



Derrymoylin Bog Decommissioning and Rehabilitation Plan 2023

SCREENING FOR APPROPRIATE ASSESSMENT | JANUARY 2024

Derrymoylin Bog Decommissioning and Rehabilitation Plan 2023

Appropriate Assessment Screening Report

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1.0 INTRODUCTION

1.1 Background

Roughan & O'Donovan (ROD) was appointed by Bord na Móna to produce, on its behalf, an Appropriate Assessment (AA) Screening Report in respect of the proposed Derrymoylin Bog Decommissioning and Rehabilitation Plan 2024 (“the Project”).

The AA Screening Report is intended to determine whether or not the Project, either individually or in combination with other plans or projects, in view of best scientific knowledge, is likely to have a significant effect on areas designated as being of European importance for nature conservation (“European sites”), thereby enabling Bord na Móna, as the competent authority in this case, to fulfil its obligations under Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”).

This document comprises the AA Screening Report in respect of the Project and was prepared by ROD on behalf of Bord na Móna and in accordance with the requirements of the Habitats Directive and the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended) (“the Habitats Regulations”). The aim of this AA Screening Report is to inform and assist the competent authority in carrying out its AA Screening by determining whether or not the Project, either individually or in combination with other plans and projects, has the potential to significantly affect one or more European sites, in view of their Conservation Objectives.

It is the considered opinion of ROD, as the author of this AA Screening Report, that the Project, either individually or in combination with other plans or projects, in view of best scientific knowledge, does not have the potential to significantly affect the Lough Forbes Complex SAC, the Ballykenny-Fisherstown Bog SPA, the Lough Ree SAC nor the Lough Ree SPA in view of the site’s Conservation Objectives. Therefore, AA is not required in respect of the Project.

1.2 Competent Experts

This AA Screening Report was prepared by Rachel Heaphy and checked/reviewed by Patrick O’Shea.

Rachel is an Ecologist with two year’s experience in ecological assessment. She holds a BSc (Hons) in Zoology from University College Cork and an MRes degree (with distinction) from the University of Roehampton. Rachel is a Qualifying Member of the Chartered Institute of Ecological and Environmental Management (QualCIEEM).

Patrick is a Principal Ecologist with over eleven years’ experience in ecological consultancy. He holds a degree in Botany from Trinity College Dublin and an MSc in Ecological Management and Conservation Biology from Queen’s University Belfast. Patrick is a Full member of the Chartered Institute of Ecological and Environmental Management (CIEEM).

1.3 Legislative Context

Council Directive 92/43/EEC of the 21st May 1992 on the conservation of natural habitats of wild fauna and flora (“the Habitats Directive”) and Directive 2009/147/EC of the European Parliament and of the Council of the 30th November 2009 on the conservation of wild birds (“the Birds Directive”) list habitats and species which are, in a European context, important for conservation and in need of protection. This protection is afforded in part through the designation of sites which support significant

examples of habitats or populations of species. ("European sites"). Sites designated for wild birds are termed "Special Protection Areas" (SPAs) and sites designated for natural habitat types or other species are termed "Special Areas of Conservation" (SACs). The complete network of European sites is referred to as "Natura 2000".

In order to ensure the protection of European sites in the context of land use planning and development, Article 6(3) of the Habitats Directive provides for the assessment of the implications of plans and projects for European sites, as follows:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site¹ and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

In Case C-323/17[§34], *People Over Wind*, the Court of Justice of the European Union ('the CJEU') referred to the nature of the test to be applied in making a screening determination as follows:

"[...] it is settled case-law that Article 6(3) of the Habitats Directive makes the requirement for an appropriate assessment of the implications of a plan or project conditional on there being a probability or a risk that the plan or project in question will have a significant effect on the site concerned. In the light, in particular, of the precautionary principle, such a risk exists if it cannot be excluded on the basis of objective information that the plan or project will have a significant effect on the site concerned (judgment of 26 May 2011, Commission v Belgium, C-538/09, EU:C:2011:349, paragraph 39 and the case-law cited). The assessment of that risk must be made in the light inter alia of the characteristics and specific environmental conditions of the site concerned by such a plan or project (see, to that effect, judgment of 21 July 2016, Orleans and Others, C-387/15 and C-388/15, EU:C:2016:583, paragraph 45 and the case-law cited)."

Further clarification on the use of mitigation measures was provided in *Eco Advocacy*², where the CJEU ruled that where constituent elements are incorporated into the design of a project as standard features required for all projects of that nature and not within the aim of reducing negative effects of a project on European sites, those features cannot be regarded as indicative of likely significant effects on European sites concerned and should not be interpreted as mitigation measures intended to avoid or reduce harmful effects of a plan or project on those European sites. The judgment was made as follows:

"In the light of the foregoing considerations, the answer to the fourth question is that Article 6(3) of the Directive 92/43 must be interpreted as meaning that, in order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site."

¹ Including, where applicable, 'sites'.

² *Eco Advocacy v. An Bord Pleanála* [2023] C-721/21.

Article 7 of the Habitats Directive provides that the provisions of, *inter alia*, Article 6(3) are to apply to SPAs under Directive 2009/147/EC (the “Birds Directive”).

As stated, the requirements arising out of Article 6(3) of the Habitats Directive are transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 as amended³ (S.I. No.477 of 2011) (the Habitats Regulations), including Part 5 thereof.

The determination of whether or not a plan or project requires AA is referred to as “Stage 1” or “AA Screening”. A “Stage 1” or “AA Screening” is completed to determine whether or not the Project, either individually or in combination with other plans or projects, in view of best scientific knowledge, is likely to have a significant effect on areas designated as being of European importance for nature conservation (“European sites”), thereby enabling the Applicant, to fulfil its obligations under Article 6(3) of the Habitats Directive.

Article 6(3) of the Habitats Directive specifies that AA must be undertaken by the “competent national authorities”. In Ireland, the “competent authority” is the relevant planning authority for each plan or project. Consequently, the responsibility for carrying out AA Screening lies solely with the competent authority. In that respect, the AA Screening Report is not in itself an AA Screening Assessment but provides the competent authority with the information it needs in order to carry out its AA Screening.

1.4 Screening Methodology

At this stage of the process, the AA Screening Report assesses the potential effects from the plan or project on the European sites within the zone of influence and evaluates them in view of the sites’ Conservation Objectives.

This AA Screening Report has had regard *inter alia* to the following matters⁴:

- The threshold test is that an appropriate assessment will be required if the Project is likely *to have a significant effect* on (a) European site(s) either individually or in combination with other plans or projects.
- It is not necessary, in order to trigger the requirement to proceed to stage 2 AA that the Project will *‘definitely’* have significant effects on the protected site, but such a requirement will arise if it is a *‘mere probability’* that such an effect exists. The requirement to carry out an AA will be satisfied if there is a *‘probability or a risk’* that the Project will have *‘significant effects’* on (a) European site(s).
- Consequent upon the application of the precautionary principle, such a *‘risk’* will be found to exist if *‘it cannot be excluded on the basis of objective information’* that the particular Project *‘will have significant effects’* on (a) European site(s).
- An AA will be required if, on the basis of objective information, a *‘significant effect’* on a European site *‘cannot be excluded’*. An AA will not be required if, on the basis of objective information, a *‘significant effect’* on (a) European site(s) *‘can be excluded’*.
- In the case of *‘doubt as to the absence of significant effects’* an AA must be carried out.

³ Including *inter alia* S.I. 290 of 2013; SI 499 of 2013; SI 355 of 2015; the Planning, Heritage and Broadcasting (Amendment) Act 2021, Chapter 4; SI 293 of 2021.

⁴ See Eoin Kelly v. An Bord Pleanála [2019] IEHC 84; Kelly v. An Bord Pleanála [2014] IEHC 400; Connelly v. An Bord Pleanála [2018] IESC 31; [2018] ILRM 453.

- The requirement to conduct an AA will arise where, at the screening stage, it is ascertained that the particular development is '*capable of having any effect*' (albeit this must be any '*significant effect*') on (a) European site(s).
- The '*possibility*' of there being a '*significant effect*' on (a) European site(s) will give rise to a requirement to carry out an AA for the purposes of Article 6(3). There is no need to '*establish*' such an effect and it is merely necessary to determine that there '*may be*' such an effect.
- In order to meet the threshold of likelihood of significant effect, the word '*likely*' in Article 6(3) means less than the balance of probabilities. The test does not require any '*hard and fast evidence*' that such a significant effect was likely. It merely has to be shown that there is a '*possibility*' that this significant effect is likely.
- The assessment of whether there is a risk of '*significant effect*' on the European site must be made in light, *inter alia*, of the '*characteristics and specific environmental conditions of the site concerned*' by the relevant plan or project.
- Plans or projects or applications for developments which have *no appreciable effect* on European sites are excluded from the requirement to proceed to AA. If all applications for permission for projects capable of having *any effect whatsoever* on such sites were to be caught by Article 6(3) *activities on or near the site would risk being impossible by reason of legislative overkill*.

While the threshold at the screening stage of Article 6(3) is very low nonetheless it is a threshold which must be met before it is necessary to proceed to the stage 2 AA.

Accordingly, best practice in undertaking AA Screening involves five steps as follows:

- (1) The first step involves gathering the information and data necessary to carry out a screening assessment. These include, but are not limited to, the details of all phases of the plan or project, environmental data pertaining to the area in which the plan or project is located, e.g. rare or protected habitats and species present or likely to be present, and the details of the European sites within the zone of influence.
- (2) The second step involves examining the information gathered in the first step and a scientific analysis of the potential impacts of the project on the receiving environment, particularly the European sites in the zone of influence.
- (3) The third step evaluates the impacts analysed in the second step against the Conservation Objectives of the relevant European sites, thereby determining whether or not those impacts constitute "likely significant effects", within the meaning of Article 6(3) of the Habitats Directive.
- (4) The fourth step involves considering the potential for likely significant effects to arise from the combination of the impacts of the plan or project with those of other plans or projects. If it is determined in the third step that Stage 2 (AA) is required, consideration of potential cumulative impacts may be deferred to that stage.
- (5) The last step involves the issuing of a statement of the determination of the AA Screening. Notwithstanding the recommendation made in the AA Screening Report, the responsibility for completing this step lies solely with the competent authority.

The following guidance documents informed the assessment methodology:

- European Commission (EC) (2021) *Assessment of plans and projects in relation to Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*. Environment Directorate-General of the European Commission.
- European Commission (EC) (2018) *Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*. European Commission, Brussels.
- European Commission (EC) (2007) *Guidance Document on Article 6(4) of the 'Habitats Directive' 92/43/EEC: Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence*. Opinion of the European Commission.
- Department of Environment, Heritage, and Local Government (DEHLG) (2010) *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*. Department of the Environment, Heritage and Local Government, Dublin.
- National Parks and Wildlife Service (NPWS) (2010a) *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities*. Circular Letter NPWS 1/10 & PSSP 2/10. National Parks & Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.
- Office of the Planning Regulator (OPR) (2021) *Practice Note PN01: Appropriate Assessment Screening for Development Management*. Office of the Planning Regulator.

1.5 Ecological Assessment

In order to fully inform this AA Screening Report in respect of the Project, it was necessary to establish the baseline ecological conditions in the receiving environment, particularly with regard to European sites.

1.5.1 Desk Study

During the desk study, the statutory consultee, the National Parks & Wildlife Service (NPWS), provided data on designations of sites, habitats and species of conservation interest. This included reports pursuant to Article 17 of the Habitats Directive⁵ (NPWS, 2019a, b, c) and Article 12 of the Birds Directive⁶ (Eionet, 2018), as well as the Site Synopses and Conservation Objectives for the relevant European sites.

The desk study involved a thorough review of existing information relating to ecology in the vicinity of the Project and in the surrounding area. The following web-based geographic information systems (GISs) were used to obtain information relating to the natural environment surrounding the Project. These included the NPWS *Map Viewer* (NPWS, 2024), which provided information on the locations of protected sites, the National Biodiversity Data Centre's (NBDC) *Biodiversity Maps* (NBDC, 2024), which provided recent and historic records of rare and protected species in the area as well as the Environmental Protection Agency's (EPA) *Unified GIS Application* (EPA, 2024) and the UCD *ESM Webtool* (UCD, 2024) which provided additional information on the wider environment.

⁵ Under Article 17, to report to the European Commission every six years on their status and on the implementation of the measures taken under the Directive.

⁶ Every three years, Member States of the European Union are required by Article 12 of the Birds Directive to report on implementation of the Directive. The most recent reporting available is for the period 2008-2012.

The desk study was also informed by the following documents:

- Bord na Móna (2023a) *Derrymoylin Bog Cutaway Bog Decommissioning and Rehabilitation Plan 2023*.
- Bord na Móna (2023b) *Derrymoylin Bog GIS Map Book 2023*.
- Bord na Móna (2023c) *Peatlands Climate Action Scheme – Derrymoylin Bog Site Characterisation and Monitoring 2023*.
- Bord na Móna (2023d) *Peatland Climate Action Scheme – Derrymoylin Bog Engineering Report*.
- Bord na Móna (2023e) *Peatland Climate Action Scheme – Environmental Management Plan*.
- Bord na Móna (2022) *Methodology Paper for the Enhanced Decommissioning, Rehabilitation and Restoration on Bord na Móna Peatlands – Preliminary Study*.
- RPS (2023) *Bord na Móna – Derrymoylin Bog Drainage Management Plan*.

As with all desk studies, the data considered were only as good as the data supplied by the recorders and recording schemes. The recording schemes provide disclaimers in relation to the quality and quantity of the data they provide, and these were considered when examining outputs of the desk study.

1.5.2 Assessment

The ecological baseline which was established by the desk study described above was used to inform the assessment of the potential ecological effects likely to arise from the Project, particularly with regard to European sites. Any assumptions that were made in view of gaps in the ecological data were made in strict accordance with the Precautionary Principle.

2.0 DESCRIPTION OF THE PROJECT

2.1 Overview

Bord na Móna is planning to rehabilitate Derrymoylin Bog, located in Roscommon approx. 4 km northwest of Tarmonbarry and 1.8 km southwest of Roosky on the west side of the River Shannon. Derrymoylin Bog, which is part of the Mount Dillon group of bogs, totals 324 ha in area with 294 ha proposed for rehabilitation. Industrial peat production commenced at Derrymoylin Bog in 1985 and permanently ceased in 2020, although some remaining stock is still on site. The former peat production areas comprised largely bare peat along with some pioneering cutaway habitats, in addition to marginal habitats. Sections of intact raised bog are present along the margins of the site. However, these areas are small, are drying out and are for the most part subject to domestic turf cutting. It is envisaged extant stock will be removed prior to scheme activities. Rehabilitation 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.

Funding is provided by the Irish Government through the Peatland Climate Action Scheme (PCAS) and by Bord na Móna. The Department of Environment, Climate and Communications has approved ongoing grant funding up to €108 million to Bord na Móna in relation to the enhanced rehabilitation of peatlands under PCAS. This funding is provided by the European Union's Recovery and Resilience Facility as part of Ireland's National Recovery and Resilience Plan.

The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat (putting a "skin" back onto the peat), and minimising effects to downstream waterbodies. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.

In general, soggy ground conditions are preferred, such that the remaining peat is wet and plants that prefer wetter conditions, such as Bog Cotton, will thrive. Some sections with deeper residual peat have the capacity to regrow Sphagnum moss again, where there are suitable hydrological conditions. *Sphagnum* is a key species for restoring naturally functioning raised bog conditions. Many Bord na Móna bogs cannot be restored back to raised bog in the short-term, as so much peat has been removed and the environmental conditions have been modified. However other peatland habitats with Heather, Bog Cotton, Rushes, Purple Moor-grass, Bog-mosses and scattered trees will develop, and in time a naturalised peatland can be restored.

The development or succession of a range of habitats within PCAS extent at Derrymoylin Bog will support biodiversity including plants, insects, birds and mammals. This includes some species that are rare and protected in the wider landscape. It will increase the national area of native woodland. Many peatland and wetland habitats in

the wider landscape have been reclaimed for agriculture and other uses and peatland rehabilitation is an opportunity to create new peatland and wetland habitats.

Measures proposed for Derrymoylin Bog include drain blocking and additional measures required to raise water levels to the surface of the peat. Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth. Bord na Móna plan to carry out this work in 2024. These rehabilitation measures will be planned by a team of expert ecologists, hydrologists and engineers. It is a guiding principle of Bord na Móna rehabilitation planning that no actions or activities will be carried out that would negatively impact on adjacent land. No boundary drains will be blocked, and water will still leave the bog via the existing outlets. It will take some time for vegetation and habitats to fully develop with the rehabilitated area and for a peatland ecosystem to be restored. However, it is expected that most of the bog will be developing pioneer habitats after 5-10 years. This is a peatland rehabilitation plan. This plan does not consider future after-use or development. Bord na Móna continually reviews its land-bank to consider future commercial or industrial developments, such as renewable energy.

Peatland rehabilitation of this bog will bring a range of benefits to the local community via improvements to the local landscape and is also important for supporting national policies and strategies in relation to reduction of carbon emissions from these peatlands, supporting biodiversity and improvements to water quality.

“Derrymoylin Bog - Cutaway Bog Decommissioning and Rehabilitation Plan 2023” is provided in full in Appendix A to this report.

The Project is neither connected to, nor necessary for the management of any European site.

2.2 Location of Project

Derrymoylin Bog is located in Co. Roscommon approx. 4 km northwest of Tarmonbarry and 1.8 km southwest of Roosky on the west side of the River Shannon. Derrymoylin Bog is part of the Mount Dillon group of bogs. The location of the Project site is shown in Plate 1.

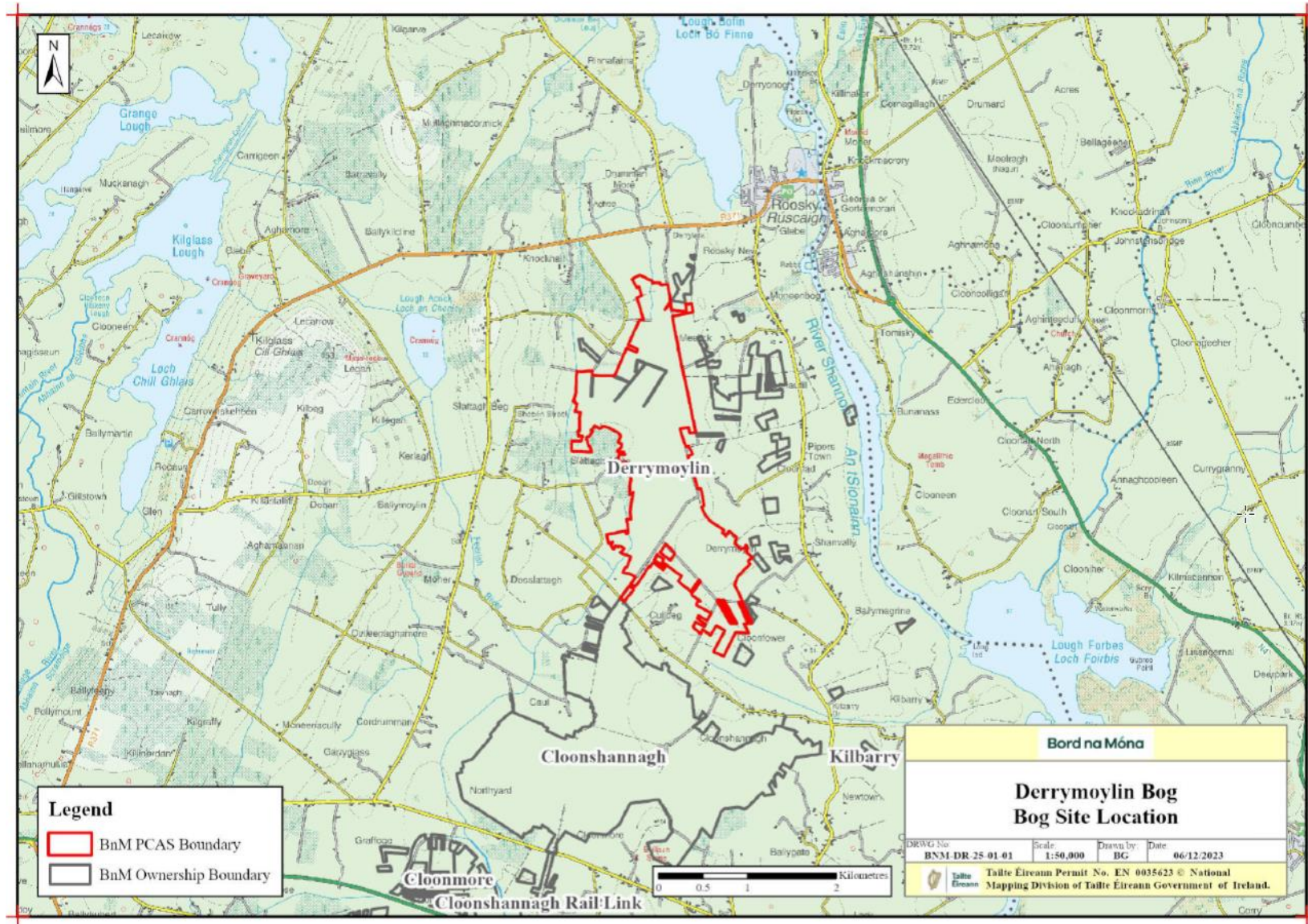


Plate 1 Derrymoylin Bog Location

2.3 Receiving Natural Environment

Overview

The surrounding landscape is dominated by a mosaic of farmland, largely consisting of improved grassland, and other bogs, many owned and managed by Bord na Móna. A rail line to the south of the site connects Derrymoylin with Cloonshannagh bog to the south. In addition, an unpaved access track crosses the site before running along the eastern boundary of the site.

Several mapped EPA watercourses flow along the boundary of Derrymoylin bog with part of the Roosky New Stream [EPA Code: 26R31] flowing in a northerly direction through a small section to the north of the bog. This watercourse flows into the Aghoo stream [EPA Code: 26A04], which flows along the north-western boundary of the bog. The Aghoo stream discharges into Lough Bofin and then River Shannon. The Slattagh_More stream [EPA Code: 26S33] flows along the south-eastern boundary of the bog, in a southerly direction, into the Feorish (Termonbarry) stream watercourse, eventually discharging to the River Shannon (Upper) south of Termonbarry. Derrymoylin Bog is one of a cluster of bogs that has developed along the floodplains of the River Shannon. Derrymoylin Bog has a gravity drainage regime.

Habitats

The main habitats are described below. The most common habitats⁷ present within the currently proposed rehabilitation area include:

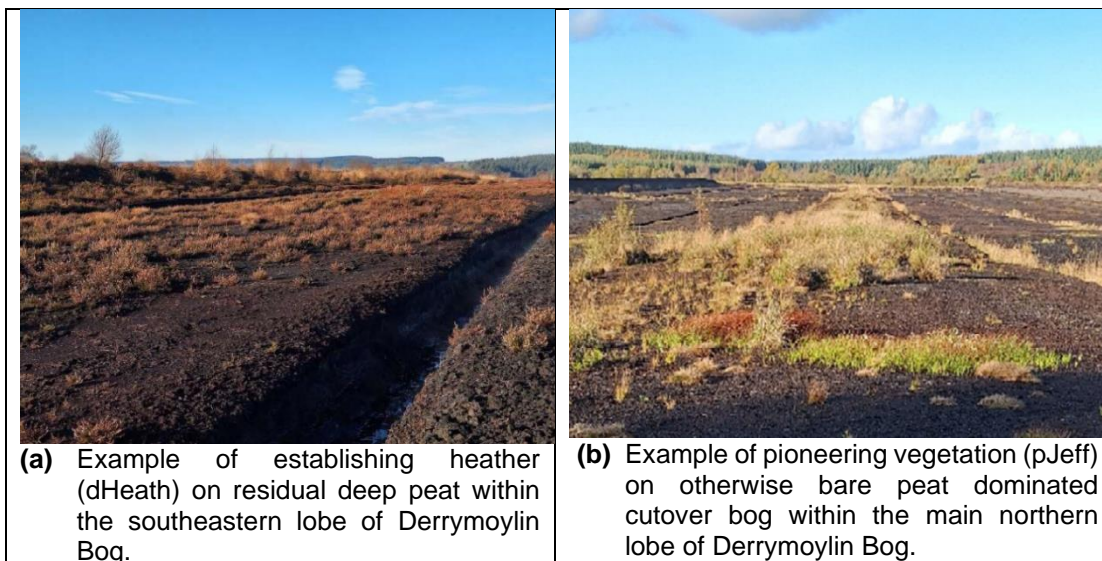
- Bare peat (0-50% cover) (BP).
- Willow-dominated scrub (eWill) (in mosaic with pJeff) (in those areas that are flooded regularly)
- Open water (OW) (permanent) and Temporary open water (TOW)
- Birch-dominated scrub (eBir, oBir) (on drier higher ground that is not flooded)
- Pioneer dry heath (dHeath) (mainly in mosaic with Birch scrub)
- Pioneer Soft Rush-dominated poor fen (pJeff)
- Dry pioneer Purple Moorgrass-dominated grassland (gMol)
- Access routes (Acc)
- Riparian zones (Rip) (with drains and associated habitats such as scrub and Birch woodland)
- Silt ponds (Silt) with Gorse/Birch scrub and Purple Moorgrass-dominated grassland (gMol)

The following habitats are classified according to A Guide to Habitats in Ireland (Fossitt, 2000) and any habitats corresponding to types listed on Annex I to the Habitats Directive were identified using the Interpretation Manual of European Union Habitats (EC, 2013).

⁷Codes refer BnM classification of pioneer habitats of production bog. See Appendix II – “An Overview of the Bord na Móna Habitat Classification” of the BnM [Biodiversity Action Plan 2016-2021](#). Note: habitat categories presented are not exhaustive and are meant to indicate the primary habitats of importance which are present.

The most common habitats found around the margins of the site include:

- Raised bog (PB1)
- Cutover Bog (PB4)
- Scrub (WS1)
- Wet grassland (GS4)
- Birch woodland (WN7)
- Dense Bracken (HD1)
- Improved agricultural grassland (GA1)



Plates 2a&b Different Habitats at Derrymoylin Bog

The locations of these habitats within Derrymoylin Bog are presented in Plate 3 below.

Species of Conservation Interest

A number of species of conservation concern utilize the habitats available at Derrymoylin Bog. The following is a summary of the records of these species available within both Bord na Móna records and those of the National Biodiversity Data Centre (NBDC).

Multiple mammal species have been recorded on or within 1 km of the bog, including Red Fox (*Vulpes vulpes*), Badger (*Meles meles*) and Irish Hare (*Lepus timidus hibernicus*).

Numerous bird species are known to use the cutover bogs in Ireland's midlands as breeding grounds, wintering grounds or both. NBDC records for red-listed⁸ Birds of Conservation Concern in Ireland (BoCCI) recorded from the hectad N08 include Black-headed Gull (*Larus ridibundus*), Common Redshank (*Tringa totanus*), Herring Gull (*Larus argentatus*) and Yellowhammer (*Emberiza citrinella*).

Note that although these species have been recorded within the wider area of Derrymoylin bog, it is considered unlikely that the bare peat dominated habitats occurring within Derrymoylin bog would offer suitable habitat for these species.

⁸ Gilbert G, Stanbury A and Lewis L (2021), "Birds of Conservation Concern in Ireland 2020 –2026". Irish Birds 9: 523–544

The aforementioned mammal species are likely to be associated with habitats occurring at the bog margins or adjacent to the bog.

Invasive Species

The invasive species Japanese Knotweed (*Reynoutria japonica*) has been recorded the eastern boundary of the site. This is located outside of the areas proposed for rehabilitation. There are no other NBDC or Bord na Móna records for high impact invasive species recorded on the bog. A broad range of common garden escapes are occasionally present around the margins of Bord na Móna bogs, and although spatial overlap with the PCAS is expected to be limited, these are, where necessary, to be treated in line with best practice during PCAS activities.

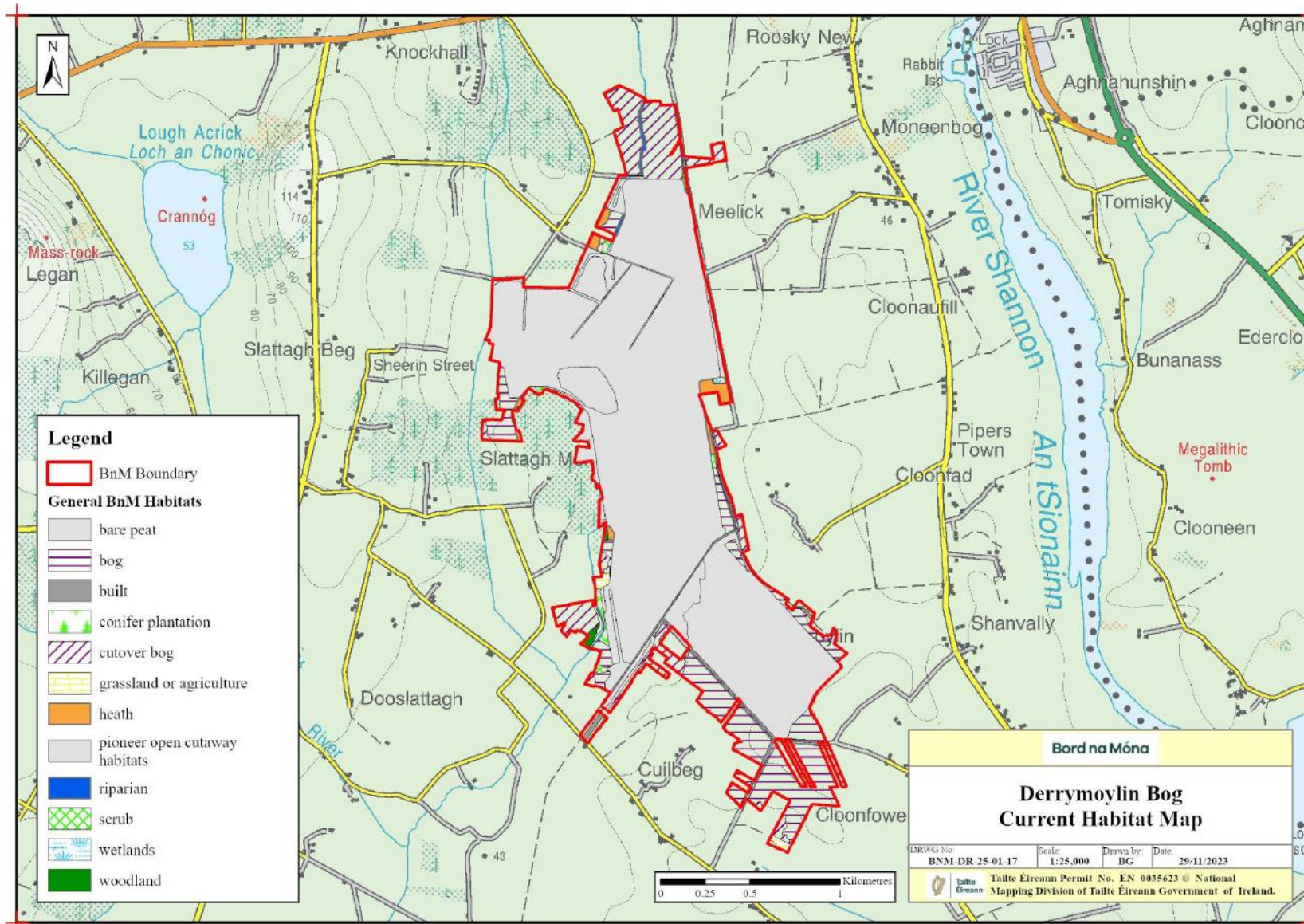


Plate 3 Different Habitats at Derrymoylin Bog

2.4 Description of the Project

The following paragraphs describe the enhanced rehabilitation measures proposed at Derrymoylin Bog:

- Deep Peat measures including field re-profiling, on deeper peat; intensive drain blocking (max 7/100 m) and modifying outfalls, and management of water levels with overflow pipes and blocking of internal outfalls;
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels, along with organic fertiliser application;
- Targeted drain blocking to optimise hydrological conditions/rewet the residual peat in targeted marginal (degraded) raised bog remnants around the margins of the site and re-wetting, where possible, using an excavator to install peat blockages.
- Targeted fertiliser applications to accelerate vegetation establishment on areas of bare peat on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Initial hydrological modelling indicates that part of the site will develop a mosaic of wetland habitats on residual deep peat, with the potential for some deeper water. Drain blocking (max 4/100 m), modifying outfalls and managing overflows will be implemented in this area. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some small sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage.

2.4.1 Rehabilitation Methodology

Drain-blocking with an excavator to re-wet cutaway bog

This enhanced measure can be applied to cutover bog, cutaway bog and drained raised bog with different environmental characteristics. It can be applied to residual peat of various depths including deep cutover peat. The main objective is to block drains with peat dams to raise water levels, rewetting peat and slowing water movements through the site. Slowing water movement will have additional benefits of reducing fluvial carbon loss (via water) and also eventually improving water quality leaving the site by reducing emissions of silt and ammonia.

These drain blocks are used in a number of enhanced rehabilitation methodologies, including DPT2, DPT3, DCT3, WLT4, WLT5, MLT2 and AW2. They are also used at the cell berm locations for the DPT4 and DPT5 methodologies. Rehabilitation methodologies are summarised in Table 2.2.

The number of peat dams per 100m is determined by the topography of the site, but an allowance has been estimated at a minimum of 4 per 100m and a maximum of 7 blocks per 100m of field drain. The number of drain blocks is dictated by the gradient of the drain and the blocks are set out at every 100mm fall up to a max of 7 blocks per 100 metres. In the case of wetland methodology WLT4 the maximum number of drain blocks is 4 per 100 metres regardless of the gradient. The methodology follows NPWS guidelines published by the National Parks and Wildlife Service (Mackin et al. 2017) and in line with methodologies originally developed by McDonagh (1996), however the drain block frequency differs as the NPWS guidelines has a maximum of 10 blocks per 100 metres. This method requires the cutting of a 500mm key along the side and base of the drain and the compaction of peat in layers when forming the drain block.

This method of forming drain blocks along with the increased number of drain blocks (compared with the standard measures) benefits re-wetting, traps silt on cutaway with slightly greater slopes and further slows the movement of water from these sites.

Where areas are heavily vegetated with scrub/trees, it is not always possible to install the number of drain blocks in accordance with the above methodology without damaging existing vegetation. In some cases, a tree felling licence would be required as small trees may be established. In these situations, targeted drain blocking is carried out and drain blocks positioned in more accessible less vegetated areas. This allows for some rewetting of these areas with minimal interference to existing ecology and biodiversity.

An example of the application of this enhanced drain blocking rehabilitation measure is at Ballysorrell Bog. Drain blocks have been provided in circa 3700 ha of the Bord na Móna peatlands as part of the Year 1 rehabilitation under the scheme. These drain blocks are performing successfully to date.

Table 2.3 summarises the rehabilitation measures and the extent of these rehabilitation measures proposed for Derrymoylin Bog:

Table 2.2 Rehabilitation Methodologies

Code	Description
Deep Peat Cutover Bog	
DPT 1	Regular drain blocking – Speed Bump method (3/100 m) + modifying outfalls and managing water levels with overflow pipes
DPT 2	More intensive drain blocking (max 7/100 m) + modifying outfalls and managing overflows with a controlled weir outfall + fertiliser application
DPT 3	More intensive drain blocking (max 7/100 m), + field reprofiling + modifying outfalls and managing overflows with a controlled weir outfall + fertiliser application
DPT 4	Berms and field re-profiling (circa 45m x 60m cell) + modifying outfalls and managing overflows with a controlled weir outfall + drainage channels for excess water + fertiliser application + <i>Sphagnum</i> inoculation
DPT 5	Cut and Fill cell bunding (circa 30m x 30m cell) + modifying outfalls and managing overflows with a controlled weir outfall + drainage channels for excess water + fertiliser application + <i>Sphagnum</i> inoculation
DPT 6	Trench drain blocking + modifying outfalls and managing overflows with a controlled weir outfall + fertiliser application
Dry Cutaway	
DCT 1	Targeted fertiliser application
DCT 2	Regular drain blocking – speed bump method (3/100 m) + modifying outfalls and managing water levels with overflow pipes + targeted fertiliser treatment
DCT 3	More intensive drain blocking (max 7/100 m) + modifying outfalls and managing overflows with a controlled weir outfall + targeted fertiliser treatment
Wetland	
WLT 1	Turn off or reduce pumping to re-wet cutaway + modifying outfalls and managing water levels with overflow pipes + targeted fertiliser application

Code	Description
WLT 2	Turn off or reduce pumping to re-wet cutaway + modifying outfalls and managing water levels with overflow pipes + targeted modifying of outfalls within a site + targeted fertiliser application
WLT 3	Turn off or reduce pumping to re-wet cutaway + modifying outfalls and managing water levels with overflow pipes + targeted modifying of outfalls within a site + constructing larger berms to re-wet cutaway + transplanting Reeds and other rhizomes + targeted fertiliser application
WLT 4	More intensive drain blocking (4/100 m), + modifying outfalls and managing overflows with a controlled weir outfall + transplanting Reeds and other rhizomes + targeted fertiliser application
WLT 5	More intensive drain blocking (max 7/100 m), + field reprofiling + modifying outfalls and managing overflows with a controlled weir outfall + transplanting Reeds and other rhizomes + targeted fertiliser application
Marginal Land	
MLT 1	No work required
MLT 2	More intensive drain blocking (max 7/100 m)
Additional Work	
AW 1	No work required
AW 2	Targeted drain blocking with excavator (1 per 100 m)

Table 2.3 Types and areas of enhanced rehabilitation measures for Derrymoylin Bog.

Type* [Rehab Code]	Enhanced Rehabilitation Measure	Extent (Ha)
Deep Peat [DPT2]	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows	77.46
Deep Peat [DPT3]	More intensive drain blocking (max 7/100 m), field reprofiling, modifying outfalls and managing overflows	52
Wetland [WLT4]	More intensive drain blocking (max 7/100 m), modifying outfalls and managing overflows, transplanting Reeds and other rhizomes	68.02
Dry Cutaway [DCT2]	Regular drain blocking (3/100 m), modifying outfalls and managing water levels with overflow pipes, targeted fertiliser treatment	30.61
Marginal Land [MLT1]	No work required	9.65
Additional Work [AW2]	Targeted drain blocking	21.13
Silt Ponds [Silt Pond]	Silt ponds	0.33
Constraint [Constraint]	Other constraints (Turbury)	64.80
Total		324

2.4.2 Programme

The programme for completion of the Project is as follows:

Short-term planning actions (0-1 years)

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise, from the EPA.
- Agree an ex-ante budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with engineering drawings outlining how the various rehabilitation methodologies will be applied to Derrymoylin Bog. This will take account of peat depths, topography, drainage and hydrological modelling.
- A drainage management assessment of the proposed enhanced rehabilitation measures has been carried out, any issues identified resolved and the rehabilitation plan adapted.
- A review of known archaeology and an archaeological impact appraisal of the proposed rehabilitation has been carried out. The results of this assessment have been incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.
- A review of issues that may constrain rehabilitation such as turbary and existing land agreements is to be carried out.
- A review of remaining milled peat stocks is to be carried out. There are peat stocks remaining on the bog.
- An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- Track implementation and enforcement of the relevant IPC Licence conditions, and other environmental control measures during the implantation of the rehabilitation plan.

Short-term practical actions (0-2 years)

- Carry out proposed measures as per the detailed site plan. This will include a combination of drain blocking and fertiliser applications targeting bare peat areas of headlands, high fields and other areas (where required) in addition to wetland creation and management prescriptions. All rehabilitation will be carried out with regard to best practice environmental control measures.
- Monitor the success of rehabilitation measures in relation to developing suitable hydrological conditions.
- Carry out the proposed monitoring.
- While natural colonisation has commenced since peat production ceased, Phase 2 actions will be carried out in targeted areas to accelerate re-vegetation and colonisation of target species. Phase 2 actions may include seeding of targeted vegetation and inoculation of *Sphagnum*.
- Silt ponds will be monitored during this period and there will be continued maintenance and cleaning to prevent potential run-off of suspended solids from the site during the rehabilitation phase.

- Submit an ex post report to the Scheme regulator to verify the eligible measures to be carried out in year 1 of the Scheme, and an ex ante estimate for year 2 of the Scheme; and so on for each year of the Scheme.

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

2.4.3 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, assess the condition of the rehabilitation work, monitoring of any potential impacts on neighbouring land, general land security, boundary management, dumping and littering.
- The number of site visits will reduce after 2 years to bi-annually and then after 5 years to annual visits.
- These monitoring visits will also consider any requirements for further practical rehabilitation measures.
- The **baseline condition of the site will be established** post-rehabilitation implementation by using an aerial survey to take an up-to-date aerial photo when rehabilitation is completed. This will be used to verify completion of rehabilitation measures. The extent of bare peat will be assessed using this baseline data, and habitat maps will be updated, if needed. It is proposed that sites can be monitored against this baseline in the future.
- **Water quality monitoring** at the bog will be established. The main objective of this water quality monitoring will be to establish a baseline and then monitor the impact of peatland rehabilitation on water quality from the bog.
- In order to assist in monitoring surface water quality from this bog, it is planned to increase the existing licence monitoring requirements to sampling for the same parameters to every month during the scheduled activities and for a period up to two years post rehabilitation, depending on the period required to confirm that the main two parameters, suspended solids and ammonia are remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e. reduction in concentration.
- Enhanced water quality monitoring will aim to include up to 70% of a bogs' drainage catchments.
- Monitoring results will be maintained, trended and reported on each year as part of the requirement to report on Condition 10.1 of the IPC Licence on bog rehabilitation in the Annual Environmental Report (AER), which will be available in April each year at www.epa.ie.
- The parameters to be included (as per condition 6.2 of the IPC Licence) include monthly monitoring for pH, Suspended Solids, Total Solids, Total Phosphorus, Total Ammonia, Colour, Chemical Oxygen Demand (COD) and Dissolved Organic Carbon (DOC).

- This monthly sampling on a selected number of silt ponds will be carried out over a two-year cycle. The original (licence) requirement was for a quarterly sampling regime, but this has been increased to a monthly regime to appropriately track the changing water chemistry that will occur as part of this enhanced rehabilitation. In addition, DOC will be included as a parameter to try and identify any changes in carbon in the surface water.
- If, after two years, key criteria for successful rehabilitation are being achieved and key targets are being met, then the water quality monitoring will be reviewed, with consideration of potential ongoing research on site. The water quality data, the aerial surveys and the habitat mapping will be collated and will be submitted to the EPA as part of the final validation report.
- If, after two years, key criteria for successful rehabilitation have **not** been achieved and key targets have **not** been met, then the rehabilitation measures and status of the site will be evaluated and enhanced, where required. This evaluation may indicate no requirement for additional enhancement of rehabilitation measures, but may demonstrate that more time is required before key criteria for rehabilitation has been achieved. Monitoring of water quality will then also continue for another period to be defined.
- Where other uses are proposed for the site that are compatible the provision of biodiversity and ecosystem services, these will be assessed by Bord na Móna in consultation with interested parties. Other after-uses can be proposed for licensed areas and must go through the required assessment process and planning procedures.

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

- Vegetation and habitat monitoring after rehabilitation is completed using a cutaway bog condition assessment, similar to ecotope mapping. This 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. It is proposed that sites can be monitored against this baseline in the future.
- The condition of the bog can be assessed using the condition assessment and suitable Greenhouse Gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson et al., 2015) and are constantly being refined with more and more research. Bord na Móna 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.

The monitoring, aftercare and maintenance programme is detailed in full in “*Derrymoylin Bog - Cutaway Bog Decommissioning and Rehabilitation Plan 2023*” provided in Appendix A to this Report.

2.5 Likely Effects of the Natural Environment

Several elements of the Project are considered likely to give rise to environmental and ecological impacts.

Water Quality

The Project has the potential for negative effects on water quality during the rehabilitation works due to the presence of equipment and machinery on the bogs, which increases the potential for the spillage of pollutants and sediment laden runoff entering watercourses through surface or groundwater connections. The Project could also lead to an increase or decrease in flow and changes to the flooding regime locally and downstream.

Disturbance/displacement

Disturbance will occur during the construction phase of the Project as a result of noise, lighting and vibration. The presence of machinery on the bog could lead to disturbance of mammals, birds and other wildlife.

Invasive Species

The Project also has the potential to introduce and spread invasive species through the movement of equipment to, from, or within the site.

3.0 IDENTIFICATION OF LIEKLY SIGNIFICANT EFFECTS

3.1 Establishing the Zone of Influence

Section 3.2.3 of DEHLG (2010) outlines the procedure for selecting the European sites to be considered in AA. It states that European sites potentially affected should be identified and listed, bearing in mind the potential for direct, indirect and in-combination effects. It also states that the specific approach in each case is likely to differ depending on the scale and likely effects of the plan or project. However, it advises that the following sites should generally be included:

- All European sites within or immediately adjacent to the plan or project area;
- All European sites within the zone of influence of the plan or project; and,
- In accordance with the Precautionary Principle, all European sites for which there is doubt as to whether or not they might be significantly affected.

The “Zone of Influence” of a project is the geographic extent over which significant ecological effects are likely to occur. In the case of projects, the guidance recognises that the Zone of Influence must be established on a case-by-case basis using the Source-Pathway-Receptor Model (OPR, 2021). A project may only lead to significant effects on the integrity of the European site where all three elements of Source-Pathway-Receptor are linked. In the absence of one element of this model, likely significant effects can be screened out with confidence. The assessment should make reference to the following key variables:

- The nature, size and location of the project;
- The nature of the impacts which may arise from the project;
- The sensitivities of the ecological receptors; and,
- The potential for in-combination effects.

For example, in the case of a project that could affect a watercourse, it may be necessary to include the entire upstream and/or downstream catchment in order to capture all European sites with water-dependent features of interest.

Having regard to the above key variables, the zone of influence was defined as:

- The Project site boundary;
- Water Framework Directive (WFD) SubCatchment Shannon[Upper]_SC_040 and all connected watercourses downstream as far as Lough Bofin;
- Water Framework Directive (WFD) SubCatchment Shannon[Upper]_SC_050 and all connected watercourses downstream as far as Lough Forbes;
- Water Framework Directive (WFD) SubCatchment Shannon[Upper]_SC_070 and all connected watercourses downstream as far as Lough Ree.

This area encompasses the maximum distance at which potential likely significant effects could occur via terrestrial and hydrological connections i.e., surface and groundwater pathways.

A geographical representation of the zone of influence was produced in QGIS 3.18.2 using the Project site boundary and publicly available OpenStreet Maps. This was used in combination with NPWS shapefiles to identify the boundaries of European sites in relation to the zone of influence.

It was determined that five European sites, namely the Clooneen Bog SAC, the Lough Forbes Complex SAC, the Ballykenny-Fisherstown Bog SPA, the Lough Ree SAC and the Lough Ree SPA occur within the zone of influence. The zone of influence is illustrated in Figure 3.1. Table 3.1 describes how these sites are connected to the Project. Detailed descriptions of these sites are provided in Section 3.2.

Table 3.1 European sites located within the zone of influence.

European site [site code]	Are there potential pathways for effects from the Project to this site? Explain.
Special Areas of Conservation (SAC)	
Clooneen Bog SAC [002348]	No. The shortest absolute distance from the Project to this European site is approx. 2.1 km east. This distance is over land and this European site is located on the eastern side of the River Shannon, while the Project site is located on the western side of the River Shannon. There is no hydrological connection between the Project and this European site. This European site is designated for a number of terrestrial peatland habitats. Due to the lack of hydrological connection, no pathways for effects exist from the Project to this European site.
Lough Forbes Complex SAC [001818]	Yes. The shortest absolute distance from the Project to this site is approx. 1.9 km east. This distance is over land. The shortest distance from the Project to the site via a hydrological connection is approx. 3.4 km downstream via a drainage ditch that flows from the south of the Project site to the northwest of this European Site in an easterly direction.
Lough Ree SAC [000440]	Yes. The shortest absolute distance from the Project to this site is approx. 12.9 km southwest. This distance is over land. The shortest distance from the Project to the site via a hydrological connection is approx. 19.1 km downstream via the Feorish (Termonbarry) stream and the River Shannon in a southerly direction. This site is designated for mobile aquatic species and as such, ex-situ pathways are considered to exist.
Special Protection Areas (SPA)	
Ballykenny-Fisherstown Bog SPA [004101]	Yes. The shortest absolute distance from the Project to this site is approx. 1.9 km east. This distance is over land. This site is designated for mobile wintering birds and as such, ex-situ pathways are considered to exist.
Lough Ree SPA [004064]	Yes. The shortest absolute distance from the Project to this site is approx. 12.9 km southwest. This distance is over land. The shortest distance from the Project to the site via a hydrological connection is approx. 19.1 km downstream via the Feorish (Termonbarry) stream and the River Shannon in a southerly direction. This site is designated for breeding and wintering birds and as such, ex-situ pathways are considered to exist.

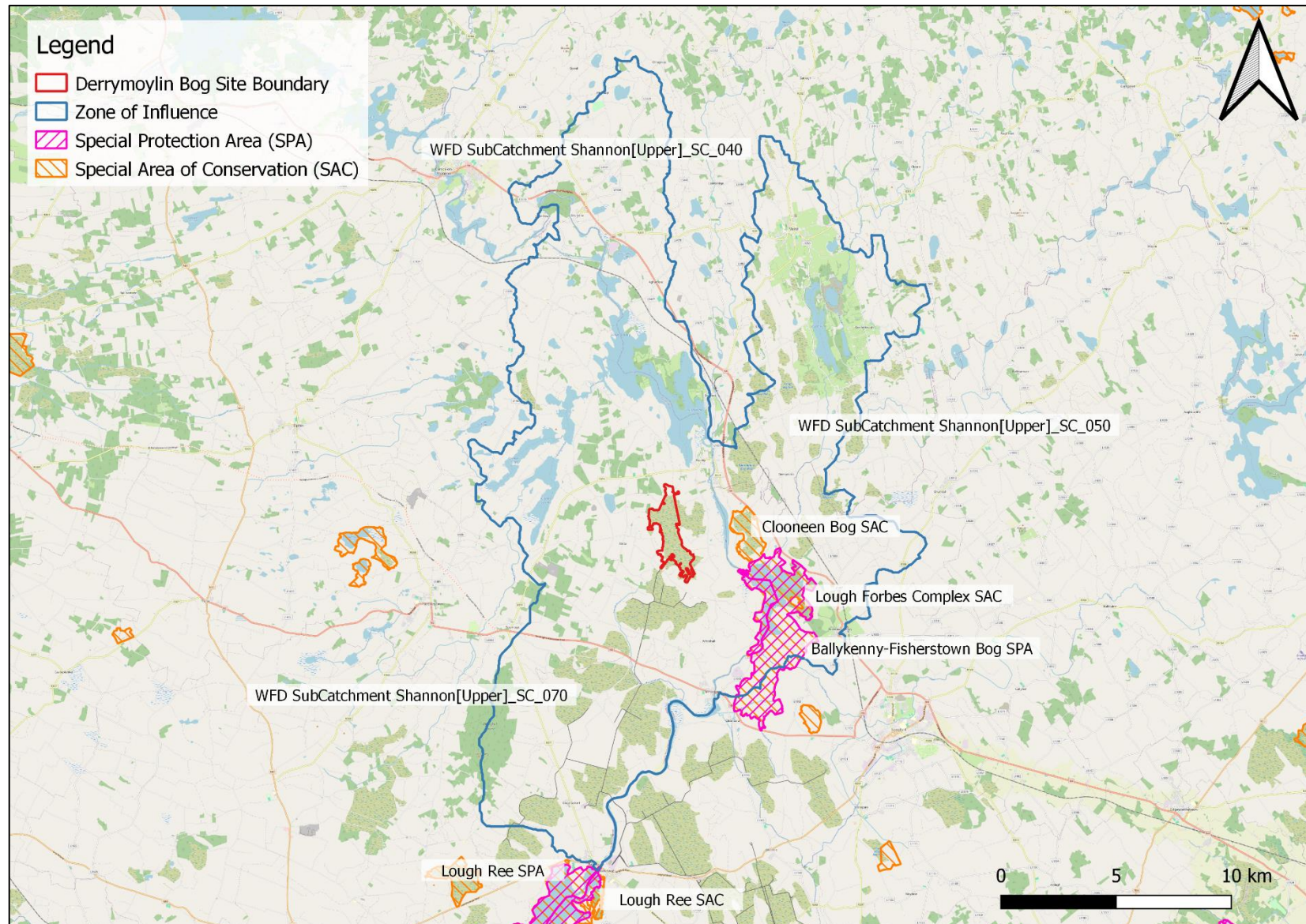


Figure 3.1 Location of European sites in relation to the Zone of Influence of the proposed development

3.2 Site Descriptions

3.2.1 Lough Forbes Complex SAC

The description of the Lough Forbes Complex SAC provided here is based on the Site Synopsis (NPWS, 2013) and Conservation Objectives (NPWS, 2016a) document for the site. Priority habitats are highlighted with an asterisk '*'.

Qualifying Interests of the Site

- [3150] Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
- [7110] Active raised bogs*
- [7120] Degraded raised bogs still capable of natural regeneration
- [7150] Depressions on peat substrates of the *Rhynchosporion*
- [91E0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)*

Site Overview

This site consists of a number of different habitats, and is centred around Lough Forbes, a lake formed by a broadening of the River Shannon. As well as the lake itself, there is also a series of raised bogs, callow grasslands and a variety of other aquatic and terrestrial habitats to the west of Newtown Forbes on the Longford/Roscommon boundary.

Active raised bog comprises areas of high bog that are wet and actively peat-forming, where the percentage cover of bog mosses (*Sphagnum* spp.) is high, and where some or all of the following features occur: hummocks, pools, wet flats, *Sphagnum* lawns, flushes and soaks. Degraded raised bog corresponds to those areas of high bog whose hydrology has been adversely affected by peat cutting, drainage and other land use activities, but which are capable of regeneration. The *Rhynchosporion* habitat occurs in wet depressions, pool edges and erosion channels where the vegetation includes White Beak-sedge (*Rhynchospora alba*) and/or Brown Beak-sedge (*R. fusca*), and at least some of the following associated species, Bog Asphodel (*Narthecium ossifragum*), sundews (*Drosera* spp.), Deergrass (*Scirpus cespitosus*) and Carnation Sedge (*Carex panicea*).

The raised bogs, located on the south-eastern shore of Lough Forbes, are known as the Ballykenny-Fishertown complex. These bogs are of international importance as unique examples of Shannon River edge bogs, and they are also the most northerly intact bogs adjacent to the River Shannon. The central core areas of the bogs are quite wet and spongy, with a good complement of bog mosses and well-developed hummocks. Ballykenny Bog is unusual in that some of its margins are intact, a rare feature in the Irish midlands. Between the Camlin River and this bog, a complete transition from raised bog to callow grasslands can be seen, while the interface between the bog and lake is colonised by a narrow band of deciduous woodland.

In the wetter areas of the bog surface, *Rhynchosporion* vegetation is sometimes found. *Sphagnum cuspidatum* is frequent, along with Bogbean (*Menyanthes trifoliata*), White Beak-sedge and Common Cottongrass (*Eriophorum angustifolium*). The relatively rare Brown Beak-sedge has also been recorded. Degraded raised bog is largely confined to the marginal areas of uncut high bog where drainage effects from adjoining turbary are most pronounced. The plant species composition of degraded raised bog is

generally similar to that of active raised bog, however species typical of very wet bog conditions are either much reduced in abundance or absent. In general, the most frequent vascular species are Deergrass, Common Cottongrass, Hare's-tail Cottongrass (*E. vaginatum*), Heather (*Calluna vulgaris*), Cross-leaved Heath (*Erica tetralix*), Bog Asphodel and Carnation Sedge. The most frequent lower plant species present are the lichen *Cladonia portentosa* and the mosses *Hypnum cupressiforme* and *Sphagnum capillifolium*.

Lough Forbes is a medium sized lake underlain by limestone. It has extensive swamps of Common Reed (*Phragmites australis*) which provide good cover for wildfowl, although numbers have declined recently, possibly due to the increase in cruisers and other pleasure boats. Freshwater marshes are also a common feature along the lakeshore. These areas contain a good diversity of aquatic and emergent vegetation, comprised of species such as sedges (*Carex vesicaria*, *C. rostrata* and *C. acuta*), Bogbean, Common Spike-rush (*Eleocharis palustris*), Fine-leaved Waterdropwort (*Oenanthe aquatica*), Water Plantain (*Alisma plantago-aquatica*), Cowbane (*Cicuta virosa*), Common Club-rush (*Scirpus lacustris*) and Reed Canary-grass (*Phalaris arundinacea*).

The site contains extensive areas of woodland. The wet woodland types present include willow woodland, Ash-Alder woodland on slightly higher ground, Ash-oak woodland at the highest levels and birch woodlands on dried-out or cut-away bog. The principal woodland type, however, is a drier mixed oak-Ash woodland. The total area of woodland within the SAC is estimated at over 170 ha, of which at least 40 ha are alluvial woodland. Several individual woodlands exceed 40 ha and there is good continuity. There is little woodland on the Roscommon side of the lough. The majority of the woodland within the SAC is recorded as having been present in part or in full on the 1st edition Ordnance Survey maps from the 1840s. These may be considered therefore as potentially ancient or long-established woodlands, a conclusion reinforced by the presence of a number of relatively rare species and ancient woodland indicator species.

The dry Pedunculate Oak (*Quercus robur*) – Ash (*Fraxinus excelsior*) woodland is dominated by Pedunculate Oak and Ash, up to 20 m tall, with occasional Alder (*Alnus glutinosa*), Rowan (*Sorbus aucuparia*) and Yew (*Taxus baccata*), as well as a variety of exotic species, principally Sycamore (*Acer pseudoplatanus*), Beech (*Fagus sylvatica*) and lime (*Tilia* sp.). The shrub layer is variable in cover and species, with Hazel (*Corylus avellana*), Holly (*Ilex aquifolium*), Hawthorn (*Crataegus monogyna*), Spindle (*Eunonymus europaea*), willows (*Salix caprea* and *S. cinerea* subsp. *oleifolia*) and the relatively rare species Bird Cherry (*Prunus padus*), Buckthorn (*Rhamnus catharticus*) and Alder Buckthorn (*Frangula alnus*). The introduced and invasive Cherry Laurel (*Prunus laurocerasus*) and Rhododendron (*Rhododendron ponticum*) are locally abundant. The herb layer consists of Bramble (*Rubus fruticosus* agg.), Enchanter's-nightshade (*Circaea lutetiana*), violet (*Viola* sp.), Bluebell (*Hyacinthoides non-scripta*) and several species of ferns, e.g. *Dryopteris filix-mas*, *D. affine*, *D. dilatata* and *Polystichum setiferum*.

Areas of birch woodland are dominated by birch, occasional Alder on more base-rich sites, Rowan, Holly and Scots Pine (*Pinus sylvestris*). Rhododendron forms thickets in some stands. The herb layer is relatively species-poor with Bramble, Purple Moorgrass (*Molinia caerulea*), Bracken (*Pteridium aquilinum*), Wood-sorrel (*Oxalis acetosella*) and abundant mosses, e.g. *Polytrichum* species.

Extensive areas of alluvial woodland fringe the shores of Lough Forbes and the Shannon, as well as extending along some of the tributaries. Three main types occur: willow woodlands, Alder-Ash woodlands and Ash-oak woodlands.

The willow woodland stands are generally found fringing the rivers and lake, and are usually quite narrow due to the hilly/boggy landscape which tends to rise steeply from the river. This results in a mostly narrow floodplain, but in places, lower lying ground may be flooded at times of high-water levels. These woodlands are generally structurally complex stands of multi-stemmed Rusty Willow (*Salix cinerea* subsp. *oleifolia*), up to 8 m tall, where the roots are in permanently waterlogged, acidic to neutral, base-rich silty soils. Birch (*Betula* sp.) and Alder are occasional. A thin shrub layer of Hawthorn may be present in drier locations. Ivy (*Hedera helix*) and Bramble occur only in small amounts. The field layer consists of tall herbaceous species such as Reed Canary-grass, Yellow Loosestrife (*Lysimachia vulgaris*), Purple Loosestrife (*Lythrum salicaria*), Meadowsweet (*Filipendula ulmaria*), Marsh Ragwort (*Senecio aquaticus*), Yellow Iris (*Iris pseudacorus*) and Marsh-marigold (*Caltha palustris*). The moss layer is poorly developed with just a scattering of species such as *Rhizonmium punctatum* and *Mnium hornum*.

Alder-Ash woodland is the most extensive type of alluvial woodland at this site. This community occurs behind the willow woodland on slightly more elevated land that nonetheless is regularly flooded. The main canopy species are Alder and Ash, with occasional Pedunculate Oak, birch and Sycamore. Rusty Willow and Hawthorn are the principal shrub species, with a small amount of Guelder-rose (*Viburnum opulus*), Bird Cherry and Hazel. The herb flora is species-rich and is dominated by Meadowsweet, with Remote Sedge (*Carex remota*) and Golden Saxifrage (*Chrysosplenium oppositifolia*). Geophytes include Bluebell and Lesser Celandine (*Ranunculus ficaria*). Other characteristic species include Ivy, Enchanter's-nightshade, Reed Canary-grass, Yellow Iris, Cuckooflower (*Cardamine pratensis*), Yellow Loosestrife and Broad Buckler-fern (*Dryopteris dilatata*). Where grazing occurs, Creeping Bent (*Agrostis stolonifera*) is abundant. The moss layer is mostly poorly developed, with *Thamnobryum alopecurum*, *Calliergonella cuspidata* and *Conocephalum conicum* being the most frequent species. The rare Elongated Sedge (*Carex elongata*) occurs locally.

Ash-Pedunculate Oak alluvial woodland occurs behind the Alder-Ash woodland where the land is subject to occasional flooding or where the water-table is high. Ash and Pedunculate Oak are the dominant canopy species, with occasional Sycamore, Beech and Horse-chestnut (*Aesculus hippocastanum*). The shrub layer is formed chiefly from Hazel, with Elder (*Sambucus nigra*), Hawthorn and occasional Bird Cherry, along with regenerating Ash and Sycamore. It is essentially a wetter version of the Oak-Ash woodland described above, but the field layer is characterised by moisture-loving species such as Golden Saxifrage, Remote Sedge, Wood-sedge (*Carex sylvatica*) and Bugle (*Ajuga reptans*). While the field layer is diverse and species-rich, the moss layer is only moderately developed, the most common species being *Thamnobryum alopecurum*, *Thuidium tamariscinum* and *Rhytidiadelphus triquetrus*.

Areas of callows (winter-flooded grassland) along the Camlin River are also included within this site. Like the internationally important Shannon Callows, these wet grasslands are included for their botanical interest as well as for the waterbirds that they support. Both Lough Forbes and the callow grasslands provide good habitat for a range of wintering waterfowl species though most occur in relatively low numbers. Counts in two of the winters in the 1995/96 to 1999/00 period are as follows: Cormorant (*Phalacrocorax carbo*) (51), Whooper Swan (*Cygnus cygnus*) (40), Wigeon (*Mareca penelope*) (419), Teal (*Anas crecca*) (444), Shoveler (*Anas clypeata*) (6), Tufted Duck

(*Aythya fuligula*) (49) and Goldeneye (*Bucephala clangula*) (11). The bogs were formerly used by part of the Loughs Kilglass and Forbes Greenland White-fronted Goose (*Anser albifrons flavirostris*) wintering population, but these appear to have now been abandoned in favour of grassland sites elsewhere. Merlin (*Falco columbarius*) has been recorded within the site and may nest. Whooper Swan and Merlin are listed on Annex I of the E.U. Birds Directive. Red Grouse (*Lagopus lagopus hibernicus*) are known from the bogs. Red Grouse is a Red Listed species in Ireland as it has declined in numbers in recent decades.

The raised bogs are vulnerable to water loss from peat-cutting and drainage, though ongoing restoration work involving blocking of drains is occurring. There are no known threats to the wintering birds though the increased use of the River Shannon system by leisure craft could cause disturbance.

The importance of the Lough Forbes site lies in its excellent diversity of habitats, some of which, for example the raised bogs, are rare and threatened. The site is also of ornithological importance for its wintering waterfowl, breeding Merlin and Red Grouse. The presence of Whooper Swan and Merlin is of particular note as these species are listed on Annex I of the E.U. Birds Directive.

3.2.2 Lough Ree SAC

The description of the Lough Ree SAC provided here is based on the Site Synopsis (NPWS, 2019d) and Conservation Objectives (NPWS, 2016b) document for the site. Priority habitats are highlighted with an asterisk ‘*’.

Qualifying Interests of the Site

- [3150] Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
- [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)
- [7110] Active raised bogs
- [7120] Degraded raised bogs still capable of natural regeneration
- [7230] Alkaline fens
- [8240] Limestone pavements*
- [91D0] Bog woodland*
- [91E0] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)
- [1355] Otter (*Lutra lutra*)

Site Overview

Lough Ree is the third largest lake in Ireland and is situated in an ice-deepened depression in Carboniferous limestone on the River Shannon system between Lanesborough and Athlone. The site spans Counties Longford, Roscommon and Westmeath. Some of its features (including the islands) are based on glacial drift. It has a very long, indented shoreline and hence has many sheltered bays. Although the main habitat, by area, is the lake itself, interesting shoreline, terrestrial and semi-aquatic habitats also occur.

The greater part of Lough Ree is less than 10 m in depth, but there are six deep troughs running from north to south, reaching a maximum depth of about 36 m just west of Inchmore. The lake has been classified as mesotrophic in quality, but the size of the system means that a range of conditions prevail depending upon, for example,

rock type. This gives rise to local variations in nutrient status and pH, which in turn results in variations in the phytoplankton and macrophyte flora. Therefore species indicative of oligotrophic, mesotrophic, eutrophic and base-rich situations occur. The water of Lough Ree tends to be strongly peat-stained, restricting macrophytes to depths of less than 2 m, and as a consequence, macrophytes are restricted to sheltered bays, where a typical Shannon flora occurs. Species present include Intermediate Bladderwort (*Utricularia intermedia*), pondweeds (*Potamogeton* spp.), Quillwort (*Isoetes lacustris*), Greater Duckweed (*Spirodela polyrhiza*), stoneworts (*Chara* spp., including *C. pedunculata*) and Arrowhead (*Sagittaria sagittifolia*). The latter is a scarce species which is almost confined in its occurrence to the Shannon Basin.

Reedbeds of Common Reed (*Phragmites australis*) are an extensive habitat in a number of more sheltered places around the lake, but single-species 'swamps' consisting of such species as Common Club-rush (*Scirpus lacustris*), Slender Sedge (*Carex lasiocarpa*), Great Fen-sedge (*Cladium mariscus*) and two scarce species of sedge (*Carex appropinquata* and *C. elata*) also occur in suitable places. Some of these grade up into species-rich alkaline fen with Black Bog-rush (*Schoenus nigricans*) and Whorl-grass (*Catabrosa aquatica*), or freshwater marsh with abundant Water Dock (*Rumex hydrolapathum*) and Hemp-agrimony (*Eupatorium cannabinum*).

Lowland wet grassland is found in abundance around the shore and occurs in two types. One is 'callowland', grassland which floods in winter. This provides feeding for winter waterfowl and breeding waders. The other is an unusual community on stony wet lake shore which is found in many places around the lake, and is characterized by Water Germander (*Teucrium scordium*), a scarce plant species almost confined to this lake and Lough Derg.

Dry calcareous grassland occurs scattered around the lake shore. This supports typical species such as Yellow-wort (*Blackstonia perfoliata*), Carlina Thistle (*Carlina vulgaris*) and Quaking-grass (*Briza media*). Orchids also feature in this habitat e.g. Bee Orchid (*Ophrys apifera*) and Common Spotted-orchid (*Dactylorhiza fuchsii*).

Limestone pavement occurs occasionally around the lake shore. The most substantial area is at Rathcline in the extreme north-east. While this has been planted with commercial forestry since the 1950s, it still displays a diverse representation of pavement types, from the typical clint-gryke system to large blocky pavements and scattered boulders. In all cases the pavement is covered by a bryophyte-rich flora, with abundant Ivy (*Hedera helix*), and a scrub layer dominated by Ash (*Fraxinus excelsior*), Hazel (*Corylus avellana*) and some Spindle (*Euonymus europaeus*). The ground flora is variable, though in places it is species-rich.

Dry broadleaved semi-natural woodland occurs in several places around the lake, most notably at St John's Wood and on Hare Island. St John's Wood is recognised as the largest and most natural woodland in the Midlands. Its canopy is dominated by Hazel, Pedunculate Oak (*Quercus robur*), Holly (*Ilex aquifolium*) and Ash, but a range of other trees and shrubs occur, including Wych Elm (*Ulmus glabra*), Yew (*Taxus baccata*), Wild Cherry (*Prunus avium*) and Irish Whitebeam (*Sorbus hibernica*). The ground flora of St John's Wood is species-rich, and is remarkable for the presence of two species, Toothwort (*Lathraea squamaria*) and Bird's-nest Orchid (*Neottia nidus-avis*), which tend to occur in sites with a long history of uninterrupted woodland cover. The tree species composition on Hare Island is similar to that in St John's Wood, with additional non-native species such as Sycamore (*Acer pseudoplatanus*) and Beech (*Fagus sylvatica*). This wood also has an exceptionally rich ground flora. Some of the smaller

areas of woodland around Lough Ree are mixed woodland with a high percentage of exotics such as Beech. Some areas of well-developed Hazel scrub also occur.

At St John's Wood, patches of wet alluvial woodland are present along the lakeshore. They are dominated by Ash, Grey Willow (*Salix cinerea*), Alder (*Alnus glutinosa*) and, in places, Downy Birch (*Betula pubescens*). The ground flora includes Creeping Bent (*Agrostis stolonifera*), Wild Angelica (*Angelica sylvestris*), Meadowsweet (*Filipendula ulmaria*), Common Marsh-bedstraw (*Galium palustre*), Yellow Iris (*Iris pseudacorus*), Gipsywort (*Lycopus europaeus*), Water Mint (*Mentha aquatica*), Reed Canary-grass (*Phalaris arundinacea*), Creeping Buttercup (*Ranunculus repens*) and Wood Dock (*Rumex sanguineus*). Pockets of wet woodland occur elsewhere around the lake. Most of these are dominated by willows (*Salix* spp.), Alder and Downy Birch. In one such wood, at Ross Lough, the terrestrial alga, *Trentopohlia* sp., has a specialised niche on the willow trunks. The ground layer has a rich bryophyte flora (*Calliergon* spp. and *Sphagnum* spp.), scattered clumps of Greater Tussock-sedge (*Carex paniculata*) and a good diversity of herb species, including Water Dock and Fen Bedstraw (*Galium uliginosum*).

Small examples of raised bog occur, which are of interest in that they show a natural transition through wet woodland and/or swamp to lakeshore habitats. Active Raised Bog (ARB) habitat comprises areas of high bog that are wet and actively peat-forming, where the percentage cover of bog mosses (*Sphagnum* spp.) is high, and where some or all of the following features occur: hummocks, pools, wet flats, *Sphagnum* lawns, flushes and soaks. Results from surveys of the raised bog habitat in 2003 indicate the presence of 5.9 ha of Active Raised Bog (ARB). Also present are examples of Degraded Raised Bog (DRB) capable of regeneration. In general the vegetation of these degraded areas is dominated by typical raised bog species such as Cross-leaved Heath (*Erica tetralix*), Heather (*Calluna vulgaris*), Hare's-tail Cottongrass (*Eriophorum vaginatum*), Bog Asphodel (*Narthecium ossifragum*) and Deergrass (*Scirpus cespitosus*). Typically the degraded bog areas have a low cover of peat-forming bog mosses (*Sphagnum* spp.). The current extent of DRB as estimated using a recently developed hydrological modelling technique, based largely on Light Detection And Ranging (LiDAR) data, is 44.7 ha.

Associated with the extensive raised bog system at Clooncruff/Clonlarge are areas of bog woodland. At least two small areas of woodland occur on the raised bog domes. However it would appear that this habitat is in the early stages of development. The largest area is dominated by low trees of Downy Birch and Lodgepole Pine (*Pinus contorta*). Occasional trees of Scots Pine (*Pinus sylvestris*) also occur. The ground layer is wet and quaking with a lush carpet of mosses present, including various species of *Sphagnum*, *Pleurozium schreberi* and *Aulacomium palustre*. The main vascular plant species in the ground flora are Bog-rosemary (*Andromeda polifolia*), Cranberry (*Vaccinium oxycoccos*), Bog-myrtle (*Vaccinium myrtillus*), Hare's-tail Cottongrass and Deergrass. Bog Woodland is of particular conservation importance and is listed with priority status on the E.U. Habitats Directive.

At St John's Wood, there is an interesting area of woodland that grows on cut-away peat. This is dominated by Downy Birch and Alder Buckthorn (*Frangula alnus*). The occurrence of the latter species in such abundance is unusual in Ireland.

Smaller lakes occur around the lake shore, especially on the east side, and these often have the full range of wetland habitats contained within and around them. A number of small rivers also pass through the site.

The site supports a number of rare plant species which are listed in the Irish Red Data Book. Alder Buckthorn and Bird Cherry (*Prunus padus*) are woodland components at St John's Wood and elsewhere. Narrow-leaved Helleborine (*Cephalanthera longifolia*) and Betony (*Stachys officinalis*), both of which are also legally protected under the Flora (Protection) Order, 1999, occur among the ground flora of Hare Island (where the former occurs in notable abundance). They also occur in a number of other woods. The stonewort *Chara tomentosa* is present in shallow water around the lake. The rare, though not legally protected, Marsh Pea (*Lathyrus palustris*) occurs on some of the callowland and in alluvial woodland at St John's Wood. The rare Myxomycete fungus, *Echinostelium colliculosum*, has been recorded from St John's Wood.

The lake itself contains one of only two populations in Ireland of the endangered fish species, Pollan (*Coregonus autumnalis*), which is genetically different from Continental European stock. The shrimp *Mysis relicta* (Class Crustacea) occurs in this lake and is a relict of the glacial period in Ireland.

Small flocks of Greenland White-fronted Goose, an Annex I species on the E.U. Birds Directive, use several areas of callowland around the lake in winter. An average spring count of 92 individuals was obtained for this species over the six seasons 1988/89 to 1993/94, indicating that Lough Ree is a nationally important site for the species. The following bird counts are derived from 6 counts during the period 1984/85 to 1986/87: nationally important populations of Golden Plover (1,350), an Annex I species; Wigeon (1,306); Teal (584); Tufted Duck (1,317) and Coot (*Fulica atra*) (798). Other winter visitors are Whooper Swan (32), an Annex I species, Mute Swan (*Cygnus olor*) (91), Little Grebe (*Tachybaptus ruficollis*) (48), Cormorant (91), Mallard (*Anas platyrhynchos*) (362), Shoveler (40), Pochard (*Aythya ferina*) (179), Goldeneye (97), Curlew (*Numenius arquata*) (178), Lapwing (*Vanellus vanellus*) (1,751) and Dunlin (*Calidris alpina*) (48). The callowland is also used by Black-tailed Godwit (*Limosa limosa*) and other species on migration.

Some of the lake islands provide nesting sites for Common Tern (*Sterna hirundo*), a species listed on Annex I of the E.U. Birds Directive. The Lough Ree colony, 86 pairs in 1995, is estimated as one of the largest of this species on midland lakes. The lake also provides excellent breeding habitat for wildfowl, including Common Scoter (*Melanitta nigra*) (30-40 pairs), a rare breeding species listed as "Endangered" in the Red Data Book, and Tufted Duck (>200 pairs). The woodlands and scrub around the lake and on the islands are a stronghold of the Garden Warbler (*Sylvia borin*) (74 territories in 1997), a bird species mainly confined to the Shannon lakes in Ireland.

There is a population of Otter (*Lutra lutra*) around the lake. This species is listed in the Red Data Book as being threatened in Europe and is protected under Annex II of the E.U. Habitats Directive.

Land uses within the site include recreation in the form of cruiser hire, angling, camping, picnicking and shooting. Chalet accommodation occurs at a few locations around the lake. Low-intensity grazing occurs on dry and wet grassland around the shore, and some hay is made within the site. Some of these activities are damaging, but in a very localised way, and require careful planning. The main threat to the aquatic life in the lake comes from artificial enrichment of the waters by agricultural and domestic waste, and also by peat silt in suspension which is increasingly limiting the light penetration, and thus restricting aquatic flora to shallower waters. At present Lough Ree is less affected by eutrophication than Lough Derg.

Lough Ree and its adjacent habitats are of major ecological significance. Some of the woodlands around the lake are of excellent. St John's Wood is particularly important;

it is one of the very few remaining ancient woodlands in Ireland. The lake itself is an excellent example of a mesotrophic to moderate-eutrophic system, supporting a rare fish species and a good diversity of breeding and wintering birds

3.2.3 Ballykenny-Fisherstown Bog SPA

The description of the Ballykenny-Fisherstown Bog SPA provided here is based on the Site Synopsis (NPWS, 2012) and Conservation Objectives (NPWS, 2022a) documents for the site.

Qualifying Interests of the Site

[A395] Greenland White-fronted Goose (*Anser albifrons flavirostris*)

Site Overview

Ballykenny-Fisherstown Bog SPA is located on the border between Counties Longford and Roscommon in the north-central midlands and is underlain by Carboniferous limestone. It is centered around Lough Forbes, a naturally eutrophic lake on the River Shannon system which is fed also from the north by the River Rinn. The lake has well-developed swamp vegetation and displays natural transitions to seasonally flooded grassland, marsh and raised bog. The raised bogs, known as the Ballykenny-Fisherstown complex, are separated by the Camlin River, which has further areas of callow grassland. The central core areas of the bogs are quite wet with a good complement of bog mosses (*Sphagnum* spp.) and well-developed hummocks. Ballykenny Bog is unusual in that some of its margins are intact, a rare feature in the Irish midlands. Between the Camlin River and this bog, a complete transition from raised bog to callow grasslands can be seen, while the interface between the bog and lake is colonised by a narrow band of deciduous woodland.

At the time this site was designated as a Special Protection Area (SPA) it was being used by part of the Loughs Kilglass and Forbes Greenland White-fronted Goose population. The geese appear to have since abandoned the peatland sites in favour of grassland sites elsewhere. The site was regularly utilised during the 1980s and Greenland White-fronted Goose is regarded as a special conservation interest for this SPA. The last record of Greenland White-fronted Goose at this site was in 1990/91 (111 individuals).

Merlin and Red Grouse have also been recorded within the site.

The lake and callow grasslands provide good habitat for a range of wintering waterfowl species though most occur in relatively low numbers: Cormorant (51), Whooper Swan (40), Wigeon (419), Teal (444), Tufted Duck (49) and Goldeneye (11) – are counts are two year mean peaks for the period 1998/99 to 1999/2000.

3.2.4 Lough Ree SPA

The description of the Lough Ree SPA provided here is based on the Site Synopsis (NPWS, 2015) and Conservation Objectives (NPWS, 2022b) documents for the site.

Qualifying Interests of the Site

[A004]	Little Grebe (<i>Tachybaptus ruficollis</i>)
[A038]	Whooper Swan (<i>Cygnus cygnus</i>)
[A050]	Wigeon (<i>Anas penelope</i>)
[A052]	Teal (<i>Anas crecca</i>)
[A053]	Mallard (<i>Anas platyrhynchos</i>)
[A056]	Shoveler (<i>Anas clypeata</i>)
[A061]	Tufted Duck (<i>Aythya fuligula</i>)
[A065]	Common Scoter (<i>Melanitta nigra</i>)
[A067]	Goldeneye (<i>Bucephala clangula</i>)
[A125]	Coot (<i>Fulica atra</i>)
[A140]	Golden Plover (<i>Pluvialis apricaria</i>)
[A142]	Lapwing (<i>Vanellus vanellus</i>)
[A193]	Common Tern (<i>Sterna hirundo</i>)
[A999]	Wetland and Waterbirds

Site Overview

Situated on the River Shannon between Lanesborough and Athlone, Lough Ree is the third largest lake in the Republic of Ireland. It lies in an ice-deepened depression in Carboniferous Limestone. Some of its features (including the islands) are based on glacial drift. The main inflowing rivers are the Shannon, Inny and Hind, and the main outflowing river is the Shannon. The greater part of Lough Ree is less than 10 m in depth, but there are six deep troughs running from north to south, reaching a maximum depth of about 36 m just west of Inchmore. The lake has a very long, indented shoreline and hence has many sheltered bays. It also has a good scattering of islands, most of which are included in the site.

Beds of Common Reed (*Phragmites australis*) are an extensive habitat in a number of the more sheltered places around the lake; monodominant stands of Common Clubrush (*Scirpus lacustris*), Slender Sedge (*Carex lasiocarpa*) and Saw Sedge (*Cladium mariscus*) also occur as swamps in suitable places. Some of these grade into species-rich calcareous fen or freshwater marsh. Lowland wet grassland, some of which floods in winter, occurs frequently around the shore.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Whooper Swan, Wigeon, Teal, Mallard, Shoveler, Tufted Duck, Common Scoter, Goldeneye, Little Grebe, Coot, Golden Plover (*Pluvialis apricaria*), Lapwing and Common Tern. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

Lough Ree is one of the most important Midland sites for wintering waterfowl, with nationally important populations of Little Grebe (52), Whooper Swan (139), Wigeon (2,070), Teal (1,474), Mallard (1,087), Shoveler (54), Tufted Duck (1,012), Goldeneye (205), Coot (338), Golden Plover (3,058) and Lapwing (5,793) – all figures are three

year mean peaks for the period 1997/98 to 1999/2000. Other species which occur in winter include Great Crested Grebe (*Podiceps cristatus*) (29), Cormorant (99), Curlew (254) and Black-headed Gull (*Larus ridibundus*) (307) as well as the resident Mute Swan (85). Greenland White-fronted Goose has been recorded on occasion on the flooded margins of the site.

The site supports a nationally important population of Common Tern (90 pairs in 1995). It is a traditional breeding site for Black-headed Gull and whilst a full survey has not been carried out in recent years, substantial numbers of nesting birds were present on at least one island in 2003. Lesser Black-backed Gull (*Larus fuscus*) and Common Gull (*Larus canus*) have bred in the past and may still breed. Lough Ree is a noted site for breeding duck and grebes: Tufted Duck (202 pairs) and Great Crested Grebe (32 pairs) – records from 1995. Of particular note is that Lough Ree is one of the two main sites in the country for breeding Common Scoter, a Red Data Book species. Surveys have recorded 39 pairs and 32 pairs in 1995 and 1999 respectively. Cormorant also breeds on some of the islands within the site – 86 nests were recorded in 2010. The woodland around the lake is a stronghold for Garden Warbler and this scarce species probably occurs on some of the islands within the site.

Lough Ree SPA is of high ornithological importance for both wintering and breeding birds. It supports nationally important populations of eleven wintering waterfowl species. The site has a range of breeding waterfowl species, notably nationally important populations of Common Scoter and Common Tern. Of particular note is the regular presence of three species, Whooper Swan, Golden Plover and Common Tern, which are listed on Annex I of the E.U. Birds Directive. Parts of Lough Ree SPA are Wildfowl Sanctuaries.

3.3 Evaluation Against Conservation Objectives

Table 3.2 – Table 3.5 below detail the evaluation of the likely effects of the Project in view of the Conservation Objectives of the sites identified in Section 3.1 and described in Section 3.2. As explained in Sections 1.3 and 1.4, AA Screening is carried out in view of the Conservation Objectives of the relevant European sites, which are in turn defined by detailed Attributes and corresponding Targets. Therefore, the evaluation of whether or not a likely effect is significant (in view of the Conservation Objective in question) is made with regard to these Attributes and Targets.

Table 3.2 Evaluation of the likely significant effects of the Project in view of the Conservation Objectives of the Lough Forbes Complex SAC [001818]

Qualifying Interest	Conservation Objective (NPWS, 2016a)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]</p>	<p><i>“To restore the favourable conservation condition of Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation in Lough Forbes Complex SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Habitat distribution”, “Typical species”, “Vegetation composition”, “Vegetation distribution”, “Hydrological regime”, “Lake substratum quality”, “Water quality”, “Acidification status”, “Water colour”, “Dissolved organic carbon (DOC)”, “Turbidity” and “Fringing habitat”.</i></p> <p>Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation occurs in this European site at least 4 km downstream of the Project. The hydrological connection provides a pathway for mobilised sediment and other pollutants to be transported to the site. However, there is considered to be no risk of likely significant effects on Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>
<p>Active raised bogs [7110]</p>	<p><i>“To restore the favourable conservation condition of Active raised bogs in Lough Forbes Complex SAC”</i></p>	<p>The Attributes of these Conservation Objectives focus on <i>“Habitat area”, “Habitat distribution”, “High bog area”, “Hydrological regime”, “Transitional areas between high bog and adjacent mineral soils (including cutover areas)”, “Vegetation quality”, “Typical ARB species”, “Elements of local distinctiveness”, “Negative physical indicators”, “Vegetation composition”, “Air quality” and “Water quality”.</i></p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016a)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Degraded raised bogs still capable of natural regeneration [7120]</p>	<p><i>The long-term aim for Degraded raised bogs still capable of natural regeneration is that its peat-forming capability is re-established; therefore, the conservation objective for this habitat is inherently linked to that of Active raised bogs (7110) and a separate conservation objective has not been set in Lough Forbes Complex SAC.</i></p> <p><i>For the purposes of this evaluation, the conservation objective is:</i></p> <p><i>“To restore the favourable conservation condition of Degraded raised bogs still capable of natural regeneration in Lough Forbes Complex SAC”</i></p>	<p>These peatland habitats occur in this European site at least 4.4 km southeast and 7.4 km downstream of the Project on the southeastern side of Lough Forbes. The drainage ditch which flows towards Lough Forbes on the south side of the Project site provides a pathway for sediment laden runoff and pollutants to be discharged to Lough Forbes during periods of heavy rainfall or high-water levels, causing water quality impacts which may affect these qualifying interests. However, there is considered to be no risk of likely significant effects on these qualifying interests for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog, allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for these Qualifying Interests.</p>	<p>No</p>
<p>Depressions on peat substrates of the Rhynchosporion [7150]</p>	<p><i>Depressions on peat substrates of the Rhynchosporion is an integral part of good quality Active raised bogs (7110) and thus a separate conservation objective has not been set for the habitat</i></p>		<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016a)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
	<p><i>in Lough Forbes Complex SAC.</i></p> <p><i>For the purposes of this evaluation, the conservation objective is:</i></p> <p><i>“To restore the favourable conservation condition of Depressions on peat substrates of the Rhynchosporion in Lough Forbes Complex SAC”</i></p>	<p>[As above]</p>	
<p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]</p>	<p><i>“To restore the favourable Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) in Lough Forbes Complex SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on “<i>Habitat area</i>”, “<i>Habitat distribution</i>”, “<i>Woodland size</i>”, “<i>Woodland structure</i>”, “<i>Hydrological regime</i>” and “<i>Vegetation composition</i>”.</p> <p>Alluvial forests occur in this European site at least 5 km downstream of the Project along the eastern boundary of Lough Forbes. This qualifying interest is periodically inundated by the annual rise of the waterbody and has the potential to be affected during periods of high-water level only.</p> <p>The drainage ditch which flows towards Lough Forbes on the south side of the Project site provides a pathway for sediment laden runoff and pollutants to be discharged to Lough Forbes during periods of heavy rainfall or high-water levels, causing water quality impacts which may affect this QI. However, there is considered to be no risk of likely significant effects on Alluvial forests for the following reasons:</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016a)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
		<ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	

Table 3.3 Evaluation of the likely significant effects of the Project in view of the Conservation Objectives of the Lough Ree SAC [000440]

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]</p>	<p><i>“To restore the favourable conservation condition of Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation in Lough Ree SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Habitat distribution”, “Typical species”, “Vegetation composition”, “Vegetation distribution”, “Hydrological regime”, “Lake substratum quality”, “Water quality”, “Acidification status”, “Water colour”, “Dissolved organic carbon (DOC)”, “Turbidity” and “Fringing habitat”.</i></p> <p>Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation occurs in this European site at least 19.1 km downstream of the Project. The hydrological connection provides a pathway for sediment laden runoff and pollutants to be discharged to Lough Forbes during periods of heavy rainfall or high-water levels, causing water quality impacts which may affect this QI. However, there is considered to be no risk of likely significant effects on Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation for the following reasons:</p> <ul style="list-style-type: none"> • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]</p>	<p><i>“To restore the favourable conservation condition of Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) in Lough Ree SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Habitat distribution”, “Vegetation composition”, “Vegetation structure” and “Physical structure”</i>.</p> <p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) occurs in this European site at least 24.8 km southwest of the Project (UCD, 2024). This is a terrestrial habitat and thus has no hydrological connection to the Project. There are no pathways for impact between the Project and this Qualifying Interest.</p> <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Active raised bogs [7110]</p>	<p><i>The status of Active raised bogs in the Lough Ree SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this habitat.</i></p> <p><i>For the purposes of this evaluation, the long-term aim for Active raised bogs is that its peat-forming capability is re-established; therefore, the conservation objective for this habitat is inherently linked to that of Degraded raised bogs still capable of natural regeneration (7120) and a separate conservation objective has not been set in Lough Ree SAC, as per the Lough Corrib SAC [000297] (NPWS, 2017).</i></p>	<p>The Attributes of these Conservation Objectives focus on “Habitat area”, “Habitat distribution”, “High bog area”, “Hydrological regime”, “Transitional areas between high bog and adjacent mineral soils (including cutover areas)”, “Vegetation quality”, “Typical ARB species”, “Elements of local distinctiveness”, “Negative physical indicators”, “Vegetation composition”, “Air quality” and “Water quality”.</p> <p>These peatland habitats occur in this European site at least 19.6 km southwest of the Project. Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. This hydrological connection provides a pathway for sediment laden runoff and pollutants to be discharged to this European site. However, there is considered to be no risk of likely significant effects on these habitats for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for these Qualifying Interests.</p>	<p>No</p>
<p>Degraded raised bogs still capable of natural regeneration [7120]</p>	<p><i>“To restore the favourable conservation condition of Degraded raised bogs still capable of natural regeneration in Lough Ree SAC”</i></p>		<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Alkaline fens [7230]</p>	<p><i>“To maintain the favourable conservation condition of Alkaline fens in Lough Ree SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Habitat distribution”, “Hydrological regime”, “Peat formation”, “Water quality”, “Vegetation structure”, “Vegetation composition”, “Physical structure”</i>.</p> <p>Alkaline fens occur in this European site at least 25.2 km south of the Project (UCD, 2024). Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. This hydrological connection provides a pathway for sediment laden runoff to be transported to this European site. However, there is considered to be no risk of likely significant effects on Alkaline fens for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>
<p>Limestone pavements [8240]</p>	<p><i>“To maintain the favourable conservation condition of Limestone pavements in Lough Ree SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Distribution”, “Vegetation composition”, “Vegetation structure”, “Physical structure”</i> and <i>“Indicators of local distinctiveness”</i>.</p> <p>Limestone pavements occur in this European site at least 21 km south of the Project. This is a terrestrial habitat and thus has no hydrological connection to the Project. There are no pathways for impact between the Project and this Qualifying Interest.</p> <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p>	<p><i>The status of Old sessile oak woods with Ilex and Blechnum in the British Isles as a qualifying Annex I habitat for the Lough Ree SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this habitat.</i></p> <p><i>For the purposes of this evaluation, the Conservation Objectives for Old sessile oak woods with Ilex and Blechnum in the British Isles is listed as “To maintain the favourable conservation condition of Old sessile oak woods with Ilex and Blechnum in the British Isles in the Lough Ree SAC” as per the Lough Corrib SAC [000297] (NPWS, 2017).</i></p>	<p>The Attributes of this Conservation Objective focuses on “Habitat area”, “Habitat distribution”, “Woodland size”, “Woodland structure” and “Vegetation composition”.</p> <p>The extent of Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles in this European site has not been mapped but has the potential to occur at least 12.9 km south of the Project. This is a terrestrial habitat and thus has no hydrological connection to the Project. There are no pathways for impact between the Project and this Qualifying Interest.</p> <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
Bog woodland [91D0]	<i>“To restore the favourable conservation condition of Bog woodland in Lough Ree SAC”</i>	<p>The Attributes of this Conservation Objective focuses on <i>“Habitat area”, “Habitat distribution”, “Vegetation composition”</i> and <i>“Woodland structure”</i>.</p> <p>Bog woodland occur in this European site at least 20.9 km southwest of the Project. Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. This hydrological connection provides a pathway for sediment laden runoff to be transported to this European site. However, there is considered to be no risk of likely significant effects on Bog woodland for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]</p>	<p><i>The status of Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) in the Lough Ree SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this habitat.</i></p> <p><i>For the purposes of this evaluation, the Conservation Objectives for Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) is listed as “To maintain the favourable conservation condition of Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) in the Lough Ree SAC” as per the River Shannon Callows SAC” [000216] (NPWS, 2022c).</i></p>	<p>The Attributes of this Conservation Objective focuses on “Habitat area”, “Habitat distribution”, “Woodland size”, “Woodland structure”, “Hydrological regime” and “Vegetation composition”.</p> <p>The extent of Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) in this European site has not been mapped but has the potential to occur at least 12.9 km south of the Project or 19.1 km downstream. Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. This hydrological connection provides a pathway for mobilised sediment and other pollutants to be transported to the site. However, there is considered to be no risk of likely significant effects on Alluvial forests for the following reasons:</p> <ul style="list-style-type: none"> • There will be no land-take or reduction in habitat area as part of the Project. • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

<p>Otter (<i>Lutra lutra</i>) [1355]</p>	<p><i>“To maintain the favourable conservation condition of Otter in Lough Ree SAC”</i></p>	<p>The Attributes of this Conservation Objective focuses on <i>“Distribution”, “Extent of terrestrial habitat”, “Extent of freshwater habitat”, “Couching sites and holts”, “Fish biomass available” and “Barriers to connectivity”.</i></p> <p>Otter is a qualifying interest of this European site, which is 19.1 km downstream of the Project. There is a hydrological connection between the Project and suitable habitat for this Qualifying Interest, and the Project has the potential to affect this species outside the SAC boundary. Otter territories are typically between 2 – 32 km in length but can be up to 80 km (Kruuk, 1995). Otter holts are important resting sites found along territories, often occurring in the natural crevices of tree roots growing along riverbanks (VWT, 2024).</p> <p><u>Water Quality</u></p> <p>Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. The hydrological connection between the Project and this qualifying interest provides a pathway for sediment laden runoff and other pollutants to be transported to suitable otter habitat, impacting otter directly and indirectly through prey availability. Fish and other aquatic prey species are likely to be present in the rivers downstream of the Project and are also vulnerable to potential water quality impacts associated with the Project.</p> <p>However, there is considered to be no risk of likely significant effects on otter due to water quality for the following reasons:</p> <ul style="list-style-type: none"> • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p><u>Disturbance</u></p> <p>Noise and vibration impacts during the rehabilitation works will be temporary, very localised and occur during daylight hours only. The adjacent rivers will not be altered or realigned as part of the Project. Otter that reside in rivers and lakes tend to be crepuscular (VWT, 2024) and are a very mobile species. Should any individuals be in the vicinity of the rehabilitation works, they will have the ability to move away from the area, as their ecological corridors will not be obstructed.</p>	<p>No</p>
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Qualifying Interest	Conservation Objective (NPWS, 2016b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
		Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site in view of its Conservation Objectives for this Qualifying Interest.	

Table 3.4 Evaluation of the likely significant effects of the Project in view of the Conservation Objectives of the Ballykenny-Fisherstown Bog SPA [004101]

Qualifying Interest	Conservation Objective (NPWS, 2022a)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Greenland White-fronted Goose (Anser albifrons flavirostris) [A395]</p>	<p><i>“To maintain or restore the favourable conservation condition of Greenland White-fronted Goose in Ballykenny-Fisherstown Bog SPA”</i></p>	<p>No Attributes or Targets are defined at present for the Qualifying Interest of the Ballykenny-Fisherstown Bog SPA in the Member State.</p> <p>According to the First Order Site-Specific Conservation Objectives for the Ballykenny-Fisherstown Bog SPA, favourable conservation status of a species is achieved when:</p> <ul style="list-style-type: none"> • <i>“Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats”</i> • <i>“The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future”</i> and, • <i>“There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis”</i> (NPWS, 2022a). <p>Greenland White-fronted goose is an exclusively overwintering species in Ireland. The Project location is 1.9 km west of this European site as the crow flies. Core foraging ranges for this species is 5-8 km (SNH, 2016). As peat harvesting was carried out on the Project site until recently, most of the Project area consists of bare peat and does not contain suitable habitat for Greenland White-fronted Goose. The only suitable habitat for this species is provided by a small number of silt ponds and a small area of fringing semi-natural habitats surrounding the site (e.g. cutover bog and raised bog). Considering the temporary and localised nature of the Project, the lack of suitable habitat on the Project site and the widespread availability of more suitable habitat closer to this European site, any impacts to this qualifying interest as a result of noise and visual disturbance, will be insignificant.</p> <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

Table 3.5 Evaluation of the likely significant effects of the Project in view of the Conservation Objectives of the Lough Ree SPA [004064]

Qualifying Interest	Conservation Objective (NPWS, 2022b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
Little Grebe (<i>Tachybaptus ruficollis</i>) [A004]	<i>“To maintain or restore the favourable conservation condition of Little Grebe in Lough Ree SPA”</i>	No Attributes or Targets are defined at present for the Qualifying Interests of the Lough Ree SPA in the Member State. According to the First Order Site-Specific Conservation Objectives for the Lough Ree SPA, favourable conservation status of a species is achieved when:	No
Whooper Swan (<i>Cygnus cygnus</i>) [A038]	<i>“To maintain or restore the favourable conservation condition of Whooper Swan in Lough Ree SPA”</i>	<ul style="list-style-type: none"> • <i>“Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats”</i> • <i>“The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future”</i> and, • <i>“There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis”</i> (NPWS, 2022b). 	No
Wigeon (<i>Anas penelope</i>) [A050]	<i>“To maintain or restore the favourable conservation condition of Wigeon in Lough Ree SPA”</i>	Many of these species occur in Ireland all-year round, with the exception of Whooper Swan, which are an exclusively overwintering species. Nevertheless, this European site is considered important for these species’ wintering populations only (NPWS, 2015). This European site is located 12.9 km southwest and approx. 19.1 km downstream of the Project site. The main impacts to these qualifying interests arising from the Project include disturbance from noise and vibration and water quality impacts altering suitable habitats for these species, which could deter species away from certain areas.	No
Teal (<i>Anas crecca</i>) [A052]	<i>“To maintain or restore the favourable conservation condition of Teal in Lough Ree SPA”</i>		No
Mallard (<i>Anas platyrhynchos</i>) [A053]	<i>“To maintain or restore the favourable conservation condition of Mallard in Lough Ree SPA”</i>		No

Qualifying Interest	Conservation Objective (NPWS, 2022b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
Shoveler (<i>Anas clypeata</i>) [A056]	<i>“To maintain or restore the favourable conservation condition of Shoveler in Lough Ree SPA”</i>	<p><u>Disturbance</u></p> <p>As peat harvesting was carried out on the Project site until recently, most of the Project area consists of bare peat and does not contain suitable foraging habitat for these species. The only suitable habitat for these species is provided by a small number of silt ponds and a small area of fringing semi-natural habitats surrounding the site (e.g. cutover bog and raised bog). Considering the distance between the Project and this European site, the temporary and localised nature of the Project, the lack of suitable habitat on the Project site and the widespread availability of more suitable habitat closer to this European site, any impacts to these qualifying interests as a result of noise and visual disturbance, will be insignificant.</p> <p><u>Water Quality</u></p> <p>Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. The hydrological connection between the Project and these qualifying interests provides a pathway for sediment laden runoff and other pollutants to be transported to suitable habitat for these species in Lough Ree.</p> <p>However, there is considered to be no risk of likely significant effects on these qualifying interests due to water quality for the following reasons:</p> <ul style="list-style-type: none"> • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project 	No
Tufted Duck (<i>Aythya fuligula</i>) [A061]	<i>“To maintain or restore the favourable conservation condition of Tufted Duck in Lough Ree SPA”</i>		No
Goldeneye (<i>Bucephala clangula</i>) [A067]	<i>“To maintain or restore the favourable conservation condition of Goldeneye in Lough Ree SPA”</i>		No
Coot (<i>Fulica atra</i>) [A125]	<i>“To maintain or restore the favourable conservation condition of Coot in Lough Ree SPA”</i>		No
Golden Plover (<i>Pluvialis apricaria</i>) [A140]	<i>“To maintain or restore the favourable conservation condition of Golden Plover in Lough Ree SPA”</i>		No

Qualifying Interest	Conservation Objective (NPWS, 2022b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
Lapwing (<i>Vanellus vanellus</i>) [A142]	<i>“To maintain or restore the favourable conservation condition of Lapwing in Lough Ree SPA”</i>	Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site view of its Conservation Objectives for these Qualifying Interests.	No
Common Scoter (<i>Melanitta nigra</i>) [A065]	<i>“To maintain or restore the favourable conservation condition of Common Scoter in Lough Ree SPA”</i>	<p>No Attributes or Targets are defined at present for the Qualifying Interests of the Lough Ree SPA in the Member State.</p> <p>According to the First Order Site-Specific Conservation Objectives for the Lough Ree SPA, favourable conservation status of a species is achieved when:</p> <ul style="list-style-type: none"> • <i>“Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats”</i> • <i>“The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future”</i> and, • <i>“There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis”</i> (NPWS, 2022b). 	No

Qualifying Interest	Conservation Objective (NPWS, 2022b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Common Tern (<i>Sterna hirundo</i>) [A193]</p>	<p><i>“To maintain or restore the favourable conservation condition of Common Tern in Lough Ree SPA”</i></p>	<p>This European site is located 12.9 km southwest and approx. 19.1 km downstream of the Project site and is considered important for the breeding populations of Common Scoter and Common Tern only (NPWS, 2015). The main impact to these qualifying interests arising from the Project include water quality impacts. Derrymoylin bog drains to the Feorish stream which joins the River Shannon and flows into Lough Ree. The hydrological connection between the Project and these qualifying interests provides a pathway for sediment laden runoff and other pollutants to be transported to suitable habitat in this European site.</p> <p>However, there is considered to be no risk of likely significant effects on these qualifying interests due to water quality for the following reasons:</p> <ul style="list-style-type: none"> • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site view of its Conservation Objectives for these Qualifying Interests.</p>	<p>No</p>

Qualifying Interest	Conservation Objective (NPWS, 2022b)	Does the Project provide for any potential delay or interruption in the achievement of this Conservation Objective, as defined by its Attributes and Targets?	Likely Significant Effect
<p>Wetland and Waterbirds [A999]</p>	<p><i>“To maintain or restore the favourable conservation condition of the wetland habitat at Lough Ree SPA as a resource for the regularly-occurring migratory waterbirds that utilise it”.</i></p>	<p>No Attributes or Targets are defined at present for the Qualifying Interests of the Lough Ree SPA in the Member State.</p> <p>According to the First Order Site-Specific Conservation Objectives for the Lough Ree SPA, favourable conservation status of a habitat is achieved when:</p> <ul style="list-style-type: none"> • <i>“Its natural range, and area it covers within that range, are stable or increasing”</i> • <i>“The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future”</i> and, • <i>“The conservation status of its typical species is favourable”</i> (NPWS, 2022b) <p>There is considered to be no risk of likely significant effects on Wetland and Waterbirds for the following reasons:</p> <ul style="list-style-type: none"> • The Project does not provide for any reduction in the permanent area of this habitat within this European site • The existing silt ponds, located at various points around the periphery of Derrymoylin bog allow for the settlement of suspended solids as part of the existing drainage management prior to water draining into the main river systems. • The works will be temporary and small-scale in nature. • The adjacent rivers will not be altered or realigned as part of the Project. <p>Therefore, it can be concluded beyond reasonable scientific doubt that the Project will not significantly affect this European site view of its Conservation Objectives for this Qualifying Interest.</p>	<p>No</p>

3.4 Summary of Likely Significant Effects

In Section 3.1, it was established that five European sites, namely the Clooneen Bog SAC, the Lough Forbes Complex SAC, the Lough Ree SAC the Ballykenny-Fisherstown Bog SPA and the Lough Ree SPA occur within the zone of influence of the Project. It was determined that potential pathways for effects exist between the Project and four of the sites, namely the Lough Forbes Complex SAC, the Lough Ree SAC the Ballykenny-Fisherstown Bog SPA and the Lough Ree SPA. There are no pathways for effects between the Project and any other European sites. The sites were described in detail in Section 3.2.

In Section 3.3, it was established, in light of best scientific knowledge, that the Project will not give rise to ecological impacts which would constitute significant effects on any of the sites, in view of the sites' Conservation Objectives. This finding had regard to the nature, size and location of the Project as well as the sensitivities of the Qualifying Interests of the sites concerned.

4.0 IN-COMBINATION EFFECTS

4.1 Introduction

Article 6(3) of the Habitats Directive requires that AA be carried out in respect of plans and projects that are likely to have significant effects on European sites, “*either individually or in combination with other plans or projects*”. Therefore, regardless of whether or not the likely effects of a plan or project are significant when considered on their own, the significance of the combination of the effects of the plan or project under assessment with the effects of other past, present or foreseeable future plans or projects must also be evaluated.

4.2 Methodology

Plans and projects approved for planning within the previous 10 years in the zone of influence with potential for interactions with the Project were selected for assessment. For the purposes of the assessment, small scale and domestic developments were not considered given the nature of the Project and the fact that these projects would be subject to stringent planning controls.

The ePlanning website for Roscommon County Council, Longford County Council and the EIA Portal was used to search for planning applications.

4.3 Outcome

Table 4.1 below details the assessment of the likelihood of significant effects arising from the Project in combination with other plans or projects. This assessment was undertaken in view of the Conservation Objectives of the relevant European sites and found that the Project does not have the potential to significantly affect any European site in combination with other plans or projects.

Table 4.1 Assessment of the potential of likely significant effects in combination with other plans and projects.

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
<p>Derryadd Wind Farm</p>	<p>The Derryadd Wind Farm is a known planned project which Bord na Móna Powergen Ltd is currently preparing to submit for planning permission.</p> <p>The Derryadd Wind Farm project will be subject to Appropriate Assessment in accordance with Article 6(3) and an Environmental Impact Assessment Report (EIAR) will be prepared in respect of the known planned project.</p>	<p>This known planned project will be carried out after the proposed rehabilitation measures are in place on Derrymoylin Bog and will be subject to its own Article 6(3) assessment. Owing to the timing, nature and scale of the Project, it does not have the potential to cause likely significant effects in-combination with the known planned Derryadd Wind Farm.</p>
<p>Cloonshannagh Bog Decommissioning and Rehabilitation Plan 2023</p>	<p>Bord na Móna propose to 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). Cloonshannagh Bog is proposed to be part of the PCAS and this rehabilitation plan outlines the approach taken. The Cloonshannagh Bog is located to the south of Derrymoylin Bog and is within the same sub-catchment as the Derrymoylin Bog. The Cloonshannagh Bog Decommissioning and Rehabilitation Plan 2023 will subject to Appropriate Assessment in accordance with Article 6(3).</p>	<p>Owing to the nature and scale of the Project, it does not have the potential to cause likely significant effects in combination with the Cloonshannagh Bog Decommissioning and Rehabilitation Plan 2023.</p>
<p>An Bord Pleanála Planning Application No.: HA20.300493</p> <p>Name: Roscommon County Council</p> <p>Address: Ballaghaderreen to Scramoge, Co. Roscommon</p>	<p>Planning Application Lodged: 20/12/2017 Decision date: 16/01/2019</p> <p>N5 Ballaghaderreen to Scramoge Road Development and associated CPO.</p> <p>An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the planning application.</p>	<p>The proposed development is located at least 7.35 km southwest of the Project site as the crow flies.</p> <p>The potential effects arising from this project and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality.</p> <p>Provided the mitigation measures presented in the NIS and EIAR and the Schedule of Environmental Commitments for the proposed development are adhered to and considering the conclusion of the</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
		Inspector's report, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.
<p>An Bord Pleanála Planning Application No.: PL14.249090</p> <p>Longford County Council Planning Application No.: 16/303;</p> <p>Name: Ronnie Walsh</p> <p>Address: Ballynakill, Killashee, Co. Longford.</p>	<p>Planning Application Lodged: 22/08/2017 Decision date: 16/05/2018</p> <p>Demolition of pig/livestock houses and ancillary structures and construction of 3 pig houses and 2 ancillary manure storage tanks which require a licence.</p> <p>An Environmental Impact Assessment Report (EIAR), Environmental Impact Statement (EIS) and AA Screening Report have been prepared in respect of the planning application.</p>	<p>The proposed development is located at least 9.45 km south of the Project site as the crow flies.</p> <p>The potential effects arising from this project and the current Project are similar. The AA Screening report has identified potential for impacts such as deterioration of water quality.</p> <p>Provided the mitigation measures presented in the EIS and the Schedule of Conditions for the proposed development are adhered to and considering the conclusion of the Inspector's report, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>
<p>Roscommon County Council Planning Application No.: 2184; 19403; 14192</p> <p>Name: Knockhall Farms Ltd.</p> <p>Address: Knockhall, Roosky,</p>	<p>Planning Application Lodged: 15/02/2021 Decision date: 09/04/2021</p> <p>2184: To (a) Re-locate, 1 No. pig house (Ref. W5) (previously approved under Planning Ref. 19/403 and referred to as building reference 29), and, 3 No. existing pre-fabricated pig houses (Ref. 22, 23 and 24); (b) Demolish substantial part of 1 No. existing pig house and construct 1 No. pig house (Hs.1); (c) Construct 1 No. pig house (Ref. W1) in lieu of developments previously approved at this location under Planning Ref. 19/403, and (d) Retain extension to meal preparation store (Ref. MP1), to aid compliance with animal welfare and nitrates regulations together with all ancillary structures and all associated site works arising from the proposed development.</p>	<p>The proposed development is located approx. 821 m northwest of the Project site as the crow flies.</p> <p>Considering the nature, size and location of the proposed development, the dilution capacity of Lough Bofin, the conclusion of the AA Screening reports, the recommendations laid out in the Planner's report and provided the schedule of conditions are adhered to, no likely significant effects are</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
Co. Roscommon.	<p>19403: To a) Demolish 5 No. pig weaner houses and construct 3 No. pig weaner houses and 2 No. Pre-fabricated pig houses (in lieu of 3 No. Weaner houses previously approved under planning ref. 16/211), 1 No. ancillary Manure storage tank, and, an extension to 1 No. existing pig house, and b) retain 7 No. Pre-fabricated pig houses (ref: 16-22) and revisions to the location of 2 No. Pre-fabricated pig houses (23-24) previously approved under Planning Ref. 16/211 to aid compliance with animal welfare and nitrates regulations, together with all ancillary structures (to include solar panels) and all associated site works arising from the above proposed development. This application relates to a development, which is for the purposes of an activity requiring a licence under part IV of the Environmental Protection Agency (Licensing) Regulations 1994 to 2013.</p> <p>An AA Screening Report was submitted with each of the above listed planning applications.</p>	<p>predicted to arise from the Project in in-combination with the proposed development.</p>
<p>Longford County Council Planning Application No.: 2275</p> <p>Name: Electricity Supply Board</p> <p>Address: Aughamore, And Lanesborough, Co Longford</p>	<p>Planning Application Lodged: 01/04/2022 Decision date: 08/12/2022 Appeal Date: 09/01/2023</p> <p>Development at the 13.1 Ha site known as 'Lough Ree Power (LRP) Station' located in Lanesborough (Lanesboro), in the townlands of Aghamore and Lanesborough, Eircode N37E180; in County Longford. The development will consist of the demolition of the existing LRP station (as approved under Longford County Council reg.ref 01/115 ' An Board Pleanala Ref. PL14.125540 and all subsequent permissions);and the development and operation of electricity grid services - namely a battery energy storage system (BESS) and a Synchronous Condenser (Sync Con). The proposed development comprises two distinct phases of activity - the initial demolition and site reinstatement (Phase 1); following by construction and operation of the new BESS and Sync Con (phase 2). Phase 1 comprises the demolition of existing site structures (with a total footprint of c. 11.195sq.m. and a total gross floor area of c. 20,000 sq.m) including the former LRP station (boiler house, turbine house, bag filter house and associated 80 m high stack); the intermediate peat storage building and associated fuel management system; and ancillary buildings including, electrical building, tippler building and associated control room and office, the screening building, lorry uploading building, water treatment plant building, offices building, laboratory building, workshop and maintenance buildings, oil pumphouse,</p>	<p>The development is located approx. 12.5 km southwest of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality and disturbance.</p> <p>Provided the mitigation measures presented in the NIS, EIAR and the Schedule of Conditions for the proposed development are adhered to and considering the conclusion of the Inspector's report, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
	<p>electrics rooms, railway/locomotive service building, cooling water pump house and sewage/foul water treatment facility. All buildings and structures (including storage tanks and vessels) will be demolished to ground level, with below ground voids filled. Existing hard standing surfaces (e.g. building ground floor concrete slabs, tarmacadam surfaces, concrete footpaths and road kerbs) will remain in site; and the site will be reinstated and secured with boundary gates and fences, etc. Associated with the demolition activity there will be on-site crushing of material using mobile machinery for the purposed of disposal and/or material re-use. Phase 2 comprises the proposed development of the BESS, Sync Con; and all associated development (Full description scanned/attached).</p> <p>An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the planning application.</p>	
<p>Longford County Council Planning Application No.: 22223</p> <p>Name: Ion Renewables Limited</p> <p>Address: Fisherstown Innovation Park, Cloondara, Co Longford, N39 RX85</p>	<p>Planning Application Lodged: 19/09/2022 Decision date: 31/01/2023</p> <p>Construction of a stationary battery energy storage facility which includes forty 20ft containers and eight medium voltage transformers and (ii) all associated site and development works.</p> <p>An AA Screening report has been prepared in respect of this planning application.</p>	<p>The development is located approx. 4.7 km southeast of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The AA Screening has identified pathways for effects such as impacts to water quality and disturbance during construction.</p> <p>Owing to the schedule of conditions of the planning permissions and conclusion of the AA Screening Report, no likely significant effects are predicted to arise from the Project in-combination with the proposed development.</p>
<p>Longford County Council Planning Application No.: 20102</p>	<p>Planning Application Lodged: 30/04/2020 Decision date: 08/07/2020</p>	<p>The development is located approx. 4 km east of the Project site as the crow flies.</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
<p>Name: Irish Water</p> <p>Address: Lough Forbes Water Treatment Plant, Clooniher, Newtownforbes, Co Longford</p>	<p>The construction of 1 no. pump house building; 1 no. dissolved air flotation (DAF) building extension; 7 no. above ground tanks; 2 no. above ground kiosks; 2 no. below ground tanks; and all associated ancillary development works, including the installation of 1 no. davit crane, and stairs and platform between chemical tanks, and temporary development works.</p> <p>A Nature Impact Statement has been prepared in respect of this planning application.</p>	<p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the mitigation measures presented in the NIS for the proposed development and the schedule of conditions are adhered to, no likely significant effects are predicted to arise from the Project in combination with the proposed development.</p>
<p>Longford County Council</p> <p>Planning Application No.: 18146</p> <p>Name: Fisherstown Property Holdings Ltd.</p> <p>Address: Fisherstown, Clondra, Co. Longford.</p>	<p>Planning Application Lodged: 02/07/2018</p> <p>Decision date: 24/08/2018</p> <p>Development at a site comprising lands within the property of the former Atlantic Mills factory. The development will comprise the construction of a solar farm with an export capacity of approximately 4MW comprising photovoltaic panels on ground mounted frames, with associated infrastructure including a switch gear control room (to be developed at 1 of 2 location options on site. No additional works proposed to the existing substation on site as part of this application), ducting and electrical cabling, internal access roads, fencing and all associated site development works.</p> <p>An AA Screening report and Ecological Impact Assessment have been prepared in respect of the planning application.</p>	<p>The development is located approx. 4.3 km southeast of the Project site as the crow flies.</p> <p>Owing to the conditions of the planning permissions and conclusion of the AA Screening Report and provided the mitigation measures presented in the EclA are adhered to, no likely significant effects are predicted to arise from the Project in combination with the proposed development.</p>
<p>Longford County Council</p> <p>Planning Application No.: 17308</p> <p>Name: Irish Water</p>	<p>Planning Application Lodged: 18/12/2017</p> <p>Decision date: 13/02/2018</p> <p>Construction of additional water treatment facilities on the existing Lough Forbes WTP site and on the site to the north west of this WTP site. These facilities will operate in conjunction with the existing WTP and are considered as an extension of the plant. The development</p>	<p>The development is located approx. 3.9 km east of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
<p>Address: Cloonihier, Newtownforbes,, Co. Longford.</p>	<p>will comprise the following:3 Nr Inlet Contact Tanks = 4.5m (h = height); Chemical Storage Tanks: 2 Nr @ = 4.5m (h), 4 Nr @ = 2.9m (h) and 2 Nr @ = 2.7m (h); Main Treatment Building: = 9m (h); Pipework Gallery: = 7m(h); 4 Nr Filters: = 5.5m (h); Pump House: = 4.7m (h); Contact/Clearwater Tank (Partially below ground): = 5.2m (h); Backwash Tank (Partially below ground) = 5.2m (deep); Used Washwater Tank (Partially below ground) = 5.2m (deep); Washwater Clarifier = 6.2m (h). The development will also include on-site roadways, parking and hardstanding areas, landscaping, external lighting, security fencing, drainage and all associated ancillary works and infrastructure and other enabling civil works. A Natura Impact Statement (NIS) has been prepared for the proposed development given its proximity to designated Lough Forbes Complex SAC (Site Code: 001818) and Ballykenny-Fisherstown Bog SPA (Site Code 004104) and the potential for significant effects.</p> <p>A Natura Impact Statement (NIS) have been prepared in respect of the planning application.</p>	<p>has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the mitigation measures presented in the NIS for the proposed development are adhered to and considering the conclusion of the Planner's report, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>
<p>Longford County Council Planning Application No.: 23103</p> <p>Name: Private Applicant</p> <p>Address: Adjacent to, Cois Abhann, Cloondara, Co. Longford</p>	<p>Planning Application Lodged: 13/09/2023 Further Info Requested: 27/10/2023 Current Status: Further Information</p> <p>Demolition of 2no. existing out-buildings (total area 40m²), 2. construction of 28no. residential units consisting of: 4no. 1 bed apartment unit; 8no. 2 bed apartment units; 6no. 3 bed apartment units; 1no. 1 bed dwelling house; 8no. semi-detached 3 bed dwelling houses; 1no. detached 4 bed dwelling house, 3. provision of bins storage structure (circa.21m²), 4. provision of estate maintenance storage structure (circa. 10m²), 5. provision of sewerage treatment holding tanks with associated pumping station, 6. provision of storm drainage attenuation tanks, 7. provision of public open space, 8. all associated landscaping and ancillary development site works at this site.</p> <p>An AA Screening report has been prepared in respect of the planning application and an NIS has been requested as further information by the planning authority.</p>	<p>The development is located approx. 6.3 km south of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The AA Screening has identified pathways for effects such as impacts to water quality and disturbance during construction.</p> <p>Considering the nature and scale of the Project, the distance to Lough Ree and the dilution capacity of the River Shannon, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
<p>Longford County Council Planning Application No.: 22290</p> <p>Name: Private Applicant</p> <p>Address: Glebe, Cloondara, Co Longford</p>	<p>Planning Application Lodged: 16/12/2022 Decision date: 23/03/2023 Appeal Date: 14/04/2023 Current Status: Appealed</p> <p>The provision of the following: 1. Provision of 10 No. prefabricated glamping pods. 2. Conversion of existing shed to communal toilet facility, universal access toilet & shower room, with kitchen, diner, laundry & drying room at ground level with the provision of first floor to existing shed for games room overhead. 3. Provision of 13 No. car parking bays. 4. Provision of 16 No. bicycle stands. 5. Provision of service road and footpaths including alterations to the existing vehicle entrance on to the local road L1162 and provision of a pedestrian entrance via existing entrance gate way on to canal path, including all associated ancillary works.</p> <p>A Natura Impact Statement (NIS) has been prepared in respect of the planning application.</p>	<p>The development is located approx. 6.5 km south of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the mitigation measures presented in the NIS for the proposed development are adhered to, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>
<p>Longford County Council Planning Application No.: 21225</p> <p>Name: Harmony Solar Longford Limited</p> <p>Address: Townlands of Ballynakill,, Bunacloy and Middleton, near Killashee, Co Longford</p>	<p>Planning Application Lodged: 29/07/2021 Decision date: 15/09/2021</p> <p>Development consisting of a ten year permission for a solar farm on a site of approximately 34.54 hectares consisting of the following; 184,500 m2 of solar photo-voltaic panels on ground mounted steel frames; Ring main unit (RMU) substation and associated hard standing; 12 no. inverter/transformer stations on 6 no. hardstandings; underground power and communication cables and ducts; boundary security fence; CCTV cameras; upgraded internal access tracks; new internal access tracks, internal bridge crossing and associated drainage infrastructure; and temporary construction compounds and all associated site services and works. The proposed development seeks to form an extension to the adjoining previously permitted "Middleton House" Solar Farm which was permitted under Longford County Council Reg. Ref 18135. Access to the proposed development is provided via the permitted "Middleton House" Solar Farm via the L-11261 local road.</p> <p>An AA Screening report has been prepared in respect of the planning application.</p>	<p>The development is located approx. 9.2 km south of the Project site as the crow flies.</p> <p>Owing to the conditions of the planning permissions and conclusion of the AA Screening Report, no likely significant effects are predicted to arise from the Project in-combination with the proposed development.</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
<p>Longford County Council Planning Application No.: 2360108</p> <p>Name: EirGrid plc</p> <p>Address: Lanesborough Town, and Aghamore Townland, County Longford</p>	<p>Planning Application Lodged: 14/08/2023 Decision date: 25/09/2023</p> <p>The proposed development within Co. Longford will comprise: • the replacement (“restringing”) of the existing overhead line circuit conductor wires with a new higher capacity conductor including installation of a new fibre communication connection; • the retention and refurbishment, steel member replacement, painting and foundation strengthening of the one retained end mast EM1, including the replacement of hardware and fittings, replacement of vibration dampers, and replacement of insulators at EM1; • The cutting of timber / vegetation; • all associated works within the existing Lanesboro 110kV substation to accommodate the uprated 110kV OHL including uprating of the Sliabh Bawn bay in Lanesboro 110kV substation and alterations to existing hardware; and • other temporary associated and ancillary site development works required for the purpose of the uprate of the existing circuit, including construction compounds, silt traps, silt fences, stone tracks, ground protection mats, infrastructure crossing support systems and temporary watercourse crossings.</p> <p>An NIS has been prepared in respect of the planning application.</p>	<p>The development is located approx. 12.7 km southwest of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the schedule of conditions and the mitigation measures presented in the NIS for the proposed development are adhered to, no likely significant effects are predicted to arise from the Project in combination with the proposed development.</p>
<p>Longford County Council Planning Application No.: 18139</p> <p>Name: EirGrid plc</p> <p>Address: Aghamore (Rathcline By), Co. Longford.</p>	<p>Planning Application Lodged: 28/06/2018 Decision date: 21/08/2018</p> <p>Development at this site - the existing Cloon to Lanesboro 110 kV Overhead Line is approximately 65 kilometres long. Approximately 37km of the existing circuit is located within the functional area of Galway County Council with approximately 27km located in County Roscommon and approximately 120 metres located in County Longford. The refurbishment works within County Longford will be undertaken at structure EM365, located within the Lanesboro Substation in the townland of Aghamore (Rathcline By). The development will consist of the refurbishment of the Cloon - Lanesboro 110 kV Overhead Line which will primarily include: replacement of a large proportion of existing structures, the breaking out and reconstruction of the concrete foundation and shear blocks at the majority of end/angle mast structures, painting of mast structures, replacement of insulators, crossarms, stays and/or fittings on existing structures; and the fitting of bird flight diverters and stay guards. No additional structures are proposed along the existing circuit. Any replacement structures will be constructed at, or immediately adjacent to the</p>	<p>The development is located approx. 12.7 km southwest of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the schedule of conditions and the mitigation measures presented in the NIS for the proposed development are adhered to, no likely significant effects are predicted to arise from the Project in in-</p>

Plan or Project	Description of Plan or Project	In-Combination Effect(s)
	<p>existing structures they will replace and will be of a generally similar height and appearance. Associated site development works to gain access to the existing structures include clearance of vegetation, disassembly and reassembly of stone walls and gate posts and removal and reinstatement of existing fencing. The proposed development includes all other associated and ancillary site development works required for the refurbishment of the existing circuit, including the installation of temporary silt traps, silt fences, bog mats and clear span bridges. No additional structures and no alteration to the nature, extent, alignment, character or voltage of the existing electricity infrastructure is proposed.</p> <p>An NIS has been prepared in respect of the planning application.</p>	<p>combination with the proposed development.</p>
<p>Roscommon County Council Planning Application No.: 23342 Name: EirGrid Plc. Address: Sliabh Bawn, Co Roscommon</p>	<p>Planning Application Lodged: 14/08/2023 Decision date: 06/10/2023</p> <p>Permission for works to uprate the existing Lanesboro - Sliabh Bawn 100kV overhead line (OHL). Within County Roscommon the proposed development is located in the following townlands; Ballyleague, Gortgallan, Ballyglass, Cloontuskert, Erenagh, Killavackan, Culleenanory, Curraghroe, Doonahaha, Terila (Dillon), Trila (Martin), Kilmacananneny, Bunnageddy, Corhawny, Tonycurneen and Tooreen. The proposed development will consist of works along the c.9.5km Lanesboro - Sliabh Bawn 100kV OHL between the existing Lanesboro 110kV substation in the townland of Lanesborough in Co Longford & the existing SliabhBawn 110kV substation in the townland of Tooreen, Co. Roscommon. Approximately 9.4 km of the existing OHL circuit is located within the functional area of Roscommon County Council with approximately 0.1 km in the functional area of Longford County Council (A separate planning application is being lodged with Longford County Council).</p> <p>The application is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).</p>	<p>The development is located approx. 8.1 km southwest of the Project site as the crow flies.</p> <p>The potential effects arising from the proposed development and the current Project are similar. The NIS has identified adverse effects such as impacts to water quality during construction.</p> <p>Provided the schedule of conditions and the mitigation measures presented in the NIS and EIAR for the proposed development are adhered to, no likely significant effects are predicted to arise from the Project in in-combination with the proposed development.</p>

5.0 CONCLUSION

In accordance with Article 6(3) of the Habitats Directive, Regulations 42 of the Habitats Regulations, the relevant case law, established best practice and the Precautionary Principle; this AA Screening Report has examined the details of the Project and the relevant European sites and has concluded, on the basis of objective information, that the Project, either individually or in combination with other plans or projects, is not likely to give rise to impacts that would constitute likely significant effects in view of the Conservation Objectives of those sites.

In light of this conclusion, it is the considered opinion of ROD, as the author of this AA Screening Report, that the competent authority, Bord na Móna, may find in completing its AA Screening in respect of the Derrymoylin Bog Decommissioning and Rehabilitation Plan, that the Project, either individually or in combination with other plans and projects, is not likely to have a significant effect on any European site, in view of best scientific knowledge and the Conservation Objectives of the sites concerned. Therefore, it is the recommendation of the author of this AA Screening Report that the competent authority may determine that AA is not required in respect of the Project.

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APPENDIX A
**Derrymoylin Bog - Cutaway Bog Decommissioning and
Rehabilitation Plan 2023**

Bord na Móna

Derrymoylin bog

**Cutaway Bog Decommissioning and
Rehabilitation Plan**

2023

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

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

This licence condition requires Bord na Móna agree with the EPA the measures that will provide for rehabilitation, i.e. stabilisation of Derrymoylin bog upon cessation of peat production and compliments the licence requirement to decommission the site.

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

Industrial peat production has now fully ceased at Derrymoylin bog.

In addition, to preparing this document to comply with Condition 10 of IPC Licence Ref 504, due regard was also given to the Peatlands Climate Action Scheme (PCAS) announced by the Minister. This Scheme will see the Minister support, via the Climate Action Fund and Ireland’s National Recovery and Resilience Plan, Bord na Móna in developing a package of measures, ‘the Scheme’, for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme’. However, only the additional costs associated with the additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support. The additional costs of the Scheme will be supported by Government, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

While this document outlines the enhanced rehabilitation measures planned for Derrymoylin bog, activities which go beyond that required by Condition 10 in the Licence, rehabilitation necessary to comply with the ‘standard’ requirement of Condition 10 (in the absence of the Scheme) is also included, to estimate costs. The inclusion of the ‘standard’ rehabilitation together with the enhanced rehabilitation in this document allows the Scheme Regulator to distinguish and objectively determine the specific activities (and their associated costs) eligible for support under the Scheme.

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

Any consideration of any other future after-uses for Derrymoylin bog will be conducted in adherence to the relevant planning guidelines and consultation with relevant authorities and will be considered within the framework of this rehabilitation plan.

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NON-TECHNICAL SUMMARY

- Bord na Móna is planning to rehabilitate part of Derrymoylin Bog, approximately 4 kilometres to the northwest of Tarmonbarry and 1.8 kilometres southwest of Roosky, County Roscommon. It is part of the Mount Dillon group of bogs.
- The total area of the PCAS extent of Derrymoylin bog is 324 ha. The PCAS extent is smaller than the Bord na Mona land ownership boundary and the PCAS extent avoids some of the fragmented areas located, primarily, to the east of the bog. Such areas support agricultural grassland or small areas of bog that have a fragmented ownership.
- Industrial peat extraction at Derrymoylin bog permanently ceased in 2020 (having commenced in 1985), although some remaining stock is still on site. Currently the former peat production area comprises largely bare peat along with some pioneering cutaway habitats, in addition to marginal¹ habitats. Sections of intact raised bog are present along the margins of the site. However, these areas are small, are drying out and are for the most part subject to domestic turf cutting. It is envisaged extant stock will be removed prior to scheme activities.
- Bord na Móna are obliged to carry out peatland rehabilitation via an IPC License issued by the Environmental Protection Agency. In addition, the Government has agreed to support peatland rehabilitation via the establishment of the Peatland Climate Action Scheme (PCAS). This is funded via the government and by Bord na Móna.
- The key objective of peatland rehabilitation is environmental stabilisation. This means developing habitats and vegetation back onto the bare peat (putting a “skin” back onto the peat), and minimising effects to downstream waterbodies. Derrymoylin bog was previously drained to allow peat production. Better results for water quality improvements, climate action, the reduction of carbon emissions and biodiversity are achieved when the remaining peat is re-wetted. This means drain-blocking and other measures to raise water levels to the surface of the bog and to encourage the natural colonisation of vegetation.
- In general, soggy ground conditions are preferred. This means the remaining peat is wet and that plants that prefer wetter conditions, like Bog Cotton will thrive.
- Some sections with deeper residual peat have the capacity to regrow *Sphagnum* moss again, where there are suitable hydrological conditions. *Sphagnum* is a key species for restoring naturally functioning raised bog conditions.
- Many Bord na Móna bogs cannot be restored back to raised bog in the short-term, as so much peat has been removed and the environmental conditions have been modified. However other peatland habitats with Heather, Bog Cotton, Rushes, Purple Moor-grass, Bog-mosses and scattered trees will develop, and in time a naturalised peatland can be restored.
- The development or succession of a range of habitats within PCAS extent at Derrymoylin Bog will support biodiversity including plants, insects, birds and mammals. This includes some species that are rare and protected in the wider landscape. It will increase the national area of native woodland. Many peatland and wetland habitats in the wider landscape have been reclaimed for agriculture and other uses and peatland rehabilitation is an opportunity to create new peatland and wetland habitats.

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

- Measures proposed include drain blocking and additional measures required to raise water levels to the surface of the peat. Some fertiliser will be spread on headlands and other areas (a small part of the overall area) to encourage vegetation growth.
- Bord na Móna plan to carry out this work in 2024.
- These rehabilitation measures will be planned by a team consisting of expert ecologists, hydrologists and engineers. It is a guiding principle of Bord na Móna rehabilitation planning that no actions or activities will be undertaken that would negatively impact on adjacent land. No boundary drains will be blocked. Water will still leave the bog via the existing outlets.
- It will take some time for vegetation and habitats to fully develop within the rehabilitated area, and for a peatland ecosystem to be restored. However, it is expected that the location will be developing pioneer habitats after 5-10 years.
- This is a peatland rehabilitation plan. This plan does not consider future after-use or development. Bord na Móna continually reviews its land-bank to consider future commercial or industrial developments, such as renewable energy.
- Peatland rehabilitation of this bog will bring a range of benefits to the local community via improvements to the local landscape and is also important for supporting national policies and strategies in relation to reduction of carbon emissions from these peatlands, supporting biodiversity and improvements to water quality.

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1. INTRODUCTION

Bord na Móna operates under IPC Licence issued and administered by the EPA to extract peat within the Mount Dillon bog group (Ref. P0504-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Derrymoylin bog is part of the Mount Dillon bog group (see Appendix II for details of the bog areas within this Group). Derrymoylin bog is located in Co. Roscommon.

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

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

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

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

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

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

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

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

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

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

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

1.1 Constraints and Limitations

This document covers the area of Derrymoylin bog.

Industrial peat extraction at Derrymoylin bog permanently ceased in 2020 (having commenced in 1985), although some remaining stock is still on site. Currently the former peat production area comprises largely bare peat along with some pioneering cutaway habitats, in addition to marginal² habitats. Sections of intact raised bog are present along the margins of the site, with some subject to domestic turf cutting.

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

The parts of Derrymoylin bog (within the areas owned and under the control of Bord na Móna) that are currently used by domestic turf cutters to harvest peat are ecologically and hydrologically linked to the area owned by Bord na Móna where rehabilitation is planned. Nevertheless, Bord na Móna are aware of such issues which may

² 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.

constrain the proposed rehabilitation actions, and this rehabilitation plan considered potential impacts of turf cutting on the delivery of the stated objectives.

Rehabilitation in other areas of the bog may also be constrained due to other property issues or archaeological features.

Derrymoylin Bog was licenced by the EPA in 1999. This application involved the submission of site maps to identify the bog boundaries, which were digitised from 6" maps to Autocad. GPS and GIS have brought many improvements in survey and mapping since then and this is the main reason for the discrepancies in the ownership boundary and IPC Licence boundary in the attached GIS Map book. Any discrete parcels of peatlands shown on the maps as outside the main bog used for the extraction of peat under the IPC Licence, were never used for milled peat extraction and as such do not have decommissioning and rehabilitation requirements.

A railway divides the larger northern lobe from the smaller southern lobe of the bog and connects with Derrymoylin to Cloonshannagh bog.

Fragmented areas to the east of the main bog are not included in the scheme extent and are constrained out.

Bord na Móna are aware of the potential development of the former rail line and an existing access track to the east of the site for amenity use. However, the proposed rehabilitation measures do not overlap with these features and there is no constraint to rehabilitation.

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2. METHODOLOGY

This rehabilitation plan was developed with a combination of desktop and field surveys, consultations with internal and external stakeholders and cognisance of the Scheme (PCAS). The development of this rehabilitation plan considered recently published guidance issued by the EPA in 2020, “*Guidance on the Process of Preparing and Implementing a Bog Rehabilitation Plan*”.

The ecological information and site information collected during the Bord na Móna ecological baseline survey, additional confirmatory site visits (covering the period 2011 to 2023 inclusive) and monitoring and desktop analysis forms the basis for the development of the rehabilitation plan for the bog, along with:

- Experience of 40 years of research on the after-use development and rehabilitation of the Bord na Móna cutaway bogs (Clarke, 2010; Bord na Móna, 2016);
- Significant international engagement during this period with other counties in relation to best practice regarding peatland rehabilitation and after-use through the International Peat Society and the Society for Ecological Restoration (Joosten & Clarke, 2002; Clarke & Rieley, 2010; Gann *et al.*, 2019);
- Consultation and engagement with internal and external stakeholders;
- GIS Mapping;
- BNM drainage surveys;
- Bog topography and LiDAR data;
- Previous research studies on site;
- Hydrological modelling; and
- The development of a Methodology Paper outlining the Scheme (PCAS)³. 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 Derrymoylin bog, in particular, optimising climate action benefits.

2.1 Desk Study

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

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

³ [Supporting Material - BNM Peatlands Climate Action Scheme \(bnmpcas.ie\)](#)

- 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.
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- Schouten (2002). Conservation and Restoration of Raised Bogs: Geological, Hydrological and Ecological Studies. Dúchas - The Heritage Service of the Department of the Environment and Local Government, Ireland;
- Thom (2019). Conserving Bogs – Management Handbook.
- Wheeler & Shaw (1995). Restoration of Damaged Peatlands – with Particular Reference to Lowland Raised Bogs Affected by Peat Extraction.
- Wittram *et al.* (2015). A Practitioners Guide to Sphagnum Reintroduction. Moors for the Future Partnership.

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

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

- Historic Environment Viewer at <https://webgis.archaeology.ie/historicenvironment/>
- National Parks & Wildlife Services Public Map Viewer (www.npws.ie);
- Water Framework Directive catchments.ie/maps/ Map Viewer (www.catchments.ie);
- OPW Indicative Flood Maps (www.floodmaps.ie);
- CFRAM Preliminary Flood Risk Assessment (PFRA) maps (www.cfram.ie);
- River Basin Management Plan for Ireland 2022-2027
- Bord na Móna Annual Report 2023.
- Spatial data in respect of Article 17 reporting, available online at <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>.

2.2 Consultation

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

2.3 Field Surveys

Bord na Móna carried out a baseline ecological survey of all of its properties in 2009-2012 and developed habitat maps. As part of this exercise, Derrymoylin bog was surveyed in 2012. This rehabilitation plan is informed by the original baseline survey as well as subsequent confirmatory site walk-over surveys and visits, and updates to baseline data.

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

A detailed ecological survey report for Derrymoylin bog is contained in Appendix III.

3. SITE DESCRIPTION

Derrymoylin Bog is located approximately 4 kilometres to the northwest of Tarmonbarry and 1.8 kilometres southwest of Roosky, County Roscommon. It is part of the Mount Dillon group of bogs. The surrounding landscape is dominated by a mosaic of farmland, largely consisting of improved grassland, and other bogs, many owned and managed by Bord na Móna. A rail line to the south of the site connects Derrymoylin with Cloonshannagh bog to the south. In addition, an unpaved access track crosses the site before running along the eastern boundary of the site.

Several mapped EPA watercourses flow along the boundary of Derrymoylin bog with part of the Roosky New (EPA Code: 26R31) stream flowing in a northerly direction through a small section to the north of the bog. This watercourse flows into the Aghoo stream (EPA Code: 26A04), which flows along the north-western boundary of the bog. The Aghoo steam discharges into Lough Bofin and then River Shannon. The Slattagh_More (EPA Code: 26S33) stream flows along the south-eastern boundary of the bog, in a southerly direction, into the Feorish (Termonbarry) stream watercourse, eventually discharging to the River Shannon (Upper) south of Termonbarry. Derrymoylin Bog is one of a cluster of bogs that has developed along the floodplains of the River Shannon. Derrymoylin Bog has a gravity drainage regime.

See Figure *BNM-DR-25-01-RP-01: Site Location*, included in the accompanying Mapbook⁴, which illustrates the location of Derrymoylin bog in context to the surrounding area.

3.1 Status and Situation

3.1.1 Site history

Derrymoylin bog is a relatively recent production bog and was in production from 1985 until 2020. The bog was formerly used to supply Lough Ree ESB Power Station. There is therefore very little development of pioneer cutaway habitats within the bog, and this area is predominately bare peat. Some extant stock is still present on the bog. Derrymoylin still retains sections of “red” or “*Sphagnum*” peat.

3.1.2 Current land-use

Industrial peat extraction has now completely ceased. The majority of the Derrymoylin Bog former production area is bare peat.

Derrymoylin still has some remaining peat stockpiles. It is envisaged that all the peat stock on the bog will be removed before the rehabilitation measures commence.

Sections of intact raised bog are present along the margins of the site; however, these areas are drying out and are for the most part subject to domestic turf cutting. Some areas have also been constrained from the rehabilitation plan due to landownership considerations that are being investigated.

A railway divides the larger northern lobe from the smaller southern lobe of the bog and connects Derrymoylin to Cloonshannagh bog. It is anticipated that the rail lines will be decommissioned in 2024. However, the rail bed will be left in place and may be used for amenity infrastructure. Bord na Móna are aware of the potential development of the former rail line and an existing access track to the east of the site for amenity use. However,

⁴ Cutaway Bog Decommissioning and Rehabilitation Plan – Derrymoylin bog Map Book

the proposed rehabilitation measures do not overlap with these features and there is no constraint to rehabilitation. Any future such land use will be subject to the requirements for planning permission and is not part of the current Scheme.

Various different habitats including Cutover Bog (PB4), Scrub (WS1), Wet grassland (GS4), Birch woodland (WN7), Dense Bracken (HD1) and Improved grassland (GA1) are located along the margins.

There are a number of areas of Derrymoylin within the IPC boundary that are outside of the PCAS rehabilitation footprint. These areas have been identified as constrained areas.

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 Derrymoylin bog, jobs would have included those to facilitate fuel peat production.

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

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

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

3.2 Geology and Peat Depths

3.2.1 Sub-soil geology

GSI data indicates that Derrymoylin Bog is underlain by five different bedrock units, including the Fearnaght Formation to the north-west, Meath Formation which covers the northern portion of the main lobe of the bog, the Moathill Formation which covers a proportion of the main lobe, the Ballysteen formation which underlies most of the lobe to the south-east, while Argillaceous Limestones (Visean) underlies a small portion of this lobe to the south-east.

The underlying soils and sub-soils are classed as ‘raised bog cutover peat’. Data used in compilation of the sub-peat map suggest that peat rests directly on glacial till in those areas where the substrate rises above c. 41.5mOD. In contrast the deeper basins are underlain by lacustrine clay.

3.2.2 Peat type and depths

Detailed information on peat depths across Derrymoylin is not available. However, limited coring records are available from peat coring carried out by RPS. This information has been used to estimate base of peat and interpolated across the bog. Estimated peat depths are provided in figure *BNM-DR-25-01-RP-04 Peat Depths*.

The majority of Derrymoylin bog is underlain by “red peat” or *Sphagnum* peat. The majority of Derrymoylin bog has residual deep peat deposits with most of the bog having peat thickness of 2-6m.

A low-lying basin towards the south of the main lobe has shallower deposits (<1m), while an elevated ridge to the west of the main lobe is anticipated to have shallower peat (albeit no coring data is available for this area).

Additional information on the peat depths and associated composition is provided in the Site Characterisation Report and the Monitoring and Verification report prepared for Derrymoylin bog.

3.3 Key Biodiversity Features of Interest

The majority of Derrymoylin bog within the Bord na Móna boundary consists of bare peat, with some development of pioneer post-production habitats since the recent cessation of peat production. Habitats of biodiversity interest are largely confined to the bog margins.

3.3.1 Current habitats

The most common habitats (codes refer BnM classification of pioneer habitats of production bog) present in the former production areas at Derrymoylin include:

- Bare peat (0-50% cover) (BP) (*Codes refer BnM classification of pioneer habitats of production bog*⁵).
- Willow-dominated scrub (eWill) (in mosaic with pJeff) (in those areas that are flooded regularly)
- Open water (OW) (permanent) and Temporary open water (TOW)
- Birch-dominated scrub (eBir, oBir) (on drier higher ground that is not flooded)
- Pioneer dry heath (dHeath) (mainly in mosaic with Birch scrub) (see Plate 2.1)
- Pioneer Soft Rush-dominated poor fen (pJeff) (see Plate 2.2)
- Dry pioneer Purple Moorgrass-dominated grassland (gMol)
- Access routes (Acc)
- Riparian zones (Rip) (with drains and associated habitats such as scrub and Birch woodland)
- Silt ponds (Silt) with Gorse/Birch scrub and Purple Moorgrass-dominated grassland (gMol)

The most common habitats (Fossitt) found around the margins of the site include:

- Raised bog (PB1)
- Cutover Bog (PB4)

⁵ See Appendix II – “An Overview of the Bord na Móna Habitat Classification” of the BnM [Biodiversity Action Plan 2016-2021](#)

- Scrub (WS1)
- Wet (callows-type) grassland (GS4)
- Birch woodland (WN7)
- Dense Bracken (HD1)
- Improved grassland (GA1)

See Figure number *BNM-DR-25-01-RP-17: Current Habitat Map*, included in the accompanying Mapbook, which illustrates the habitats at Derrymoylin bog, see Table 1 for representations of habitats present.

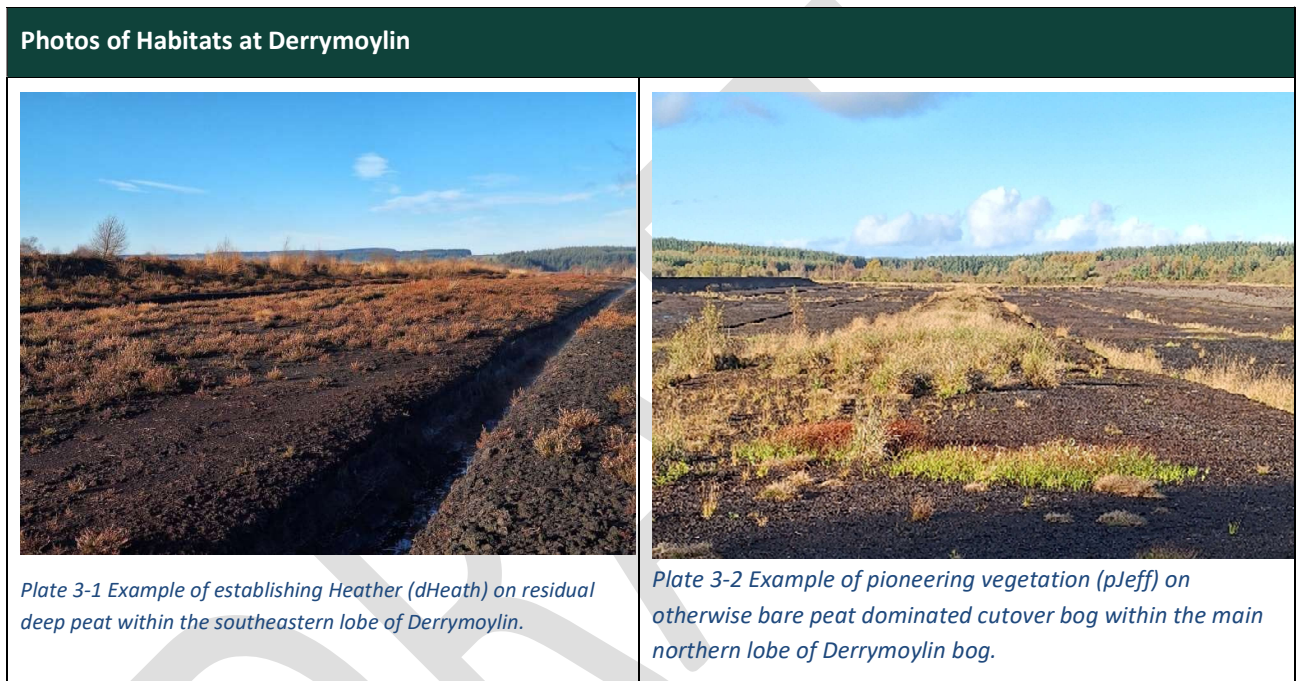


Table 1: Photos of Habitats at Derrymoylin bog (November 2023).

3.3.2 *Species of conservation interest*

A number of species of conservation concern utilize the habitats available at Derrymoylin bog. The following is a summary of the records of species available within both BnM records and those of the National Biodiversity Data Centre (NBDC).

Multiple mammal species have been recorded on or within 1 Km of the bog: including Red Fox (*Vulpes vulpes*), Badger (*Meles meles*) and Irish Hare (*Lepus timidus hibernicus*).

Numerous bird species are known to use the cutover bogs in Ireland's midlands as breeding grounds, wintering grounds or both. NBDC Records for red-listed⁶ bird species of conservation concern recorded from the hectad N08 include Black-headed Gull (*Larus ridibundus*), Common Redshank (*Tringa totanus*), Herring Gull (*Larus argentatus*), Yellowhammer (*Emberiza citrinella*) (Annex I listed species of the EU habitats directive), have also been recorded within this hectad.

Note that although these species have been recorded within the wider area of Derrymoylin bog, it is considered unlikely that the bare peat dominated habitats occurring within Derrymoylin bog would offer suitable habitat for these species. The aforementioned mammal species are likely to be associated with habitats occurring at the bog margins or adjacent to the bog.

Peatland rehabilitation may result in positive quality effects on the relative abundance or proportion of species of conservation concern utilising the bog post rehabilitation. This may include Red or Amber listed species of breeding wader, along with wintering species including Swans and other wildfowl⁷.

3.3.3 *Invasive species*

The invasive species Japanese Knotweed (*Fallopia japonica*) has previously been recorded the eastern boundary of the site. This is located outside of the areas proposed for rehabilitation. There are no other NBDC or BNM records for high impact invasive species recorded from the bog.

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

3.4 **Statutory Nature Conservation Designations**

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

- Clooneen Bog SAC (Site Code 002348) – 1.9 km to the east of Derrymoylin. This site is located on the eastern side of the River Shannon from Derrymoylan.
- Lough Forbes Complex SAC is located c. 2 km to the southeast and is also located on the eastern side of the River Shannon from Derrymoylan.
- Ballykenny-Fisherstown Bog SPA (Site Code 004101) -1.97km to the south-east of Derrymoylin.

⁶ Gilbert G, Stanbury A and Lewis L (2021), "Birds of Conservation Concern in Ireland 2020 –2026". Irish Birds 9: 523–544

⁷ Refer to Scheme Year 1 Monitoring and Verification Report

⁷https://www.bnmpcas.ie/wpcontent/uploads/sites/18/2023/08/Annual-Monitoring-Report_Final-Rev-A_Redacted.pdf

There are no Natural Heritage Areas (NHAs) located adjacent, or in close proximity to, Derrymoylin bog. The most proximal NHAs to Derrymoylin are Aghnamona bog NHA (Site code: 000422); 2.24 km to the north-east of Derrymoylin and Rinn River NHA (Site code: 000691); 3.73 km to the east of Derrymoylin.

A number of non-statutory designated sites also occur in the wider area around Derrymoylin bog. Lough Boderg and Lough Bofin pNHA (site code: 001642) is located 0.71 km north of Derrymoylin. Clooneen Bog pNHA (site code: 000445) is located 1.9km east of Derrymoylin. Lough Forbes Complex pNHA (site code: 001818) is located 2.5 km southeast of Derrymoylin.

3.4.1 Other Nature Conservation Designations

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

3.5 Hydrology and Hydrogeology

Derrymoylin forms part of the Upper Shannon Catchment (Catchment ID: 26C) as defined by the EPA under the Water Framework Directive (WFD) and is primarily situated within the Shannon [Upper]_SC_040 sub-catchment which flows to the north via the Roosky New Steam. The southern portion of the bog is situated within the Shannon [Upper]_SC_070 sub-catchment to the south-west and Shannon [Upper]_SC_050 sub-catchment to the south-east.

The bog contains several drainage pathways and discharge locations, with the majority of the bog discharging to rivers which eventually flow into the River Shannon.

Regional hydrological data suggest that Derrymoylin receives average precipitation of 997mm/yr (1981-2010), with an estimated annual effective rainfall rate of 685 mm/yr based on GSI data. The GSI also estimate an annual average recharge rate of 27mm/year for Derrymoylin.

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

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

Groundwater Vulnerability is generally mapped as Low both within the bog and the immediate surroundings, albeit with small pockets of high and extreme vulnerability in areas where bedrock is mapped close to the surface (e.g., to the south-west of the main lobe of the bog).

3.6 Emissions to surface-water and watercourses

Derrymoylin Bog has 5 treated surface water outlets from a previously active peat extraction catchments, all which discharge to the Shannon Upper. Several mapped EPA watercourses flow along the boundary of Derrymoylin bog with part of the Roosky New (EPA Code: 26R31) stream flowing in a northerly direction through a small section to the north of the bog. This watercourse flows into the Aghoo stream (EPA Code: 26A04), which flows along the north-western boundary of the bog. The Aghoo steam discharges into Lough Bofin and then River Shannon. The Slattagh_More (EPA Code: 26S33) stream flows along the south-eastern boundary of the bog, in a southerly direction, into the Feorish (Tarmonbarry) stream watercourse, eventually discharging to the River Shannon (Upper) south of Tarmonbarry.

Both Lough Bofin and the Shannon Upper are classed as at Moderate water quality status, with the Feorish at Poor status (Ecological Status or Potential SW 2016-2021) – Water Framework Directive.

Details of silt ponds, associated surface water emission points and those being monitored and sampled as part of the PCAS scheme are detailed in figure *BNM-DR-25-01-RP-WQ01: Water Quality Map*. There is a robust monitoring program to track and verify any changes in baseline water quality conditions pre and post decommissioning and rehabilitation, so that the success or otherwise can be tracked and verified for the National Parks and Wildlife Service, Environmental Protection Agency, and Local Authority Water Program, amongst a range of stakeholders.

Peat extraction was identified as pressure in the second cycle of the river basin management plan is indicated as remaining so in the third cycle, which is currently under preparation.

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

From an analysis of any results over number of years of the IPC licence environmental monitoring of some of the discharges from this bog, these indicate that results were under the Emission Limit Value for Suspended Solids, under the trigger level for Ammonia and broadly under the trigger level for COD, excepting an occasion in 2017.

Ammonia averaged 0.47mg/l and ranged from 0.017 to 2.1mg/l with Suspended Solids ranging from 2 to 6 mg/l and averaging 4.07mg/l. See Table 3.1⁸.

⁸ Units are mg/l for SS, TS, Ammonia, TP and COD. Colour is mg/l Pt Co

Bog	SW	Monitoring	pH	SS	TS	Ammonia	TP	COD	Colour
Derrymoylin	SW-1	Q3 20	7.3	2	235	0.017	0.05	76	258
Derrymoylin	SW-2	Q3 20	6.7	3	196	0.149	0.05	92	481
Derrymoylin	SW-3	Q3 20	7.2	2	179	0.088	0.1	71	314
Derrymoylin	SW-4	Q3 20	7.1	2	237	0.169	0.11	87	240
Derrymoylin	SW-5	Q3 20	7.1	2	215	0.183	0.05	74	376
Derrymoylin	SW-1	Q1 18	7.5	5	374	0.28	0.05	44	91
Derrymoylin	SW-2	Q1 18	7.6	5	163	2.1	0.05	17	63
Derrymoylin	SW-3	Q1 18	7.8	5	232	0.5	0.05	46	121
Derrymoylin	SW-4	Q1 18	7.6	5	150	0.28	0.05	51	196
Derrymoylin	SW-5	Q1 18	7.9	5	310	0.28	0.05	40	119
Derrymoylin	SW-2	Q2 14	8.2	6	352	0.02	0.05	61	107
Derrymoylin	SW-3	Q2 14	8.1	5	376	0.05	0.05	35	71
Derrymoylin	SW-4	Q2 14	7.8	5	370	1.7	0.06	62	109
Derrymoylin	SW-5	Q2 14	7.8	5	488	0.76	0.05	20	57

Table 3.1 Decommissioning and Rehabilitation Programme Water Quality Monitoring.

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

Water quality of water discharges from restored peatlands normally improves as a result of bog restoration measures and the restoration of natural peatland processes (Bonn *et al.*, 20017). Bog restoration is also expected to improve water attenuation of the site as the drains are blocked, slowing water movement and water release from the site. Restored peatlands help slow the release of water and aid the natural regulation of floods downstream (Minayeva *et al.*, 2017). The National River Basin Management Plan (NRBMP) 2022-2027 (DHLGH, 2022) is the key national plan for Ireland to achieve the objectives of the Water Framework Directive (WFD). The NRBMP outlines how key actions such as the Bord na Móna peatland rehabilitation is expected to have a positive impact on water quality and help the NRBMP deliver its objectives in relation to the WFD.

Water will still discharge from designated emission points when rehabilitation at Derrymoylin bog has been completed. This discharge will have improving water quality and there will be increased wetland attenuation, meaning slower release of water. This is expected to have a positive impact on status of downstream water bodies. While water quality improvements assist in meeting water frameworks directive ambitions and targets, they can also improve drinking water sources in applicable catchments with drained peatlands and the potential for associated reduction in treatment requirements at drinking water treatment facilities.

Decommissioning and Rehabilitation Programme Water Quality Monitoring.

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

To assist in monitoring surface water quality from this bog, it was agreed with the EPA 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 January 2023 and is enabling a baseline to be established, with sampling to progress during the scheduled works, and for a period of up to 2 years post rehabilitation. Depending on the period required to confirm that the main two parameters, suspended solids, and ammonia as remaining compliant with the licence emission and trigger limit values and there is an improving trajectory in these two parameters i.e., reduction in concentration, the monitoring programme and intensity will be periodically reviewed and amended.

Initial monthly results are included in Appendix XIII, for Derrymoylin bog. These results cover the period from January to November 2023 and are from some of the surface water outlet from the sections of bog to be rehabilitated in 2024. Peat extraction ceased in this bog in 2020 and as expected some of the key water quality parameters that can impact water quality from peat extraction activities, remain on a relatively static trajectory, with suspended solids indicating a very slight upward trend from SW2 during the period, primarily due to one higher than normal result in September and no trend at SW5, all well below any limits of concern. During this same period there was a mixed trend in Ammonia for both SW2 and SW5, with all other parameters fluctuated slightly, most likely influenced by normal weather patterns, including rainfall.

Monthly ammonia concentrations from both emission points for January to November 2023 had a range of 0.04 to 0.404 mg/l with an average of 0.142 mg/l. Results for suspended solids for the same period indicated a range of 2 to 29mg/l with an average of 5.0 mg/l.

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

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

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

Success criteria:

The key water quality success criteria associated with this enhanced rehabilitation are as follow:

- That there is a stabilizing/improving concentration of suspended solids and ammonia in discharges from Bord na Móna sites, associated with the measures undertaken to stabilize the peat surface by the blocking of the internal drainage system and the maximized rewetting of the peat surface.

- Receiving water bodies have been classified under the River Basin Management Plan and this classification includes waters that are At Risk from peatlands and peat extraction. The success criteria will be that any At Risk classification will see improvements in the associated pressures from this peatland or if remaining At Risk, that there is an improving trajectory in the pressure from this peatland.

As the monthly monitoring program at Derrymoylin Bog continues in 2023 and 2024 and during the rehabilitation works planned for 2024, further trending will be produced to verify any ongoing trends.

3.7 Fugitive Emissions to air

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

3.8 Carbon emissions

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

Re-wetting of dry peatlands will increase methane emissions (Gunther et al. 2020) as a consequence of the anoxic conditions within the peat body that provide a suitable environment for the microbial breakdown of plant litter and root exudates. Tanneberger et al. (2021) describes how peatland management has to choose between CO₂ emissions from drained peatlands or increased methane (CH₄) emissions from rewetted industrial peatlands. However, when radiative effects and atmospheric lifetimes of both GHG gases are considered and modelled, postponing rewetting increases the longterm warming effect of continued CO₂ emissions (Gunther et al. 2020). This means the increase in methane due to rewetting of dry peatlands is still negated by the CO₂ emissions reductions. Further, Wilson et al. (2022) confirmed the benefit of rapid rewetting to achieve strong carbon reductions and potentially altering the warming dynamics from warming to cooling depending upon the climate scenario.

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

3.9 Current ecological rating

(Following NRA (2009) Evaluation Criteria)

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

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4. CONSULTATION

4.1 Consultation to date

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

There has been ongoing consultation about rehabilitation, biodiversity and other general issues over the years about Mount Dillon group bogs including Derrymoylin 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).
- Archaeological Liaison Committee (National Museum of Ireland & Dept of Culture Heritage and the Gaeltacht).

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

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

4.2 Issues raised by Consultees

N/A Yet as consultation has not commenced.

4.3 Bord na Móna response to issues raised during consultation

N/A Yet as consultation has not commenced.

5. REHABILITATION GOALS AND OUTCOMES

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

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

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

- It will take some time for stable naturally functioning habitats to fully develop at Derrymoylin bog. This will happen over a longer timeframe than the implementation of this rehabilitation plan.
- Re-wetting residual peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water storage and attenuation and help support biodiversity both on the site and in the catchment (See Section 3.8). This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action.
- It is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). Furthermore, only a proportion of the bog has potential to develop *Sphagnum*-rich habitats in this timeframe. Nevertheless, re-wetting across the entire bog, as part of the scheme, will improve habitat conditions of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions.
- Rehabilitating former industrial peat production bog will also in the longer-term support other ecosystem services such as the development of new habitat to support biodiversity and local attenuation of water flows from the bog.
- WFD status in receiving water bodies can be affected by peatlands and peat extraction but is also affected by other sources such as agriculture. In addition, receiving water bodies that are assessed as At Risk from peatlands and from peat extraction are likely to have several contributory sources of impacts (private peat extraction and Bord na Móna). Reducing pressures due to former peat extraction activities at Derrymoylin bog will contribute to stabilising or improving water quality status of receiving water bodies

in general. Ultimately, improving the WFD status of the receiving water body will depend on reducing pressure from a range of different sources, including peatlands in general (private and Bord na Móna).

- Bord na Móna are also planning rehabilitation measures in adjacent Cloonshannagh bog in 2023, and rehabilitation has taken place in surrounding bogs in 2021/2022, including Derrycashel and other wider restoration and rehabilitation sites. There are expected to be cumulative water quality and other ecosystem service benefits to receiving water bodies from rehabilitating more than one bog in the same catchment.
- Re-wetting in general will benefit the future preservation of most known and unknown archaeological features. An Archaeological Impact Assessment (AIA) is to be carried out under the PCAS scheme.

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6. SCOPE OF REHABILITATION

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

- The area of Derrymoylin bog.
- EPA IPC Licence – (Ref. P0504-01). As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Derrymoylin bog is part of the Mount Dillon Bog group.
- The Scheme is designed to exceed the stabilisation requirements as defined by the IPC Licence. This scheme is designed to enhance the ecosystem services of Derrymoylin bog, in particular, optimising **climate action benefits**. The proposed interventions will mean that environmental stabilization is achieved (meaning IPC obligations are met) and, in addition, significant other ecosystem service benefits particularly for climate action will be accrued.
- The local environmental conditions of Derrymoylin bog mean that deep peat measures along with wetland creation is the most suitable rehabilitation approach for this site. Derrymoylin bog has a gravity drainage regime and has residual deep peat in the majority of the bog along with some small pockets of shallower peat.
- Bord na Móna have defined the key goal and outcome of rehabilitation at Derrymoylin Bog as **environmental stabilisation** of the site via **optimising climate action benefits, where possible**. The rewetting of residual peat in the areas recently out of peat extraction will optimise hydrological conditions by raising the water table within the formerly intensively drained peatland. Such measures will **set the site on a trajectory towards the development of peat-forming communities on residual deep peat, and the development of wetlands/Reed Swamp and fen on shallow more alkaline peat and other subsoils**. Many of the areas identified for wetland rehabilitation measures (i.e. regular drain blocking and targeted berms) occur in depressions that will be relatively easy to rewet. Such areas at Derrymoylin bog are situated on residual deep peat and it is therefore expected that these areas are likely to develop more typical bog vegetation communities in time. The remaining areas of shallow residual peat on sloping ground, particularly near the bog margins, will benefit from drain blocking. However, it is likely that these areas will develop more Birch dominated scrub and woodland. The rehabilitation of these areas will still have significant biodiversity and climate benefits.
- Rehabilitation of Derrymoylin bog will support multiple national strategies of climate action, biodiversity action and other key environmental strategies such as the Water Framework Directive.
- The time frame for the delivery of the planned rehabilitation will be undertaken according to available resources and appropriate constraints.

6.1 Key constraints

- **Bog conditions.** Rehabilitation outcomes of sites are constrained by the environmental characteristics of these particular areas. For example, there is potential for raised bog restoration at some sites where there has not been significant industrial peat extraction and the peat body is largely intact (deep peat sites that are drained). At other sites, most of the peat mass has been removed, the environmental characteristics of these areas have therefore changed radically (peat depths, hydrology, water chemistry, substrate type, nutrient status, etc.) and there will therefore be different habitat outcomes (wetlands, fen, heathland, grassland and Birch woodland).

- Most of Derrymoylin bog has residual deep peat, with peat thickness of 2-6 metres remaining. Some shallower peat occurs in the northern section of the site. A low-lying basin towards the south of the main lobe has shallower deposits (<1m), while an elevated ridge to the west of the main lobe is anticipated to also have shallower peat. This bog will therefore develop regenerating deep peat vegetation with wetlands, fen, heathland, grassland and Birch woodland.
- **Surrounding landscape and neighbours.** Another key constraint is the interaction between the Bord na Móna sites and the surrounding landscape. Care has to be taken that no active rehabilitation management is carried out that could negatively and knowingly impact on surrounding land. This includes any hydrological management on neighbouring farmland. It is anticipated that the work proposed here (blocking drains and re-wetting cutaway peatlands) will not have any flooding impacts on adjacent land.
- **Archaeology.** The discovery of monuments or archaeological objects during peatland rehabilitation may potentially constrain the rehabilitation measures proposed for a particular area. While the rehabilitation will optimise hydrological conditions for the protection of exposed archaeological structures, their retention in situ and preservation into the future, any new archaeology may require rehabilitation measures will be reviewed and adapted. If this occurs, rehabilitation measures will be reviewed and adapted. An Archaeological Impact Assessment (Appendix XII) will be carried out to mitigate against any impact on found archaeology at Derrymoylin bog. In the worst-case scenario works affecting the surface and sub-surface of the bog might disturb previously unknown archaeological deposits or artefacts without preservation by record taking place. Should any previously unknown archaeological material be uncovered during the rehabilitation works, it will be avoided and reported to Bord na Móna Archaeological Liaison Officer and the National Museum of Ireland.
- **Public Rights of Way.** There are known rights of way around the margins of Derrymoylin bog. Where a public right of way or similar burden exists on Bord na Móna property, consideration will be given to ensuring that this remains intact where possible. In some instances, depending upon previous land uses and management, alternative solutions may be required. These will be explored in consultation with local communities and statutory bodies during the consultation work associated with the decommissioning and rehabilitation work described here.
- **Turbary.** A number of areas of remnant raised bog close to the bog margins are excluded as these areas are currently being 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 Derrymoylin bog.
- Derrymoylin Bog was licenced by the EPA in 1999. This application involved the submission of site maps to identify the bog boundaries, which were digitised from 6" maps to Autocad. GPS and GIS have brought many improvements in survey and mapping since then and this is the main reason for the discrepancies in the ownership boundary and IPC Licence boundary in the attached GIS Map book. Any discrete parcels of peatlands shown on the maps as outside the main bog used for the extraction of peat under the IPC Licence, were never used for milled peat extraction and as such do not have decommissioning and rehabilitation requirements.

6.2 Key Assumptions

- It is assumed that Bord na Móna will have all resources required to deliver this project.

- It is expected that weather conditions will be within normal limits over the rehabilitation plan timeframe. Long periods of wet weather have the capacity to significantly affect ground conditions and constrain drain blocking and other ground activities.

6.3 Key Exclusions

The scope of this rehabilitation plan does not cover:

- Active turbary areas to the north and south of the main production bog are excluded.
- Derrymoylin Bog was licenced by the EPA in 1999. This application involved the submission of site maps to identify the bog boundaries, which were digitised from 6" maps to Autocad. GPS and GIS have brought many improvements in survey and mapping since then and this is the main reason for the discrepancies in the ownership boundary and IPC Licence boundary in the attached GIS Map book. Any discrete parcels of peatlands shown on the maps as outside the main bog used for the extraction of peat under the IPC Licence, were never used for milled peat extraction and as such do not have decommissioning and rehabilitation requirements. These are excluded from the rehabilitation footprint.
- The longer-term development of stable naturally functioning habitats to fully develop at Derrymoylin bog. The plan covers the short-term rehabilitation actions and an additional monitoring and after-care programme to monitor the rehabilitation and to respond to any needs.
- This plan is not intended to be an after-use or future land-use plan for Derrymoylin bog.
- The longer-term management of this site, potentially as a nature conservation site, or for amenity, or for other uses in the future.

7. CRITERIA FOR SUCCESSFUL REHABILITATION

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

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

Rehabilitation is generally defined by Bord na Móna as:

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

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

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

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

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

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

As the monthly monitoring program at Derrymoylin bog continues in 2023/2024 during the rehabilitation works planned for 2024, and data from the 2023 monitoring program is compiled, further trending will be produced to verify any ongoing trends.

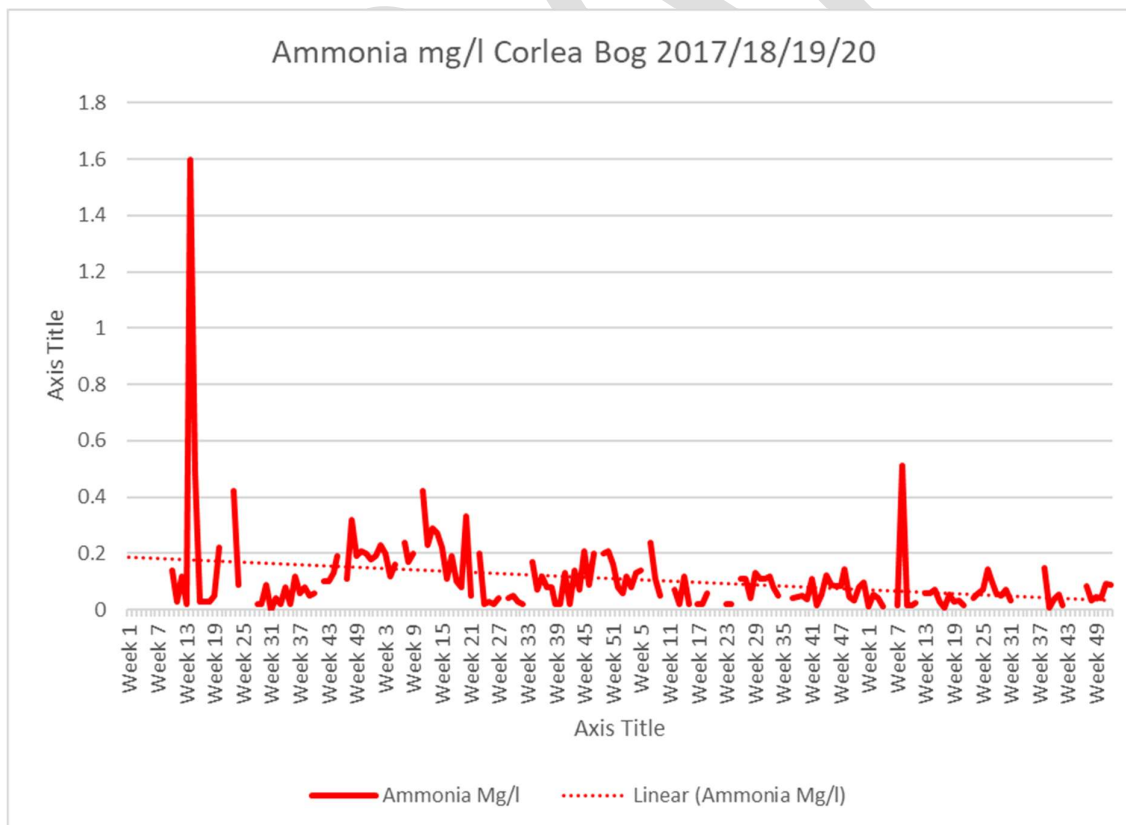
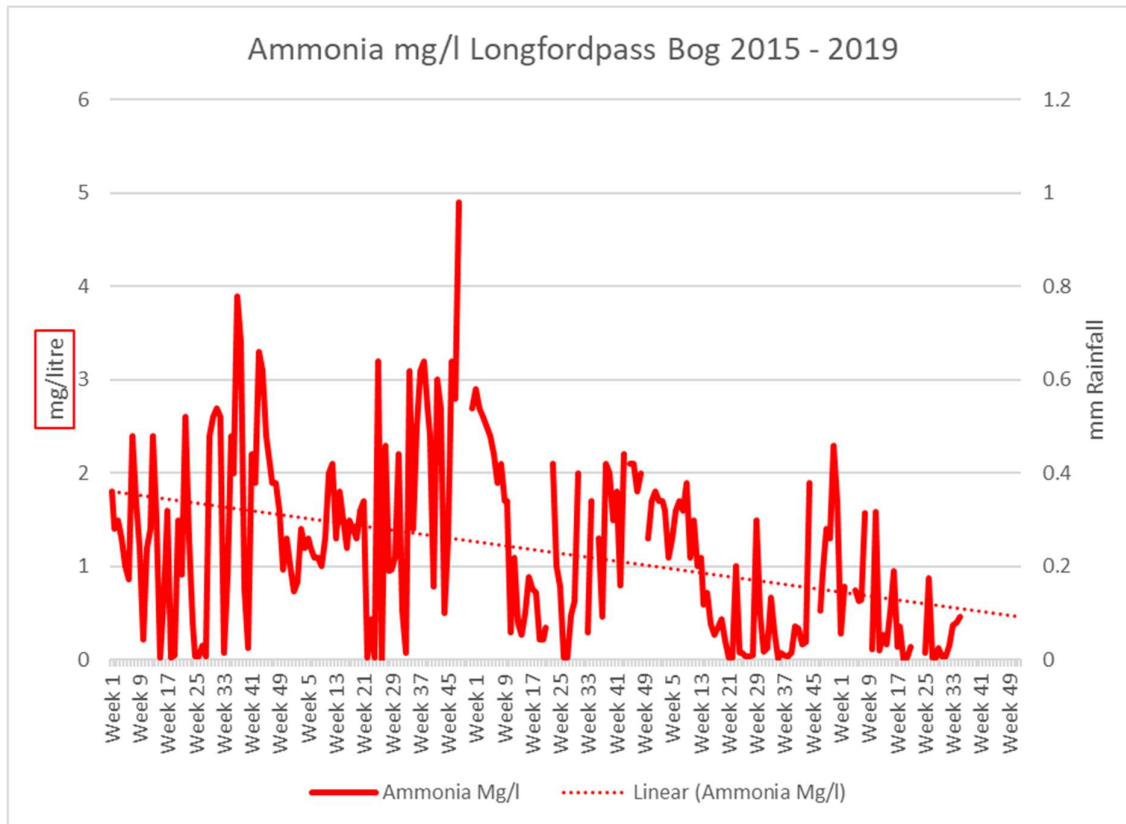


Figure 7.1. Ammonia levels over the period 2015-2019 at Longfordpass and the period 2017-2020 at Corlea.

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

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

Table 7-1 Summary of Success criteria, targets, how various success criteria will be measured and expected timeframes.

Criteria type	Criteria	Target	Measured by	Expected Timeframe
IPC validation	Rewetting in the former area of industrial peat production	Delivery of rehabilitation measures Reduction in bare peat.	Aerial photography after rehabilitation has been completed – to demonstrate measures (drain-blocking) Establishment of a baseline for future monitoring of bare peat, vegetation establishment and habitat condition.	2024-2026
IPC validation	Key water quality parameters Ammonia, Phosphorous, Suspended solids, pH and conductivity	Reduction or stabilisation of key water quality parameters associated with this bog	Water quality monitoring for a period after rehabilitation has been completed	2023-2026
IPC validation	Reducing pressure from peat production on the local water body catchment (WFD)	Where this section of the water body, that this bog drains to, has not been identified as under pressure from peat extraction, that the intervening EPA monitoring programme associated with its Programme of Measures for this water body, confirms that its classification remains at not being at risk from peat extraction associated with activities at this bog.	EPA WFD monitoring programme	WFD schedule
Climate action verification	Optimising the extent of suitable hydrological conditions to optimise climate action	Optimal extent of suitable hydrological conditions	Aerial photography and Habitat mapping to map extent of suitable hydrological conditions. Baseline monitoring to be carried out during the scheme when rehabilitation is complete. Sites can be re-monitored in the future and	2024-2026

Criteria type	Criteria	Target	Measured by	Expected Timeframe
			compared against this baseline.	
Climate action verification	Reduction in carbon emissions.	Reduction in carbon emissions	Carbon emissions – estimated using a bog condition assessment and appropriate carbon emission factors.	2024-2026
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.	2024-2026

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

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

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

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

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

8. REHABILITATION ACTIONS AND TIME FRAME

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

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

BNM-DR-25-01-RP-21: Aerial Imagery 2020

BNM-DR-25-01-RP-04: Peat Depths

BNM-DR-25-01-RP-03: LiDAR Map

BNM-DR-25-01-RP-09: Depression Analysis

The rehabilitation actions themselves will be a combination of PCAS measures to re-wet peat. The distribution of these measures is provisionally outlined in Figure titled *BNM-DR-25-01-RP-05: Enhanced Rehabilitation Measures* in the accompanying Mapbook (note that the actual distribution of these measures may be subject to change in response to stakeholder consultation and refinement of the enhanced rehabilitation measures.)

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

- Deep Peat measures including field re-profiling, on deeper peat; intensive drain blocking (max 7/100 m) and modifying outfalls, and management of water levels with overflow pipes and blocking of internal outfalls;
- Regular drain blocking (3/100) on dry cutaway along with the blocking of outfalls and management of water levels, along with organic fertiliser application;
- Targeted drain blocking to optimise hydrological conditions/rewet the residual peat in targeted marginal (degraded) raised bog remnants around the margins of the site and re-wetting, where possible, using an excavator to install peat blockages.
- Targeted fertiliser applications to accelerate vegetation establishment on areas of **bare peat** on headlands and high fields, and within certain areas of dry cutaway. Areas where vegetation has established do not need fertiliser application.
- Initial hydrological modelling indicates that part of the site will develop a mosaic of wetland habitats on residual deep peat, with the potential for some deeper water. Drain blocking (max 4/100 m), modifying outfalls and managing overflows will be implemented in this area. Hydrological management will look to optimise summer water levels to maximise the development of wetland vegetation (by looking to set water depths at < 0.5 m, where possible. It is inevitable that some small sections will naturally have deeper water due to the topography at this site). Water-levels will be adjusted at outfalls and by adjusting piped drainage.

Table 8-1 Enhanced Rehabilitation Measures and Rehab Areas

Type	Code	Enhanced Rehabilitation Measure	Extent (Ha)*
Deep Peat	DPT2	More intensive drain blocking (max 7/100 m) and modifying outfalls and managing overflows	77.46
Deep Peat	DPT3	More intensive drain blocking (max 7/100 m), field reprofiling, modifying outfalls and managing overflows	52
Wetland	WLT4	More intensive drain blocking (max 7/100 m), modifying outfalls and managing overflows, transplanting Reeds and other rhizomes.	68.02
Dry Cutaway	DCT2	Regular drain blocking (3/100 m), modifying outfalls and managing water levels with overflow pipes, targeted fertiliser treatment.	30.61
Marginal land	MLT1	No work required	9.65
Additional Work	AW2	Targeted Drain Blocking	21.13
Silt ponds	Silt pond	Silt ponds	0.33
Constraint	Constraint	Other Constraints (Turbarry)	64.80
Total			324

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

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

- Seek formal approval of the enhanced plan, noting the alternative standard plan should funding from the Scheme not materialise, from the EPA.
- Agree an *ex ante* budget of eligible costs (based on the approved enhanced plan) with the Scheme regulator.
- Develop a detailed site plan with engineering drawings outlining how the various rehabilitation methodologies will be applied to Derrymoylin bog. This will take account of peat depths, topography, drainage and hydrological modelling (see map for an indicative view of the application of different rehabilitation methodologies).
- A drainage management assessment of the proposed enhanced rehabilitation measures will be carried out and any issues identified resolved and the rehabilitation plan adapted.
- A review of archaeology and an archaeological impact appraisal of the proposed rehabilitation will be carried out. The results of this assessment will be incorporated into the rehabilitation plan to minimise known archaeological disturbance, where possible.
- A review of issues that may constrain rehabilitation such as turbarry and existing land agreements is to be carried out.
- A review of remaining milled peat stocks is to be carried out. There are peat stocks remaining on the bog.

- An ecological appraisal of the potential impacts of the planned rehabilitation on the presence of sensitive ground-nesting bird breeding species (e.g. breeding waders) is to be carried out. The scheduling of rehabilitation operations will be adapted, where required.
- Ensure all activities comply with the environmental protection requirements of the IPC Licence.
- Carry out Appropriate Assessment of the Rehabilitation Plan.
- Track implementation and enforcement of the relevant IPC Licence conditions, the mitigation measures (AA) and other environmental control measures during the implantation of the rehabilitation plan.

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

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

8.3 Long-term (>3 years)

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

8.4 Timeframe

- **2023-2024:** Short-term planning actions.
- **2024-2025:** Short-term practical actions.
- **2025-2026:** Long term practical actions. Evaluate success of short-term rehabilitation measures outlined above and remediate where necessary.
- **2025-2026:** Decommission silt-ponds, if necessary.

8.5 Budget and costing

Bord na Móna (BnM) appreciates the Minister's intention to support Bord na Móna in developing a package of measures, 'the Scheme', for enhanced decommissioning, rehabilitation and restoration of cutaway peatlands referred to as, the Peatlands Climate Action Scheme'. However, only the additional costs associated with the

additional and enhanced rehabilitation, i.e., measures which go beyond the existing standard mandatory decommissioning and rehabilitation requirements arising from Condition 10 will be eligible for support.

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

Bord na Móna maintains a provision on its balance sheet to pay for the future costs of **standard** rehabilitation and decommissioning when industrial peat extraction ceases. This is updated every year - for more information see the Bord na Móna Annual Report (Bord na Móna, 2023). Bord na Móna is fully committed to meeting its obligations relating to rehabilitation and decommissioning under the Integrated Pollution Control Licence.

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

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

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

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

Additional monitoring measures are also proposed to monitor ecosystem service benefits that have been derived by enhanced rehabilitation. These proposed monitoring measures will be funded by the proposed Climate Action Fund 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 environmental and ecological indicators such as vegetation cover, vegetation communities, presence of key species, *Sphagnum* cover, bare peat cover and water levels. It is proposed that sites can be monitored against this baseline in the future.
- The condition of the bog can be assessed using the condition assessment and suitable greenhouse gas (GHG) emission factors can be assigned to different habitats. GHG emission factors have been determined for various peatland habitats in Ireland (Wilson *et al.*, 2015) and are constantly being refined with more and more research. BnM is actively supporting research into GHG fluxes in different rehabilitated peatland habitats. This means that potential GHG emissions can be estimated from the site, as the site continues along its trajectory towards a naturally functioning peatland ecosystem.

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

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

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

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

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

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

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

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

Scope of rehabilitation

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

- The area of Derrymoylin bog.
- EPA IPC Licence - Ref. P0504 - 01. As part of Condition 10.2 of this license, a rehabilitation plan must be prepared for permanent rehabilitation of the boglands within the licensed area. Derrymoylin bog is part of the Mount Dillon Bog Group.
- The current condition of Derrymoylin bog. This site has a gravity drainage regime.
- The key objective of rehabilitation, as defined by this licence, is **environmental stabilisation** of the bog.
- To minimise potential impacts on neighbouring land. Boundary drains around Derrymoylin bog will be left unblocked as blocking boundary drains could affect adjacent land.
- Land-use.

Rehabilitation goals and outcomes

The key rehabilitation goal and outcome for Derrymoylin bog is environmental stabilisation of the site deep peat rewetting. This is defined as:

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

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

Criteria for successful rehabilitation:

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

Rehabilitation targets

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

Rehabilitation measures:

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

Timeframe:

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

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

Table AP-1. Rehabilitation measures and target areas.

Type	Code	Description	Area (Ha)
Deep peat	DPT1	Regular drain blocking (3/100 m) + modifying outfalls and managing water levels with overflow pipes	129.46
Dry cutaway	DCT1	Modifying outfalls and managing water levels with overflow pipes	30.61
Wetland	WLT1	Modifying outfalls and managing water levels with overflow pipes	68.02
Marginal Land	MLT1	No work required	30.77
Other	Silt Pond	Silt ponds	0.33
Other	Constraint	Constrained areas	64.80
Total			324

See Figure number *BNM-DR-25-01-RP-20: Standard Rehab Measures* included in the accompanying Mapbook which illustrates the standard rehab measures to be applied.

Monitoring, after-care, and maintenance

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

Validation and IPC Licence surrender

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

- The planned rehabilitation has been completed;

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

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APPENDIX II: BOG GROUP CONTEXT

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

Industrial peat extraction in the Mount Dillon Bog Group ceased in 2019. Peat stockpiles which were harvested within the Bog Group prior to 2019 continued to be delivered to Lough Ree Power Station until its closure in 2020. Intensive decommissioning and rehabilitation for the Mount Dillon Bog Group started in 2020/2021.

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

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

A breakdown of the component bog areas for the Mount Dillon Bog Group IPC License Ref. P0-504-01 is outlined in Table Ap-2.

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

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

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

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
Clooneeny	358	Cutover Bog Industrial peat production commenced at Clooneeny Bog in 1985 and ceased in 2020. Deep peat reserves remain on much of the former production area. Clooneeny is considered a deep peat cutover bog.	Clooneeny Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power Most of the former production area on site is bare peat. Some areas of cutaway on site are developing pioneer cutaway vegetation communities.	2020	Finalised 2022 Rehab started in 2022
Cloonmore	102	N/A	Never developed for industrial peat production; scattered plots.	N/A	N/A
Cloonshannagh	494	Cutover Bog Industrial peat production commenced at Cloonshannagh Bog in 1985 and ceased in 2020. Deep peat reserves remain across the former production area. Cloonshannagh is considered a deep peat cutover bog.	Cloonshannagh Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power Restoration work has been carried out on a 38ha section of high bog within Cloonshannagh Bog. Some of the former production area on site is developing pioneer cutaway vegetation communities, the remainder of the site is bare peat.	2020	Rehab plan to be updated in 2023. Rehab to commence in 2024.
Cloonshannagh Rail Link	28	Cloonshannagh rail link is a link between sites.	N/A	N/A	N/A
Corlea	163	Cutaway Bog Industrial peat production commenced at Corlea Bog in 1960 and ceased in 2018. Long-term peat extraction has reduced peat reserves on this bog. Corlea is considered a shallow peat cutaway bog.	The former production area at Corlea has already extensively colonised. Pioneer wetland and scrub development has occurred over much of the site. Some wetland and rehabilitation management was undertaken between 2016-2018. Part of site leased to local community development group to develop amenity walkway in association with Longford County Council.	2018	Rehab plan finalised 2023. Rehab commenced 2023.
Derraghan	289	Cutover Bog Industrial peat production commenced at Derraghan Bog in the 1940's and ceased in 2020. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derraghan is considered a shallow peat cutover bog.	Derraghan Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power Much of the former production area at Derraghan has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.	2020	Plan Finalised 2021 Rehab commenced 2022
Derryadd	653	Cutover Bog Industrial peat production commenced at Derryadd Bog in 1964 and ceased in 2019. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryadd is considered a shallow peat cutover bog.	Much of the former production area at Derryadd has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities Derryadd Bog will form part of the footprint of the proposed Derryadd Wind Farm Project (in pre-planning). An amenity walkway through part of Derryadd Bog is proposed for the Derryadd Wind Farm project	2019	Draft 2017
Derryadd2	328	Cutover Bog Industrial peat production commenced at Derryadd 2 Bog in 1960 and ceased in 2020. Long-	Much of the former production area at Derryadd 2 has been out of peat production for some time. These areas have already	2020	Rehab plan finalised 2023

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryadd 2 is considered a shallow peat cutover bog.	extensively colonised with pioneer wetland and scrub vegetation communities		
Derryarogue (excluding the current PCAS extent)	895	Cutover Bog Industrial peat production commenced at Derryarogue Bog in 1952 and ceased in 2019. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derryarogue is considered a shallow peat cutover bog.	Much of the former production area at Derryarogue has been out of production for some time. These areas have already extensively colonised with pioneer wetland, cutaway and scrub vegetation communities. Derryarogue Bog will form part of the footprint of the proposed Derryadd Wind Farm project (in pre-planning). An amenity walkway through part of Derryarogue is proposed for the Derryadd Wind Farm project	2019	Rehab plan finalised 2023
Derrycashel	388	Cutover Bog Industrial peat production commenced at Derrycashel Bog in 1951 and ceased in 2018. Long-term peat extraction has reduced peat reserves on this bog. Most of the former production area has shallow peat reserves. Some pockets of deep peat remain. Derrycashel is considered a shallow peat cutover bog.	Derrycashel Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power Much of the former production area at Derrycashel has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities. Some wetland and rehabilitation management was undertaken (c.60ha) between 2014-2015.	2018	Finalised 2021 Rehab started in 2021
Derrycolumb	454	Cutover Bog Industrial peat production commenced at Derrycolumb Bog in the 1980's and ceased in 2019. Most of the former production area still has deep peat reserves. Derrycolumb is considered a deep peat cutover bog.	Derrycolumb Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power Much of the former production area at Derrycolumb has been out of production for some time. These areas have already extensively colonised with pioneer wetland and scrub vegetation communities.	2018	Finalised 2021 Rehab started in 2021
Derrymoylin	356	Cutover Bog Industrial peat production commenced at Derrymoylin Bog in 1985 and ceased in 2020. Long-term peat extraction has reduced peat reserves on this bog. Derrymoylin is considered a shallow peat cutover bog.	Derrymoylin Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. Most of the former production area on site is bare peat.	2020	Rehab plan updated 2023
Derryshannoge	452	Cutover Bog Industrial peat production commenced at Derryshannoge Bog in 1985 and ceased in 2020. Deep peat reserves remain across most of the site. Derryshannoge is considered a deep peat cutover bog.	Derryshannoge Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. Much of the former production area at Derryshannoge has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Rehab plan finalised 2023
Edera	281	Cutover Bog Development for industrial peat production commenced at Edera Bog in 1990's. Active extraction from Edera began in 2003 and	Edera Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. The majority of Edera Bog former production area is bare peat.	2020	Finalised 2021 Rehab started in 2021

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
		ceased in 2018. Edera is considered a deep peat cutover bog.			
Erenagh	93	Cutover Bog Development for industrial peat production commenced at Erenagh Bog in 1970's. Erenagh is considered a deep peat cutover bog.	Erenagh Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. Much of the former production area at Erenagh has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities.	2020	Draft 2017
Granaghan	212	Cutover Bog Development for industrial peat production commenced at Granaghan Bog in 1980's. Long-term peat extraction has reduced peat reserves on this bog but deep peat reserves remain on site. Granaghan is considered a deep peat cutover bog.	Granaghan Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power. The majority of Granaghan Bog former production area is bare peat.	2020	Rehab plan finalised 2023
Killashee	110	Cutover Bog Development for industrial peat production commenced at Killashee Bog in 1985. Killashee is considered a deep peat cutover bog.	Killashee Bog formerly supplied a range of commercial functions including; horticultural peat and fuel peat for Lough Ree Power. The majority of Killashee Bog former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2020	Rehab plan finalised 2023
Knappoge	313	Cutaway Bog Peat Production at Knappoge bog commenced in 1963, and finished in 2018. Peat depths on the former production area are generally shallow. There are some pockets of deeper peat. Knappoge is considered a shallow peat cutaway bog.	Knappoge Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. The majority of Knappoge Bog former production area is bare peat. Some areas have colonised with pioneer cutaway and scrub vegetation communities.	2018	Finalised 2021 Rehab started in 2022
Lough Bannow	739	Cutaway Bog Peat Production at Lough Bannow bog commenced in 1964 and finished in 2019. Peat depths on the former production area are generally shallow. There are some pockets of deeper peat. Lough Bannow is considered a shallow peat cutaway bog.	Much of the former production area at Lough Bannow has been out of production for some time. These areas have already extensively colonised with pioneer cutaway and scrub vegetation communities. A small (35ha) conifer plantation was established in 1980's. Lough Bannow will form part of the footprint of proposed Derryadd Wind Farm Project (in pre-planning). An amenity walkway through part of Lough Bannow is proposed for the Derryadd Wind Farm project	2019	Draft 2017
Moher	483	Cutover Bog Peat Production at Moher bog commenced in the 1960'S, and finished in 2020. Peat depths on the former production area remain relatively deep. Moher is considered a deep peat cutover bog.	Moher Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. Much of the former production area at Moher has been out of production for some time. These areas have already extensively colonised	2020	Draft 2021

Bog Name	Area (ha)	Stage of development	Land-Use and History	Peat Production Cessation	Rehab Plan Status
			with pioneer cutaway and scrub vegetation communities.		
Mount Dillon	592	Cutaway Bog Peat Production at Mount Dillon bog commenced in the 1940'S, and finished in 2020. Peat depths on the former production largely shallow and the peat is considered cutaway. Some deep peat remains on the west of the site. Mount Dillon is considered a shallow peat cutaway bog.	Mount Dillon Bog formerly supplied a range of commercial functions including; fuel peat for Lough Ree Power. Much of the former production area at Mount Dillon has been out of production for some time. These areas have already extensively colonised with pioneer cutaway, wetland and scrub vegetation communities.	2020	Draft 2017

See Figure number *BNM-DR-25-01-RP-24: Mount Dillon Bog Group*, included in the accompanying Mapbook which illustrates the location of Derrymoylin bog and the Mount Dillon Bog Group in context to the surrounding area.

APPENDIX III: ECOLOGICAL SURVEY REPORT

Note: this report covers the whole of Derrymoylin including small, fragmented parcels of land within the IPC boundary that are not within the PCAS rehabilitation extent i.e. are treated as constraints. On this basis there may be references to receptors or habitats not within the current PCAS extent. See Section 3.3. for Biodiversity features of Interest within the PCAS extent.

Ecological Survey Report			
<i>Note: This report outlines an ecological survey of the bog. This report should not be taken as a management plan for the site as other land-uses may still be considered. Information within this report may inform the development of other land-uses and identify areas with particular biodiversity value.</i>			
Bog Name:	<u>Derrymoylin</u>	Area (ha):	388ha
Works Name:	Mount Dillon	County:	Roscommon
Recorder(s):	BnM Ecology Section	Survey/ monitoring Date(s):	20th September 2012
Habitats present (in order of dominance)			
The most common habitats present at this site include:			
<ul style="list-style-type: none"> • Bare peat (Codes refer BnM classification of pioneer habitats of production bog. See Appendix II). • Pioneer Soft Rush-dominated poor fen (pJeff) • Willow-dominated scrub (eWill) (in mosaic with pJeff) (in those areas that are flooded regularly) • Open water (OW) (permanent) and Temporary open water (TOW) • Birch-dominated scrub (eBir, oBir) (on drier higher ground that is not flooded) • Pioneer dry heath (dHeath) (mainly in mosaic with Birch scrub) • Dry pioneer Purple Moorgrass-dominated grassland (gMol) • Access routes (Acc) • Riparian zones (Rip) (with drains and associated habitats such as scrub and Birch woodland) • Silt ponds (Silt) with Gorse/Birch scrub and Purple Moorgrass-dominated grassland (gMol) 			
The most common habitats found around the margins of the site include:			
<ul style="list-style-type: none"> • Raised bog (PB1) (Codes refer to Heritage Council habitat classification, Fossitt 2000), See Appendix II.) • Cutover Bog (PB4) • Scrub (WS1) • Wet (callows-type) grassland (GS4) • Birch woodland (WN7) • Dense Bracken (HD1) • Improved grassland (GA1) around the boundary where the GIS boundary extends into adjacent fields. 			

Description of site

Description of site

Derrymoylin Bog is located approximately four kilometres to the north west of Tarmonbarry in County Roscommon. This bog is located within one main section. The Bog is relatively long and narrow and runs in a north south orientation. An unpaved access track crosses the site before running along the eastern boundary of the site. This site is the most northerly of the Mount Dillon group of bogs. There are no pumps in Derrymoylin Bog.

Derrymoylin Bog has only been in industrial peat production since 1985, some sections of the bog still retain a significant depth of peat (“red” or “sphagnum” peat also). Large sections of intact raised bog is still present on the site, the largest section of remnant raised bog lies immediately to the south of the access track and was screw levelled in 2012.

All of the peat harvested on the site is used as fuel peat in Lough Ree Power in Lanesborough, Co.Longford.

A rail lines to the south of the site connects the site with Cloonshannagh. This site is the most northerly of the Mount Dillon group of bogs.

The section of the site that lies to the north of the access track has been in production since 1985 and has been mainly mapped as bare peat. Small areas of pioneer poor fen vegetation (pJeff mainly) has emerged in places. Japanese Knotweed is present along the access track that runs along the eastern boundary of the site. The access track is used by BnM and private individuals and turf cutting is common in many locations on the site.

The boundary map shows that there are many small segments of raised bog in BnM ownership to the east of the site. These sections contain some areas of raised bog that are in relatively good condition, however BnM does not own the entire area of bog and domestic turf cutting is widespread along the margins of these sections.

The section of bog to the south of the access route was screw levelled in 2012 (immediately prior to the ecological survey). No vegetation remained in this section; however there was still a quaking feel to the area.

Smaller sections of raised bog are located along the margins of the site; however these areas are small, are drying out and are for the most part subject to domestic turf cutting.

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

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

None

Adjacent habitats and land-use

Adjacent habitats include wet grassland (GS4), improved agricultural grassland (GA1), raised bog (PB1), scrub (WS1), Birch woodland (WD7), conifer plantation along with inactive cutover bog (PB4).

Watercourses (major water features on/off site)

- The Slattaghmore Stream flows along the western edge of the site

- The Aghoo Stream flows out of the northern section of the site.
- All water courses on the site flow into Lough Bofin, which is a small lake on the River Shannon

Peat type and sub-soils

There are sections of “red” or “sphagnum” peat on the site. The site is underlain with gravel

Fauna biodiversity**Birds**

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

- Kestrel
- Grey Heron
- Raven
- Swallow
- Other more common species include Hooded Crow, Blackbird, Robin, Wood Pigeon, Meadow Pipit

Mammals

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

- Fox
- Badger
- Otter

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

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

APPENDIX V. BIOSECURITY

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

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

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

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

In addition to the above, best practice measures around the prevention and spread of Crayfish plague⁹ will be adhered with throughout all rehabilitation measures and activities.

⁹ <https://www.biodiversityireland.ie/projects/invasive-species/crayfish-plague/>

APPENDIX VI. POLICY AND REGULATORY FRAMEWORK

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

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

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

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

1 EPA IPC Licence

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

2 The Peatlands Climate Action Scheme (PCAS)

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

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

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

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

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

3 National and EU Climate and Biodiversity Policy

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

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

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

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

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

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

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

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

International research and scientific understanding of peatlands is now reflected in key Irish national policy and strategy documents such as the National Raised Bog Special Areas of Conservation (SACs) Management Plan 2017 - 2022 (Department of Arts, Heritage and the Gaeltacht 2017), The National Peatland Strategy (Department of Arts, Heritage and the Gaeltacht 2015), The National Biodiversity Action Plan (National Parks and Wildlife Service 2017), the Draft River Basin Management Plan for Ireland 2022-2027 (Department of Housing, Local Government and Heritage, 2022), and the Biodiversity – Climate Change Sectoral Action Plan (Department of Arts, Heritage and the Gaeltacht 2019). Each of the national plans, which are also complemented with the recently published EU Green Deal communication on Biodiversity Strategy for 2030 (COM 2020) have overlapping objectives and actions that focus on the restoration of peatlands damaged by turf-cutting, drainage and other impacts, as well as the re-wetting of Bord na Móna industrial peat extraction bogs.

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

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

4 National Peatlands Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

6 National Biodiversity Action Plan 2016-2021

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

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

A new National Biodiversity Action Plan is currently being developed.

7 National Conservation Designations

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

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

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

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

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

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

9 All-Ireland Pollinator Plan 2021-2025

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

10 Land-use Planning Policies

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

11 National Archaeology Code of Practice

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

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

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

12 Bord na Móna Biodiversity Action Plan 2016-2021

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

One example of a key CBD target is:

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

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

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

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

13 Bord na Móna Commitments

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

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

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

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

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

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

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

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

APPENDIX VII. DECOMMISSIONING

1. Condition 10 Decommissioning

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

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

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

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

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

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

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

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

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

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

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

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

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

7.3.3 The ultimate destination of the waste.

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

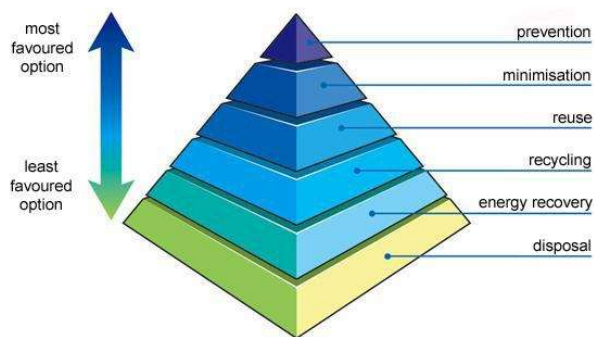
7.3.5 The tonnages and EWC Code for the waste materials listed in *Schedule 2(i) Hazardous Wastes for Disposal/Recovery* and *Schedule 2(ii) Other Wastes for Disposal/Recovery* sent off-site for disposal/recovery.

7.3.6 Details of any rejected consignments.

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

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

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



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

2. Enhanced Decommissioning.

The remaining infrastructure does not constitute a risk to the environment and would not be a requirement of condition 10 of the licence. The removal of these are deemed as enhanced measures. These may enhance the future 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	Derrymoylin Decommissioning Plan
1	Removal of Railway Lines	Removal of Railway Lines
2	Decommissioning Bridges and Underpasses	Where Applicable
3	Decommissioning Railway Level Crossing	Where Applicable
4	Restricting Access (bogs and silt ponds)	Restricting Access to Bog
5	Removal of High Voltage Power Lines	Where Applicable

APPENDIX VIII. GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX IX. EXTRACTIVE WASTE MANAGEMENT PLAN

(Minimisation, treatment, recovery and disposal)

Objective:

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

Scope:

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

1.0 Extractive Waste:

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

1.1 Silt Pond excavations and maintenance.

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

1.2 Power Station screenings:

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

1.3 Bog Timbers:

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

2.0 P0504-01 IPPC Licence Extractive Waste Conditions

2.1 Condition 7.5 Extractive Waste Management

The licensee shall draw up a Waste Management Plan (to be known as an Extractive Waste Management Plan) for the minimisation, treatment, recovery and disposal of extractive waste. This Plan shall meet the requirements of regulation 5 of the Waste Management (Management of Waste from the Extractive Industries) Regulations, 2009. The Plan shall be submitted for agreement by the Agency by the 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 Mount Dillon IPPC Licence Coordinators office.

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

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

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

Review.

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

APPENDIX X. MITIGATION MEASURES FOR THE APPLICATION OF FERTILISER

- Any fertiliser used will be Rock Phosphate and will not be applied in the following conditions:
 1. The land is waterlogged;
 2. The land is flooded, or it is likely to flood;
 3. The land is frozen, or covered with snow;
 4. Heavy rain is forecast within 48 hours (forecasts will be checked from Met Éireann).
 5. The ground slopes steeply and there is a risk of water pollution, when factors such as surface run-off pathways, the presence of land drains, the absence of hedgerows to mitigate surface flow, soil condition and ground cover are taken into account.
- Buffer zones in respect of waterbodies, as specified on <https://www.epa.ie/about/fag/name,57156,en.html>, will be adhered with at all times with regard to fertiliser application.
- No fertiliser will be spread within or in proximity to European Sites. Fertiliser will not be spread within 25m of a hydraulic break (where slope indicates runoff potential); 25m of an area subject to annual winter inundation, 25m of a natural watercourse, or 25m of any drains where conveyance is to be retained through the proposed rehabilitation extent.
- Fertiliser will be applied to headlands and bare fields where the surface slope indicates runoff is directed away from the above areas, and to within 2m of internal drainage channels within the cutover high field areas. These drainage channels will be blocked in advance of fertiliser application, restricting potential run-off to downstream drainage channels

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

APPENDIX XI. CONSULTATION SUMMARIES

Not applicable until consultation complete

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APPENDIX XII. ARCHAEOLOGY

Role of the Archaeological Liaison Officer

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



Code of Practice

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Code of Practice

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



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

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			

APPENDIX XIII. WATER QUALITY MONITORING RESULTS FOR DERRIMOYLIN BOG

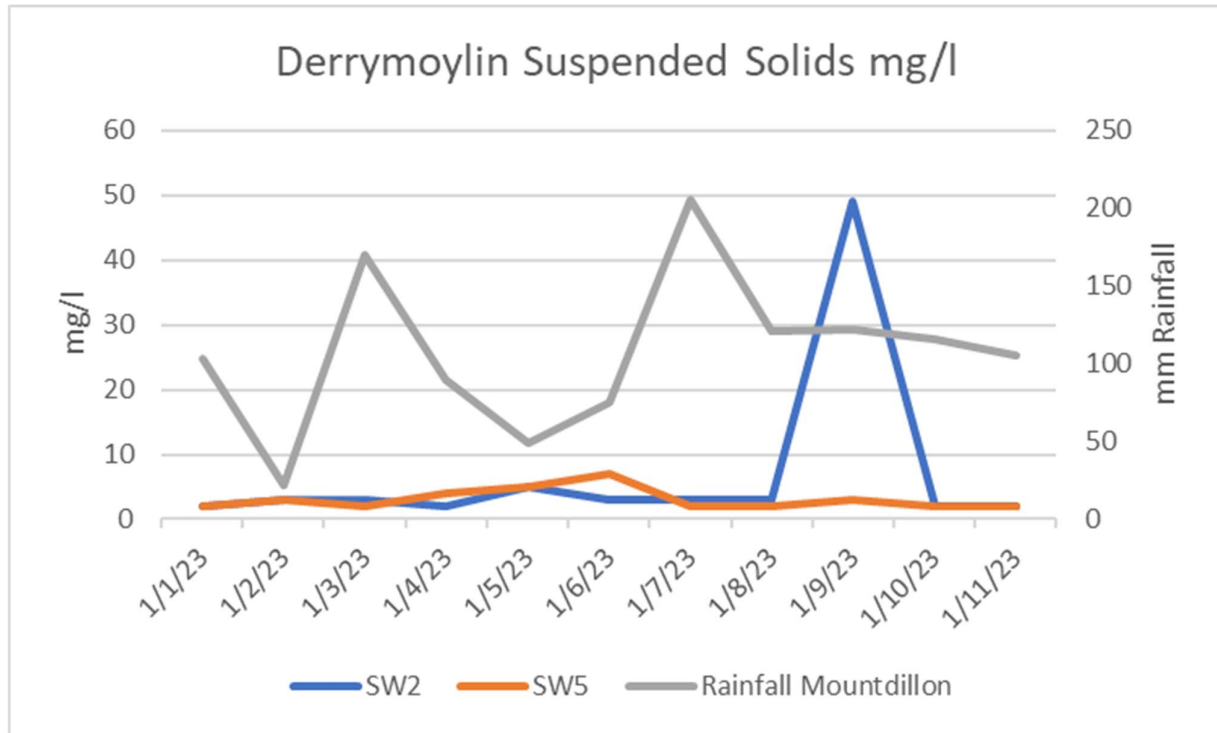


Plate 130-1 Derrymoylin suspended solids sampling results

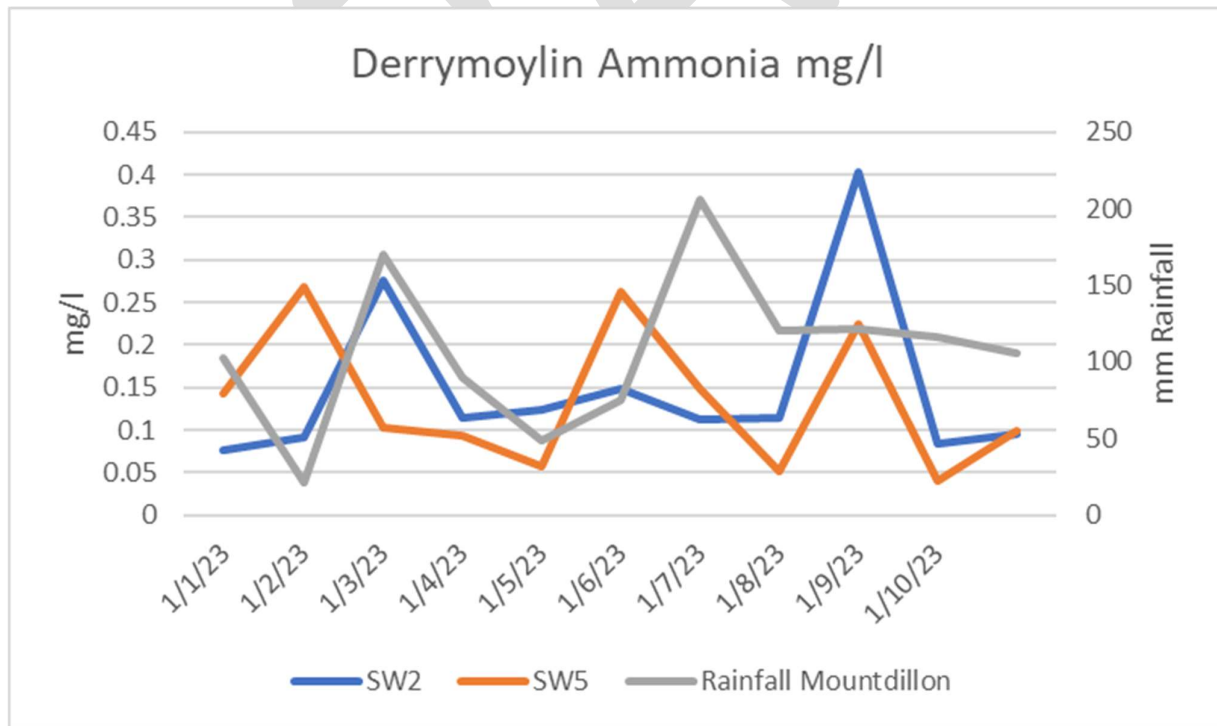


Plate 13-2 Derrymoylin Ammonia sampling results

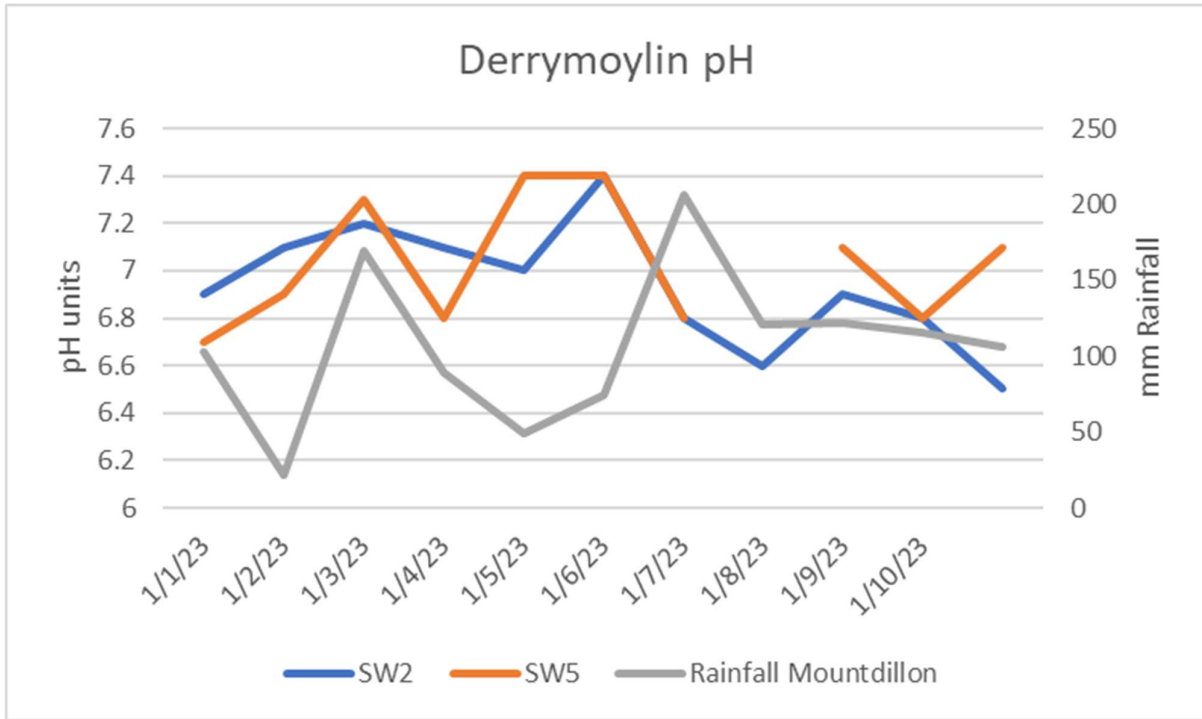


Plate 13-3 Derrymoylin PH sampling results

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PCAS SW Sampling Scheme				Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids	Suspended Solids
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	2	3	3	2	5	3	3	3	49	2	2
Mountdillon	P0504-01	Derrymoylin	SW5	2	3	2	4	5	7	2	2	3	2	2
PCAS SW Sampling Scheme				Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour	Colour
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co	mg/l Pt Co
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	308	295	305	444	492	320	566	652	888	566	584
Mountdillon	P0504-01	Derrymoylin	SW5	366	326	267	349	398	316	424	534	398	434	427
PCAS SW Sampling Scheme				COD	COD	COD	COD	COD	COD	COD	COD	COD	COD	COD
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	59	58	100	99	50	72	130	125	101	109	108
Mountdillon	P0504-01	Derrymoylin	SW5	69	67	91	84	43	63	117	102	81	84	79
PCAS SW Sampling Scheme				pH	pH	pH	pH	pH	pH	pH	pH	pH	pH	pH
Bog Group	Licence No	Bog Name	SW Code GIS	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units	pH Units
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	6.9	7.1	7.2	7.1	7	7.4	6.8	6.6	6.9	6.8	6.5
Mountdillon	P0504-01	Derrymoylin	SW5	6.7	6.9	7.3	6.8	7.4	7.4	6.8	6.8	7.1	6.8	7.1
PCAS SW Sampling Scheme				TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P	TP as P
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	0.05	0.07	0.07	0.09	0.08	0.09	0.09	0.07	0.28	0.09	0.05
Mountdillon	P0504-01	Derrymoylin	SW5	0.05	0.05	0.05	0.11	0.1	0.15	0.14	0.11	0.12	0.11	0.09
PCAS SW Sampling Scheme				TSS	TSS	TSS	TSS	TSS	TSS	TSS	TSS	TSS	TSS	TSS
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	117	188	572	232	199	291	207	141	347	150	203
Mountdillon	P0504-01	Derrymoylin	SW5	153	228	208	161	249	313	220	305	199	252	211
PCAS SW Sampling Scheme				Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N	Ammonia as N
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	0.077	0.092	0.275	0.115	0.124	0.148	0.112	0.115	0.404	0.083	0.096
Mountdillon	P0504-01	Derrymoylin	SW5	0.143	0.269	0.102	0.093	0.057	0.263	0.149	0.052	0.224	0.04	0.099
PCAS SW Sampling Scheme				DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC	DOC
Bog Group	Licence No	Bog Name	SW Code GIS	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				1/1/23	1/2/23	1/3/23	1/4/23	1/5/23	1/6/23	1/7/23	1/8/23	1/9/23	1/10/23	1/11/23
Mountdillon	P0504-01	Derrymoylin	SW2	23.4	22.5	24.9	31.2	31.9	27.8	37.9	44.9	34.2	42.4	43.8
Mountdillon	P0504-01	Derrymoylin	SW5	26.1	26.3	22.6	24	30	22.7	29.7	40.1	28.4	34.2	31.8

Table AP13.1. Water quality data from January 2023 to November 2023 at Derrymoylin Bog.



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