Suppliers Association)	General email	01/04/2025	Email		
Mountdillon/Erenagh	ICSA (Irish Cattle and Sheep Farmers Association)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Environmental Network (Agriculture and Land Use Policy and Advocacy Officer)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Farmers Association	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Farmers Association (Senior Policy Exec)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Farmers Association (Galway/Leitrim/Longford/Roscommon/Sligo)	General email	01/04/2025	Email	22/04/2025	Email
Mountdillon/Erenagh		General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Peatlands Conservation Council (IPCC)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Raptor Study Group	General email	01/04/2025	Email		
Mountdillon/Erenagh	Irish Rural Link	General email	01/04/2025	Email		

Mountdillon/Erenagh	Irish Wildlife Trust	General email	01/04/2025	Email		
Mountdillon/Erenagh	Inland Waterways Association of Ireland (IWA)	General email	01/04/2025	Email		
Mountdillon/Erenagh	National Association of Regional Game Councils	General email	01/04/2025	Email		
Mountdillon/Erenagh	National Association of Regional Game Councils	Chairperson	01/04/2025	Email		
Mountdillon/Erenagh	NPWS Rangers North Midlands	General email	01/04/2025	Email		
Mountdillon/Erenagh	NUIG Galway	General email	01/04/2025	Email		
Mountdillon/Erenagh	PPN Roscommon Public Participation Network	General email	01/04/2025	Email		
Mountdillon/Erenagh	Outdoor Recreation NI	General email	01/04/2025	Email		
Mountdillon/Erenagh	Ranger Association Committee	General email	01/04/2025	Email		
Mountdillon/Erenagh	Mid-Shannon Wilderness Park Awareness Group	General email	01/04/2025	Email		
Mountdillon/Erenagh	Sustainable Water Action Network (SWAN)	General email	01/04/2025	Email		
Mountdillon/Erenagh	Trinity College Dublin	General email	01/04/2025	Email		
Mountdillon/Erenagh	Turf Cutters and Contractors Association	General email	01/04/2025	Email		
Mountdillon/Erenagh	UCD / Irish Rural Link	General email	01/04/2025	Email		
Mountdillon/Erenagh	University College Dublin	General email	01/04/2025	Email		
Mountdillon/Erenagh	Earthy Matters	General email	01/04/2025	Email		
Mountdillon/Erenagh	Waterways Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	Waterways Ireland Org	General email	01/04/2025	Email		
Mountdillon/Erenagh	Woodlands of Ireland	General email	01/04/2025	Email		
Mountdillon/Erenagh	University of Galway	General email	01/04/2025	Email		



Mountdillon/Erenagh	Roscommon Chief Executive	General email	01/04/2025	Email		
Mountdillon/Erenagh	Head Of Human Resources	General email	01/04/2025	Email		
Mountdillon/Erenagh	Director of Services - Environment, Assets and Climate	General email	01/04/2025	Email		
Mountdillon/Erenagh	Director of Services - Planning	General email	01/04/2025	Email		
Mountdillon/Erenagh	Director of Services	General email	01/04/2025	Email		
Mountdillon/Erenagh	Heritage Officer	General email	01/04/2025	Email		
Mountdillon/Erenagh	General Customer Service	General email	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Vice Chairperson	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Cllr Emer Kelly	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Cllr Domnick Connolly	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Cllr Laurence Fallon	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Cllr Tony Ward	01/04/2025	Email		
Mountdillon/Erenagh	Athlone Municipal District	Cllr Gareth Scahill	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Paschal Fitzmaurice	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Anthony Waldron	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Nigel Dineen	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Larry Brennan	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Marty McDermott	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	Cllr Valerie Byrne	01/04/2025	Email		

Mountdillon/Erenagh	Roscommon Municipal District	CLlr Sean Moylan	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District	CLlr Liam Callaghan	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District Boyle MD	CLlr Micheal Frain	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District Boyle MD	CLlr Tom Crosby	01/04/2025	Email		
Mountdillon/Erenagh	Roscommon Municipal District Boyle MD	CLlr Leah Cull	01/04/2025	Email		
Mountdillon/Erenagh	TDs Roscommon / Galway	Michael Fitzmaurice TD	01/04/2025	Email		
Mountdillon/Erenagh	TDs Roscommon / Galway	Claire Kerrane TD	01/04/2025	Email		
Mountdillon/Erenagh	TDs Roscommon / Galway	Martin Daly TD	01/04/2025	Email		
Mountdillon/Erenagh	Local landowner A		Letter drop	Email	16/04/2025	Email
Mountdillon/Erenagh	Local landowner B		Letter drop	Phone	08/04/2025	Phone
Mountdillon/Erenagh	Local landowner C		In person	In person	08/04/2025	In person
Mountdillon/Erenagh	Local landowner D		Phone	Phone	08/04/2025	Phone
Mountdillon/Erenagh	Ciaran Mullooly MEP		18/07/2025 22/06/2025 26/06/2025	Email	16/06/2025 23/07/2025	Email

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

Organisation	Summary of Response by Stakeholder	BnM Response
<p>Uisce Éireann (formerly Irish Water)</p>	<p>In their response, Uisce Éireann stated that they are ‘supportive of the key objective of achieving environmental stabilisation of the bog and stabilising/improving key emissions to water. Uisce Éireann understand that restored peatlands are generally beneficial for drinking water sources downstream by improving water quality and by creating water retention and slowing the flow from the site. We are therefore in support of the Cutaway Bog Decommissioning and Rehabilitation Plan and believe that it could help to achieve to improvements the quality of drinking water sources downstream in terms of suspended sediment, colour, ammonia and dissolved organic carbon.</p> <p><b>Mountdillon Bog</b> is located within the drinking water abstraction catchment for five public water supplies. The closest abstraction point is located approximately 31 km downstream of the site, where the Athlone Public Water Supply abstracts from the River Shannon.</p> <p><b>Erenagh Bog</b> is located within the drinking water abstraction catchment for five public water supplies. The closest abstraction point is located approximately 32 km downstream of the site, where the Athlone Public Water Supply abstracts from the River Shannon.</p> <p>Uisce Éireann provided suggestions and recommendations around water quality monitoring and the management of silt ponds during and post rehabilitation.</p>	<p>BnM acknowledged the response and responded to the queries raised. Consultation is ongoing.</p>
<p>Irish Farmers Association   Roscommon, Leitrim, Sligo</p>	<p>IFA agrees that there is a need to protect the environment and manage our national peatlands there is also a need to protect the local farmers, who may be affected negatively by the development of the Peatlands Climate Action Plan. Farmers, whose land neighbours the planned development of the Mountdillon and Erenagh Bogs have expressed</p>	<p>BnM acknowledged the response and responded to the queries raised. Consultation is ongoing.</p>

Organisation	Summary of Response by Stakeholder	BnM Response
	<p>concerns around the potential impact that this peatland rehabilitation may have on their farmland surrounding the designated areas.</p> <p>The IFA raised concerns relating to potential for flooding of adjacent farmland, health and safety considerations, potential negative effect on adjacent property value, contingency planning and considerations local domestic around turf cutting associated with the rehabilitation plan.</p>	
Local landowner A	Query from local landowner regarding overlap of the BnM boundary and their property. Additional query around a folio occurring within the BnM boundary.	BnM acknowledged the response. BnM investigated the ownership deeds of the relevant folios and responded to the submission. Consultation is ongoing.
Local landowner B	Query around potential flooding impacts on turf bank adjacent to the cutover bog. Other query around ownership of individual plots.	BnM acknowledged the response. BnM investigated the ownership deeds of the relevant folios. Consultation is ongoing.
Local landowner C	Query around boundary fencing.	BnM community liaison representative met with landowners to discuss. BnM do not provide fencing for adjacent private property.
Ciaran Mullooly MEP	<p>Following a meeting with local farmers and landowners in the Mountdillon, Erenagh and surrounding areas on the 22<sup>nd</sup> July 2025, a number of concerns were raised:</p> <ul style="list-style-type: none"> <li>• A need for more consultation regarding the proposed rehabilitation.</li> <li>• Environmental and Hydrological Impact Assessment for Mountdillon and surrounding bogs.</li> <li>• Mapping queries and potential discrepancies.</li> </ul>	<p>BnM responded with information regarding BnM's commitment to working with neighbouring landowners in relation to the delivery of the PCAS programme on the 16<sup>th</sup> June 2025 and 23<sup>rd</sup> July 2025.</p> <p>A stakeholder consultation process is carried out for all bogs prior to the</p>

Organisation	Summary of Response by Stakeholder	BnM Response
	<ul style="list-style-type: none"> <li>Request for an independent agronomist</li> </ul> <p>Health and Safety issues in relation to silt ponds.</p> <p>In correspondence on the 18<sup>th</sup> July 2025, Ciaran Mullooly MEP acknowledged a previous meeting between BnM and local landowners on site. Topics discussed included the maintenance of existing boundary drains.</p> <p>Local farmers had contacted Ciaran Mullooly MEP regarding BnMs notification to commence rehabilitation of Mountdillon and Erenagh bogs; however, local landowners request further consultation.</p> <p>Local landowners also request that boundary drains should be cleaned in advance of rehabilitation commencement.</p> <p>Request that BnM undertake further consultation in advance of rehabilitation commencement.</p> <p>In correspondence on the 26<sup>th</sup> July 2025, Ciaran Mullooly MEP raised queries relating to disputed boundaries, the siltation of local boundary drains and concerns relating to health and safety of silt ponds.</p>	<p>commencement of rehabilitation. BnM encourage any landowners who have not already contacted BnM to make contact with BnM's Land Use and Rehabilitation teams.</p> <p>All requests are dealt with on a case-by-case basis and in some cases, outstanding issues are resolved, in discussions with landowners during implementation, or on completion, of the rehabilitation measures prior to the removal of the machines from the bogs, rather than in advance of rehabilitation.</p> <p>BnM has a dedicated Boundary Management Team who work with neighbouring landowners on a continuous basis. If a neighbouring landowner has a query with regard to BnM's management of the boundary drains on completion of rehabilitation measures, please contact our Boundary Management Team at <a href="mailto:landuseinfo@bnm.ie">landuseinfo@bnm.ie</a> and each such query will be investigated and actioned appropriately. Any queries in advance of, or during implementation of the</p>

Organisation	Summary of Response by Stakeholder	BnM Response
		rehabilitation measures can also be directed to our dedicated email address <a href="mailto:pcasinfo@bnm.ie">pcasinfo@bnm.ie</a> .

## 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.





Bord na Móna		Land & Habitats– Bog Operations	
		Archaeological Findings	
Document Approved By:	Revision Date:	Doc No:	Revision No:
EMD	13/08/2024	ENV017	2
	Control Location		Page
	Environment Department		1 of 5

### 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.

### 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 manmade 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 Enda McDonagh

## 2) Records

Revision Index			
Revision	Date	Description of change	Approved
1	13/19/2020	First release	EMcD
2	13/08/2024	Second release	EMcD



# **Archaeological Impact Assessment of Proposed Bog Decommissioning and Rehabilitation at Erenagh and Mountdillon Bogs, Co. Roscommon**

**Draft**

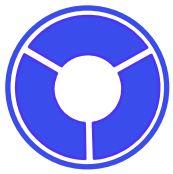
**Report For**

**Bord Na Móna Energy Ltd.**

**Author**

**Dr. Charles Mount**

**Bord Na Móna Project Archaeologist**



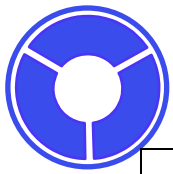
## Introduction

The EPA (2020) *Guidance on the process of preparing and implementing a bog rehabilitation plan* notes that the licensee should characterise the bog prior to embarking on detailed planning and implementation. This characterisation should detail how the land is classified in terms of statutory protections, e.g. as European sites, world heritage sites, RAMSAR sites, National Heritage Areas, national monuments, archaeological heritage, etc. This archaeological impact assessment report was prepared by Dr. Charles Mount for Bord na Móna Energy Ltd to fulfil this characterisation in relation to archaeological heritage. It represents the results of a desk-based assessment and field survey of the impact of proposed bog rehabilitation of c.712 hectares at Erenagh and Mountdillon Bogs, Co. Roscommon 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 Erenagh Bog will include (See Table 1a and Fig. 1):

- Deep Peat measures including field re-profiling, on deeper peat; intensive drain blocking (max 7/100 m) and 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, along with organic fertiliser application.
- 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.
- Intensive drain blocking around the existing wetlands or standing water to create/promote the spread of wetland habitats.
- Re-assessment of the pumping regime and removing the existing pump, if this desired and has no significant external impact. Initial hydrological modelling indicates that a part of the bog will remain as wetland and 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 nearby River Shannon.
- Additional work will include targeted drain blocking.

Type*	Rehab Code	Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat	DPT2	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows.	5.9
	DPT3	More intensive drain blocking (max 7/100 m), field reprofiling, blocking outfalls and managing overflows.	9.0



Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	5.1
	DCT2	Regular drain blocking (3/100m), modifying outfalls and managing water levels with overflow pipes and targeted fertiliser treatment.	10.6
Wetland	WLT2	Turn off or reduce pumping to re-wet cutaway, blocking outfalls and managing water levels with overflow pipes, targeted blocking of outfalls within a site.	2.3
	WLT4	More intensive drain blocking (max 7/100 m), modifying outfalls and managing overflows, transplanting Reeds and other rhizomes.	3.5
Marginal land	MLT1	No work required.	3.1
Silt ponds	Silt pond	Silt ponds.	0.05
Constraint	Constraint	Other Constraints (rights of way, turf cutting, potential renewable development area).	53.6
<b>Total</b>			<b>92.9</b>

Table 1a. Types of and areas for enhanced rehabilitation measures at Erenagh Bog.

These enhanced measures for Mountdillon will include (see Table 1b and Fig. 1):

- Deep Peat measures including field re-profiling, on deeper peat; intensive drain blocking (max 7/100 m) and 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, along with organic fertiliser application.
- 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.
- Intensive drain blocking around the existing wetlands or standing water to create/promote the spread of wetland habitats.
- Re-assessment of the pumping regime. There are currently six functional pumps located on Mountdillon, the two most northerly pumps will be decommissioned as part of the rehabilitation plan, while the other pumps are to be retained at present, subject to finalisation of a proposed renewables project within the footprint of Mountdillon/Erenagh.
- Initial hydrological modelling indicates that a part of the bog will remain as wetland and 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 nearby River Shannon.

- Additional work will include targeted drain blocking in areas where mature scrub/vegetation has developed.

Type*	Rehab Code	Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat	DPT2	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows.	10.7
	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows.	8.4
Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes.	16.6
	DCT2	Regular drain blocking (3/100m), modifying outfalls and managing water levels with overflow pipes and targeted fertiliser treatment.	9.1
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway, blocking outfalls and managing water levels with overflow pipes.	3.5
	WLT2	Turn off or reduce pumping to re-wet cutaway, blocking outfalls and managing water levels with overflow pipes, targeted blocking of outfalls within a site.	51.8
	WLT4	More intensive drain blocking (max 7/100 m), modifying outfalls and managing overflows, transplanting Reeds and other rhizomes.	34.4
Marginal land	MLT1	No work required.	11.4
Additional Work	AW2	Targeted Drain Blocking.	20.9
Constraint	Constraint	Other constraints (potential renewable energy development, rights of way, turf cutting, access tracks, extant high bog).	451.8
<b>Total</b>			<b>618.7</b>

Table 1b. Types of and areas for enhanced rehabilitation measures at Mountdillon Bog.



Erenagh and Mountdillon Bogs are located 3.5km northwest of Lanesborough. It situated on the western side of the R371 road. The overall rehabilitation area occupies the townlands of Culleenanory, Killavackan, Erenagh, Cloontuskert, Doughil, Mountdillon and Erenagh OS 6 inch sheet Roscommon Nos. 29, 30, 36 and 37.

## 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 Erenagh and Mountdillon Bogs, followed by a field survey. The overall extent of the rehabilitation is indicated in Fig. 1. This area was examined using information from:

- The Peatland Survey 2007 & 2008
- The Record of Monuments and Places
- The Sites and Monuments Record that is maintained by the Dept of Housing, Local Government and Heritage
- The topographical files of the National Museum of Ireland.
- The Excavations database
- Previous assessments
- Field survey

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

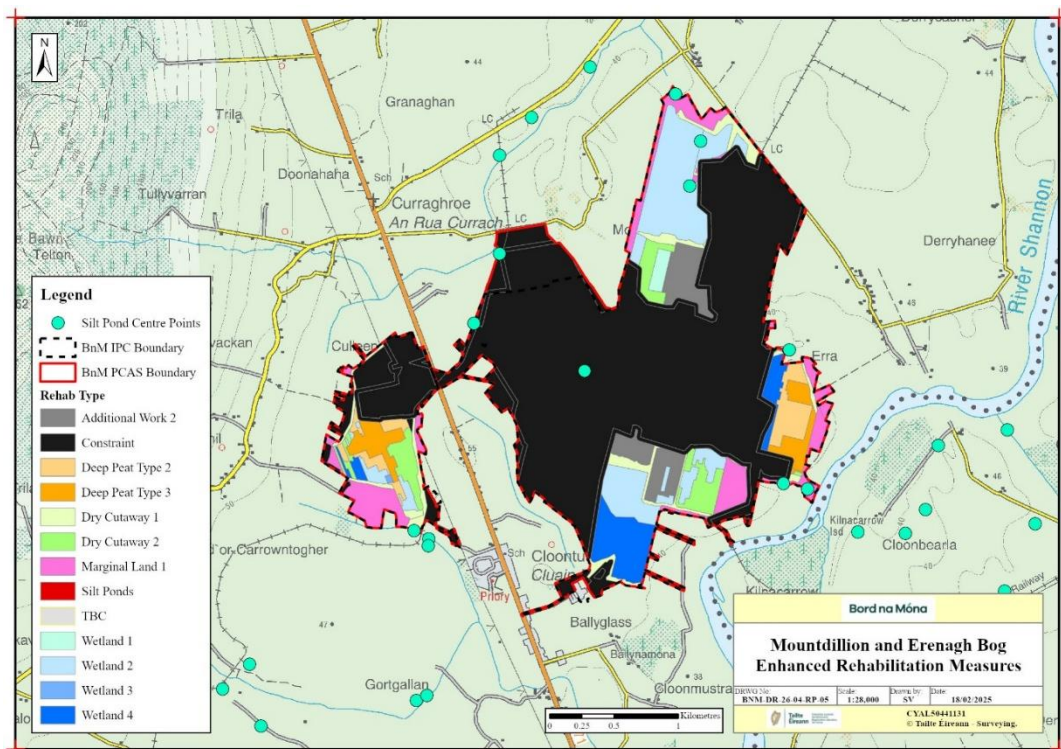


Fig. 1. Erenagh and Mountdillon Bogs, Co. Roscommon, proposed enhance rehabilitation measures.





## Desktop assessment

### Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Roscommon which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1998). These records were published by the Minister in 1998 and include sites and monuments that were known in Erenagh and Mountdillon Bogs before that date. This review established that there is one RMP within the rehabilitation area (see Fig. 2 and Table 2).

RMP_NO	SMR No.	RMP Class	Townland	ITM E	ITM N
RO030-015----	RO030-015----	Road - gravel/stone trackway - peatland	MOUNTDILLON	600921	774938
RO030-015----	RO030-022----	Road - gravel/stone trackway - peatland	ERRA	601457	774821

Table 2. Sites in Erenagh and Mountdillon Bogs entered in the RMP.

### 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 6th of March 2025. The SMR consists of records included in the RMP and sites and monuments notified to the Dept. since the publication of the RMP. This review established that there are no additional entries in the SMR in the proposed rehabilitation area (see Fig. 3).



Fig. 2. Erenagh and Mountdillon Bogs, Co. Roscommon, detail of the Sites and Monuments Record with six inch map. The proposed rehabilitation area is outlined with the red line.

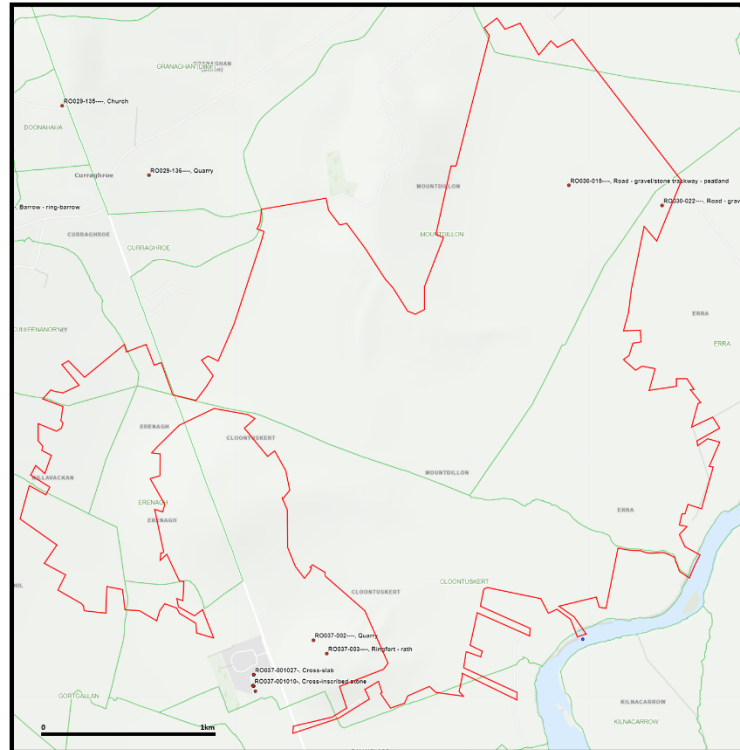
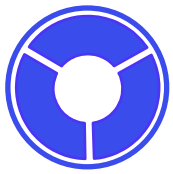


Fig. 3. Erenagh and Mountdillon Bogs, Co. Roscommon, detail of the Sites and Monuments Record with OS Discovery map. The proposed rehabilitation area is outlined with the red line.

### Peatland survey

Erenagh and Mountdillon Bogs were surveyed by the DOEHLG & Bord na Móna Survey 2007 & 2008 (Rohan 2009, 136; unlicensed and 08E0644). Nothing of archaeological significance was found during the field walking of Erenagh Bog. Three sightings of RMP RO030-015---- were identified in Mountdillon Bog (see Table 3).

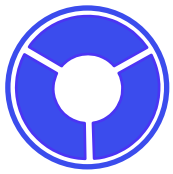
RMP_NO	Cat. Code.	RMP Class	Townland	NGRE	NGR N	ITM E	ITM N
RO030-015--- -	RO-MDN001a	Togher (secondary)	MOUNTDILLON	201493	274810	601443.609 4	774828.1374
RO030-015--- -	RO-MDN001b	Togher (secondary)	MOUNTDILLON	201511	274802	601461.605 4	774820.1390
RO030-015--- -	RO-MDN001c	Togher (secondary)	MOUNTDILLON	201519	274796	601469.603 7	774814.1402

Table 3. Sightings in Mountdillon Bog made by the DOEHLG & Bord na Móna Survey 2007 & 2008.

### Previous assessments

Erenagh and Mountdillon Bogs 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 P0504-01. The assessment noted that there was a high potential for archaeological features to be uncovered during the course of any future development works in Erenagh Bog and a moderate to high potential in Mountdillon Bog. This assessment included a review of the topographical files and finds registers of the National Museum of Ireland intended to identify all archaeological objects from the bogs reported to the Museum by that date and these are included below in Table 4 (Pers Comm. Jane Whitaker).





## Reported finds

As noted above the EIAR carried out by Irish Archaeological Consultancy LTD in relation to an IPC Licence contains a complete list of the known archaeological objects from Erenagh and Mountdillon Bogs reported to the National Museum of Ireland up to 2018 and these are included in Table 5.

Location	Museum No.	Description
Doughill Bog	2004:72	Bog butter
Erenagh Bogs	2007:42	Bog butter
Mountdillon Bog	1991:77a-b	wooden mether
Mountdillon Bog	1980:89	bog butter container
Mountdillon Bog	1945:146	incomplete woollen garment
Drinagh townland, Mountdillon Bog	1945:146	Human remains and wool
Mountdillon Bog	1946:335	wooden tankard
Mountdillon Bog	1915:35	bronze spearbutt
Mountdillon Bog	1958:36	polished stone axehead
Mountdillon Bog	IA/197/1947	a wooden tankard

Table 5. List of archaeological finds from Bloomhill East Bog reported to the National Museum of Ireland.

## Archaeological investigations

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

## Field Survey

A field survey of Erenagh and Mountdillon Bogs will be completed in 2025. Erenagh and Mountdillon Bogs is considered to be suitable for a field survey as it:

- has wide drains at regular spaced intervals,
- appears from recent aerial photography that, although the central part of Mountdillon bog is becoming overgrown, the west and part of the east of the bog and most of Erenagh Bog are still suitable for field survey.

## Impact assessment

There are sightings of a Road - gravel/stone trackway - peatland (RMP RO030-015---- and SMR RO030-022---) known in Mountdillon Bog. There are several archaeological objects known from the bog that have been removed to the National Museum.

## Recommendations

There are sightings of a Road - gravel/stone trackway - peatland (RMP RO030-015---- and SMR RO030-022---) known in Mountdillon Bog. This monument should be protected within a 20m buffer zone. There are several archaeological objects known from the bog that have been removed to the National Museum. 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.

Note this is a draft desktop report and will be revised with the results of the field survey carried out in 2025. As there will be a full field survey observing the surfaces and every second drain face, archaeological monitoring during rehabilitation works is not recommended.



## Conclusion

There are sightings of a Road - gravel/stone trackway - peatland (RMP RO030-015---- and SMR RO030-022---) known in Mountdillon Bog. This monument should be protected within a 20m buffer zone. There are no sightings of archaeological material recorded in Erenagh and Mountdillon Bogs. 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.

Note this is a draft desktop report and will be revised with the results of the field survey carried out in 2025. As there will be a full field survey observing the surfaces and every second drain face, archaeological monitoring during rehabilitation works is not recommended.

## References

DAHGI 1998. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Roscommon.

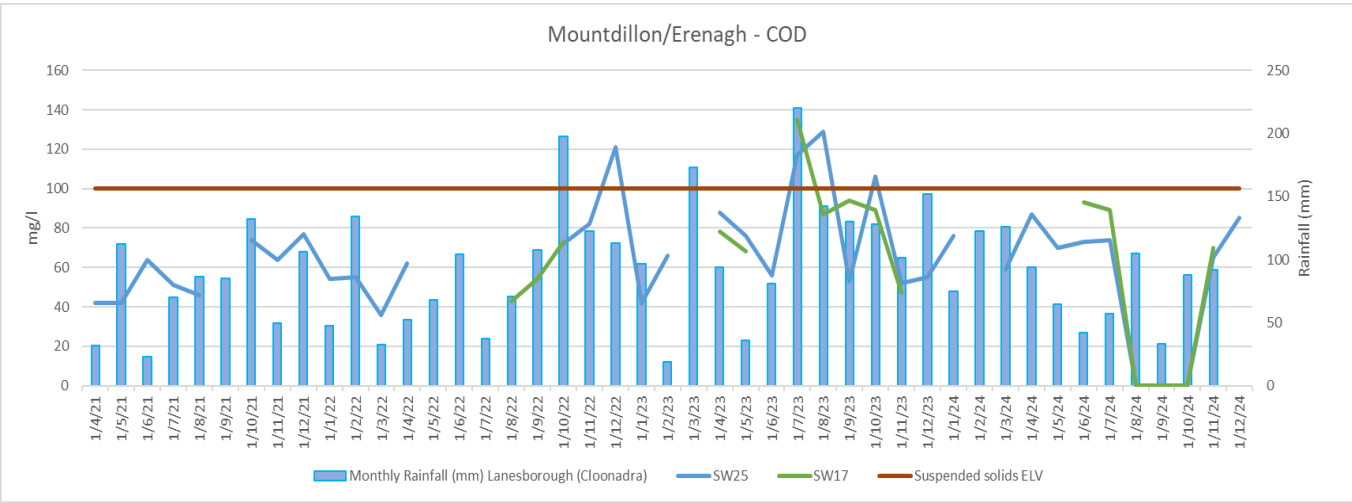
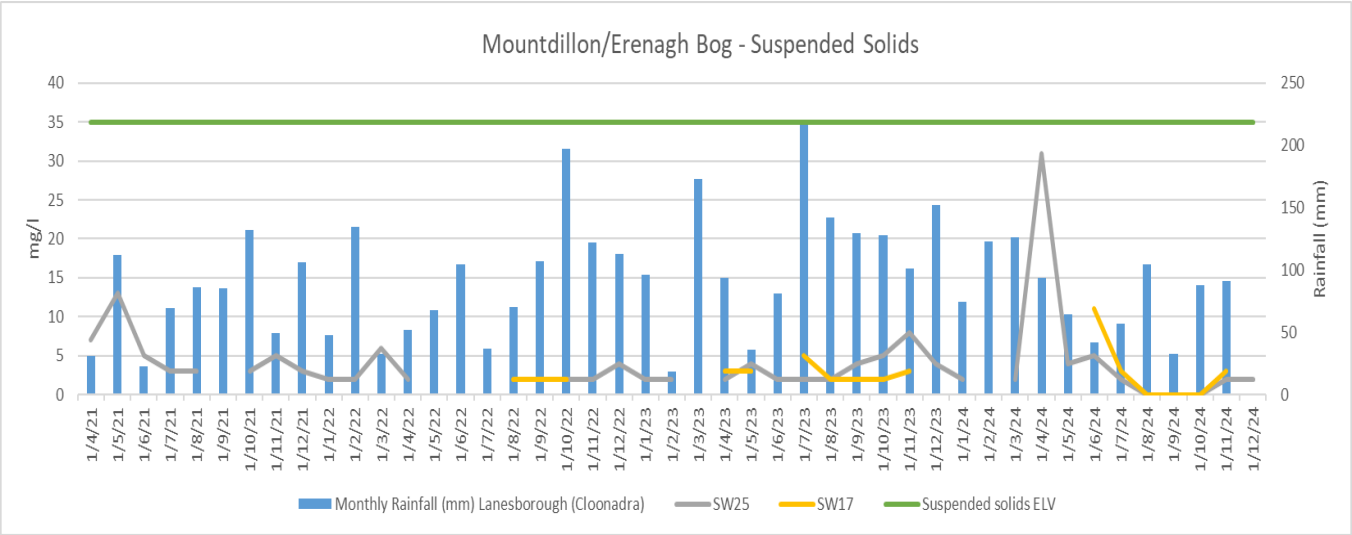
EPA 2020. Guidance on the process of preparing and implementing a bog rehabilitation plan.

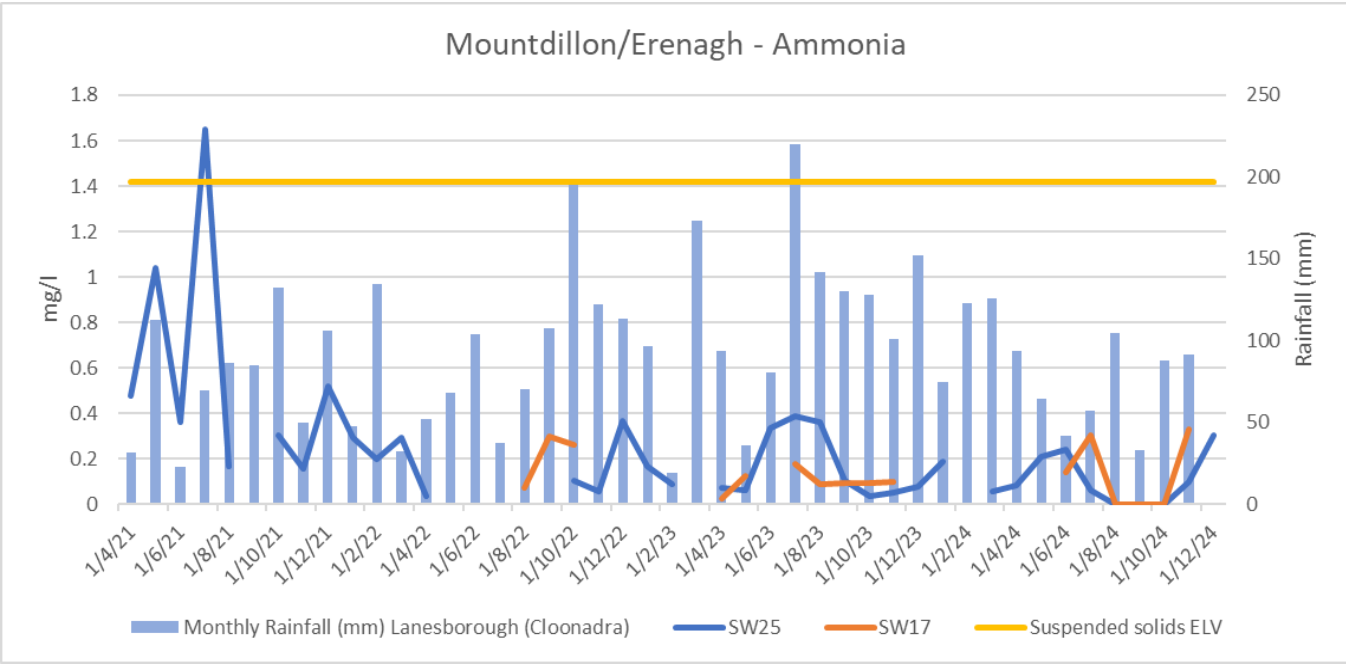
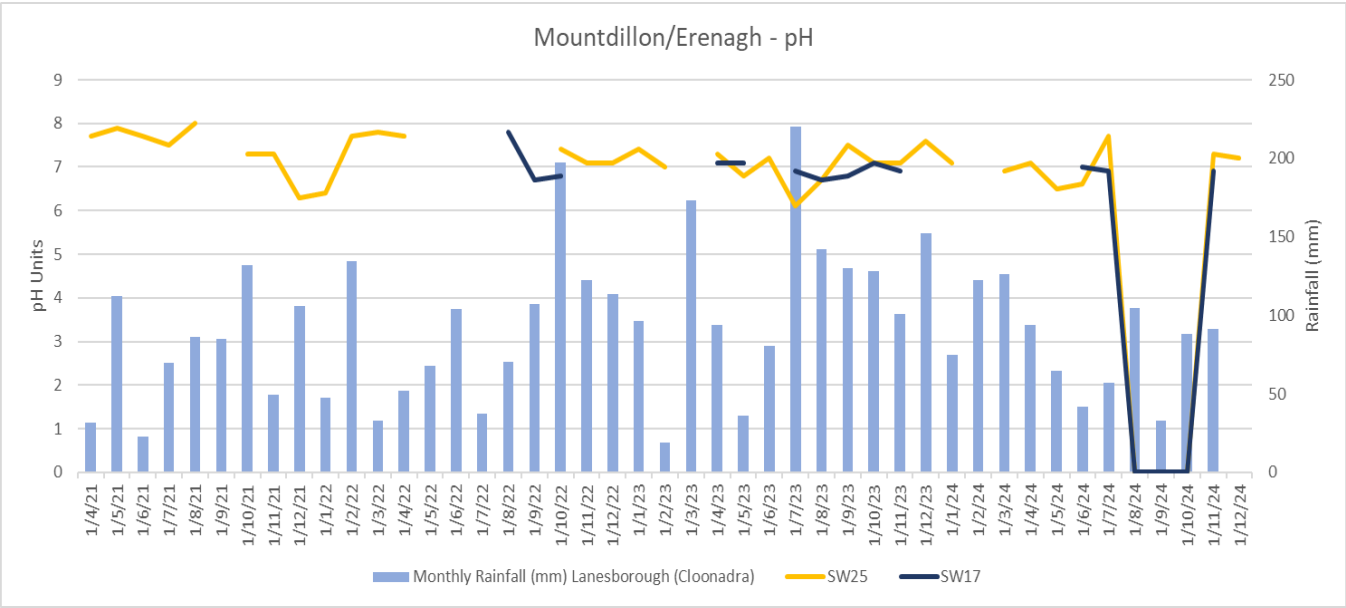
Rohan, N. 2009. 2007 & 2008 Peatland Survey. Blackwater, Derryfadda, Coolnagun & Mountdillon Group of bogs, Counties Offaly, Galway, Longford, Westmeath and Roscommon. Unpublished report Bord na Móna.

Dr. Charles Mount  
7 March 2025

APPENDIX XIII: WATER QUALITY MONITORING RESULTS FOR MOUNTDILLON BOG

Note the data presented in this section includes the water quality monitoring results for Erenagh Bog and Mountdillon Bog combined.





PCAS SW Sampling Scheme				Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	7	13	5	3	3		3	5	3	2	2	6	2		5		2	2	2	4	2
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
		Suspended solids ELV		35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35
PCAS SW Sampling Scheme				Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	206	139	148	160	144		351	277	317	196	237	171	196		233		362		278	374	222
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
PCAS SW Sampling Scheme				COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	42	42	64	51	46		74	64	77	54	55	36	62		84		80		72	82	42
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
		Suspended solids ELV		100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
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
Bog Group	Licence No	Bog Name	SW Code -GIS	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	7.7	7.9	7.7	7.5	8		7.3	7.3	6.3	6.4	7.7	7.8	7.7		7.3		6.7		7.4	7.1	7.4
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
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
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	1/4/21	1/5/21	1/6/21	1/7/21	1/8/21	1/9/21	1/10/21	1/11/22	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	0.07	0.13	0.11	0.16	0.05		0.13	0.11	0.05	0.05	0.05	0.06	0.05		0.11		0.05		0.05	0.09	0.05
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
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
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	343	367	422	370	421		197	279	89	55	265	376	257		297		98		246	506	317
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
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
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	0.479	1.04	0.36	1.65	0.166		0.303	0.157	0.521	0.291	0.199	0.294	0.034		0.249		0.23		0.103	0.056	0.365
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4
		Suspended solids ELV		1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42	1.42
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
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
Mountdillon	P0504-01	Erenagh	SW25	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	1/12/22
Mountdillon	P0504-01	Mountdillon	SW17	16.9	15.8	19.4	15.6	17.5		27	28.3	28	15.4	23.6	19	20.7		30.3		28.4		26.5	35.5	47.6
		Monthly Rainfall (mm) Lanesborough (Cloonadra)		31.5	112.3	22.9	69.8	86.1	85.1	132.1	49.5	106	47.6	134.3	32.6	52.1	68	104.2	37.1	70.5	107.2	197.5	122.4	96.4

PCAS SW Sampling Scheme				Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids		
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l		
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	2		2	4	2	2	2	4	5	8	4	2		2	31	4	5	2	D	D	D	2	2	
						3	3		5	2	2	2	3						11	3	D	D	D	3			
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
			Suspended solids ELV	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	
PCAS SW Sampling Scheme				Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co		
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	337		355	422	414	328	508	171	478	292	266	391		334	472	277	329	140	D	D	D	298	311	
						316	373		590	446	550	492	288						544	454	D	D	D	D	376		
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
PCAS SW Sampling Scheme				COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	66		88	76	56	117	129	53	106	52	55	76		59	87	70	73	74	D	D	D	65	85	
						78	68		135	87	94	89	47						93	89	D	D	D	D	70		
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
			Suspended solids ELV	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
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	
Bog Group	Licence No	Bog Name	SW Code -GIS	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	7		7.3	6.8	7.2	6.1	6.7	7.5	7.1	7.1	7.6	7.1		6.9	7.1	6.5	6.6	7.7	D	D	D	7.3	7.2	
						7.1	7.1		6.9	6.7	6.8	7.1	6.9						7	6.9	D	D	D	D	6.9		
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
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	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	0.05		0.12	0.07	0.1	0.05	0.07	0.12	0.09	0.08	0.06	0.05		0.07	0.12	0.05	0.05	0.09	D	D	D	0.07	0.05	
						0.05	0.05		0.1	0.08	0.12	0.27	0.11						0.08	0.08	D	D	D	D	0.05		
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
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	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23	1/12/23	1/1/24	1/2/24	1/3/24	1/4/24	1/5/24	1/6/24	1/7/24	1/8/24	1/9/24	1/10/24	1/11/24	1/12/24	
Mountdillon	P0504-01	Mountdillon	SW17	168		139	186	208	141	188	353	250	112	280	223		148	181	116	176	447	D	D	D	285	276	
						176	178		212	267	190	112	145						160	172	D	D	D	D	163		
		Monthly Rainfall (mm)	Lanesborough (Cloonadra)	19	173.2	93.9	35.9	80.8	219.9	142.1	129.9	128.1	101.1	152	74.8	122.7	126	93.9	64.6	41.8	56.9	104.6	33	87.9	91.5		
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	
Bog Group	Licence No	Bog Name	SW Code -GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Mountdillon	P0504-01	Erenagh	SW25	1/2/23	1/3/23																						

## APPENDIX XIV: STOCKPILE DECOMMISSIONING PROCEDURE

### Scope

All IPC licensed peatlands with residual peat stockpiles requiring decommissioning and rehabilitation, as required by Condition 10.

The aim of this Stockpile Decommissioning Procedure is to stabilise any remaining stockpiles by depositing the peat in the two drains located immediately adjacent to the stockpile field, enabling the re-shaping of the stockpile to facilitate stabilization and revegetation.

### 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. Strip any remaining stockpile protection and remove using the poly wrapper for recycling.
2. Ensure the silt pond servicing this pile field catchment has been cleaned within the last six months as per condition 6.8, and visually inspected as per condition 6.7, prior to any pile decommissioning.
3. Where stockpiles occur within areas planned for rehabilitation, such planned rehabilitation measures (regular drain blocking) will be implemented in advance of any stockpile decommissioning, with priority given to the required adjacent stockpile field drains.
4. Once the rehabilitation measure above has been completed, proceed to reprofile the stockpile as per below.
5. Using suitable available excavator/dozer to make a safe ramp up onto the end of the pile.
6. Track up onto the pile and establish a safe level base.
7. Using the machine to reduce and reprofile the pile height and deposit into the adjoining pile field drains. The residual height to be determined based on stockpile size and area required to reprofile.
8. Work along the pile using this method until reaching the pile end.
9. Using a suitable machine, track the peat into the pile field drain along both sides of the pile, ensuring the final level is below the existing drain blocks and any damage to existing drain blocks avoided.
10. If required, use a suitable machine to track along the top of the reprofiled stockpile to level and flatten the profile to reduce the runoff gradient.
11. Fertiliser application and any grass seed mix should be applied to each stockpile following completion of the above steps, to accelerate the stabilisation.