



# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

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**Doreen King - Project Manager**  
**Peatlands Climate Action Scheme**  
**Bord na Móna Energy Division**  
**Leabeg**  
**Tullamore**  
**Co. Offaly**  
**Doreen.King@bnm.ie**

**7th December 2020**

## **RE: Edera Bog (County Longford) Draft Rehabilitation Plan**

Dear Mrs King,

Thank you for allowing the Irish Peatland Conservation Council (IPCC) to make comments on this draft rehabilitation plan. IPCC previously had input into the decommissioning and rehabilitation of Edera Bog as a consultee on the previous draft plan (See our letter addressed to David Fallon of 23rd May 2019).

Initially, IPCC find this plan very general and lacking in data and information that could assist consultees in assessing the proposed actions within the plan. This is surprising as it is being billed as an enhanced rehabilitation plan. It is in this regard that IPCC would like to make a number of points that will strive to make a more robust plan that safeguards the future of Ireland's natural peatland landscape and its carbon sink and greenhouse gas emissions.

1. The published data on the methods to be used in the rehabilitation needs to be provided for evaluation. This would allow us and other consultees to compare methods in the context of Edera Bog.
2. Bord na Móna must guarantee resilience in terms of carbon and rewetting effectiveness. What enhanced steps are you taking to ensure Edera Bog once rehabilitated will withstand the impacts of climate change as described by the EPA published reports NEROS and VAPOR?
3. Edera is a varied site and could be an ideal one for full GHG monitoring which would include CH<sub>4</sub>, CO<sub>2</sub> and DOC on the different habitats within the site. Please also include what type of sites Bord na Móna will monitor these GHG's on so it is possible to understand the strategy more fully.
4. The carbon savings from the rehabilitation measures you propose on Edera need to be monitored and reported on. At this stage would you have some information on the baseline emissions from this site that you could provide.
5. Please provide information on what bird species you will target as indicative of peat-loving habitat and good sustainable wetland.
6. In addition to monitoring vegetation from aerial photos IPCC need to see piezometers on the ground for water level monitoring. This would provide precise data on the exact areas the water table is within 20cm and for what period of the year. From this data hydrographs can be provided as part of the monitoring. Please provide us with a map of the location of the network of piezometers you will be monitoring on this site.
7. IPCC need specific targets being set in terms of the types of vegetation communities developing on the cut-away that have a strong role to play in greenhouse gas sequestration. Bord na Móna also need to specifically track the development of these peat-forming vegetation communities and report on them to National Parks and Wildlife Service. Please advise us as to which of these communities you are targeting.

## **35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

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Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh

Directors/Stiúrthóirí: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail,

Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,

Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

8. Dissolved Organic Carbon emissions from the site also need to be determined and monitored. IPCC understand that a huge quantity of carbon is being lost from cutaway bogs in bog water. This needs to be quantified and accounted for. We can see no detail as to how DOC will be measured within this plan. Perhaps you will clarify this issue?
9. Please clarify where the donor site for *Sphagnum* inoculation of Edera will be. Fisherstown Bog (Co. Longford) is part of an SPA and this would not be suitable.
10. Within the IPCC Sites Database Edera Bog is described as containing birch woodland, heath, poor fen, reedbed, scrub, wetland, woodland and embryonic *Sphagnum* vegetation. What are the priority habitats that this rehabilitation plan will target?
11. Please clarify what actions will be taking place in each zone marked for rehabilitation in Figure 8.5 in the plan. Actions should be tabulated. The table should include information on the action methods, the expected results in terms of birds, vegetation, carbon storage and carbon sequestration and costed.
12. Are there any plans for a commercial use of this site? e.g. the Derryadd Windfarm is north of the rehab site, is there any plans to extend this into Edera Bog?
13. Could you please clarify if this rehabilitation plan needs planning permission? IPCC note that retrospective EIAR has not been applied for. Can this be explained?
14. The IPCC Sites Database has an area value of 467ha for Edera Bog which differs from the area of 283ha quoted in this rehabilitation plan. Is this an error? What has happened to the other 184ha of this site? Best practice would suggest a holistic approach should be taken to the rehabilitation including all areas owned by Bord na Móna.
15. Please include a best estimate on the amount of carbon presently stored within Edera Bog.

Thank you for reading through our concerns and we await your response.

Your Sincerely,

A handwritten signature in black ink that reads "Tristram Whyte". The signature is written in a cursive, slightly slanted style.

Tristram Whyte - Freshwater Biology B.Sc(hons) - IPCC - Conservation Policy & Fundraising Officer