



Pollagh Bog

Cutaway Bog Decommissioning and Rehabilitation Plan 2021

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0500-01:

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

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

Industrial peat production has now permanently ceased at Pollagh Bog.

In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref. P0500-01, due regard was also given to the proposed ‘Peatlands Climate Action Scheme’ (PCAS) announced by the Minister. This Scheme will see the Minister support, via the Climate Action Fund, Bord na Móna in developing a package of measures, ‘the proposed 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 proposed Scheme will be supported by Government through the Climate Action Fund, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

While this document outlines the enhanced rehabilitation measures planned for the Pollagh 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 proposed 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 proposed Scheme.

Bord na Móna have defined the key rehabilitation outcome at Pollagh Bog as environmental stabilisation, re-wetting and setting the bog on a trajectory towards development of naturally functioning peatland habitats.

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SUMMARY

Name of bog: Pollagh **Area:** 305ha

Site description:

- Pollagh Bog was drained and developed for industrial peat production in the 1950s and has been in active peat production since the 2004. Industrial peat production ceased in 2019.
- The majority of the former peat production footprint is bare peat (~75%) and contains active drainage channels.
- Peat Depths generally vary across the site from 0-2 m, with the deepest peat in the mid southern section (where depths of 2-4m exist). Pollagh is considered a cutover bog with variable depths of peat and some sections having deep peat.
- The site is located adjacent to the Grand Canal and several designated conservation sites.

Rehabilitation goals and outcomes

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

- Meeting condition of the IPC licence;
- Stabilisation or improvement in water quality parameters (e.g. suspended solids);
- Environmental stabilisation.
- Optimising hydrological conditions for **climate action benefits as part of PCAS**. This will be achieved via intensive **re-wetting**.
- Optimising hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation communities on deeper peat, fen and Reedswamp on shallow cutaway peat, and eventually naturally functioning peatland habitats.
- Optimising hydrological conditions for the development of embryonic *Sphagnum*-rich vegetation communities in suitable deep residual peat areas.
- Rehabilitation will support the National Policies on Climate Action and GHG mitigation by maintaining and enhancing the current condition peat storage capacity of the bog (locking the carbon into the ground). In time, it is expected that the bog will develop its carbon sink function, in part, as *Sphagnum* communities develop across the bog. It will also support Ireland's commitments towards Water Framework Directive and the National River Basin Management Plan 2018-2021 and future National River Basin Management Plans.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future.

Scope of rehabilitation

The principal scope of this rehabilitation plan is defined by:

- The area of Pollagh Bog.
- No rehabilitation measures are proposed for Cornalaur Bog as BnM never drained, or developed or carried out any industrial peat extraction on this bog.
- EPA IPC Licence - Ref. P0500-01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The key objective of 'rehabilitation', as required by this licence, is achieved by the **environmental stabilisation** of the bog.
- **The proposed Scheme (PCAS)** includes enhanced measures which are designed to exceed/meet the standard stabilisation requirements as defined by the IPC Licence and to enhance the ecosystem services of Pollagh Bog, in particular, optimising **climate action benefits**.

- The local environmental conditions of this bog.
- The key goals and outcomes of rehabilitation at this bog outlined above.
- Minimising potential impacts on neighbouring land. Some boundary drains around Pollagh Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Land-use. Bord na Móna have identified the main land-use at this site as biodiversity and ecosystem services.

Criteria for successful rehabilitation:

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

- Rewetting of residual peat in the former area of industrial peat production to slow water movement across the site to retain silt, encouraging development of vegetation cover via natural colonisation, and reducing the area of bare exposed peat (IPC Licence validation).
- Stabilising or reducing potential emissions to water (e.g. silt) (IPC Licence validation).
- Reducing pressure from peat production on the local river catchment (WFD) (IPC Licence validation).
- Optimising the extent of suitable hydrological conditions to optimise climate action (Climate action verification).
- Reduction in carbon emissions (Climate action verification).
- Setting the site on a trajectory towards establishment of a mosaic of compatible habitats including fen, Reed swamp, heath, scrub, Birch woodland and embryonic *Sphagnum*-rich peatland communities, where conditions are suitable, and eventually towards a carbon sink (Climate action verification). These habitats will generally establish initially as pioneer vegetation. It will take some time for stable naturally functioning habitats to fully develop at this bog.
- Improvement in biodiversity and ecosystem services. (Climate action verification).

Meeting climate action verification criteria and monitoring of these criteria is dependent on support from the Climate Action Fund or other sources of funding.

Summary of measures:

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

- Planning actions, including developing a detailed site plan and carrying out a site drainage management plan.
- Carry out an ecological assessment of the potential impacts of the planned rehabilitation.
- Carry out proposed measures, which will be a combination of drain blocking, peat field re-profiling and cell-bunding.
- Phase 2 measures will include fertiliser application, seeding of targeted vegetation and inoculation of *Sphagnum*.
- Silt ponds will continue to be maintained during the rehabilitation and decommissioning schedule.
- Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.

Timeframe:

- 2020-2021. Short-term planning actions.
- 2021. Short-term practical actions.
- 2021-2024. Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate, where necessary.
- 2024. Decommission silt-ponds, if necessary.

Budget and Costing

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

Monitoring, after-care and maintenance

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

- There will be initial quarterly monitoring assessments of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, assess the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to additional rehabilitation, if required.
- The monitoring and validation of re-vegetation via natural colonisation will be carried out using an aerial survey, after enhanced rehabilitation measures are implemented.
- **Water quality monitoring** will be established. Monitoring of key water quality parameters will include: pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, COD and DOC.
- Decommissioning of silt-ponds will be assessed and carried out, where needed.

Additional Monitoring:

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

Validation and IPC Licence surrender

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

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

1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Boora bog group (Ref. P0500-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Boora bog group (see Appendix II for details of the bog areas within the Boora Bog Group). Pollagh Bog is located in Co. Offaly.

This document seeks to address the requirements of Condition 10.2 of IPC License Ref. P0500-01:

“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. For the avoidance of doubt this document only covers the area of Pollagh Bog.

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; and
- Associated aftercare, maintenance and monitoring.

It is proposed by Government that Bord na Móna carry out a Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme on its peatlands. Note this proposal is also known colloquially as the ‘Peatlands Climate Action Scheme’ (PCAS). The additional costs of the proposed Scheme will be supported by Government through the Climate Action Fund, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

Bord na Móna have identified a footprint of 33,000 ha as peatlands suitable for this scheme. This proposed Scheme will significantly go beyond what is required to meet rehabilitation and decommissioning obligations (Appendix VII & IX) under existing EPA IPC licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered. Only the costs associated with the additional, enhanced and accelerated rehabilitation, i.e. those measures which go beyond the existing decommissioning and rehabilitation requirements arising from Condition 10, will be eligible for support under the proposed Scheme. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021).

It is expected that the proposed Scheme 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 proposed 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 drain-blocking and cell bunding;
- re-profiling that will deliver suitable conditions for development of wetlands, fens and bog habitats;
- targeted fertiliser applications,
- seeding of targeted vegetation; and
- proactive inoculation of suitable peatland areas with *Sphagnum*.

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

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

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

1.1 Constraints and Limitations

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

The future use of Pollagh Bog has not been defined by Bord na Móna. Bord na Móna will continue to review the future after-use of its land-bank. Any consideration of any other future after-uses for Pollagh Bog, will be conducted in adherence to the relevant planning legislation and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

Industrial peat extraction at Pollagh Bog ceased in 2019. Currently the most recent peat production area is bare peat, and there is some pioneering vegetation in the north of the bog. The combination of active enhanced rehabilitation measures and natural colonisation will quickly establish further pioneer vegetation and will be planned to accelerate environmental stabilisation. Nevertheless, it will take some time (30-50 years) for naturally functioning peatland ecosystems to fully re-establish.

Parts of Pollagh Bog (outside the areas owned and under the control of Bord na Móna) are currently used by domestic turf cutters to harvest peat. These areas are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. It is beyond the scope of this rehabilitation plan to address turf

cutting issues on the margins of Pollagh Bog that are outside of the control of Bord na Móna. Nevertheless, Bord na Móna are aware of such issues which may constrain the proposed rehabilitation actions, and this enhanced rehabilitation plan considered potential impacts of these on the delivery of the stated objectives.

There is also an area of extant (undeveloped) high bog to the east of which BnM have partial ownership (referred to as Cornalaur – 20 ha). Due to the absence of Bord na Móna development the extant high bog at Cornalaur is excluded from decommissioning and rehabilitation.

Pollagh Bog is also referred to as 'Pollagh/Cornalaur' and the use of this designation, such as in mapping, should be seen as interchangeable with 'Pollagh'.

Rehabilitation in other areas of the bog may also be constrained due to other property issues or issues such as rights of way.

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 proposed Scheme (PCAS). The development of this rehabilitation plan considered recently published guidance issued by the EPA in 2020 – **Guidance on the process of preparing and implementing a bog rehabilitation plan**.

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

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

2.1 Desk Study

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

- Anderson *et al.* (2017). An overview of the progress and challenges of peatland restoration in Western Europe.
- 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.
- 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:

- Boora Integrated Pollution Control Licence;
- Boora Annual Environmental Reports;
- Review of the National Biodiversity Data Centre (NBDC) webmapper;
- Inland Fisheries Ireland (IFI) Reports;
- Environmental Protection Agency database (www.epa.ie);
- EPA Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity
- BirdWatch Ireland online data (including I-WeBS and CBS datasets; www.birdwatchireland.ie);
- Geological Survey of Ireland - National Draft Bedrock Aquifer map;
- Geological Survey of Ireland - Groundwater Database (www.gsi.ie);
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (www.catchments.ie);
- OPW Indicative Flood Maps (www.floodmaps.ie),
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (www.cfram.ie),
- River Basin Management Plan for Ireland 2018 – 2021,
- Bord na Móna Annual Report 2020,

- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

2.2 Consultation

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

2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this baseline survey, Pollagh Bog was surveyed in January 2011. Additional surveys and visits have taken place at Pollagh Bog between 2012-2020 to inform rehabilitation planning. A further confirmatory site visit to examine Pollagh Bog took place by BNM Ecologists in Sept 2020. This rehabilitation plan is informed by the original baseline survey as well as subsequent site walk-over surveys and visits, and updates to baseline data.

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

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

3. SITE DESCRIPTION

Pollagh Bog is located in Co. Offaly, adjacent to the village of Pollagh and adjacent to the south side of the Grand Canal. (see Figure 3.1 & 3.2). The surrounding landscape is a mosaic primarily consist of low-lying agricultural land (pasture) interspersed with other raised bogs, many of which have also been managed by Bord na Móna for peat production with some areas utilised for domestic turf-cutting. Pollagh Bog lies approximately 0.5Km to the South of the River Brosna, adjacent to the southern side of the Grand Canal and is linked by rail, to Derrinlough Brickette Factory and to West Offaly Power (WOP), which provides the main access to the site.

3.1 Status and Situation

3.1.1 Site history

Pollagh Bog was originally developed for peat production in the 1950's. It has been in peat production since this period. Industrial peat production ceased at Pollagh Bog in 2019. The peat was harvested for fuel peat to be used in West Offaly Power Station in Shannonbridge and Derrinlough Brickette Factory, Offaly.

3.1.2 Current land-use

Industrial peat production ceased at Pollagh Bog in 2019. Site infrastructure and structures are mapped in Figure 3.7. A marginal area in the northernmost part of the Bord na Móna boundary close to the Grand Canal is actively being cut for private turbary (see Figure 3.2).

The entire bog is not within the ownership of Bord na Móna and domestic turf cutting (private turbary) is having a significant impact on the bog, both within and outside the BnM boundary.

Biodiversity and ecosystem services have been identified as the primary future land use for Pollagh Bog by Bord na Móna.

There are no known right of ways on this bog.

3.1.3 Socio-Economic conditions

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

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

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

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

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

3.2 Geology and Peat Depths

3.2.1 Sub-soil geology

The underlying geology at Pollagh Bog is Waulsortian Limestones, which are described as Massive unbedded lime-mudstone¹. The underlying soils and sub-soils are classed as ‘Raised Bog Cutover Peat’.

3.2.2 Peat type and depths

Pollagh Bog has a long history of industrial peat production. Fen peat and exposed underlying sub-soil is now exposed across the site. Peat depths (2015) generally vary across the site from 0-2 m, with the deepest peat in the mid southern section (where depths of 2-4m exist) (Figure 8.2). Peat depths around the eastern, western and southern margins are much shallower (0-1 m).

3.3 Key Biodiversity Features of Interest

The majority of Pollagh Bog within the Bord na Móna boundary is bare peat as this site was in production until 2018. A small portion of the site is developing as cutaway. This area acts as a local refuge for wildlife in the area.

3.3.1 Current habitats

Pollagh bog is a relatively deep basin that is dominated by bare peat and former industrial production bog. This bog has a pumped drainage system. Pollagh is also spring-fed (possibly related to the former soak system).

There is a small area of cutaway towards the north-west corner of the site that extends along the northern boundary of the site. The majority of this area is over some higher ground and glacial gravel is exposed in a few places. The oldest section of vegetation on the highest ground is mainly vegetated by typical cutaway habitats such as open Birch and Willow scrub and poor fen vegetation dominated by Soft Rush and Bog Cotton. Some of the drier poor fen also has frequent grass cover with Creeping Bent and Cocksfoot. Bulrush and Common Reed are spread throughout this area in the drains with several clumps of Common Reed present. Towards the western side there is some lower ground that is partially re-wetted with Bog Cotton-dominated poor fen and some shallow pools. This band of pioneering vegetation has extended north eastwards towards the location of the existing pump and silt pond. The newest vegetation cover corresponds to Birch Scrub, with poor fen and pioneering dry grassland.

¹ <https://www.gsi.ie/en-ie/data-and-maps/Pages/Bedrock.aspx>

The margins of the former production area contain a range of habitats, including Birch woodland, scrub, small dried remnants of raised bog (some being actively cut) and cutover bog.

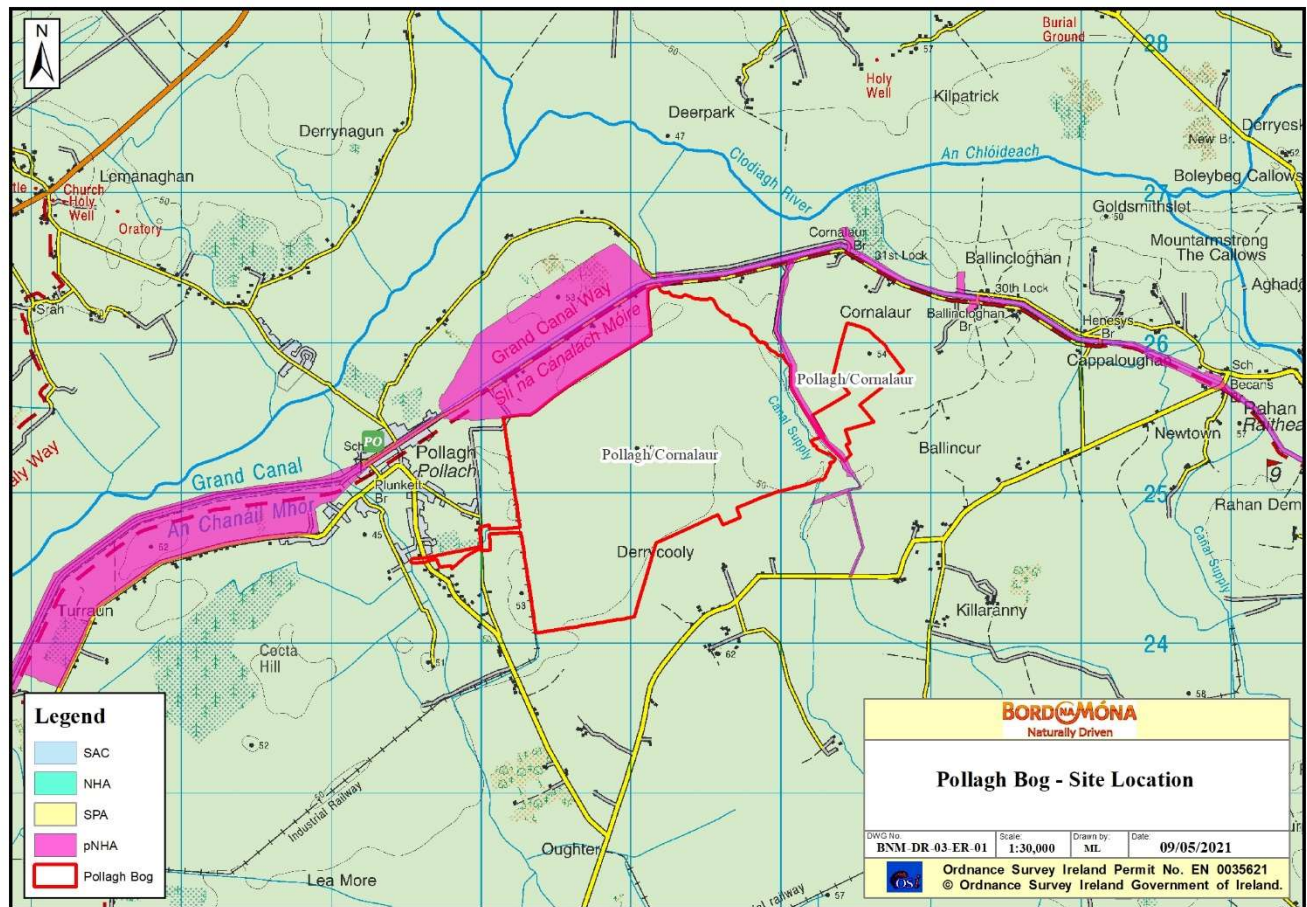


Figure 3.1 Location of Pollagh Bog in context to other Bord na Móna bogs, designated sites and the surrounding area.



Figure 3.2. View of the typical milled peat surface with existing drainage across Pollagh Bog (2011)



Figure 3.3. View of milled peat surface with emerging vegetation at Pollagh Bog (2020)



Figure 3.4. Mosaic of pioneering Birch Scrub & Poor Fen at Pollagh Bog (2020)

A habitat map of Pollagh Bog is shown in Figure 3.6, overleaf.

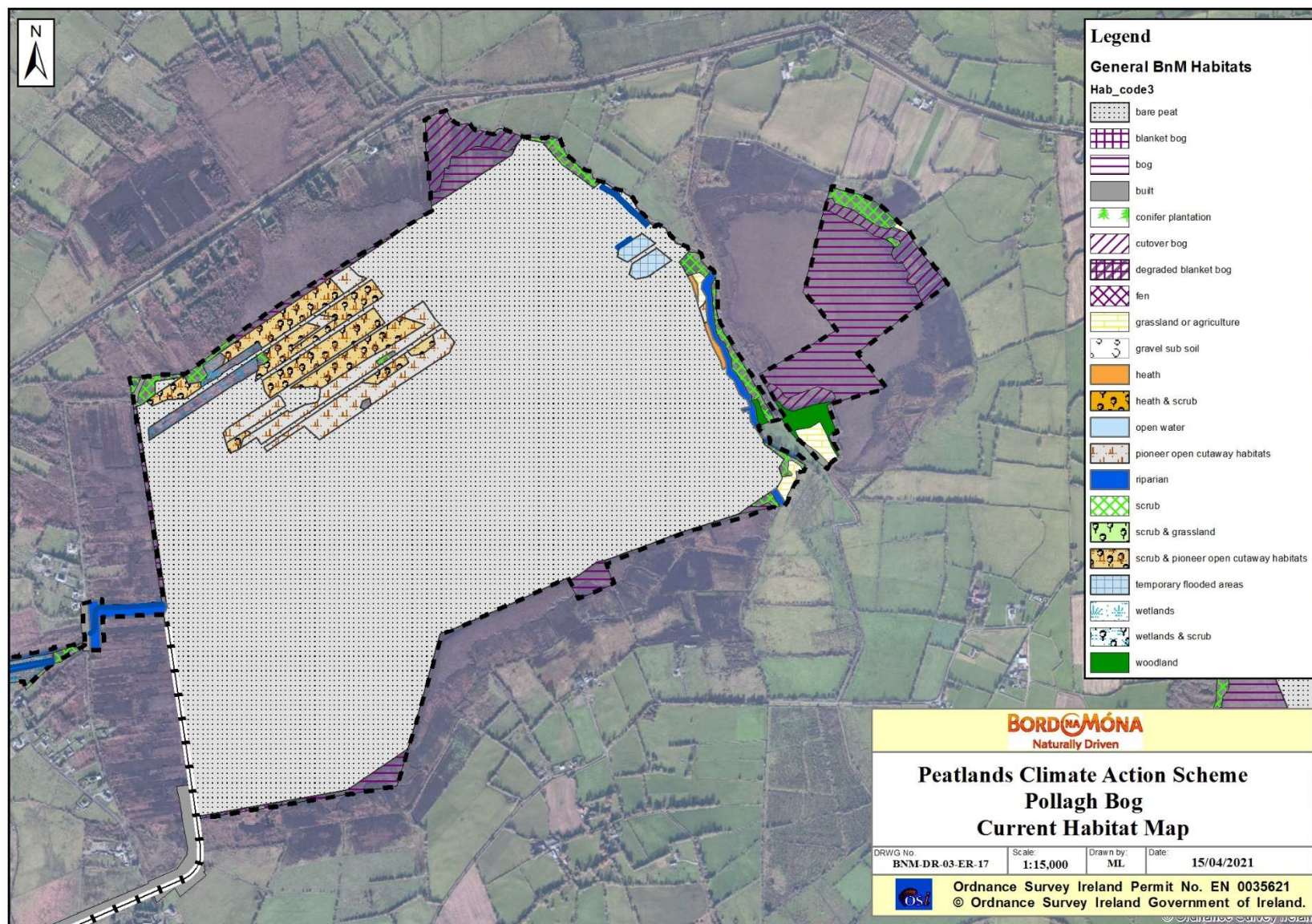


Figure 3.5. Habitat map of Pollagh Bog showing Bord na Móña habitat categorisation.

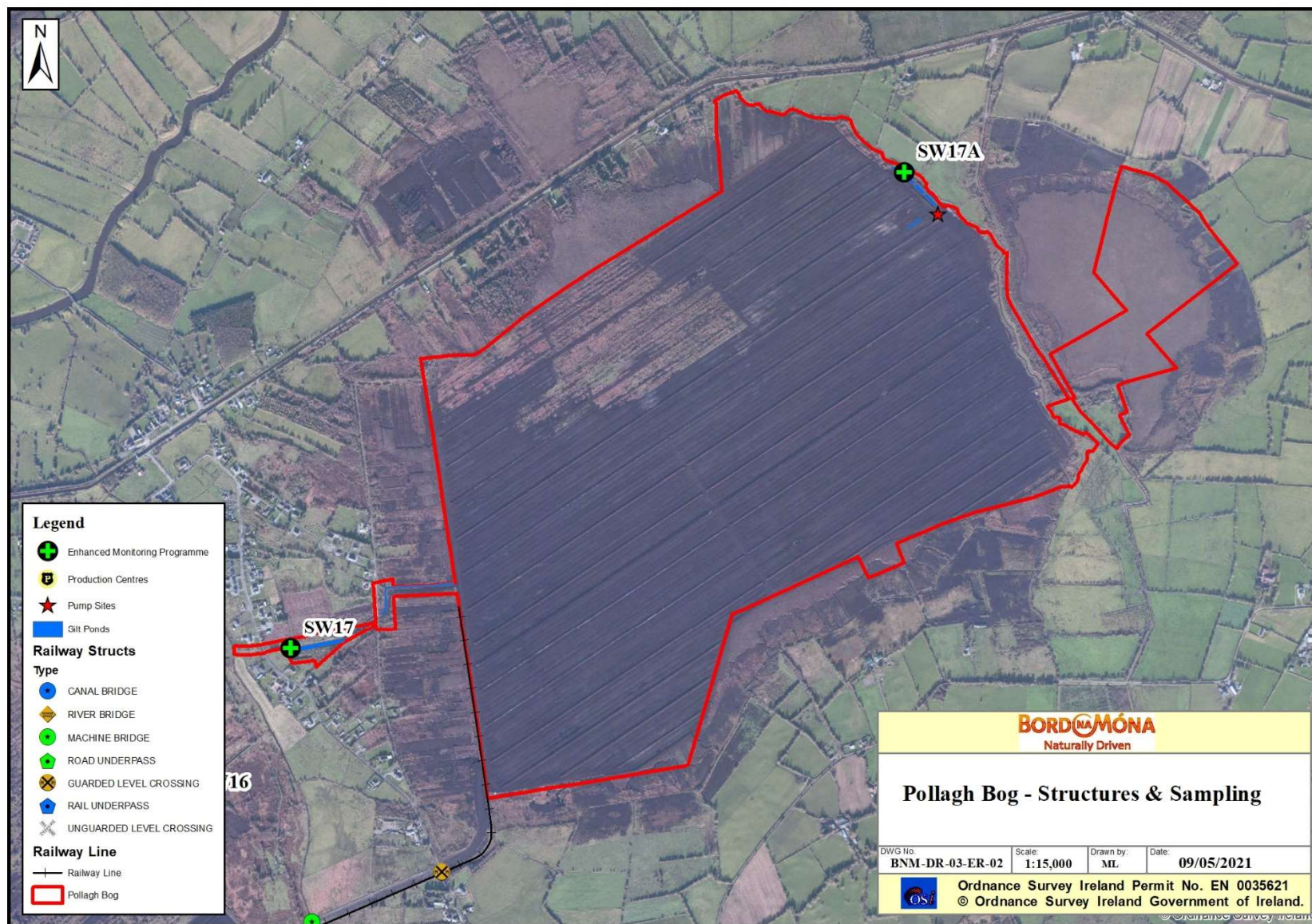


Figure 3.6. Map of Pollagh Bog showing structures, site infrastructure and designated emission points.

3.3.2 Species of conservation interest

During field surveys in January 2011 Kingfisher *Alcedo atthis* and 6 no. Whooper Swan *Cygnus cygnus* (Amber listed in Ireland and also on Annex I of the EU Birds Directive) were recorded on site. Kingfisher may utilise the feeder channel into the Grand Canal, and or the bordering watercourses to the east (Derrycooley Stream) or West (DERRYCOOLEY/Pollagh). In July of 2020, ‘chipping’ (considered equivalent of breeding season song) Snipe *Gallinago gallinago* were recorded at 2 no. locations; other species utilising the bog were Grey Heron *Ardea cinerea*, Mallard *Anas platyrhynchos*, Skylark *Alauda arvensis* (recorded in song on pioneering cutaway therefore considered a likely breeder); and Common Kestrel *Falco tinnunculus* (Amber listed) was also noted hunting.

A review of available Biodiversity records from the National Biodiversity Data Centre (hereafter NBDC) on the 2 no. tetrads (N22C/N22D) which include Pollagh Bog found records of 2 no. species of bird in N22C (the tetrad which includes the majority of Pollagh Bog) namely Common Grasshopper Warbler *Locustella naevia* and Eurasian Woodcock *Scolopax rusticola* (Amber listed), whilst the tetrad N22D had no bird species noted.

With regard to terrestrial mammals, Irish Hare *Lepus timidus hibernicus* and Otter *Lutra lutra* occurs at Pollagh, in addition European Hedgehog *Erinaceus europaeus* have been recorded in tetrad N22D, along with Eurasian Badger *Meles meles*. With regard to Bats, three species namely Lesser Noctule *Nyctalus leisleri*, Common Pipistrelle (*Pipistrellus pipistrellus sensu lato*) and Soprano pipistrelle (*pipistrellus pygmaeus*) have been recorded in tetrad N22C.

Pollagh Bog has an interesting botanical history. It was studied by the famous Irish botanist J.J. Moore in the 1950's who recorded several rare plants including Rannoch Rush (*Scheuchzeria palustris*) in a soak system on Pollagh Bog, the only site in Ireland where this plant has been recorded. This plant was subsequently transplanted in 1959 to Clara and Raheenmore Bog when it became known that Bord na Móna was going to drain the bog. J.J. Moore described Pollagh Bog as being very wet and containing some wet woodland. A second plant species Toothed Wintergreen (*Orthillia secunda*), was recorded from the site. This species has a very restricted distribution in ROI, only being known from three sites, although it has recently been recorded at Bord na Móna Ballydangan Bog. Both species are thought to be extinct at Pollagh Bog.

3.3.3 Invasive species

Invasive alien species known to occur at the subject bog (or desktop review suggests presence is likely), and for which reasonably foreseeable source impact pathways for dispersal may result from the proposed PCAS are described here. No such instances exist in respect of Pollagh Bog. American Mink *Mustela vison* has been recorded in tetrad N22C – but is unlikely to be dispersed during PCAS activities. A broad range of common garden escapes are occasionally present around the margins of Bord na Mona 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

No part of Pollagh Bog is designated as SAC or SPA.

The Grand Canal pNHA (NPWS site code 2104) is located to the north of this site and part of the designated area along the canal is adjacent to the northern Pollagh BnM boundary (Figure 3.1). Some undeveloped and partially fringe habitats within the BnM boundary are designated as part of this pNHA. A small feeder channel links into the canal and flows along the east side of the production bog, separating Pollagh from Cornalaur. This feeder is also within the pNHA designation. The ecological value of the canal lies more in the diversity of species it supports

along its linear habitats than in the presence of rare species. It crosses through agricultural land and therefore provides a refuge for species threatened by modern farming methods.

Regarding European Sites the closest to Pollagh Bog is Clara Bog SAC (Site Code 000572) which is ca.3.5km northeast. Additional European Sites in proximity include Charleville Wood SAC (Site Code 000571-ca. 7.5km east), Clonaslee Eskers and Derry Bog SAC (Site Code 000859 -ca.12km south southeast), Ferbane Bog SAC (Site Code 000575- ca.8.5km west), and Moyclare Bog SAC (Site Code 000581- ca.12km west).

3.4.1 *Other Nature Conservation Designations*

The Ramsar Convention entered into force in Ireland on 15th March 1985. Ireland currently has 45 sites/wetlands designated as Wetlands of International Importance (Ramsar Sites). These cover a surface area of 66,994ha. There are no Ramsar Sites in the local vicinity of Pollagh Bog (i.e. within 3km) The closest Ramsar Sites to Pollagh Bog include Mongan Bog, Clara Bog, and Raheenmore Bog².

3.5 **Hydrology and Hydrogeology**

Pollagh Bog has a pumped drainage regime. Hydrological modelling (Figure 8.3 & 8.4) indicates that the majority of the bog is a natural basin with significant potential for re-wetting. It is likely that a portion of these basins will re-wet with deeper water, creating a mosaic of wetland habitats, when pumping ceases or is reduced. Anecdotally, Pollagh Bog has always had a significant spring influence and was difficult to drain in places. There is likely to be alkaline influence on the water chemistry of the ground water of a portion of this bog due to exposed underlying marls that are highly alkaline or sub-soils that are limestone-based.

Pollagh Bog is located in the Upper River Shannon Catchment. It is separated into two main catchments that drain to the east and to the west. The western catchment discharges via silt ponds to the Pollagh Stream. The eastern catchment discharges via a pump and silt ponds to the Derrycooly Stream. Both channels discharge north to the River Brosna, north of the canal. The Grand Canal feeder also flows between Pollagh and Cornalaur. However, this feeder is perched at a higher level than the above stream and there is no inflow from the production bog, and no hydrological connection to the canal.

Silt ponds are present at both sides of the site to manage discharges to neighbouring water-courses. The bog has field drains running in a north-northeast to south-southwest orientation.

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

² <https://www.arcgis.com/apps/MapTour/index.html?appid=cd6e1a247bdc4179b9dfc0461e950f1e#>

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

The peat is underlain by glacial deposits interbedded with glacio-fluvial deposits over limestone bedrock. The glacial deposits generally consist of grey gravelly clay/silt. The bog water table across the site is expected to be high when bog drains are blocked, and perched above the underlying regional groundwater table. The ability of the shallow peat water to interact with the underlying regional groundwater flows is limited by the permeability of the underlying glacial deposits. As such the potential for bog rehabilitation to interact or impact on underlying groundwater is very low.

3.6 Emissions to surface-water and water-courses

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

Silt ponds are the key silt control infrastructure to control potential emissions from industrial peat production sites. As required under licence, BNM have a number of procedures for how it manages and maintains its silt pond network. The silt that builds up in silt ponds is excavated on a regular basis by Bord na Móna to facilitate an efficient level of silt control. Silt ponds will continue to be maintained during rehabilitation and decommissioning. Silt pond decommissioning will be considered when sites are deemed to be on a trajectory of environmental stability and peatland rehabilitation has been completed. Silt ponds are present at both sides (east and west) of the site to manage discharges. The bog has field drains running in a north-east to south-west orientation.

There are 6 silt ponds at Pollagh Bog. Two are located on the western side (Reference PH34, PH34A) and there are 4 in close proximity to each other in the NW of the bog, which together comprise Reference PH35, close to the onsite pump. The western silt ponds discharge to the Pollagh Stream. The eastern silt ponds discharge to the Derrycooly Stream. Both streams discharge to the River Brosna catchment.

Pollagh bog has two surface water outlets. The east discharge is to the Derrycooly Stream. The western discharge is to the Brosna river IE_SH_25B090761 via IE_SH_25P050300. Peat extraction was identified as pressure in the second cycle of the river basin management plan but is not indicated as remaining so in the third cycle, currently under preparation, in relation to the Brosna River.

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

The main emission limit value associated with this bog is 35mg/l suspended solids, with trigger levels for ammonia of 3.7 mg/l and COD 100mg/l. Initial monthly ammonia concentrations from August to November 2021 have a range of 0.005 to 1.4mg/l with an average of 0.504mg/l.

From an analysis of any monitoring over the past 4 yrs. of the IPC licence environmental monitoring of some of the discharges from this bog, indicate that results were under the ELV for SS and trigger level for ammonia and COD. (Table 3.1).

Table 3.1.

Bog	SW	Monitoring	Sampled	pH	SS	TS	Ammonia	TP	COD	Colour
Pollagh	SW-17A	Q3 20	17/08/2020	8.2	5	423	0.124	<0.05	23	73.9
Pollagh	SW-17	Q3 20	17/08/2020	7.7	20	475	0.241	<0.05	11	72.1
Pollagh	SW-17	Q3 19	02/09/2019	7.6	4	484	0.646	<0.05	26	95.8
Pollagh	SW-17A	Q3 19	02/09/2019	8.2	10	476	0.117	<0.05	15	84
Pollagh	SW-17	Q4 17	13/12/2017	7	5	212	1.9	0.05	63	231
Pollagh	SW-17A	Q4 17	13/12/2017	7.4	5	374	0.34	0.05	67	169

Rehabilitation of cutaway peatland is closely linked with control of emissions. One of the criteria for successful rehabilitation is stabilisation through re-vegetation, which will stabilise all substrates and in turn remove the need for further silt control measures. Re-wetted peat also aid the primary objective of stabilizing peat, as when peat is re-wetted it minimises risk to wind erosion. Re-wetted peat and the development of wet peatland habitats can also act as sinks for silt and mobile peat, and increases additional retention time for solids, and the peatland vegetation can quickly stabilise this material within blocked drains on site (by acting like constructed wetlands).

Water quality of water discharges from restored/rehabilitated peatlands normally improves as a result of bog rehabilitation and restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Peatland rehabilitation is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2018-2021 (DHPCLG, 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Móna cutaway 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 Pollagh Bog has been completed. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of the key downstream water body receptors, and is expected to support the retention of the current and future status of Pollagh Stream as being of Good Status.

Decommissioning and Rehabilitation Programme Water Quality Monitoring.

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

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

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

In the preparation of this monitoring programme, Bord na Moña have been providing the Local Authority Water Programme (LAWPRO) with details of the surface water emissions points associated with this bog and will be amending some of the proposed monitoring locations on foot of this engagement. LAWPRO have in turn provided details of their 2021 monitoring programme and these are included, where applicable, in the WQ map as Figure 3.7.

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

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

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

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

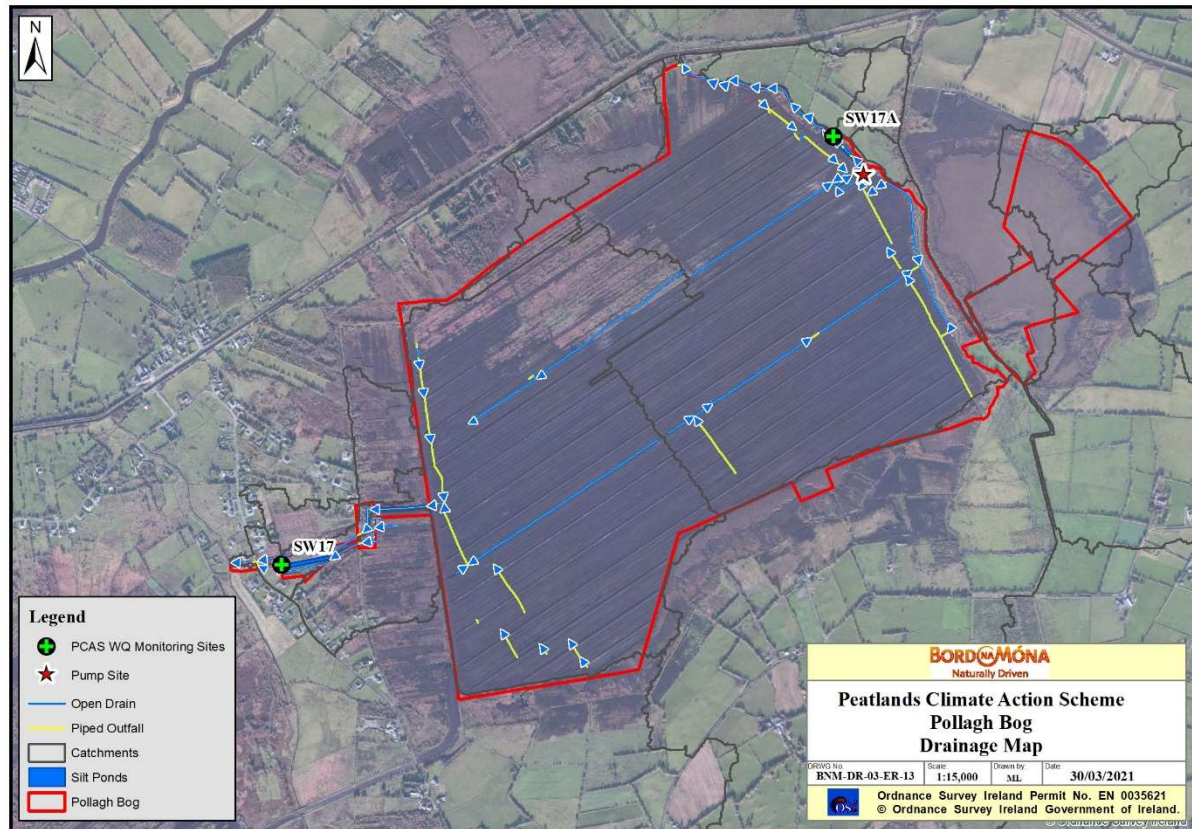
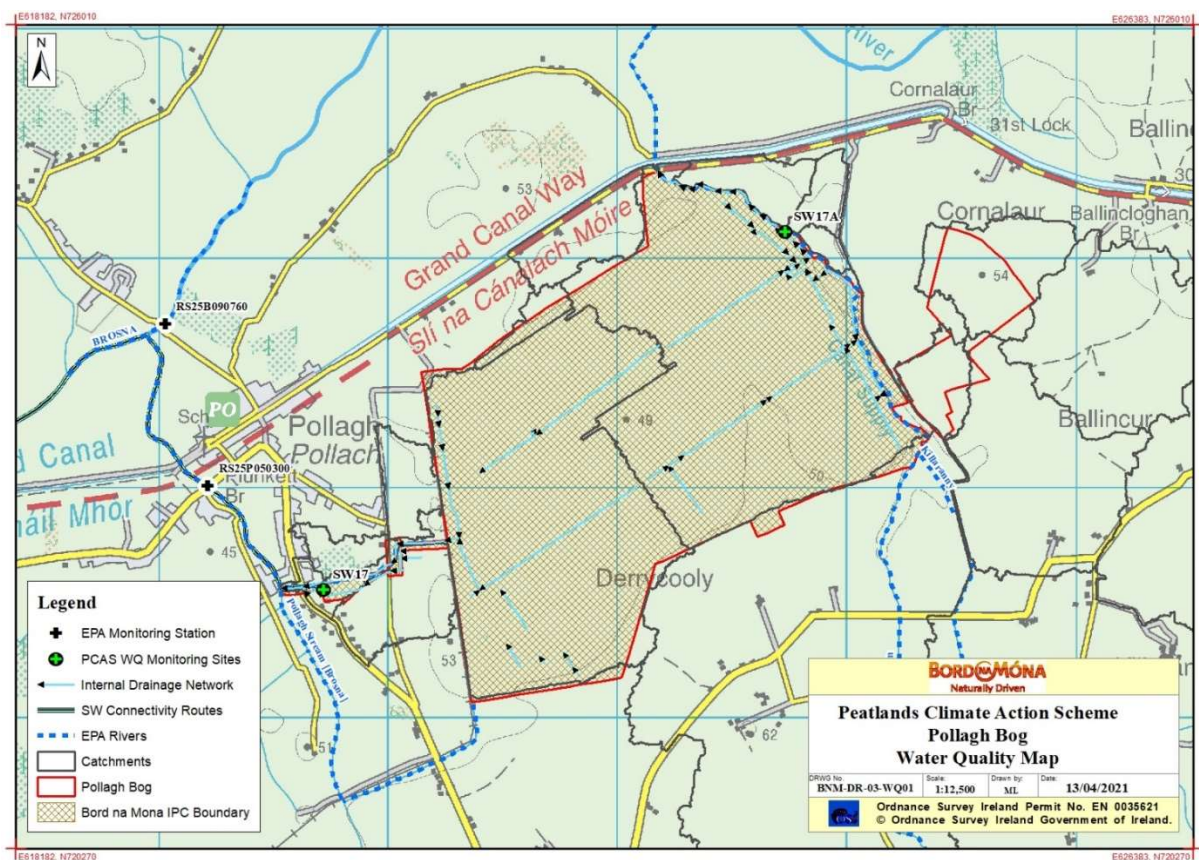


Figure 3.8 Maps of Pollagh Bog showing water management features and water quality monitoring points.

3.7 Fugitive Emissions to air

Industrial peat production has ceased at this bog. Rehabilitation of the cutaway peatland will seek to re-wet peat where possible, and re-vegetate all areas (whether wet or dry). Collectively, ceasing industrial peat production, re-wetting and re-vegetating will minimise any risk of emission to air from dust.

3.8 Carbon emissions

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

The EPA-funded CarbonRestore Project (Renou-Wilson *et al.* 2012) found that rewetting of drained peatlands can lead to restoration of functional peatland, such as the return of typical plant and animal species, which in turn may lead to the restoration of peat-formation and the C-sink function. The EPA NEROS project carried out GHG flux research at Moyarwood Bog and found that Moyarwood Bog was overall a Carbon sink (sink for CO₂ and a source for Methane) 6 years after bog restoration was carried out (Renou-Wilson *et al.* 2018). It is expected that Pollagh Bog will become a reduced Carbon source following rehabilitation. The site does have potential to become a carbon sink in the longer-term. This depends on the success of the rehabilitation measures, the extent of development of *Sphagnum*-rich habitats, the balance of carbon fluxes from different cutaway habitats (some of the cutaway is expected to develop Reed Swamp and fen habitats with alkaline emission factors) and future climatic conditions. Degraded peatlands also release carbon/GHG emissions via the fluvial/aquatic pathway (Dissolved Organic Carbon – DOC, Suspended Solids/Particulate Matter, degassing of GHGs from water).

It is expected that Pollagh Bog can become a reduced carbon source with sections having potential to develop as a carbon sink (albeit in the longer term) following rehabilitation. The potential of any cutaway site to develop as a reduced carbon source/carbon sink in the longer-term depends on the success of the rehabilitation measures, the extent of development of any *Sphagnum*-rich or other peat-forming habitats, the balance of carbon fluxes from different cutaway habitats and future climatic conditions. This bog is expected to develop a mosaic of fen, Reed swamp, wet woodland, scrub and embryonic *Sphagnum*-rich habitats. There is also known to be a spring influence on the ground-water of the bog. Birch woodland is expected to develop on the drier mounds and peripheral headlands.

3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

The majority of Pollagh can be rated as having a **low-moderate local ecological value (E)**. Bare peat and other intensively managed areas are assessed as having a low local ecological value and there is only a small area of developing cutaway present on the site.

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

3.10 Pollagh Bog Characterisation Summary

Pollagh Bog has been in commercial peat production since the 1950s, with all commercial peat extraction ceasing in 2019. The former production area of the bog is mostly bare peat but a range of cutover habitats are present on the northern side of the site. Poor fen mosaics of birch scrub or bare peat are situated in the northern half of the site. A small fragment of cutover bog and raised bog are located in the north-east portion of the site.

The bog can be broadly divided into several categories:

- 1) Shallow Cutaway Bog modelled as wetland; These areas are predicted to develop wetland habitats such as reedbeds. This habitat is predicted to form in the areas of shallow topographical depressions. Rehabilitation will facilitate the development and establishment of wetland vegetation.
- 2) Shallow Cutaway bog modelled as deeper water; These areas are predicted to develop deep open water habitats. This habitat is predicted for the deep topographical basins on the east and west extremities of the site. An open water body (2-3m depth) will develop in these areas.
- 3) Deep residual peat modelled as dry; These areas are modelled as dry and are predicted to develop *Sphagnum*-rich habitats when they are re-wetted.
- 4) Shallow Cutaway Bog modelled as dry; These areas are modelled as dry and are predicted to develop dry cutaway vegetation communities such as birch woodland (already developing).
- 5) Marginal areas, including headlands and high fields are likely to remain relatively dry. Drain-blocking and some fertiliser application is proposed on these area, where Birch woodland and other drier habitats are expected to develop.

4. CONSULTATION

4.1 Consultation to date

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

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

- General consultation with range of stakeholders at annual Bord na Mona Biodiversity Action Plan review days 2010-2018.
- Midlands & East Regional WFD Operational Committee (River Basin Management Plans).
- Sub-committee on Shannon Flooding Work Programme and Measures (OPW, Waterways Ireland, ESB, LA's, Fisheries Ireland, NPWs etc).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).
- The development of Lough Boora Discovery Park (Offaly County Council);
- Bird surveys carried out by Birdwatch Ireland for Bord na Móna
- Development of the Midlands National Shooting Centre of Ireland.

Consultation was carried out in 2019 on an earlier draft of this plan and additional consultation was carried out in 2020/2021.

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

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

4.2 Issues raised by Consultees

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

4.2.1 Assessments of rehabilitation

Queries on general pre-rehabilitation assessments were raised by NPWS and Offaly County Councils, the National Museum of Ireland and a number of local residents in relation to Appropriate Assessment, Environmental Impact Assessment and Strategic Environmental Assessment.

4.2.2 *Restoration scope*

Restoration/rehabilitation of marginal habitats was raised by IPCC and BCI as worthy of consideration within the rehabilitation measures to support carbon storage/sequestration and biodiversity objectives.

4.2.3 *Monitoring*

Further details on monitoring of ecological metrics, including water quality, carbon sequestration and biodiversity, and how and where reporting on this monitoring would take place, was raised by the IPCC, Offaly County Council and Trinity College Dublin. Butterfly Conservation Ireland also suggested that monitoring of Large Heath butterfly be considered to assess the success of the proposed rehabilitation actions.

The ICMSA queried if a hydrological baseline was being established on surrounding private land in relation to assessing ex-situ impacts arising from re-wetting. Michael Fitzmaurice TD queried what monitoring was being undertaken to assess carbon emission reductions and storage within the bogs as part of PCAS.

4.2.4 *Flooding of adjacent land*

Michael Fitzmaurice TD, IFA, ICMSA and a number of local landowners and residents queried likely impacts arising from the proposed re-wetting associated with the rehabilitation in relation to flooding on adjoining lands and, specifically, with regards to the maintenance of drains. The IFA and the Pollagh Community Residents also raised the issue of Health and Safety in relation to raising water levels as well as possible impacts on land and property prices. Local landowners and residents raised the issue of risks to pets and livestock.

4.2.5 *Other potential impacts arising from rehabilitation*

A local resident raised concerns over habitat loss for Grey Partridge arising from PCAS.

4.2.6 *Land Management*

The ICMSA and local landowners and residents queried the long-term management of the Bord na Móna's estate, particularly in relation to maintenance of boundary fencing to exclude livestock from the bogs and maintenance of drainage.

The NARGC suggested that heather be established on large area of the cutaway in general as this is beneficial from biodiversity and pollinators. NARGC were also keen to minimise the spread of scrub and woodland habitats to reduce habitats for predators (such as foxes) and were keen to seek control of so-called "vermin" species on the rehabilitated bogs.

A number of stakeholders including the Pollagh Residents Group, Fianna Fáil Councillors and Erin Rovers GAA Club expressed concern over the potential rise in anti-social activity (e.g. dumping) and fire risk as a result of PCAS.

4.2.7 *Other issues (including amenity)*

A number of stakeholders including; local residents and landowners, trinity college, Fianna Fáil Councillors and Erin Rovers GAA club expressed concern regarding the "short duration" of the consultation period concerning PCAS at Pollagh Bog.

Opportunities to develop amenities on the bog to support local communities was raised by a number of consultees, including the Pullough Residents Development Association, IPC and Fianna Fáil Councillors.

Other issues (raised by IPCC and local landowners and residents) included after use of the bog and turf cutting on the margins of the bog (outside of the area owned by Bord na Móna).

One local resident suggested that BnM consider pursuit of designation of the bog as a Dark Skies astronomy reserve.

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

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

4.3 Bord na Móna response to issues raised during consultation

4.3.1 Assessments of rehabilitation

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

An Archaeological Impact Assessment (AIA) is also being undertaken on all the bogs in PCAS. The aim for known archaeology on these bogs is to accomplish preservation in situ and we are taking steps to identify and avoid all known archaeology. Bord na Móna aim to achieve this through including all known archaeology on our GIS from the AIA process, and either excluding or defining a buffer zone around these features. Areas of archaeological importance will then be excluded from 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 archaeological features in an anoxic environment. There is also an identified procedure for managing reports of stray finds that may arise during rehabilitation works.

An archaeological end of life survey of all the bogs as requested by National Museum of Ireland and National Monuments Unit is not part of the current scope of the scheme. Bord na Móna would be happy to assist such a survey, where possible.

4.3.2 Restoration scope

The scope of this rehabilitation plan covers the former Pollagh Bog industrial peat production area. As part of the PCAS, all restoration/rehabilitation options have been developed to support climate action and biodiversity objectives.

Bord na Móna will not be entering or carrying out work on any private third party lands.

There are no proposals to designate Pollagh Bog as a conservation area in the short-term. It should be noted that any nature conservation designation is a decision for the Government and not Bord na Móna.

4.3.3 *Monitoring*

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

Water monitoring is undertaken as part of Bord na Móna's IPC licence obligations, and this will continue until such a time as the licence can be surrendered.

4.3.4 *Flooding of adjacent land*

It is the intention of Bord na Móna that the re-wetting of the bogs will be carried out in such a manner that does not impact on third party lands including adjoining private turf banks.

External consultants have been appointed to carry out a hydrological assessment, to identify any potential impacts to neighbouring lands and, where required, the rehab design will be amended to prevent any identified impact. Please note that climate change is considered in the hydrological assessment. Information on these hydrological assessments will be made available through our website.

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

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

4.3.5 *Other potential impacts arising from rehabilitation*

In relation to the ecological value of Pollagh Bog, Bord na Móna have a team of very experienced Ecologists who are qualified to assess the existing and future ecology and habitats of the bog. Re-wetting of the bog will increase the biodiversity on the bog and will not displace wildlife currently living there. While Grey Partridge are known to occur around Pollagh Bog, the amount of suitable habitat on site lost as a result of PCAS is considered negligible given the availability of high quality habitat nearby.

4.3.6 *Land Management*

Bord na Móna will continue to have responsibilities for managing the land in their ownership as any landowner would. In addition, land still under an IPC licence will need to be managed in accordance with that licence.

It is expected that re-wetting will reduce the overall area being colonised by Birch and other scrub species as conditions will be more suitable for wetter species. However, in drier areas that cannot be re-wetted, particularly where there is shallow (or no) residual peat, it is inevitable that drier-habitat vegetation communities, including Birch woodland, grassland and Heather-dominated vegetation, will develop. However, it is expected that as naturally functioning peatland ecosystems develop that are analogous to fen, these will colonise with some Heather and other ericoid species in time. Fens and other wet peatland habitats in good condition are known to support species such as Curlew and in time these sites could regain this potential.

Rehabilitation through PCAS aims to re-wet the bog and so should reduce Fire Risk at all PCAS sites in the mid to long term. However, BnM are cognisant of fire risk across the estate and will continue to apply best practice in relation to fire safety at all sites, to continue to minimise fire risk and react accordingly if a fire incident arises.

4.3.7 Other issues (including amenity)

BnM acknowledges that the initial consultation period for Pollagh Bog was short in duration. However, the initial deadline of 24/01/2021 was pushed back to 22/02/2021 to provide further opportunity for interested parties to make a submission and receive a response. Also, numerous virtual presentations and meetings were held for stakeholders, to both provide information on PCAS and address stakeholder concerns. Furthermore, to ensure transparent progress on the PCAS scheme, Bord na Móna will continue to engage with stakeholders beyond the current deadline, the purpose of which was to enable preliminary consultation to be captured within this rehabilitation plan.

Creating amenity such as walking tracks is not part of the direct scope of PCAS. However, PCAS will enable and support future amenity development. Future amenity proposals can be positively aligned and integrated to after-use plans following the completion of the proposed rehabilitation at Pollagh Bog. Rehabilitation measures proposed for Pollagh Bog do not need to be amended to integrate any future amenity track positioned along the margin of the former production bog or along the former bog railway.

Other issues, including after-use and management issues outside the boundary of Pollagh Bog, are acknowledged but are specifically outside the scope of this rehabilitation plan. This includes reference to the cessation of turf-cutting on private lands. Bord na Móna rehabilitation proposals will not impact on private turf-cutting and will have no impact on private turf-cutting outside Bord na Móna boundaries.

4.3.8 Concluding statement.

- No specific issues were raised during consultation that required significant changes to the substance of the rehabilitation plan.
- Issues raised by several consultees in relation to potential impacts on adjacent land had already been accounted for during the hydrological analysis. Several marginal drains will not be blocked to avoid impacts on adjacent lands or turf-banks.
- No changes were required to the rehabilitation plan to enable any potential future amenity or other land-use.

5. REHABILITATION GOALS AND OUTCOMES

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

- Meeting conditions of IPC Licence.
- Stabilisation or reduction in water quality parameters of water discharging from the site (e.g. suspended solids).
- Reducing pressure on receiving water-bodies that have been classified as At Risk from peatlands and from peat extraction, via stabilization or improving water-quality from this bog, and therefore, reducing pressures.
- Reducing pressure on receiving water-bodies from peat extraction, via stabilization or improving water-quality from this bog.
- 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, and eventually naturally functioning and peatland habitats.
- Optimising hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, where possible.
- The main goal and outcome of this plan is the successful rehabilitation (environmental stabilisation) of peatlands used for industrial peat production at the bog in a manner that is acceptable to both external stakeholders and to Bord na Móna and which optimise climate action and other ecosystem service benefits.

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

- It will take some time for stable naturally functioning habitats to fully develop at Pollagh Bog. This will happen over a longer time-frame than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (See Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- 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. Reducing pressures due to former peat extraction activities at Pollagh will contribute to stabilising or improving water quality status of receiving water bodies in general. Ultimately, improving the WFD status of the receiving water-body will depend on reducing pressure from a range of different sources., including peatlands in general (private and Bord na Mona).
- Bord na Móna are also planning rehabilitation measures in some adjacent bogs (e.g. Turraun and Oughter) in 2021. There are expected to be cumulative positive water quality and other ecosystem service benefits to receiving water bodies such as the River Brosna from rehabilitation of more than one bog in the same catchment.

- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features.

6. SCOPE OF REHABILITATION

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

- EPA IPC Licence - Ref. P0500-01. 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. Pollagh Bog is part of the Boora Bog group.
- The proposed Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This Scheme is designed to enhance the ecosystem services of Pollagh 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 area of Pollagh Bog is defined by Figure 3.1
- No rehabilitation measures are proposed for Cornalaur Bog as Bord na Móna never drained, or developed or carried out any industrial peat extraction on this bog.
- The local environmental conditions of Pollagh Bog identify deep peat re-wetting, dry cutaway and wetland prescriptions as the most suitable rehabilitation approach for this site.
- The key goals and outcomes of rehabilitation set by Bord na Móna. Bord na Móna have defined the key goal and outcome of rehabilitation at Pollagh Bog as **environmental stabilisation and optimising suitable hydrological conditions and setting the site on a trajectory towards the development of embryonic peat-forming (*Sphagnum*-rich) vegetation communities on deep peat, and the development of Reed Swamp and fen on shallow more alkaline peat and other subsoils**.
- Enhanced Rehabilitation of Pollagh Bog will support multiple National strategies of climate action, biodiversity action and other key environmental strategies such as the Water Framework Directive.
- The time frame for the delivery of the planned rehabilitation will be undertaken according to available resources and appropriate constraints.
- It is not proposed to carry out any rehabilitation in the marginal cutover bog zone. The cutover bog mainly consists of active private turbary.

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), and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).
- At Pollagh Bog, a significant portion of peat has been removed leaving a largely un-vegetated surface over peat deposits of varying depth. In addition, the site is spring-fed and has some exposed glacial gravel, along with pioneering scrub, poor fen and grassland communities. There are local factors that will influence the future trajectory of this site (hydrological and underlying geological conditions) which need to be considered as part of the wider rehabilitation work. A pump was installed in 2011; and an assessment will be needed when this pump is being decommissioned. There is significant potential for development of wetland habitats in this site due to the current drainage conditions and topography of

the site. The bog is underlain by springs, further affecting the drainage conditions. The bog is also underlain by shell marl, which will have a significant influence on water chemistry and the development of the future wetlands habitats, meaning there is potential for more extensive rich fen development.

- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care must be taken to ensure that active rehabilitation management will not 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. Some boundary drains around Pollagh Bog will be left unblocked as blocking boundary drains could affect adjacent land.
- **The Grand Canal feeder,** which occurs in close proximity, is hydrologically distinct from the hydrology of Pollagh Bog. There is no connection between the bog and the feeder. Therefore neither the canal feeder or the canal itself is expected to be affected by decommissioning and rehabilitation.
- **Public Rights of Way.** Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remain intact where possible. In some instances, depending upon previous land uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, any new archaeology may require rehabilitation measures will be reviewed and adapted. An archaeological impact assessment of the proposed rehabilitation at Pollagh Bog was carried out (Appendix XII). There are no known archaeological features. Rehabilitation will take account of stray archaeological finds (Appendix VI). Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

6.2 Key Assumptions

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

6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- The longer-term restoration trajectory of the site to raised bog. The plan covers the short-term rehabilitation **actions** and **an additional monitoring and after-care programme** to monitor the rehabilitation during the Scheme and to respond to any needs. It is expected that this rehabilitation plan will set the site on an enhanced and accelerated trajectory towards the development of naturally functioning peatland habitats (wetland, fen, some embryonic *Sphagnum*-rich vegetation). The plan does not set any goals or outcomes, for example, the extent (specific area) of active raised bog habitat (ARB) that may develop at this site. This is beyond the scope of this rehabilitation plan.

- This plan is not intended to be an after-use or future land-use plan for Pollagh Bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future.
- Cornalour Bog. Bord na Móna never carried out any bog development on this site.

7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

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

Rehabilitation is generally defined by Bord na Móna as

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

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

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

- Rewetting of residual peat in the former area of industrial peat production to offset potential silt run off and to encourage development of vegetation cover via natural colonisation and through a number of rehabilitation measures. The promotion of the development of target habitats on site will reduce the area of bare exposed peat. The target will be the delivery of measures and this will be measured by an aerial survey after rehabilitation is completed.
- Stabilization/improvement in 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.
- Receiving water bodies have been classified under the River Basin Management Plan. The success criteria will be that waterbodies downstream of Pollagh will see improvements in the associated pressures from this peatland.

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

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

As the monthly monitoring program at Pollagh continues in 2021 during the rehabilitation works, and data from the 2020 monitoring program is compiled, further trending will be produced to verify any ongoing trends.

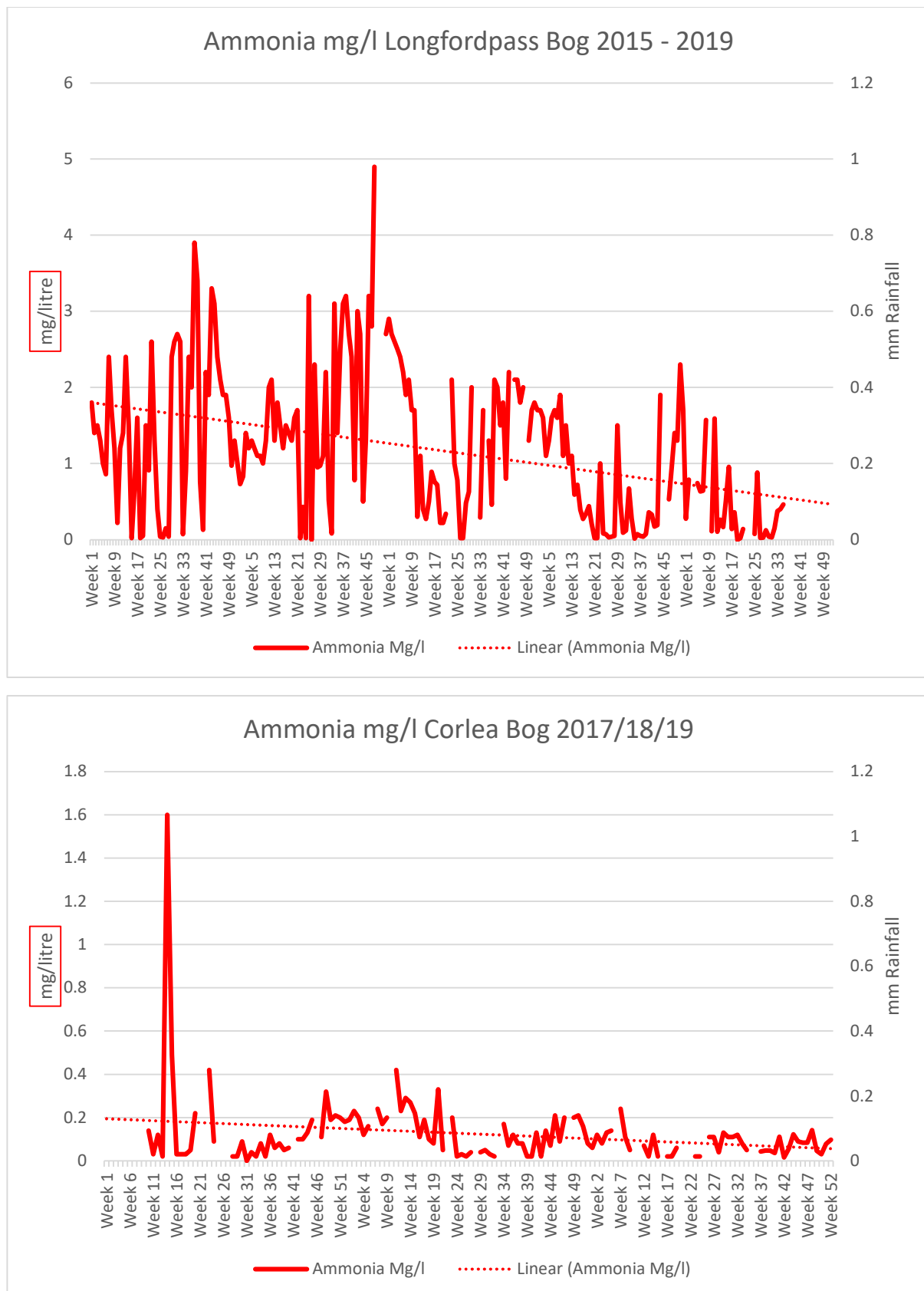


Figure 7.1. Ammonia levels over the period 2015-2019 at Longfordpass and Corlea.

(See Table 7.1 for a summary of the criteria for successful rehabilitation and associated monitoring.)

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

- Optimising the extent of suitable hydrological conditions to optimise climate action and other ecosystem service benefits (optimising residual peat re-wetting). This will be measured and demonstrated by site monitoring (updated aerial photography) to measure the extent of suitable hydrological conditions.
- Accelerating the trajectory of the site towards becoming reduced carbon source/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).
- 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.
- 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 time-frames.

Criteria type	Criteria	Target	Measured by	Expected Time-frame
IPC validation	Rewetting in the former area of industrial peat production	Delivery of rehabilitation measures Reduction in bare peat.	Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking) Establishment of a baseline for future monitoring of bare peat, vegetation establishment and habitat condition.	2021-2025
IPC validation	Key water quality parameters Ammonia, Phosphorous, Suspended solids,	Reduction or stabilisation of key water quality parameters	Water quality monitoring for a period after rehabilitation has been completed	2021-2023

	pH and conductivity	associated with this bog		
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	Where the section of the water body that this bog drains to, continues not to be identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body shows positive improvements in water quality impacts that can be attributable to the rehabilitation	EPA WFD monitoring programme Additional BnM water quality monitoring	WFD schedule
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action	Optimal extent of suitable hydrological conditions	Aerial photography and Habitat mapping to map extent of suitable hydrological conditions. Baseline monitoring to be carried out during the Scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025
Climate action verification	Setting the site on a trajectory towards establishment of a mosaic of compatible habitats	Establishment of compatible cutaway habitats	Habitat map, Cutaway bog condition map Baseline monitoring to be carried out during the Scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.	2021-2025

Climate action verification	Biodiversity and ecosystem services. Habitat establishment Presence of key species – Sphagnum Breeding birds Pollinators Carbon emissions	Improvement in biodiversity and ecosystem services.	Metrics that relate to selected biodiversity and ecosystem services (to be defined) Presence of key species – Sphagnum – Walkover survey Breeding birds – Breeding bird survey Pollinators – Pollinator walk Water quality – Water quality monitoring	2021-2025
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Meeting climate action verification criteria and monitoring of these criteria after the proposed Scheme has been completed is dependent on support from the Climate Action Fund or other sources of funding. Note that monitoring and verification of the overall Scheme will be stratified – not all these criteria will be measured at each individual site. Baseline monitoring to be carried out during the Scheme when rehabilitation is complete. Sites can be re-monitored in the future and compared against this baseline.

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

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

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

vegetation can develop relatively quickly (3-10 years) and wetland habitats can develop relatively quickly. Birch woodland may take 20-30 years to develop. However, it may take 50 years for active raised bog vegetation to re-develop on ground that was previously cutaway. Different environmental conditions will have a significant impact on the rate of natural colonisation, and as a result of the combination of different environmental conditions and the application of different rehabilitation measures, there will be a variety of habitat outcomes.

- Rehabilitation measures have been designed to accelerate and work with natural colonisation and other natural processes. Bord na Móna experience of rehabilitation has shown that re-wetting improves conditions for natural colonisation and that natural colonisation is accelerated where the environmental conditions are most suitable. Rehabilitation measures have been designed to modify the conditions of areas within sites where conditions are less suitable for natural colonisation (modifying hydrology, topography, nutrient status or availability of potential seed sources).
- **Monitoring to be robust and effective.** Rehabilitation Monitoring will be established to validate the success of rehabilitation as required by Condition 10 of the IPC Licence and to verify the benefits of the proposed enhanced measures to optimise climate action. This will focus on collecting a range of scientific data that can then quickly be adapted into metrics that can be used to measure changes in various ecosystem services.

8. REHABILITATION ACTIONS AND TIME FRAME

Peatland rehabilitation requires detailed planning and the use of data from desktop surveys and field surveys. This data in association with topographical and hydrological modelling (Figure 8.3 & 8.4) 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 (Figure 8.4) indicates those areas that are likely to re-wet when drains are blocked, based on the current topography, and areas where water levels may have to be modified, where needed. Enhanced rehabilitation measures will look to optimise hydrological conditions for re-wetting peat in other areas. This planning is also essential for matching the most sustainable rehabilitation methodology to the most suitable cutaway environment to maximise the benefits of the resource outlay (maximising cost/benefit).

The rehabilitation actions will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in Figure 8.5. (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 Pollagh Bog will include:

- Re-assessment of the pumping regime and turning off pumps if this desired and has no significant external impact. Initial hydrological modelling indicates that a part of the site will develop a mosaic of wetland habitats with deeper water, when pumping is reduced or stopped. 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 variable topography). Water-levels will be adjusted at outfalls and by adjusting piped drainage. More sustainable permanent gravity drainage solutions will be examined. It is expected that a natural seasonal flooding regime will develop, with water-levels fluctuating in association with levels in the adjacent River Brosna catchment.
- Re-wetting the deep peat areas of the bog using berms and field re-profiling. This enhanced measure seeks to create large (c. 45m x 60m) flat areas or cells of shallow (< 10 cm) water conditions on bare peat, across multiple fields that are enclosed by shallow berms to retain shallow surface water.
- In some areas, a cut-and-fill cell bunding technique is proposed. The cut and fill cell bunding approach aims to create 'saucers' or flat bunded areas (cells) on peat with berms to hold shallow water at appropriate levels.
- Re-wetting some deep peat areas of the bog through regular field drain blocking using a dozer/excavator to create three peat barriers every 100 m along each field drain.
- Re-alignment of piped drainage.
- Blocking drains in targeted existing pioneering vegetation mosaics, to accelerate re-wetting, and/or manage water levels to the correct height to accelerate the current trajectory towards Reed swamp and fen, using a dozer/excavator.
- Targeted fertiliser applications to accelerate vegetation establishment on headlands and high fields.
- Seeding of vegetation and inoculation of *Sphagnum*.
- Modifying water levels at outfalls, as it may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated. This will further slow the movement of water through and out of Pollagh Bog. It may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated.

Table 8.1: *Types of and areas for enhanced rehabilitation measures at Pollagh Bog.* (Note that the actual distribution of these measures may be subject to change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.)

Type		Enhanced Rehabilitation Measure	Extent (Ha)
Deep peat	DPT4	Berms and Field re-profiling (45X60M cell) + blocking outfalls and managing overflows+ Sphagnum inoculation	76.3
Deep Peat	DPT5	Cut and Fill cell bunding (30m x 30m cell)+blocking outfalls and managing overflows+drainage channels for excess water+sphagnum innoculation	5.8
Deep peat	DPT3	More intensive drain blocking (max 7/100 m), + field reprofiling + blocking outfalls and managing overflows	6.9
Dry cutaway	DCT2	Regular drain blocking (max 3/100 m) + blocking outfalls and managing water levels with overflow pipes + targeted fertiliser treatment	42.8
Wetland	WLT2	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	1.7
Wetland	WLT3	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes + Targeted blocking of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes	29.6
Wetland	WLT4	More intensive drain blocking (max 7/100m) +blocking outfalls and managing overflows +transplanting reeds and other rhizomes	83.0
Marginal land	MLT1	No work required (Marginal land including Silt Ponds)	40.7
Silt ponds		Silt ponds8.1	4.2
Constraint			14.1
Total			305.2

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

- Seek formal approval of the enhanced plan from the EPA;
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator;
- Develop a detailed site plan with detailed site drawings outlining how the various rehabilitation methodologies (the proposed PCAS) will be applied to Pollagh 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);
- Carry out a hydrology and drainage management assessment of the proposed enhanced rehabilitation measures;
- Carry out a review of known archaeology and an archaeological impact assessment of the proposed rehabilitation. Incorporate the results of this assessment into the rehabilitation plan to minimise known archaeological disturbance, where possible;

- Carry out a review of remaining milled peat stocks;
- Carry out a review of issues that may constrain rehabilitation such as known rights of way, turbary and existing land agreements. A known right of way exists along across one of the Bord na Móna margins.
- Carry out an ecological appraisal of the potential impacts of the planned rehabilitation, if needed, such as the presence of sensitive ground-nesting bird breeding species (e.g. Curlew) or larval webs of Marsh Fritillary butterfly, etc. The scheduling of rehabilitation operations will be adapted, as mitigation; and
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- Carry out Appropriate Assessment of the Rehabilitation Plan. Incorporate any required mitigation measures from the AA in the plan for the delivery of rehabilitation and decommissioning across the site. (Note that an AA screening of Pollagh has been carried out and the rehab plan has screened out at Stage 1).
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implantation of the rehabilitation plan.

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

- Carry out proposed measures as per the detailed site plan. This will include a combination of drain blocking, peat field re-profiling, cell-bunding and fertiliser applications targeting headlands, high fields and other areas (where required). All rehabilitation will be carried out with regard to environmental control measures (Appendix IV);
- Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions.
- While natural colonisation is expected to commence almost immediately, Phase 2 actions will be carried out in targeted areas to accelerate re-vegetation and colonisation of target species. The wetland areas are already colonising with pioneer vegetation. Phase 2 actions will include seeding of targeted vegetation and inoculation of *Sphagnum* on deep peat and transplanting of some wetland vegetation, where needed.
- Silt-ponds will be monitored during this period and there will be continued maintenance and cleaning (if required) to prevent potential silt run-off from the site during the rehabilitation phase.
- Submit an *ex post* report to the Scheme regulator to verify the eligible activities and interventions 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 proposed Scheme.

8.3 Long-term (>3 years)

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

8.4 Timeframe

- 2020-2021. Short-term planning actions.
- 2021. Short-term practical actions.
- 2021-2024. Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2024. Decommission silt-ponds, if necessary.

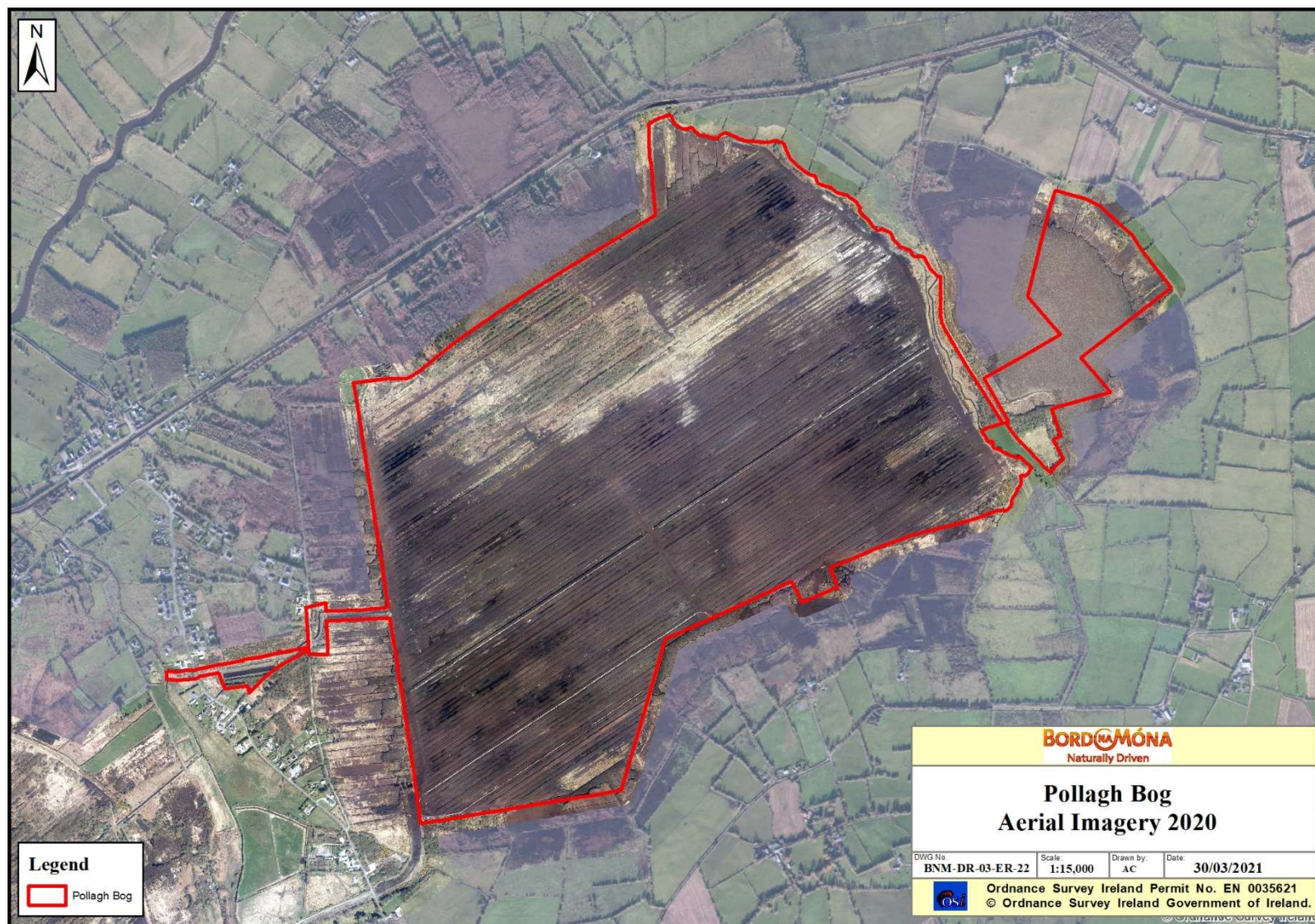


Figure 8.1 Pollagh Bog Aerial Photograph. The majority of the bog is bare peat.

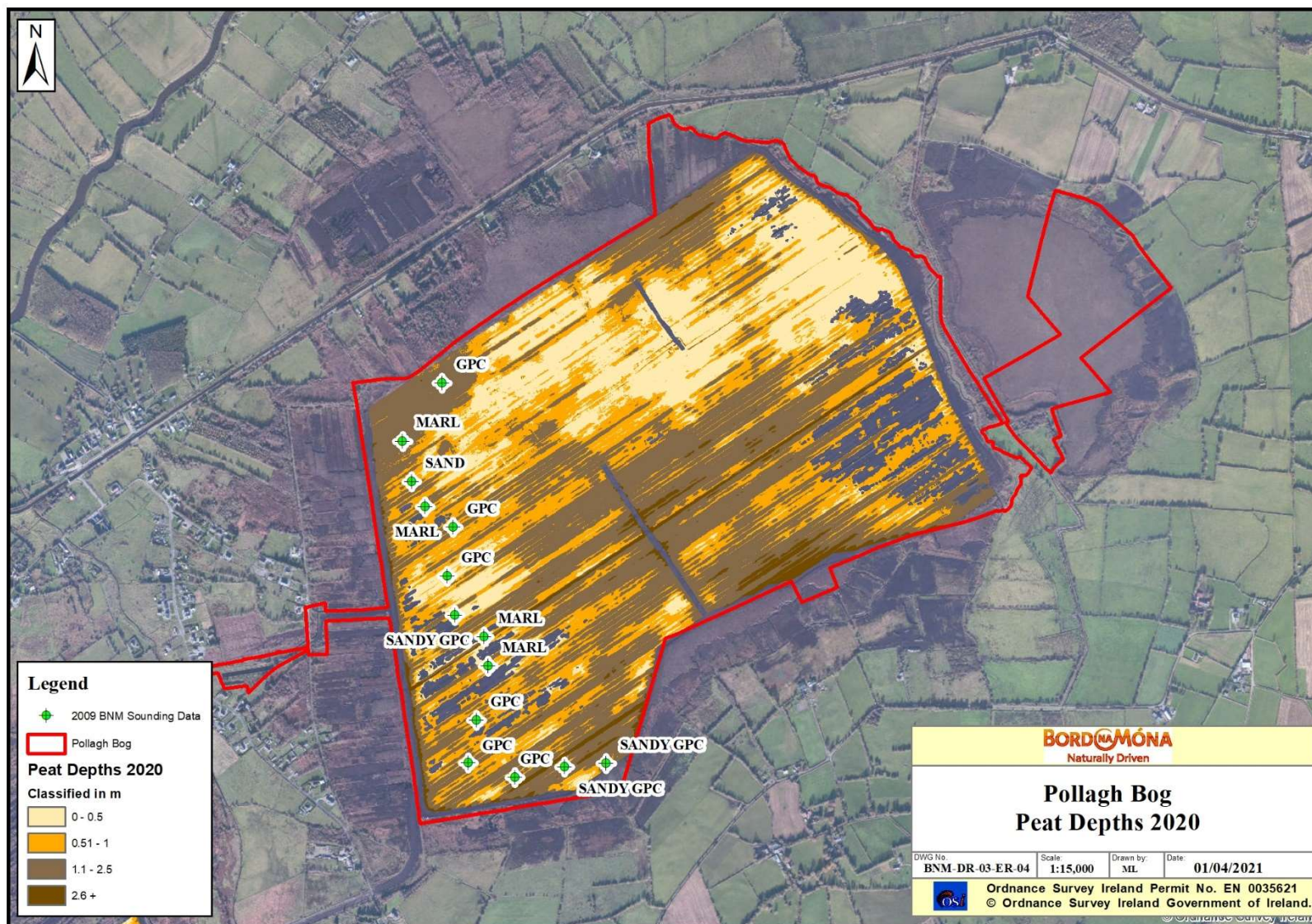


Figure 8.2. Peat Depth Map for Pollagh Bog. Deep peat reserves remain in the central and south-west areas, the peat over the remainder of the site has been cutaway.

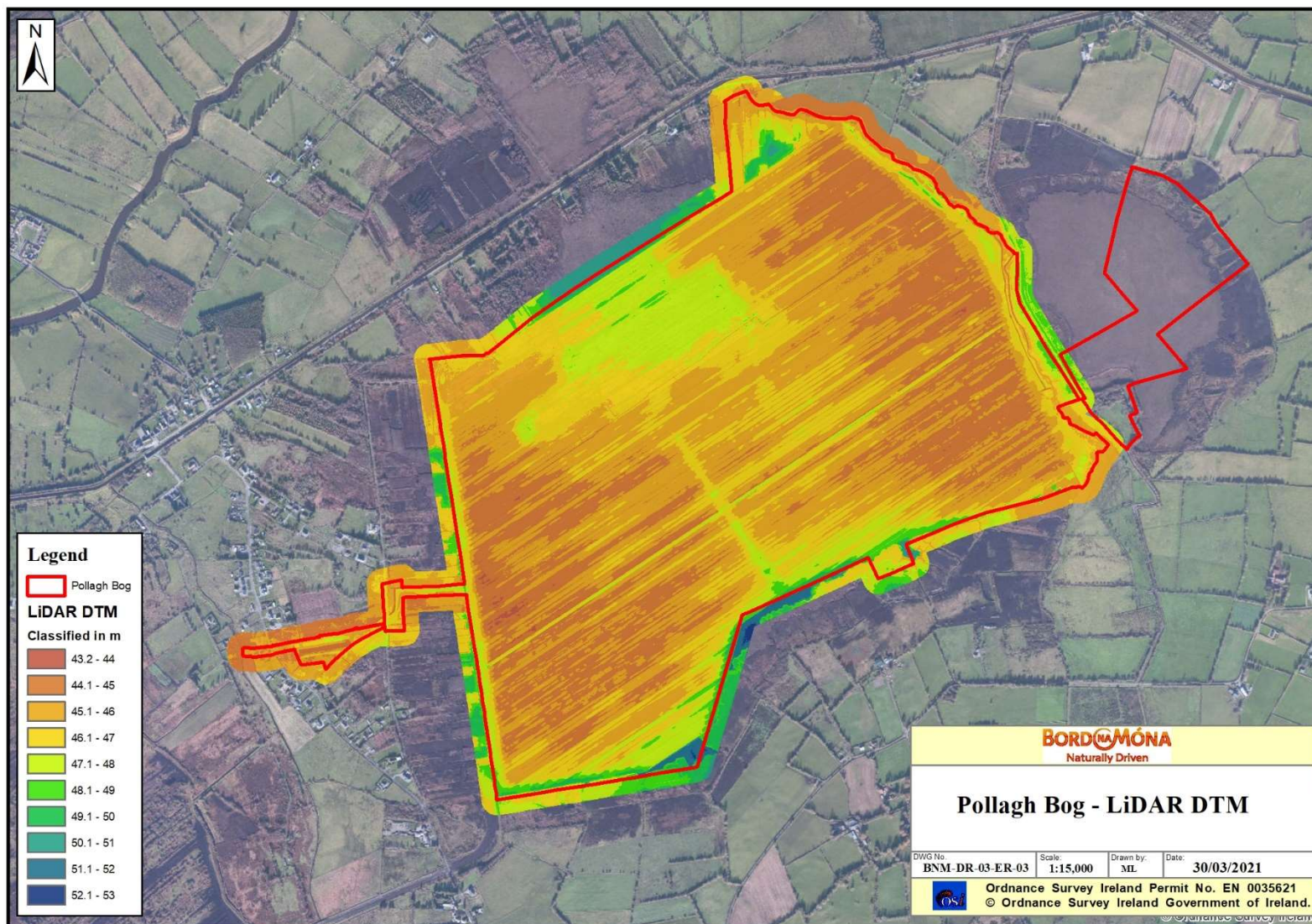


Figure 8.3. LIDAR topography map of Pollagh Bog. Low areas and basins are orange-yellow, more elevated areas are blue-green.

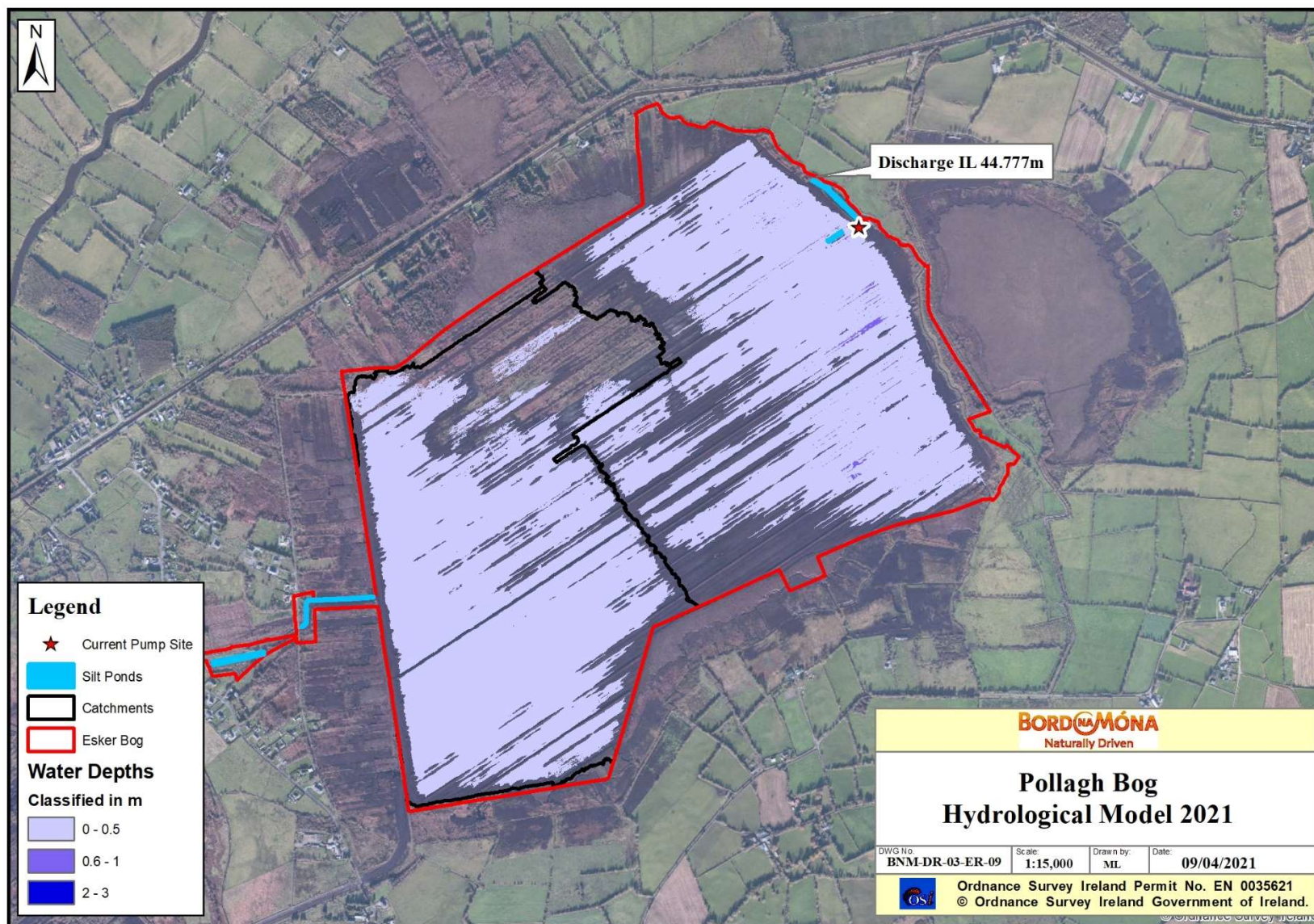


Figure 8.4. Hydrological modelling for Pollagh Bog showing range of expected water depths based on current topography and key flow-paths.

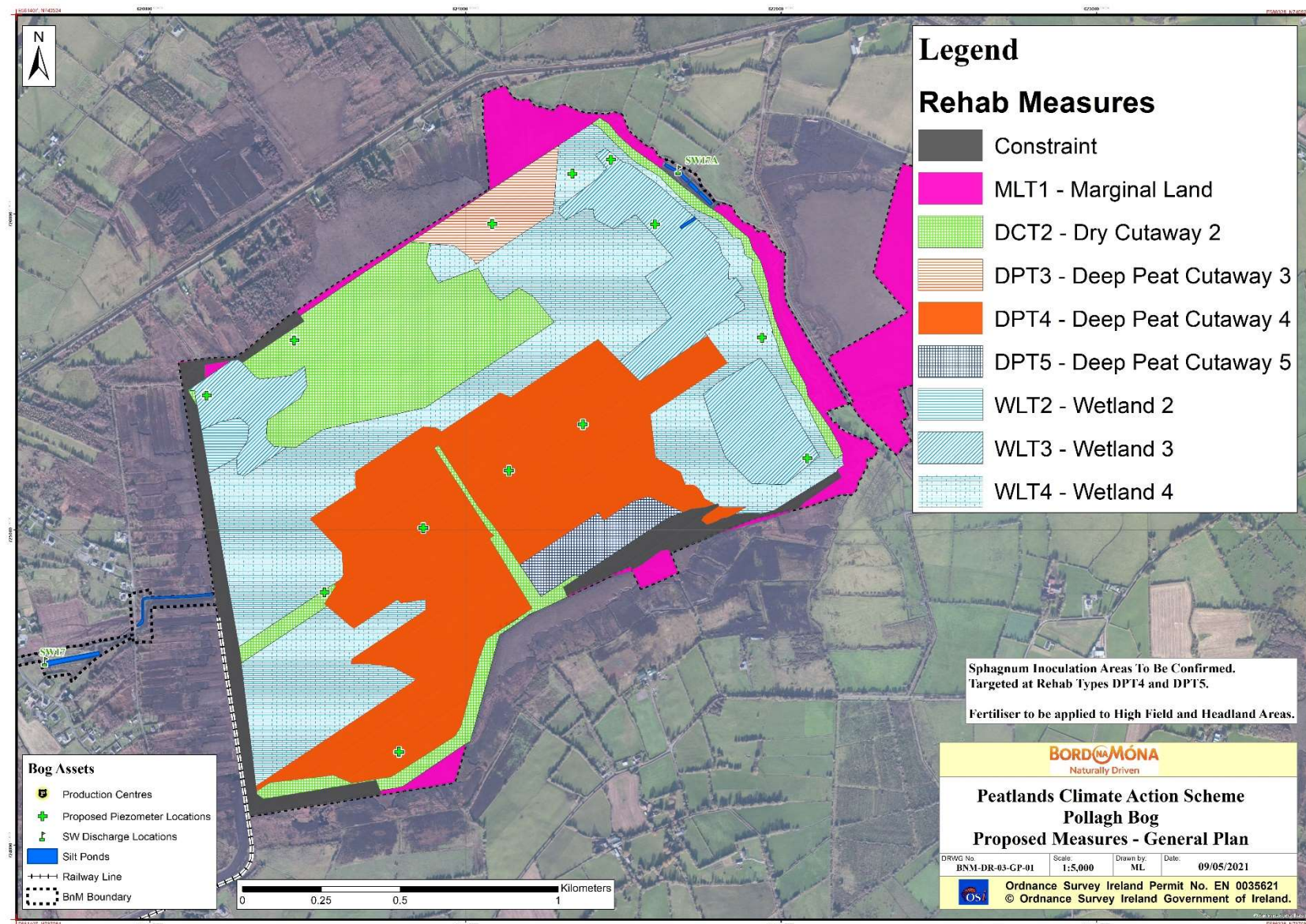


Figure 8.5. Indicative Enhanced Rehabilitation Plan

8.5 Budget and costing

Bord na Móna (BnM) appreciates the Minister's intention to support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed 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 proposed Scheme will deliver benefits across climate action (GHG mitigation through reduced carbon emissions and acceleration towards carbon sequestration), enrich the State's natural capital, increase eco-system services, strengthen biodiversity, improve water quality and storage attenuation as well as developing the amenity potential of the peatlands.

Bord na Móna maintains a provision on its balance sheet to pay for the future costs of **standard** rehabilitation and decommissioning when industrial peat extraction ceases. This is updated every year - for more information see the Bord na Móna Annual Report (Bord na Móna 2020). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

At this time, a 'standard' rehabilitation provision (sufficient to discharge the requirement of Condition 10 in the licence) has been allocated to the site based on the area of deep peat habitats, shallow cutaway areas and regenerating bog communities across high bog (See Appendix I).

9. AFTERCARE AND MAINTENANCE

9.1 Programme for monitoring, aftercare and maintenance

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

- There will be **initial quarterly monitoring assessments** of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbours land, general land security, boundary management, dumping and littering.
- The number of these site visits will reduce after 2 years to bi-annually 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 required.
- **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 a minimum of 70% of a bogs drainage catchments.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at www.epa.ie.
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Flow, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, and COD.
- This monthly sampling regime on a selected number of silt ponds will be carried out over a three-year cycle. The original (licence) requirement was for a quarterly sampling regime but this has been increased to a monthly regime to appropriately track the changing water chemistry that will occur as part of this 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 water quality monitoring will be reviewed, with consideration of potential ongoing research on site. The water quality data, the aerial surveys and the habitat mapping will be collated and will be submitted to the EPA as part of the final validation report.
- If, after two years, key criteria for successful rehabilitation have **not** been achieved and key targets have **not** been met, then the rehabilitation measures and status of the site will be evaluated and enhanced, where required. This evaluation may indicate no requirement for additional enhancement of rehabilitation measures, but may demonstrate that more time is required before key criteria for

rehabilitation has been achieved. Monitoring of water quality will then also continue for another period to be defined.

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

Additional monitoring measures are also proposed to monitor ecosystem service benefits that have been derived by enhanced rehabilitation. These proposed monitoring measures will be funded by the proposed 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 (Similar to ecotope mapping). This assessment will include assessment of on environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated peatland habitats. This means that potential GHG emissions can be estimated from the site, as the site continues along its trajectory towards a naturally functioning peatland ecosystem.
- It is proposed to monitor the improvement of some biodiversity ecosystem services. A breeding bird monitoring programme will be established.

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

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

In the event that the proposed 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.

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

Scope of rehabilitation

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

- EPA IPC Licence - Ref. P0500-01. 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. Pollagh Bog is part of the Boora Bog group.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- The area of former industrial peat production at Pollagh Bog as defined by Figure 3.1.
- No rehabilitation measures are proposed for Cornalaur Bog as BnM never drained, or developed or carried out any industrial peat extraction on this bog.
- Minimising potential impacts on neighbouring land. Some boundary drains around Pollagh Bog will be left unblocked as blocking boundary drains could affect adjacent land.

Rehabilitation goals and outcomes

The key rehabilitation goals and outcomes for this bog are defined as:

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

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

Criteria for successful rehabilitation:

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

- That there is a stabilising/improving concentration of suspended solids and ammonia associated with the measures undertaken to stabilise the peat surface by the blocking of the internal drainage system and the maximised rewetting of the peat surface. This will be demonstrated by developing a stable or downward trajectory of water quality indicators (suspended solids and ammonia) towards what would be typical of a re-wetted cutaway bog. This will be measured via water quality monitoring (suspended solids and ammonia).
- That the main water body associated with surface water from this bog continues to be excluded in the EPA's list of peat pressure water bodies as reported in the River Basin Management Plans. Where the water body has been identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body shows positive improvements in water quality impacts that were attributable to the original peat extraction activity.

Rehabilitation indicators

- Demonstrating the delivery of the rehabilitation through site visits and through updated aerial photography (indicating presence of peat barriers, elevated water levels and re-wetting).
- Stabilising potential emissions from the site (e.g. silt). 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.

Rehabilitation measures: (see Figure Ap-1)

- Blocking field drains in the former industrial production area using a dozer/excavator to create regular peat blockages (three barriers per 100 m) along each field drain.
- Re-alignment of piped drainage.
- Realignment of gravity outfalls (where needed).
- Fertiliser treatment of high fields and headlands (typically slow to naturally re-colonise) to encourage natural colonisation, if needed.
- No measures are planned for the surrounding marginal peatland habitats.
- Silt ponds will continue to be maintained during rehabilitation and decommissioning.
- Evaluate success of short-term rehabilitation measures and enhance where necessary.
- Decommissioning of silt-ponds will be assessed and carried out, where required.

Timeframe:

- 2021. 1st phase of rehabilitation. Field drain blocking with dozer/excavator.
- 2021. 2nd phase. Further realignment of piped drainage and other re-wetting measures dependent on success of 1st phase re-wetting, as determined by ongoing monitoring of water levels and re-vegetation.
- Other enhancement measures such as fertiliser treatment will be carried out, if needed. These will be determined by ongoing monitoring.
- 2023-2024. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- 2023-2024. Decommission silt-ponds.

Table AP-1. Rehabilitation measures and target area.

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + blocking outfalls and managing water levels with overflow pipes	89.0
Dry Cutaway	DCT1	Blocking outfalls and managing water levels with overflow pipes	42.8
Wetland	WLT1	Turn off or reduce pumping to re-wet cutaway + blocking outfalls and managing water levels with overflow pipes	114.4
Marginal land	MLT1	No work required	40.7
Silt ponds		Silt-ponds/ Constraint	18.3
Total			305.2

Monitoring, after-care and maintenance

- There will be initial quarterly monitoring assessments of the site to determine the general status of the site, the condition of the silt-ponds, assess the condition of the rehabilitation work, assess the progress of natural colonisation, monitoring of any potential impacts on neighbouring land and general land security. The number of site visits will reduce after 2 years to bi-annually. These site visits will assess the need to any additional rehabilitation.
- Water quality monitoring will be established.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on Bog Rehabilitation in the Annual Environmental Report, which will be available in April each year at www.epa.ie.
- 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.

Validation and IPC Licence surrender

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

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

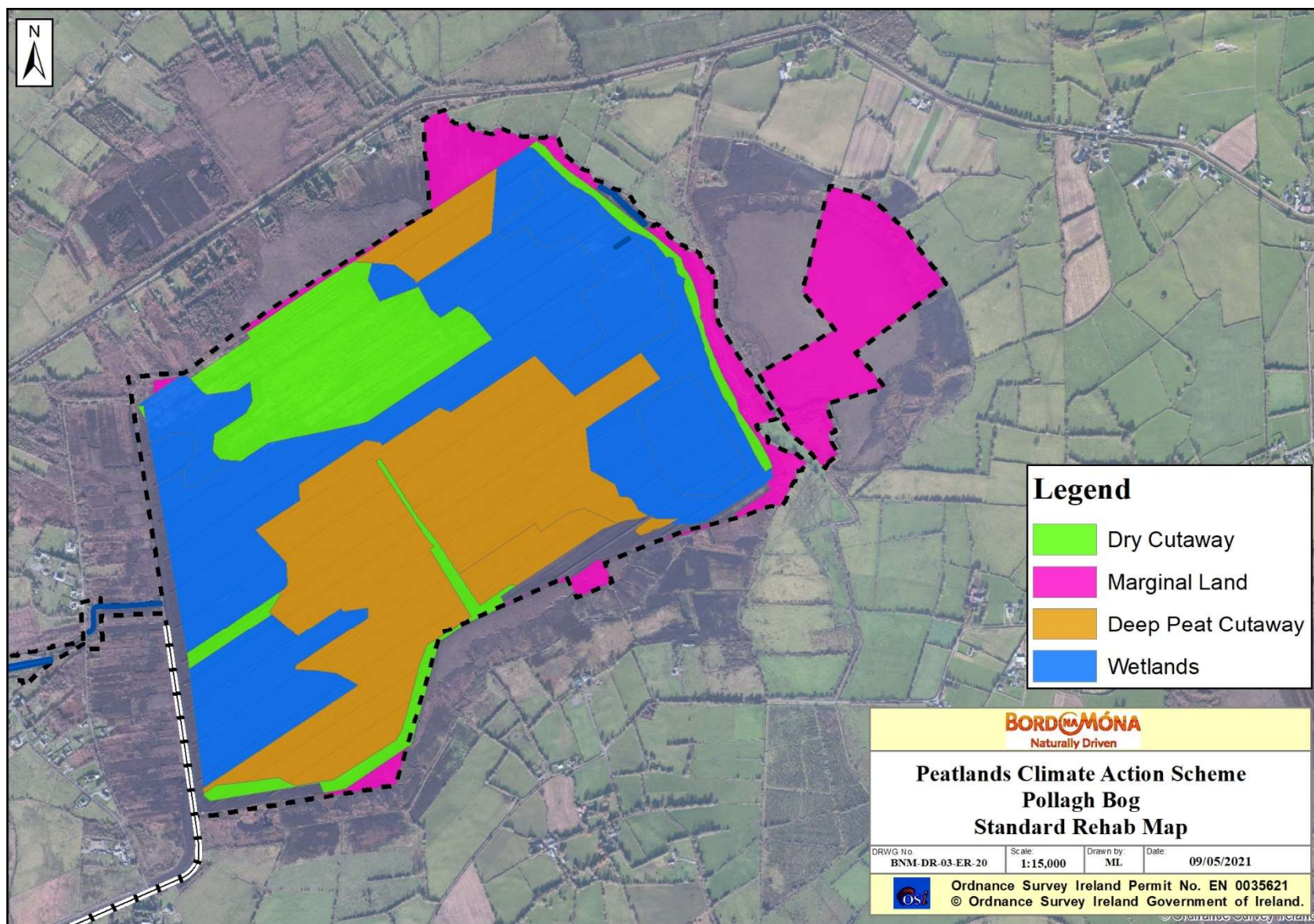


Figure Ap-1. Indicative Standard rehabilitation plan for Pollagh Bog.

APPENDIX II: BOG GROUP CONTEXT

The Boora group of bogs are sited between Killeigh (Offaly) in the East to Banagher (Offaly) in the West and between Kinnitty (Offaly) in the south and Clara (Offaly) in the North. The River Shannon is the major river catchment for the area with a smaller area lying within the Barrow catchment.

The Boora Group is one of the oldest bog groups in Ireland. Bord na Móna was set up in 1946 and it commenced the development of the Boora Bogs in 1946 with milled peat production commencing in 1955. Milled peat was produced in the Boora Bog for the supply of fuel peat to the power station in Ferbane which commenced power generation in 1957 and closed in 2001. The Boora bogs were also developed for the supply of milled peat to the Derrinlough Briquette factory, which commenced production in 1957.

Much of the Boora Bog complex became cutaway as it was in peat production at an early stage. A number of rehabilitation measures comprising naturalisation and development of alternative after-uses have been already explored at the Boora Bog Group, including coniferous forestry, biomass, agricultural grassland, amenity use, rare species conservation management (specifically Grey Partridge) and wetland creation. Some of this was carried out in the 1980s. While agricultural fields and coniferous forestry have been developed successfully on the cutaway bogs at Boora, it was found that these require financial investment that at this time exceeds any potential commercial output value. The Lough Boora Discovery Park encompasses all areas relating to amenity and biodiversity. www.loughboora.com.

The bogs in The Boora Bog Group have been used in the past to supply milled peat for the horticultural market, local power stations (Ferbane, Shannonbridge and West Offaly Power) and Derrinlough Briquette factory.

A breakdown of the component bog areas for the Boora Bog Group IPC License Ref. PO500-01, and current, indicative Peat Production Status, is outlined in Table Ap-2. These areas are also outlined on Figure Al-2 (Map of the Boora Bog Group).

Table Ap-2: Boora Bog Group names, area and indicative status

Bog	Area (Ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Killaun	359.5	Cutover Bog Industrial peat production commenced at Killaun Bog in 1996 and ceased in 2020. Only the upper most layers of peat have been harvested. Deep peat reserves remain on site. Killaun is considered a deep peat cutover bog.	Killaun Bog formerly supplied a range of commercial customers including; horticultural peat and fuel peat. Most of the former production area is bare peat.	2020	Draft 2017
Boora	1,842.4	Cutaway Harvested since the 1950's resulting in the exhaustion of the commercially viable peat resource at the bog. The majority of Boora Bog is considered a shallow peat cutaway bog. Some areas of deep peat persist at this site.	The majority of Boora bog has already been rehabilitated. A significant area of cutaway bog has been re-wetted, developed as conifer forestry (Coillte) and developed as farmland (1980s). This site now forms the core of Lough Boora Discovery Park.	2020	Finalised 2021

Pollagh/ Cornalaur	280.8	<p>Cutaway</p> <p>At Pollagh Bog, industrial peat production began in 2004 and ceased in 2020.</p> <p>Peat reserves of variable depth remain on site. Some deep peat areas remain. Pollagh is considered a cutover bog with variable peat depths.</p>	<p>Pioneer emergent peatland vegetation communities are developing throughout the bog.</p> <p>The adjacent Cornalaur Bog was never developed for peat production.</p>	2020	Finalised 2021
Noggusboy	917.4	<p>Cutaway Bog</p> <p>Industrial peat production commenced at Noggusboy during the 1950's and ceased in 2020. Long-term peat extraction has exhausted commercially viable peat reserves on this bog. Noggusboy is considered a shallow peat cutaway bog.</p>	<p>Part of the site was developed for conifer forestry by Coillte.</p> <p>Part of the site was developed as Cloghan Lake, as part of Lough Boora Discovery Park, in 1999.</p> <p>There is some emerging naturally colonising cutaway.</p>	2020	Draft 2017
Drinagh	1,339.1	<p>Cutaway Bog</p> <p>Industrial peat production commenced at Drinagh during the 1950's and ceased in 2020. Some small pockets of deep peat reserves remain in parts of Drinagh Bog but most of the commercially viable peat reserves have been exhausted. Drinagh is considered a shallow peat, cutaway bog.</p>	<p>Drinagh East is cutaway and has been extensively rehabilitated as wetland. This part of the site has extensive development of naturally functioning peatland habitats.</p> <p>Some Coillte conifer forestry is also present.</p> <p>There is some emerging naturally colonising cutaway in Drinagh West.</p>	2020	Draft 2017
Killaranny	242.8	<p>Cutover Bog</p> <p>Industrial peat production commenced at Killaranny during the 1980's. Deep peat reserves remain on much of the bog. Killaranny is considered a deep peat cutover bog.</p>	<p>Killaranny Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat.</p> <p>A portion of the site is leased by NPWS since 2011 as a re-location area for turf cutters from nearby Clara Bog SAC.</p>	2020	Draft 2017
Oughter	352.9	<p>Cutaway</p> <p>Development of Oughter Bog commenced in the 1960's. Industrial peat production ceased in 2012. Shallow peat depths remain over much of the former production bog area. Oughter is considered a shallow peat cutaway bog.</p>	<p>The site has naturally been re-wetting and there is already significant natural colonisation.</p> <p>Part of the site has been developed as the Midlands National Shooting Centre of Ireland.</p>	2012	Finalised 2021
Galros	191.5	<p>Cutover Bog</p> <p>Industrial peat production commenced at Galros during the 1980's and ceased in 2020. Some areas of deep peat remain on the former production area. Galros is considered a cutover bog of variable peat depth.</p>	<p>Galros Bog formerly supplied a range of commercial customers including; horticultural peat and fuel peat.</p> <p>Some naturally emerging cutaway habitats are developing in part of the site.</p>	2020	Draft 2017
Clongawny More	987.2	<p>Industrial peat production commenced at Clongawny More during the 1950's and ceased in 2020. Some pockets of deep peat persist, particularly in the south-</p>	<p>Part of the site rehabilitated, as part of Lough Boora Discovery Park, in 1999.</p>	2020	Draft 2017

		western portion of the former production area. Clongawny More is considered a cutover bog with variable peat depths throughout the site.	Some Coillte conifer forestry is also present. The site has naturally been re-wetting and there is already significant natural colonisation. BnM currently have submitted an application for renewable energy development on this bog.		
Derrinboy	305.7	Cutover Bog Derrinboy was first developed by BnM in the 1980's. Peat production ceased at Derrinboy in 2020. This bog was used to supply horticultural peat. Only the upper layers of peat have been harvested. Derrinboy is considered a deep peat cutover bog.	Derrinboy Bog formerly supplied a range of commercial customers including; horticultural peat and fuel peat.	2020	Draft 2017
Moneitta	707.5	Cutover Bog Moneitta was first developed by BnM in the 1970's. Peat production ceased at Moneitta in 2020. This bog was used to supply horticultural peat. Only the upper layers of peat were harvested. Moneitta is considered a deep peat cutover bog.	Moneitta Bog formerly supplied a range of commercial customers including; horticultural peat and fuel peat.	2020	Draft 2017
Boora Lemanaghan Rail_Link	6.9	N/A	Not applicable	N/A	N/A
Derries	368.2	Cutaway Bog Development of The Derries Bog commenced in the 1960's. Industrial peat production ceased in 2005. Shallow peat depths remain over much of the former production bog area. The Derries Bog is considered a shallow peat cutaway bog.	Wetland rehabilitation carried out over part of site in 1999. Amenity trackway development in 2015. Part of the Lough Boora Discovery Park. The site has now been extensively naturally colonised and is a mosaic of wetland and Birch woodland habitats.	2005	Finalised 2021
Turraun	534.5	Cutaway Bog Development of Turraun Bog commenced in the 1950's. Industrial peat production ceased in 2018. Turraun is considered a shallow peat cutaway bog.	Wetland rehabilitation carried out over part of area in 1999 as part of the Lough Boora Discovery Park. This section of the site has now been extensively naturally colonised and is a mosaic of wetland and Birch woodland habitats.	2018	Finalised 2021
Derryclure	327.6	Cutover Bog Derryclure was first developed by BnM in the 1980's. Peat production ceased at Derryclure in 2020. This bog was used to supply horticultural peat. Only the upper layers of peat were harvested. Derryclure is considered a deep peat cutover bog.	Derryclure Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat.	2020	Draft 2021
Lemanaghan	1,253.7	Cutover Bog Industrial peat production commenced at Lemanaghan during the 1950's and ceased in 2019. Varied peat depths across the site. Deep peat reserves remain on	Lemanaghan Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat.	2020	Draft 2017

		much of the former production area of Lemanaghan Bog. It is considered a cutover bog.	There are some naturally emerging cutaway habitats.		
Belair North	565.7	Cutover Bog Belair North was first developed by BnM in the 1960's. TPeat production ceased at Belair North in 2020. This bog was used to supply horticultural peat. Only the upper layers of peat were harvested. Belair North is considered a deep peat cutover bog.	Belair North Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat.	2020	Draft 2017
Derrybrat	171.6	Cutaway Bog Industrial peat production commenced at Derrybrat during the 1950's and ceased in 2016. Derrybrat has shallow peat depths across the site. It is considered a shallow peat cutaway bog.	The site has been partially rehabilitated and there is already significant natural colonisation. Some conifer forestry has been developed by Coilte on the site.	2016	Finalised 2021
Belair South	228.8	Cutover Bog Belair South was first developed by BnM in the 1970's. Peat production ceased at Belair South in 2020. This bog was used to supply horticultural peat. As a result, only the upper layers of peat were harvested. Belair South is considered a deep peat cutover bog.	Belair South Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat.	2020	Draft 2017
Boora Bog Group Total	10,983.7				

APPENDIX III: ECOLOGICAL SURVEY REPORT

Ecological Survey Report

Note: This report outlines a baseline ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.

Bog Name:	<u>Pollagh</u>	Area (ha):	304Ha (752.4 acres)
Works Name:	Boora	County:	Offaly
Recorder(s):	MMC & DF	Survey Date(s):	26 & 27/01/2011

Habitats present (in order of dominance)

The most common habitats present at this site include:

- (Codes refer BnM classification of pioneer habitats of production bog. See Appendix II).
- Bare peat
- Scrub (eGor, eBir, oBir and cBir)
- PJeff, pRos
- gCal
- pPhrag
- Dry heath
- Silt traps
- Rip
- Temporary open water
- (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II.)
- Raised bog (PB1)
- Cutaway bog (PB4)
- Wet grassland (GS4)
- Birch woodland (WN7)
- Buildings and artificial surfaces

Description of site

Pollagh/Cornalaur bog is located in Co. Offaly, adjacent to the village of Pollagh and adjacent to the south side of the Grand Canal. Other adjacent BnM bogs include Turraun, which is located to the SW of Pollagh, while Oughter and Kilaranny are located to the south of the site. The main feature of the surrounding landscape is the Grand Canal, which is positioned to the north of the bog. A feeder channel into the canal actually separates Pollagh production bog from an adjacent undeveloped high bog in Cornalaur, to the east. The surrounding landscape of this area is fairly low-lying and dominated by secondary peatland habitats and reclaimed grassland, with some drier grassland found on mineral soils that overlay glacial mounds and ridges through the area.

Pollagh

Pollagh bog is a relatively deep basin that is dominated by bare peat and production bog. This bog has some drainage problems and a pump is being installed at the eastern side to lower the water level. Pollagh is also spring-fed (possibly related to the former soak system), which has created drainage problems for production.

There is a small area of production-related bog towards the north-west corner of the site that extends along the northern boundary of the site. The majority of this area is over some higher ground and glacial gravel is exposed in a few places. The oldest section of vegetation on the highest ground is mainly vegetated by typical cutaway habitats such as open Birch and Willow scrub and poor fen vegetation dominated by Soft Rush and Bog Cotton. Some of the cutaway vegetation in this area is relatively wet (drainage impeded?) and there are pools within the open Birch scrub in places. *Calliergonella cuspidata* dominates the moss flora in the wetter area and the drier areas have typical species such as *Polytrichum juniperum*, *Polytrichum commune*, *Campylopus introflexus* and *Rhytidiadelphus squarrosus*. Some of the drier poor fen also has frequent grass cover with Creeping Bent and Cocksfoot. Bulrush and Common Reed are spread throughout this area in the drains with several clumps of Common Reed present. Broom is one untypical species found within the drier scrub and along the marginal high bog. Towards the western side there is some lower ground that is partially re-wetted with Bog Cotton-dominated poor fen and some shallow pools.

Along the eastern boundary there is a narrow strip of land adjacent to the stream that has not been in production. The stream channel is in poor condition as it has been 'cleaned' in the past with deep vertical banks and the channel is quite silty. The majority of this area contains scrub (WS1), Bracken and some Dry Heath (HH1). There is also a small area (possibly diverse) of wet grassland (GS4) present adjacent to the stream. Some of this land has recently been cleared of vegetation and silt ponds and a new pump is being constructed. A zone to the edge of the stream channel has been cleared of vegetation, leaving no buffer. Within the adjacent production bog where were small pools of temporary re-wetted bog.

The southern boundary is almost entirely bare peat apart from some small sections of remnant raised bog that are within the BnM property.

Cornalaur

This is a relatively large area of undeveloped high bog that is located to the east of Pollagh. Bord na Móna only own a portion of the overall high bog. The high bog is in relatively good condition, although the majority of the high bog would be classified as sub-marginal or degraded raised bog. Some small Pine trees are scattered over the high bog. There is no recent peat-cutting along the western side of the site but both the southern and eastern sides are being cut. There is still a significant elevated dome present

The central area has a relatively well-developed micro-topography with tall hummocks. *Sphagnum* is mainly represented by *S. capillifolium* and *S. papillosum*, with *S. cuspidatum* only found in some small hollows. Some relic hummocks of *S. fuscum* and *S. imbricatum* are present in the central area. This is a small depression in the central area that is wetter where there may be some surface pooling of water. In this section both Common Bog Cotton and Hair's-tail Bog Cotton are more prominent in the vegetation with Heather. There are some old pools present that have now degraded and are infilling hollows with *S. cuspidatum* and *S. magellanicum*.

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

The Grand Canal pNHA (NPWS site code 2104) is located to the north of this site and part of the designated area along the canal is adjacent to the northern Pollagh BnM boundary. A small drainage channel feeds into the canal and flows along the east side of the production bog, separating Pollagh from Cornalaur. This feeder is also within the pNHA designation.

Adjacent habitats and land-use

The surrounding landscape is dominated by farmland with improved grassland. Much of the improved grassland has been developed from peatland. Adjacent habitats include scrub (WS1), Birch woodland (WN7), improved

grassland (GA1) and wet grassland (GS4). There are also some high bog (PB1) remnants and active cutover bog (PB4) around the margins that are not in ownership by BnM.

Watercourses (major water features on/off site)

- The majority of the bog drains towards a stream flowing along the east side of the bog. This stream flows under the Grand Canal and is part of the River Brosna catchment. The stream and adjacent riparian zone are in poor condition and the stream bed is quite silted. There have been recent BnM work along the edge of the stream with clearance of vegetation and creation of new silt ponds.
- The Grand Canal feeder also flows between Pollagh and Cornalaur. However, this feeder is perched at a higher level than the above stream and there is no inflow from the production bog. The feeder bed has been supported by impermeable plastic (see pictures).

Peat type and sub-soils

Blue-silt Clay and Gravel have been exposed along the edges of the stream. Gravel Sub-soil has been exposed in places within the production-related cutaway area.

Fauna biodiversity

Birds

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

- Kestrel
- Kingfisher (along the eastern stream)
- Snipe (3)
- Whooper Swan (6) (flying over site)
- Mallard (4)
- Other species present included Blackbird, Rook, Blue Tit, Wren, Pheasant and Wood Pigeon.
- Some of the younger cutaway vegetation surrounding the scrub in the production-related area may be suitable for breeding waders as there are unused bare peat fields and adjacent wet pools with emergent poor fen vegetation present.

Mammals

- Signs of Fox, Rabbit and Badger were noted on the site.
- Hares were observed on the site and there are frequent signs of Hares around the cutaway with browsing of Birch and Willow saplings.
- Mink and Otter have been recorded from the adjacent section of the Grand Canal in the past and would be likely to visit the site on occasion (inland Water Ways – Grand Canal Ecological study)

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 measures 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, work will be halted.
- Rehabilitation 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

No invasive species have been recorded at Pollagh Bog.

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 inspecting and washing vehicles prior to entering sites.

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

In addition to the above, Best Practise measures around the prevention and spread of Crayfish plague³ and Zebra Mussel will be adhered with throughout all rehabilitation works and activities.

³ <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 have now announced the complete cessation of industrial peat production across its estate (January 2021).

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.

EPA IPC Licence

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Boora Bog Group (Ref. P0500-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. The bog is part of the Boora Bog 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) appreciates the Minister's intention to support, via the Climate Action Fund, Bord na Móna in developing a package of measures, 'the proposed Scheme', for the enhanced decommissioning, rehabilitation and restoration of cutaway peatlands, referred to as the 'Peatlands Climate Action Scheme'. The enhanced decommissioning, rehabilitation and restoration of the peatlands funded by the proposed 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.

It is envisaged that Bord na Móna carry out an enhanced decommissioning, rehabilitation and restoration scheme, (PCAS), across a footprint of 33,000 ha. This proposed 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 costs associated with the additional and*

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

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. 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 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.

5 National River Basin Management Plan 2018-2021 (Water Framework Directive)

The National River Basin Management Plan (2018-2021) (Department of Housing, Planning, Community and Local Government 2017) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). In broad terms, the objectives of the WFD are (1) to prevent the deterioration of water bodies and to protect, enhance and restore them with the aim of achieving at least good status and (2) to achieve compliance with the requirements for designated protected areas.

The NRBMP outlines 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) is part of the WFD (2018-2021) programme of measures. The NRBMP takes account of the fact that Bord na Móna is 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 rehabilitation target is set to be superseded by the acceleration of the Bord na Móna de-carbonisation programme and PCAS.

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

6 National Biodiversity Action Plan 2016-2021

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

7 National conservation designations

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

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

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

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

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

9 All-Ireland Pollinator Plan 2015-2020

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

10 Land-use planning policies

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

Pollagh Bog is located in an area zoned by Offaly County Council as open countryside.

11 National Archaeology Code of Practise

Bord na Móna operates under an agreed Code of Practice regarding archaeology with the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland which provides a framework to enable the Company to progress peat extraction whilst carrying out archaeological mitigation. The Code replaced a set of Principles agreed with the Department of Arts, Heritage and the Gaeltacht in the 1990s. Under the Code Bord na Móna, the Minister and Director work together to ensure that appropriate archaeological mitigation is carried out in advance of peat extraction.

- BNM must ensure that any monuments or archaeological objects discovered during peat extraction are protected in an appropriate manner by following the Archaeological Protection Procedures.
- BNM must ensure that any newly discovered monuments on Bord na Móna lands are reported in a timely manner to the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht.
- BNM must ensure that any archaeological objects discovered on Bord na Móna lands are reported immediately to the Duty Officer of the National Museum of Ireland.
- Bord na Móna will endeavour to adhere to this code of practice during the peatland rehabilitation phase and appropriate archaeology mitigation is carried out before and during cutaway peatland rehabilitation. An Archaeological Impact Assessment is being carried out for the proposed rehabilitation at this site (Appendix XII). The recommendations of this assessment will be incorporated into the rehabilitation plan to minimise impacts on known archaeology. In addition, Bord na Móna will adhere to the Archaeology Code of Practice relating to management of stray archaeological finds that may arise during cutaway peatland rehabilitation and decommissioning.

12 Bord na Móna Biodiversity Action Plan 2016-2021

Rehabilitation of industrial peatlands is a key objective of the Bord na Móna Biodiversity Action Plan 2016-2021. This action plan outlines the main objectives and actions around biodiversity on Bord na Móna lands. The Bord

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

One example of a key CBD target is:

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

The EUs headline target for progress by 2020 is to:

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

The Pollagh Bog Rehabilitation Plan is aligned to the CBD target and the EU Biodiversity Strategy target and will help Ireland meet its commitment to these international Biodiversity policies.

13 Bord na Móna commitments

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

The company announced that peat production would be cut by over 50 percent in 2019 and would entirely cease over most of its lands by the mid-2020s. Bord na Móna have now announced the complete cessation of industrial peat production across its estate (January 2021). 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 Climate Action Plan 2019, the Water Framework Directive, etc.) and rehabilitation guidelines set down by the Environmental Protection Agency. To date, 15,000 hectares of cutaway and cutover bog have been rehabilitated using this approach with 5,000 hectares in active rehabilitation.

In line with Bord na Móna's accelerated decarbonisation programme, the company has also committed to a significantly larger rehabilitation target. This is 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 plan to restore a further 1,000 hectares of raised bog habitat by 2025. These targets are significant in both timing and scale and are indicative of Bord na Móna's increased new ambition in this area.

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.

14 Bord na Móna Strategic Framework for the future use of cutaway peatlands 2021 (Draft)

The general after-use strategy of Bord na Móna is outlined in the Bord na Móna Strategic Framework for Future-Use of Cutaway Bogs 2020. This document outlines how Bord na Móna's cutover peatland estate is complex in nature with great variability in terms of peat depths, peat types, drainage, subsoil condition and environmental

value. Thus, future options require consideration on a site-specific basis, also bearing in mind the considerable internal variation within bogs. The development of the land-bank will also take account of national needs, while also taking account of the various national legislation, policies and plans related to the management of peatlands. In general, Bord na Móna will seek to balance and optimise commercial, social, and environmental value of these sites, while taking account of the need for sustainability and their biodiversity value.

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

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

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APPENDIX VII: DECOMMISSIONING

1. Condition 10 Decommissioning

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

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

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

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

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

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

Item	Description	Pollagh Decommissioning Plan
1	Clean-up of remaining or unconsolidated waste or materials located in Bogs, Yards, Buildings and Offices	Clean-up of Bog
2	Cleaning Silt Ponds	Cleaning Silt Ponds
3	Decommissioning Peat Stockpiles	Peat Stockpile Management via Levelling
4	Decommissioning or Removal of Buildings and Compounds	Decommission and Removal of Porto-cabin tea centre and materials store
5	Decommissioning Fuel Tanks and associated facilities	Decommissioning and De-Gassing Mobile Fuel Tanks
6	Decommissioning and Removal of Bog Pump Sites	Not Applicable
7	Decommissioning or Removal of Septic Tanks	De-sludge Septic Tank

In addition, condition 7 of the license 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.

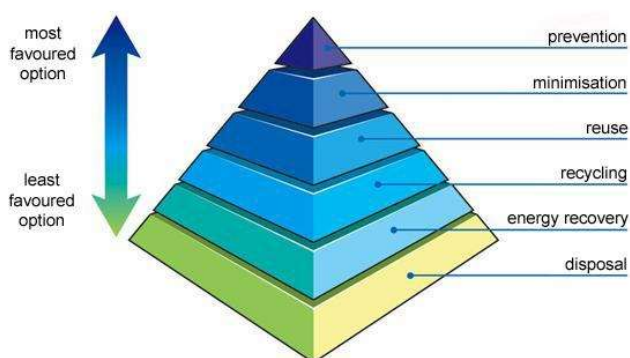
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

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 an EPA Exit Audit (EA) and the eventual partial or full surrender of the licence.

2. Enhanced Decommissioning.

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

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

APPENDIX VIII: GLOSSARY

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

Deep peat cutover bog. Deep peat cutaway bog is defined as former raised bogs that have been in industrial peat production, where production has ceased but the residual peat depth is typically in excess of 2m. *Sphagnum* mosses are key species of raised bogs and the majority of the peat mass is formed from these mosses. *Sphagnum* species and other raised bog species are a key part of raised bog habitat function and prefer more acidic, nutrient poor, water-logged conditions. Typical raised bog *Sphagnum* mosses and other bog species do not thrive with the more typical alkaline water chemistry of cutaway bog but do grow well in these more acidic conditions where peat has been re-wetted. There is potential to re-develop *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 (ie. at the margin) where the peat can not be re-wetted due to boundary constraints. Dry cutaway may also develop in situations where there a relatively steep slope that inhibits re-wetting. The majority of dry cutaway will develop towards grassland, heath, scrub and dry woodland habitats.

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

Enhanced rehabilitation: This is defined as rehabilitation carried out under proposed 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 proposed 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 proposed Scheme.

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 have changed so radically (with the removal of the acrotelem – the living layer and much of the peat mass). However, they can be returned to a **trajectory** towards a naturally functioning peatland system (Renou-Wilson 2012). **Raised bog restoration** is an objective of some BnM sites where there is residual natural raised bog vegetation and where the majority of the peat is still intact.

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

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

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

APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

(Minimisation, treatment, recovery and disposal)

Objective:

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

Scope:

This plan covers IPPC Licence's P0500-01, Boora Group of Bogs in County Offaly.

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

1.2 Power Station screenings:

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

1.3 Bog Timbers:

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

2.0 P0500-01 IPPC Licence Extractive Waste Conditions

2.1 Condition 7.5 Extractive Waste Management

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

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

2.2 Condition 7.6 Waste Facility

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

2.3 Condition 7.7 Excavation Voids

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

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

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

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

3.0 Minimisation.

3.1 Silt pond excavation material and cleanings.

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

3.2 Power Station Screenings.

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

3.3 Bog Timbers.

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

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

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

4.2 Power Station Screenings.

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

4.3 Bog Timbers

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

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

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

5.2 Power Station Screenings.

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

5.3 Bog Timbers

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

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

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

6.2 Power Station Screenings.

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

6.3 Bog Timbers

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

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

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

5 (2a)(ii)

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

5 (2a)(iii)

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

5 (2a)(iv)

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

5 (2a)(v)

Peat mineral resources do not undergo any treatment.

5 (2b)

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

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

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

5 (3)

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

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

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

Classification in accordance Annex II.

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

Description of operations.

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

Closure plan. (Bog Rehabilitation Plan).

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

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

10.2 Cutaway Bog Rehabilitation Plan:

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

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

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

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

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

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

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

Review.

This plan will be reviewed every five years, the first review to take place in September 2017. This review will entail an inspection of these waste facilities to ensure their placing, management, maintenance and stability comply with the requirements of the Extractive Waste Management requirements and condition 7.5, 7.6 and 7.7 of the Boora IPPC Licence P0500-01.

APPENDIX X. MITIGATION MEASURES FOR THE APPLICATION OF FERTILISER

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

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

APPENDIX XI. CONSULTATION SUMMARIES**Table APXI -1 Consultees contacted**

Bog Name	Contact Organisation	Contact Name	Date of Issue	Communication Format	Date Response Received	Response format
Pollagh/Oughter	Offaly County Council - Chief Executive	Anne-Marie Delaney	08/01/2021	E-mail		
Pollagh/Oughter	Offaly County Council - Senior Planner	Andrew Murray	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Council - Heritage Officer	Amanda Pedlow	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. John Carroll	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. John Clendennon	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. Eamonn Dooley	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. John Leahy	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. Clare Claffey	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Birr District	Cllr. Peter Ormond	04/01/2021	E-mail	24/01/2021	E-mail
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Neil Feighery	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Tony McCormack	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Declan Harvey	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Sean O'Brien	04/01/2021	E-mail		

Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Ken Smollen	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr. Frank Moran	04/01/2021	E-mail		
Pollagh/Oughter	Offaly County Councillors - Tullamore District	Cllr Danny Owens	04/01/2021	E-mail		
Pollagh/Oughter	TD Laois/Offaly	Barry Cowen	04/01/2021	E-mail		
Pollagh/Oughter	TD Laois/Offaly	Charlie Flanagan	04/01/2021	E-mail		
Pollagh/Oughter	TD Laois/Offaly	Sean Fleming	04/01/2021	E-mail		
Pollagh/Oughter	TD Laois/Offaly	Carol Nolan	04/01/2021	E-mail	25/01/2021	E-mail
Pollagh/Oughter	TD Laois/Offaly	Brian Stanley	04/01/2021	E-mail		
Pollagh/Oughter	Eastern and Midland Regional Assembly		04/01/2021	E-mail		
Pollagh/Oughter	Environmental Protection Agency	Brian Meeney	04/01/2021	E-mail		
Pollagh/Oughter	National Parks and Wildlife Service	Brian Lucas	04/01/2021	E-mail		
Pollagh/Oughter	NPWS Regional Network	District Conservation Officer	12/01/2021	E-mail		
Pollagh/Oughter	Dept of the Housing Local Government and Heritage	Malcom Noonan (Minister of State at the Department of Housing, Local Government and Heritage)	06/01/2021	E-mail		
Pollagh/Oughter	National Monuments Service	Margaret Keane	04/01/2021	E-mail		
Pollagh/Oughter	National Museum of Ireland (Irish Antiquities Division)	Isabella Mulhall	04/01/2021	E-mail		
Pollagh/Oughter	Minister for Environment, Climate and Communications	Minister - Eamon Ryan	06/01/2021	E-mail		
Pollagh/Oughter	Minister of state for Agriculture with responsibility for Land use and Biodiversity	Pippa Hackett Minister of State for Land Use and Biodiversity	06/01/2021	E-mail		
Pollagh/Oughter	Inland Fisheries Ireland	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Waterways Ireland	General e-mail contact	04/01/2021	E-mail	24/01/2021	E-mail
Pollagh/Oughter	The Heritage Council	Lorcán Scott	04/01/2021	E-mail	04/01/2021	E-mail

Pollagh/Oughter	An Forum Uisce (The Water Forum)	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	An Taisce	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Friends of the Earth	Oisin Coughlan	04/01/2021	E-mail		
Pollagh/Oughter	Friends of the Irish Environment	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Birdwatch Ireland	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Irish Peatlands Conservation Council	General e-mail contact	04/01/2021	E-mail	25/01/2021	E-mail
Pollagh/Oughter	Irish Wildlife Trust	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Bat Conservation Ireland	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Woodlands of Ireland	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Butterfly Conservation Ireland	Jesmond Harding/info email	04/01/2021	E-mail	12/01/2021	E-mail
Pollagh/Oughter	Community Wetlands Forum (part of Irish Rurallink)	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Turf Cutters and Contractors Association	Postal Address	15/01/2021	Post		
Pollagh/Oughter	Offaly Public Participation Network (PPN)	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Sustainable Water Action Network (SWAN)	http://www.swanireland.ie/	04/01/2021	E-mail		
Pollagh/Oughter	Irish Farmers Association (Laois Offaly and Westmeath Office)	General e-mail contact	04/01/2021	E-mail	23/01/2021	E-mail
Pollagh/Oughter	Irish Farmers Association (Head Office)	General e-mail contact	04/01/2021	E-mail	23/01/2021	E-mail
Pollagh/Oughter	National Association of Regional Game Councils	Email - nargc@nargc.ie	04/01/2021	E-mail		
Pollagh/Oughter	Midlands National Shooting centre	General e-mail contact	04/01/2021	E-mail	24/01/2021	E-mail
Pollagh/Oughter	ICMSA (Irish Creamery Milk Suppliers Association)	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	ICSA (Irish Cattle and Sheep Farmers Association)	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Midlands & East Regional WFD Operational Committee	Ray Spain Co-ordinator Local Authority Water Programme	04/01/2021	E-mail		

Pollagh/Oughter	Shannon Flood Risk State Agency Co-ordination Working Group	Jackie Stewart - Flood Risk management Policy	04/01/2021	E-mail		
Pollagh/Oughter	CARO (Climate Action Regional Office) Eastern and Midlands	Alan Dunney	04/01/2021	E-mail		
Pollagh/Oughter	Ferbane Tidy Towns	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Tullamore Tidy towns	General e-mail contact	04/01/2021	E-mail		
Pollagh/Oughter	Dr. Catherine Farrell Trinity College	General e-mail contact	Contact Initiated by Stakeholder		22/01/2021	E-mail
Pollagh/Oughter	Erin Rovers GAA Club	General e-mail contact	Contact Initiated by Stakeholder		25/01/2021	E-mail
Pollagh/Oughter	Francis Kenna OPW	General e-mail contact	Contact Initiated by Stakeholder		22-23/01/2021	E-mail
Pollagh/Oughter	Dr. John Connolly Trinity College	General e-mail contact	15/01/2021	E-mail and virtual meeting	24/01/2021	E-mail
Pollagh/Oughter	Just Forests	Tom Roche	04/01/2021	E-mail	04/01/2021	E-mail
Pollagh/Oughter	Pollagh Residents Development Association	Caitriona Devery	Contact Initiated by Stakeholder		24/01/2021	E-mail
Pollagh/Oughter	Thomas Joseph Donnellan- Local Resident		Contact Initiated by Stakeholder		07/01/2021	E-mail
Pollagh/Oughter	Tullamore Tribune	Gearoid Keegan	Contact Initiated by Stakeholder		04/01/2021	E-mail
Pollagh/Oughter	Matthew English- Local resident		Contact Initiated by Stakeholder		12/02/2021	E-mail
Pollagh/Oughter	Kieran Keenaghan- Local resident		Contact Initiated by Stakeholder		05/01/2021	E-mail

Pollagh/Oughter	Christina Buckley - Local resident		Contact Initiated by Stakeholder		06/01/2021	E-mail
Pollagh/Oughter	Marie Regazzoli - Local resident		Contact Initiated by Stakeholder		07/01/2021	E-mail
Pollagh/Oughter	Oliver Buckley- Local resident		Contact Initiated by Stakeholder		07/01/2021	E-mail
Pollagh/Oughter	Caitriona Hilliard- Local resident		Contact Initiated by Stakeholder		24/01/2021	E-mail

Table APXI -2 Response summary from Consultees contacted

Organisation	Summary of Response by Stakeholder	BnM Response
Offaly County Councillors - Birr District	<p>Cllr. Peter Ormond contacted BnM to make submission on the rehabilitation of Pollagh/Oughter on behalf of Fianna Fáil councillors on Offaly County Council. A number of concerns were raised in the submission;</p> <ol style="list-style-type: none"> 1) Advised that the Fianna Fáil council members are concerned at the short notice period prior to the end of the consultation process for PCAS 2) Request for details on the consultation process by BnM to date 3) Advised that PCAS should be considerate of the social, cultural, economic, industrial and ecclesiastical history of the region in which it takes place 4) Expressed interest and support for comments regarding natural capital by BnM staff during interviews with The Irish Times 5) A number of specific questions were asked of BnM including; <ul style="list-style-type: none"> • What is the acreage of each of the bogs covered by this submission and what percentage of that total area will be re-wetted or regenerated? • Given that peat production has long ceased in Derries, Oughter and Pollagh bogs are we correct in assuming that re-wetting of these two bogs is the only option? • Please clarify what amenity opportunities exists for these three bogs? • What opportunities have been examined and have any plans been considered? • Will the swing bridge over the Grand Canal at Turraun and the Bridge north of that bridge over the river Brosna linking Lemonaghan bog to Boora bog remain in place? • How is the stewardship of the cutaways going to be addressed? • Will there be a risk assessment carried out in relation to Outfalls, Deep Drains, and Silt Ponds? • Will fire breaks be provided in each of the bogs? • What plans are being put in place to protect the environment from fire risks? • The need to enforce litter control cannot be overstated. 	Response 26/01/2021, acknowledgement, all concerns addressed in future drafts of rehab plans and that stakeholder engagement had been increased by 3 weeks.

Offaly County Council	Request for all draft rehabilitation plans in Co. Offaly.	BnM provided the requested documents. A virtual meeting, including a general PCAS presentation, was held for Offaly County Council on 10/02/2021
Offaly County Council	Offaly County Council e-mailed a submission to outline potential for integration of PCAS with opportunities regarding the Offaly County Council Inaugural Digital Strategy 2020-2022.	A meeting on Offaly's digital strategy was held between BnM and Offaly County Council on 04/03/2021.
Offaly County Council	<p>Submission provided on behalf on Offaly County Council on a number of PCAS bogs including Pollagh on 22/02/2021. Key points raised were;</p> <ol style="list-style-type: none"> 1) Requested that details of security fencing to be identified and detailed on plans. 2) Long term rehabilitation plan to be provided addressing above areas of consideration post 2024 if required. 3) Public Rights of Way access locations are to be maintained with relevant stakeholders and marked on drawings. 4) A number of technical issues with draft rehabilitation plans. 5) Advised BnM to carefully consider after use of bogs as part of PCAS 6) Request that the impact of PCAS on surrounding roads be considered as part of rehabilitation plans. 7) Advised that long term management (post 2024) is considered by BnM. 8) Advised that Appropriate assessment and the habitats directive are taken into account by BnM. 9) Advised that BnM consider management of flooding & water pollution, fire risk, invasive species and waste management as part of PCAS. 	<p>A virtual meeting/general presentation on PCAS to between BnM and Offaly Councillors and OCC personnel was conducted on 10/02/2021.</p> <p>BnM provided further PCAS documentation on request, via e-mail on 27/01/2021.</p> <p>Refer to Section 4 for response on issues raised. Dialogue with Offaly County Council is ongoing.</p>
Irish Peatlands Conservation Council	<p>"Responded to consultation regarding Pollagh/Oughter and the PCAS project at large to express support for the project and list a number of comments on how the project might be improved;</p> <ol style="list-style-type: none"> 1) Potential for inclusion of local environmental groups in species specific conservation plans 2) Requested that a map of potentially suitable areas for such projects should be included in rehab plans 3) Promoted the idea of creating a biodiversity action plan that considers the use of site by all relevant stakeholders 4) Recommended following the NPWS community engagement strategy as it was largely successful in bring local communities along with restoration projects 	<p>"BnM responded 25/01/2021, all issues raised will be taken into account in future drafts of plan. BnM also advised that;</p> <ol style="list-style-type: none"> 1) We have included DOC as an additional parameter on our suite of water monitoring analysis. 2) BnM are working with Lawco and WFD to align the BNM monitoring programme with the EPA's 2021 Monitoring programme 3) BnM have an extensive community consultation process ongoing with a dedicated Community Liaison Officer communicating to affected and interested parties

NPWS Regional Network	NPWS responded through e-mail thread on the 02, 03,07,09/12/2020 in relation to all PCAS bogs. The main points discussed were to advise of the requirement to investigate if assessment under the SEA and Birds directives for each site.	BnM acknowledged via e-mail to address queries on 09/12/2021. Also, a phone conversation with local NPWS Conservation Ranger on 11/01/2021 discussed biodiversity and rehabilitation measures on PCAS bogs including Pollagh.
National Museum of Ireland (Irish Antiquities Division)	Responded through e-mail 28/12/2020 in relation to all PCAS bogs. Issues raised were; 1) The request that due diligence be taken during works to protect any archaeologically significant findings or areas 2) The NMI reiterated the importance of peatlands for the preservation of archaeology and requested they be consulted as part of any EIA undertaken	BnM acknowledged and responded via e-mail on 28/12/2020 to assure BnM will give due cognisance to all points raised in the submission by NMI in the rehabilitation plan for Pollagh Bog. A virtual meeting on PCAS between BnM and NMI was held on 18/01/2021
Irish Farmers Association	Responded to consultation regarding Pollagh and the PCAS project at large on multiple dates throughout ongoing discourse. Specific submission on Pollagh Bog received from Westmeath, Offaly and Laois IFA Office. Concerns raised were: 1) Potential for flooding on adjacent lands. 2) Health and Safety 3) Perceived potentially detrimental impact of PCAS on property value 4) Reiterated the desire of the IFA that people who have been cutting turf on bogs should retain this right.	A working group has been established at a high level between BnM and IFA on various issues including PCAS. A meeting was held between BnM and IFA representatives on 18/02/2021 to present details on PCAS. Dialogue is ongoing.
LS (The Heritage Council)	Responded to consultation via e-mail on 04/01/2021 asking for more information on PCAS in general and looking to be involved in any seminar or information events.	BnM responded via phone conversation on 11/01/2021. Dialogue is ongoing.
Dept. of Agriculture, Food & the Marine (DAFM)	Submission by e-mail to express support for PCAS in general. Submission recommended; 1) That local landowners and stakeholders be considered as part of the consultation process. 2) EIA assessment be carried out prior to PCAS works. 3) Hydrological assessments are carried out with a view to protecting adjoining lands from adverse impacts.	BnM acknowledged and responded via e-mail on 02/03/2021 to assure that all points raised within the submission will be considered. A virtual meeting/PCAS presentation was held for DAFM on 11/12/2020.

Erin Rovers GAA Club	<p>"Erin Rovers GAA club contacted BnM to make submission on the rehabilitation of Pollagh/Oughter. A number of concerns were raised in the submission.</p> <ol style="list-style-type: none"> 1) The social impact (including job loss) involved in industrial closure of bog sites 2) The increase in anti-social activity (e.g. fly tipping) involved in under managed sites 3) Re-iterated the responsibility of BnM to communities in the area as an employer 4) Request for funding aide to club as gesture of good will to community 	BnM acknowledged and will give due cognisance to all points within the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.
OPW	<p>"A flood relief engineer for OPW contacted BnM to request rehab plans for Pollagh/Oughter. A submission on the rehabilitation of Pollagh/Oughter on behalf of several un-named concerned members of the Pollagh community was then made 23/01/2021. A number of concerns were raised in the submission;</p> <ol style="list-style-type: none"> 1) The residents are unhappy with the low level of consultation undertaken by BnM for the project. 2) The perceived risks associated with altering the hydrological regime of the bog was highlighted and a request for detailed hydrological assessment was made 3) Request for details on the drainage management plans for the bog 4) Health and safety concerns were raised regarding high water levels on the rehabilitated bog 5) Request for clarification on post PCAS amenity use of bogs was made 	BnM acknowledged and will give due cognisance to all points raised in the submission by OPW flood relief engineer in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.
Trinity College	<p>"A researcher at Trinity College, Dublin, made a submission by e-mail 24/01/2021. The following points were raised;</p> <ol style="list-style-type: none"> 1) Advised that the consultation phase of the project should be given more time 2) Advised that there is little evidence of pre-project and post-project measurement 3) Advised that further community engagement with local stakeholders and research based stakeholders would benefit the project 	BnM acknowledged and will give due cognisance to all points raised in the submission by Trinity College Researcher in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.
Just Forests	Submission requesting information on the PCAS consultation phase.	BnM acknowledged and will give due cognisance to all points raised in the submission by Just Forests in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.

Pollagh Residents Development Association	<p>"The Pullough Residents Development Association made a submission on Pollagh/Oughter bogs by e-mail 24/01/2021. A number of issue were raised, including;</p> <ol style="list-style-type: none"> 1) Advised that the consultation process was too short for meaningful engagement 2) Request for clarification on how local community groups can be actively involved in future use of site 3) Support and endorse the commitment from BnM to minimise impacts of PCAS on adjacent landowners 4) Request for clarification on the future ownership/maintenance of the bog post PCAS 5) Advised that there is large potential for environmental recreation and amenity development at site and request that PRDA are involved in any consultation or plans for after use of the bog 6) Advise that a holistic approach must be taken to bog rehabilitation with each plan developed with the surrounding bogs, communities and landscapes in mind 7) Advise that BnM should strive to employ local people where possible to alleviate impact of job loss brought about by industrially peat harvest cessation 	BnM acknowledged and will give due cognisance to all points raised in the submission by Pullough Residents Association in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.
Local Resident A	A local resident (A) made a submission by e-mail 07/01/2021 to request draft rehab plans and query drain blocking locations with a view to acquiring reassurance that his land would not flood as a result of PCAS.	BnM responded via e-mail to provide plans and assure Local Resident A that BnM would take all precautions to avoid adverse impacts on adjoining lands during PCAS.
Tullamore Tribune	E-mail request for draft rehabilitation plans for Pollagh/Oughter bogs.	BnM responded via e-mail to make The Tullamore Tribune aware that further information and plans would be made available as soon as possible
Local resident B	<p>"A local resident (B) made a submission by e-mail 12/02/2021. A number of concerns were raised including;</p> <ol style="list-style-type: none"> 1) Perceived increase in flood risk 2) Expressed concern for the conservation of Grey Partridge and potential habitat loss as a result of PCAS 	BnM contacted through community liaison officer.
Local resident C	A local resident (C) made a submission by e-mail to request information on PCAS	BnM responded via e-mail to provide the requested information on PCAS
Local resident D	A local resident (D) made a submission by e-mail to request information on PCAS	BnM responded via e-mail to provide the requested information on PCAS
Local resident E	A local resident (E) made a submission by e-mail to request information on PCAS	BnM responded via e-mail to provide the requested information on PCAS

Local resident F	A local resident (F) made a submission by e-mail to express concerns regarding the potential increased risk of flooding as a result of PCAS	BnM acknowledged and will give due cognisance to all points raised in the submission by Local Resident F in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.
Local resident G	<p>A local resident (G) made a submission by e-mail in which the following points were raised;</p> <ol style="list-style-type: none"> 1) Amenity nature walks and facilities are considered as part of PCAS works 2) The consideration of wild camping as a potential revenue source 3) Consider pursuit of designation for area as a dark skies astronomy reserve 4) Advised that the post industrialised bogs should be considered for biomass hydrogen production facilities 	BnM acknowledged and will give due cognisance to all points raised in the submission by Local Resident G in the rehabilitation plan for Pollagh/Oughter Bogs. BnM raised responded via e-mail.

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.



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



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

1) Purpose

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

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

2) Procedure

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

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

Your Archaeological Liaison Officer is

3) Records

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

Archaeological Impact Assessment of Proposed Bog Rehabilitation at Pollagh Bog, Co. Offaly. Dr. Charles Mount.



Archaeological Impact Assessment of Proposed Bog Decommissioning and Rehabilitation at Pollagh Bog, Co. Offaly

Report For

Bord Na Móna Energy Ltd.

Author

Dr. Charles Mount

Bord Na Móna Project Archaeologist



Introduction

This archaeological impact assessment report was prepared by Dr. Charles Mount for Bord na Móna Energy Ltd. It represents the results of a desk-based assessment of the impact of proposed bog rehabilitation on c.303 hectares at Pollagh Bog, Co. Offaly on the known archaeological heritage of the bog. The proposed rehabilitation actions will be a combination of measures to re-wet peat as outlined in the draft Methodology Paper (EDRRS). These enhanced measures for Pollagh Bog will include:

- Re-wetting the deep peat areas of the bog using berms and field re-profiling. This enhanced measure seeks to create large (c. 45m x 60m) flat areas or cells of shallow (< 10 cm) water conditions on bare peat, across multiple fields that are enclosed by shallow berms to retain shallow surface water.
- In some areas, a cut-and-fill cell bunding technique is proposed. The cut and fill cell bunding approach aims to create 'saucers' or flat bunded areas (cells) on peat with berms to hold shallow water at appropriate levels.
- Re-wetting some deep peat areas of the bog through regular field drain blocking using a dozer/excavator to create three peat barriers every 100 m along each field drain.
- Re-alignment of piped drainage.
- Blocking drains in targeted existing pioneering vegetation mosaics, to accelerate re-wetting, and/or manage water levels to the correct height to accelerate the current trajectory towards Reed swamp and fen, using a dozer/excavator.
- Targeted fertiliser applications to accelerate vegetation establishment on headlands and high fields. (It is noted that the application of fertiliser may need additional assessment and approval as per the IPC Licence).
- Seeding of vegetation and inoculation of Sphagnum.
- Modifying water levels at outfalls, as it may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated. This will further slow the movement of water through and out of Pollagh Bog. It may be desirable to change and control water levels at the site over time, e.g. to increase water levels as the site becomes increasingly vegetated.

Pollagh Bog is located immediately south of the Grand Canal, south-east of Pollagh village and 8km east of Ferbane, Co. Offaly. An unclassified road from Pollagh to the R357 runs along the western extent of the bog and east of the L4602 road. The bog occupies the townlands of Derrycooly, Cornalaur and Ballincur on OS 6 inch sheets Offaly 15 and 16.

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

- The Bord na Móna Peatland Survey
- The Bord na Móna excavation programme
- The Sites and Monuments Record that is maintained by the Dept of Housing, Local Government and Heritage



- The Excavations database
- Previous assessments

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

Desktop assessment

Recorded Monuments

The Record of Monuments and Places (RMP) for Co. Offaly which was established under Section 12 of the National Monuments (Amendment) Act, 1994 was examined as part of the assessment (DAHGI 1995). This Record was published by the Minister in 1995 and includes sites and monuments that were known in Pollagh Bog before that date. This review established that there are no RMPs situated in the proposed rehabilitation area or vicinity (see Fig. 1). The closest RMP to the rehabilitation area OF015-007---- an Enclosure in Pollagh townland, is located more than c.0.8km north of the rehabilitation area.

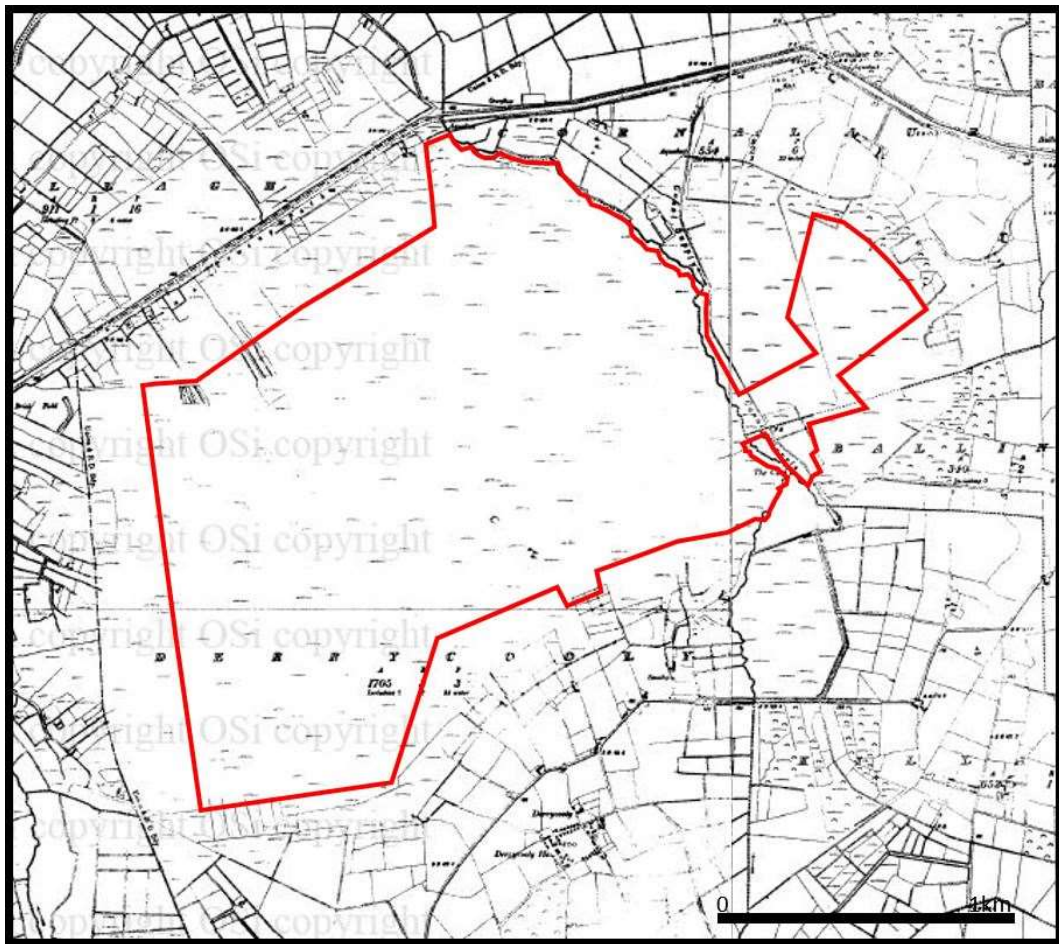


Fig. 1. Pollagh Bog, Co. Offaly, detail of the Record of Monuments and Places map sheets No. 15 and 16. The proposed rehabilitation area is outlined with the red line. There are no Recorded Monuments in the area or vicinity.



Peatland survey

Pollagh Bog was surveyed by the Irish Archaeological Wetland Unit in 1997 as part of the Archaeological Survey of Ireland Peatland Survey. There were no archaeological sites recorded during the survey. No further archaeological work has taken place since 1997.

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 30th of October 2020. 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 monuments entered in the SMR in the proposed rehabilitation area (See Fig. 2).

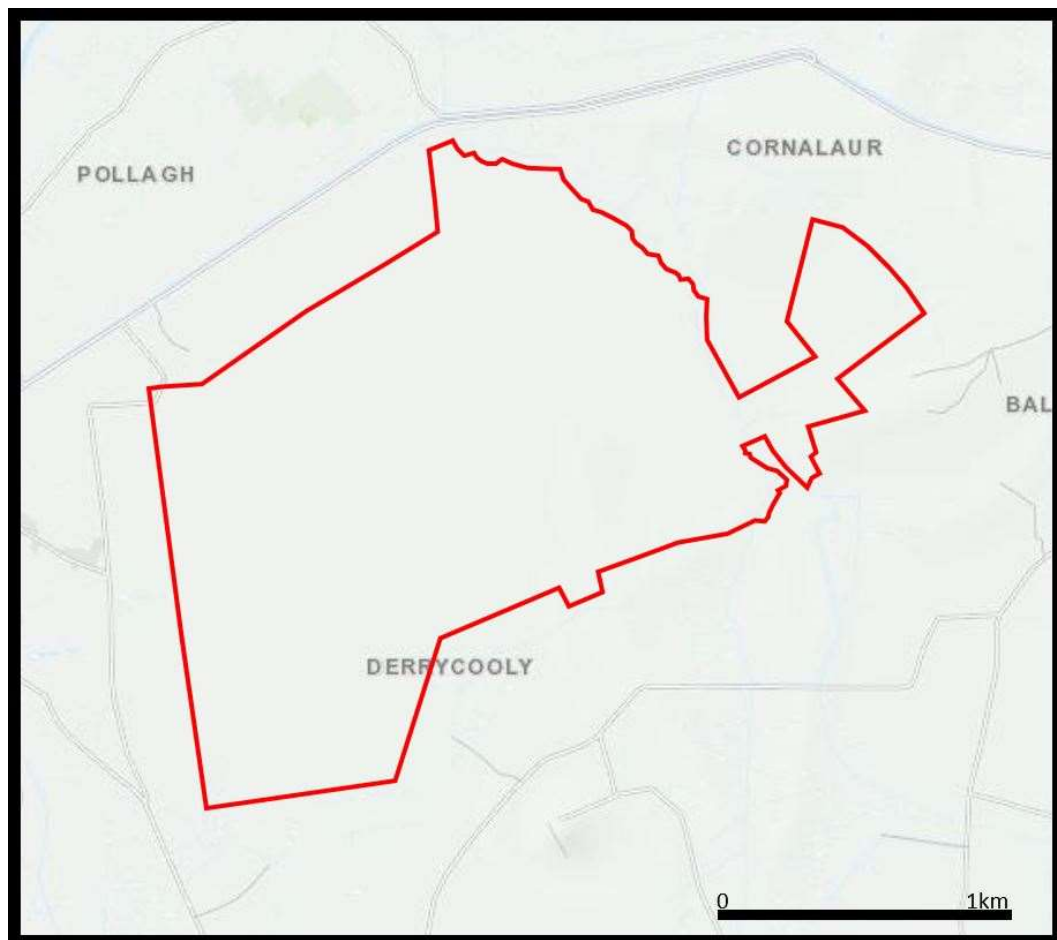


Fig. 2. Pollagh Bog, Co. Offaly, detail of the Sites and Monuments Record. The proposed rehabilitation area is outlined with the red line. There are no SMRs in the area.

Archaeological investigations

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



Reported finds

A single archaeological find from Pollagh Bog was reported to the National Museum of Ireland in the twentieth century and is recorded in the Museum Topographical Files. A stone mortar (1970:170) from dryland in Ballincur townland was found in surface soil. It is roughly cylindrical with convex sides, a flat plain rim, flat base, and a simple horizontal hand grip.

Previous assessments

Pollagh bog has been the subject of an Environmental Impact Assessment Report carried out by Irish Archaeological Consultancy Limited in 2018 for Bord na Móna Energy Limited in relation to IPC Licence P0500-01. The assessment identified no extant archaeological material in the rehabilitation area but concluded that:

While there are no records of archaeological sites within Pollagh Bog, wetlands and Peatlands are considered as Areas of Archaeological Potential for their potential to contain archaeological organic preserved remains. Wetlands also provide a significant resource for environmental analysis. It must be considered therefore that there remains a moderate potential for additional buried features to be uncovered during the course of any future development works in Pollagh Bog.

Impact assessment

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

Recommendations

Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

Conclusion

This is a desk-based archaeological assessment and includes a collation of existing written and graphic information to identify the likely archaeological potential of the proposed rehabilitation area. There are no known items of archaeological heritage in the rehabilitation area. The proposed rehabilitation will have no impact on any known archaeological material in the application area or the vicinity. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it should be avoided and reported to the Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.

References

DAHGI 1995. Recorded Monuments Protected under Section 12 of the National Monuments (Amendment) Act, 1994. County Offaly.



Mackin *et al.* 2017. Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service.

Dr. Charles Mount
2 November 2020