



# IRISH PEATLAND CONSERVATION COUNCIL

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**Peatlands Policy Unit**  
**Department of Arts, Heritage, and the Gaelteacht**  
**7 Ely Place**  
**Dublin 2**

**16th April 2014**

## **Re: Submission on the National Peatlands Strategy**

A Chara,

The Irish Peatland Conservation Council (IPCC) refer to the public consultation on the *National Peatlands Strategy* as published by the National Parks & Wildlife Service on the 15th January 2014. Firstly we would like to welcome the publication of this document as it begins to address the long overdue need to achieve realistic peatland conservation goals. However in many cases we feel the document does not adequately address all of the relevant issues and wish to highlight a number of elements which we outline below. The investigations by the RPS eco-hydrologists and the data provided by National Parks & Wildlife Service have concluded that we are still seeing an overall decline in Active Raised Bog and High Bog areas within the national Raised Bog network in Ireland (Table 1 of the Raised Bog SAC Management Plan document). And this is only specific to raised bogs. Though they have not been given adequate review for this strategy we know that all but one peatland habitat type assessed under Article 17 reporting have an overall rating of BAD. We need to ensure conservation going forward and National Peatlands Strategy must be strengthened to deliver on this goal.

### **1. Focus on Turf Cutting**

Understandably much of the National Peatlands Strategy is geared towards reaching agreement in terms of turf-cutting. In fact the other two documents are aimed solely at tackling this issue. It is quite obvious that the main concern of the Peatlands Council was to deal with turf cutting on the raised bogs. Thus we note that raised bogs are the only area of the National Peatlands Strategy that have proper aims, actions and identifiable targets to be delivered. However the National Peatlands Strategy needs to recognise that this is not the only issue facing peatlands. Nor are raised bogs the only peatland habitat in the country. The Strategy needs to be more wide-ranging both in terms of the habitats it deals with and the issues that it is attempting to tackle.

On topics other than turf cutting the strategy is not hard-hitting enough or in any way aspirational. Serious issues such as Climate Change, Wind Farm Development, Forestry, Education and many more need to be given a more robust policy direction by a document intending to govern the entirety of Irish peatlands.

### **2. New Site Designation**

IPCC would stress that the publication of advertisements notifying the de-designation of NHAs prior to the end of the consultation period was greatly disappointing. We would fear that this has in fact undermined the entire 3 documents. Though there are concerns with sites being de-designated resulting in an overall loss of peatland habitat a further issue is that the process of designating new sites is set to be completed in 2017. The concern here is that directly before this there will be another General Election. This could lead to the next Government once again reviewing the NHA status ergo bringing us back to square one again.

### **3. Peatland Strategy Implementation Group**

A key recommendation of the National Peatlands Strategy is the creation of a 'Peatland Strategy Implementation Group'. The document fails to give enough information on this group. Relevant details such as who will make up the group and what weight they will carry to influence the various Government Departments regulating peatlands for various uses are missing. IPCC are concerned about the set up of this interdepartmental group to implement the National Peatlands Strategy. It needs to be clarified whether this group will have

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

sufficient power to ensure that the general policies of the strategy are implemented and its principles upheld. A further issue is that even if such a group is correctly set up the strategy is lacking good policy guidelines in the key areas of biodiversity, invasive species, climate change, water management and flood control, energy, agriculture and education to guide this group. Given the work that the IPCC have done throughout the duration of the Peatland Council and its various subgroups we respectfully ask that we be given consideration for a permanent position on the Peatland Strategy Implementation Group.

#### **4. Continuing issue with fen and transition mire habitats**

Despite continual reference by the IPCC throughout the process of the Peatlands Council and Strategy formation there is still an issue with the inclusion of fen and transition mire. There appears to be a refusal to properly tackle this issue despite the fact that these habitats face serious degradation if current practices are maintained. Throughout the Peatlands Strategy there is reference to the lack of work that has been carried out. No reference is made to the significant amount of work that has in fact been carried out to date: ie. Wetland Surveys for a number of counties, the National Fen Survey 2007 and the data presented in the IPCC in our most recently published action plan (ref Malone & O'Connell 2009. *Ireland's Peatland Conservation Action Plan 2020*). Even with the recognition of the lack of information on these habitats the National Peatlands Strategy has no actions on increasing our knowledge base.

Where fen habitat is referenced in the strategy it seems that very little thought has been put into the actions aside from the production of a management plan for one site, presumably Pollardstown Fen SAC. IPCC would highlight that this is certainly the site where it would be easiest to implement such a plan given its status and the amount of research that has already been carried out there. Transition mire on the other hand is not mentioned once in the entire Peatlands Strategy document. This is despite the fact that it is an Annex I habitat and a peat forming community which Ireland is committed to protecting under the EU Habitats Directive and the Ramsar Convention.

One of the greatest problems facing fens is the issue of dumping. The strategy does recognise this, pointing out that the Monaghan Fen Survey (2007) found that 20 of the 42 sites surveyed were affected by dumping and infilling. This is the only mention of the Monaghan Fen Survey. Also the proposed action (NPS A 32) for dealing with the issue is "The National Raised Bog SAC Management Plan will include provisions to combat unauthorised dumping on these sites". IPCC would question whether this is actually applicable given that these sites are not SACs and in the main will not even be designated sites. If the issue of dumping is to be efficiently tackled it must be stated that guidelines will be drawn up (though IPCC feel such guidelines should be included in the strategy itself) which will cover all peatland sites. There is an overall lack of management guidelines for a number of peatland habitats and notably very little on water pollution which is particularly damaging to groundwater dependant habitats. Such guidelines can then be brought in and implemented in Local Biodiversity Action Plans, County Development Plans, County Heritage Plans etc.

#### **5. Guidance of policy**

A number of key policies in the National Peatlands Strategy are not sufficiently detailed. The strategy puts much of the workload of devising how actions should be brought into policy onto other bodies for example the Interdepartmental Implementation Group and the EPA. Take for example issues such as wind farms and horticultural peat. Very little is recommended in terms of these within the Strategy. It is not good enough to state that these should be guided by current policy (e.g. the *Bord na Móna Strategic Plan*). Current policy is not doing an adequate job at protecting peatlands. This is evident from the continuing decline in peatland habitat that we are seeing in the country. Despite licensing and corporate biodiversity plans by large corporations there have been recent incidences of unregulated peatland destruction. This is further explored in the attached case study in Appendix 1.

Furthermore IPCC have significant concerns about the entire peat moss industry in Ireland. Currently Bord na Móna are the only company in the country licensed to extract peat under the Integrated Pollution Prevention Control licensing system implemented by the EPA, despite the fact that there are a large number of companies involved in this business. There needs to be much greater control of corporate entities that utilise peatlands. Those who are not licensed need to be brought under such measures while once a license is obtained there needs to be more thorough monitoring and enforcement of the conditions of the license which governs their works. A National Peatlands Strategy which claims to be holistic in its focus should aim to revolutionise our thinking on peatlands in order to ensure that they are conserved into the future.

As it stands this document will not be leading aspirational policy, instead once again passing the responsibility onto others to draw up necessary actions - as it stands a group that have no experience of the process by which the National Peatlands Strategy reached its current content. The IPCC have been operating in accordance with our own action plans (7 revisions) since 1987. In these there are a list of actions that we recommend to governing bodies when devising strategy. Our vision for the National Peatlands Strategy was that the document would lend weight to these actions and recommend that such be implemented as policy at a national and international level. Disappointingly in this regard the document regularly fails to do so.

#### **6. Political focus**

Many of the IPCC's issues with the three documents are a result of the fact that the entire process seems to have been driven by political interests as opposed to environmental concern. For example the further derogation on sites until 2017 and the de-designation of sites in politically sensitive areas. This is evident from the fact that the three documents deal mainly

with the issue of turf cutting. Again we must stress that this is not the only issue facing peatlands and that many others, mentioned above need to be tackled. If this does not occur the Peatlands Strategy itself will be of no use in achieving its aim - to conserve Irish Peatlands - beyond the immediate issue of turf cutting on raised bogs. There is also a fear that the provisional date of 2017 for the cessation on cutting on NHAs was politically motivated. We would ask for an official response on how this date was developed and what the reasoning behind same is?

### **7. Resourcing the Peatlands Strategy**

IPCC would highlight another very important political issue: ensuring that the National Parks & Wildlife Service and the Peatlands Policy Unit have adequate resources (in particular in terms of staffing) to ensure that the actions of the Strategy can actually be achieved and its principles adhered to. Current staff of the National Parks and Wildlife Service are to be admired for the work they are doing, particularly in relation to turf cutting, but if the Government are serious about resolving issues on peatlands this needs to be shown through the provision of increased funding to allow NPWS to adequately staff and resource the implementation of this strategy. To this effect the IPCC insist that the National Peatlands Strategy needs to give an indication of the level of resources required, both human and financial, to implement and deliver on its goals.

### **8. IPCC submissions to the development of the National Peatlands Strategy**

In 2011 IPCC made a substantial submission on the National Peatlands Strategy and the issues we felt were key at the beginning of the process. Subsequently we made detailed submissions on draft versions issued on the 9th February 2013, 8th May 2013, 15th October 2013 and the 13th November. As part of our review of the current draft Strategy we have assessed which of our recommendations have been taken on board and which still remain outstanding.

#### **Financing and Funding**

Previous IPCC submissions have highlighted the need to include a chapter in the strategy on financing and funding for its implementation. This has not been done. As part of our participation on the Peatlands Council we were informed that this issue was also highlighted by officials from the European Commission. Further comments on this are included in Section 7 above.

#### **Air Quality**

IPCC highlighted the release of particulate matter in burning peat as an issue. We are surprised to see that there is no action on this important environmental topic.

#### **Management of privately cut peatlands**

As highlighted previously the focus of the National Peatlands Strategy is largely inspired by the conservation and management of raised bogs. In IPCC's commentary on previous drafts we underlined the need for an holistic approach to the management of all raised bog resources whether it occurs inside or outside designated sites and whether it is privately or publicly owned. Therefore we are rather disappointed not to see a series of clear actions on this important issue which requires much greater clarity. For example there are no actions concerning the afteruse management of privately cut raised bogs. Similarly there is no action on how turf cutting in these areas is to be managed and controlled into the future and there is no indication of any intent to include any of these sites within local biodiversity areas. These actions have serious implications for climate change and biodiversity management.

#### **Conservation Designation Process**

IPCC highlighted the need for more formal designation of peatland sites to ensure protection. Though this is happening on a number of sites at that time we could not have foreseen it being at the expense of others. With the alterations in NHAs (de-designation and new designations) the IPCC sites database will still show a significant amount of conservation worthy peatlands that are afforded no protection. IPCC are pleased to see that a number of Bord na Móna biodiversity sites are being afforded designation. However we would like to see this applied to all of these sites to ensure their conservation into the future. Recent developments in terms of the opening of new sites (see case study in Appendix 1) highlight the need for this to be the case. We would also have major concerns about any site of peatland of conservation worth being used for the purpose of relocation. Bord na Móna are heavily involved in providing sites to be used in compensatory measures. IPCC feel that it would be entirely remiss if any of the sites to be used as relocation sites were sourced from the Bord na Móna network of Biodiversity areas which they have been promoting as part of their 'Contract with Nature'. We also lobbied for the encouragement of Local Authorities to explore the concept of designating locally important sites within development plans as is done in the UK and Northern Ireland. This has not occurred and as such there are very few guidelines for what Local Authorities need to do when creating new plans for their respective counties.

#### **BOGLAND project**

The original submission from the IPCC makes a number of references to the BOGLAND project and the need for the National Peatlands Strategy to address the issues presented in BOGLAND. The plan does make regular reference to the report and its role as a major guidance of the strategy but fails to include many of the harder hitting actions that were recommended in BOGLAND.

The Peatlands Strategy itself is a recommendation of BOGLAND but if it is not taking into account the issues identified by same and attempting to address these issues one wonders why the BOGLAND project was carried out at all. For example Action MLP3 of the BOGLAND project recommends that "Wind-farm development on mountain blanket bogs of

conservation value should be banned”. Such an action is conclusive and the conservation value of such easily recognisable. Introducing such a measure could have a direct positive impact on the future conservation of peatlands. Why has this not been included? The National Peatlands Strategy needs to promote the actions of BOGLAND and implement these across the policy making spectrum.

### Implementation

In addition to the proposed implementation body IPCC originally suggested that the work of the Peatlands Strategy be supported by a professional and formally recognised Peatland Research Group. We would urge you to follow up on this recommendation so that the ecological and hydrological information gained as part of the various peatland reviews is retained to be used for future guidance.

### 9. National Conservation Targets Incomplete

IPCC would like to raise a number of issues with the target or conservation objective for Raised Bog Habitat in the country. Firstly we would highlight again that it is very disappointing that such targets have not been developed for other peatland habitats and feel that this needs to be done for the peatlands strategy. IPCC would also question the setting of the target based on the area of active and degraded Raised Bog within designated sites in 1994. We are unsure what was so ideal about the situation in 1994 that this is deemed to be sufficient. A more aspirational plan would aim to conserve a far greater amount, based on what we should be aiming to achieve as opposed to what we think we can achieve.

Furthermore there is an issue with the way the network target is laid out in the plan (page 79/80/81). The numbers referred to in the text differ from those presented in the Table 1, page 80. Either the figures and/or the table are wrong and need correction or the strategy is using data not presented which would show a worrying lack of transparency. If the latter IPCC would be extremely concerned.

In addition to this there is only a conservation target for raised bog habitat. Again we would stress that the National Peatlands Strategy needs to be an all encompassing document and set targets and conservation goals for all peatland habitats. Not doing so serves only to pass on the responsibility of this to the next plan when such issues are likely to be more prevalent. The National Peatlands Strategy needs to take a preventative approach to tackling problems that are sure to arise with peatland habitats other than raised bogs in the near future.

*Extract of text from page 79 of National Peatlands strategy*

#### “ NATIONAL NETWORK TARGET

The target of achieving 3,600 ha of active raised bog in the national network is derived by summing the areas of active and degraded raised bog in the SAC and NHA networks at the time of designation in 1994. There is currently a total of 1,530 ha of active raised bog in the SAC and NHA networks, plus 1,605 of degraded raised bog which can be restored to active using the measures outlined in this plan. However, this still leaves a shortfall of 230 ha. Achieving this target will require restoration of a portion of the cut-over bog as well as restoration of degraded bog.”

*Table 1 from page 80 of the National Peatlands Strategy:*

**Table 1 Condition, Trends and Conservation Objectives (Targets) for Ireland’s National Raised Bog Network**

Bog Habitat	Resource	1994 (ha)	2012 (ha)	Change (ha)	Conservation Objective (Target) (ha)
Active Raised Bog (ARB)	<b>SAC network</b>	<b>1,940A</b>	<b>1,210</b>	<b>-730</b>	<b>2,590(A+C)</b>
	NHA network	490B	284	-206	
	Non Designated Sites	200	145	-55	
	<b>National Resource</b>	<b>2,630</b>	<b>1,639</b>	<b>-991</b>	
Degraded Raised Bog (DRB)	SAC network	650C	1,200	+550	
	NHA network	520D	410	-110	
	Non Designated Sites	625	520	-105	
	<b>National Resource</b>	<b>1,795</b>	<b>2,130</b>	<b>+335</b>	
High Bog	SAC network	10,740	10,515	-225	
	NHA network	7,790	7,480	-310	

## 10. Actions

Although we would urge for the actions in the National Peatlands Strategy to be more wide ranging there are a number of well thought out actions proposed. Achieving these would start Ireland on the right road to successful peatland conservation. However setting timelines for these is essential if they are to be achieved. The Strategy needs to set actionable aims, targets and timelines to allow for monitoring its effectiveness into the future.

We would raise the issue that for many of the actions the strategy devolves decision making on policy matters to the different stakeholder interests and fails to provide a holistic approach to the conservation of peatland sites and the wise use of peatland resources nationally. It is not enough for the strategy to refer to currently available documents as a guiding force behind peatland conservation and management. The Strategy itself needs to be the driver behind these aims and set realistic, attainable but aspirational goals to ensure the future of these habitats. When the Peatlands Council was set up developing a National Peatlands Strategy was one of the goals. Although at meetings many of these issues were repeatedly highlighted for inclusion IPCC are very disappointed to note that they do not appear in the final document.

### Notes on specific principles & actions

The first 5 principles of the National Peatlands Strategy are key to the entire document. These need to be more inclusive of the various uses and threats that peatlands face. IPCC are very disappointed not to see education listed as one of the many uses that peatlands in Ireland provide (General Principles, P1, pg 93). We recommend that the entire Principle reads as follows *“Ireland’s peatlands are currently, and can continue to be, used for many purposes including agriculture, development, education, peat extraction, forestry, conservation and amenity purposes, but they must be used wisely and in a sustainable manner.”*

There needs to be greater elaboration on a number of the principles. Chiefly in what way is it intended to implement Principle 2, *“The potential economic, environmental and social benefits and cost of peatland uses will be considered and applied to policy and land use decisions.”*

Under Principle 7 which deals with the issue of the continuation of the exercising of turbary rights the National Peatlands Strategy should state clearly that such activity will be regulated by permits and licences.

IPCC were very disappointed **not** to see any reference to the potential of peatland areas for carbon farming within the Agriculture section of the actions (pg 93-95). This is certain to grow in potential over the coming years as the country try to meet our climate change targets.

Also in the agriculture section IPCC would like to see a direct action in relation to horticultural peat extraction. Ideally we would recommend a commitment to promote that Ireland become peat free in public areas and an attempt by the current Governments to catch up with regulations introduced by other EU counterparts, in particular the UK and Northern Ireland.

Earlier in this document IPCC outlined our concern of the lack of focus on climate change throughout the National Peatlands Strategy document. The neglecting of this issue is further evident from the principles and actions listed under the heading ‘Peatlands and Climate Change’, that is Principles 23, 24, 25 and 26 and Actions 10 and 11. These do not seem to have been put together logically and for the actions in particular there is a need to detail how these actions will actually achieve anything in regards to counteracting climate change.

In the Bodies Responsible section within the summary pages IPCC feel that Principle 20 needs to include Bord na Móna as a responsible body and that Principle 22 should include ourselves, the Irish Peatland Conservation Council.

## 11. Education & Community Potential

IPCC stress that education is key for the future survival of peatlands. We are pushing for more support and greater guidance for actions relating to the promotion of peatland education. The draft strategy rightly refers to the document “Conserving Peatland in Northern Ireland - A Statement of Policy” within which are seven specific actions on peatland education. However instead of following suit and creating actions, the National Peatland Strategy again delays such work with the action on this topic (NPS 1 28) stating that after reviews, recommendations and consultations we may be able to define such a list. Much of the work has already been done. For example the draft strategy states that the recommendations of BOGLAND will be considered in this context. BOGLAND has already done much of this work and we would argue that the recommendations from same should be considered now and specific actions laid out in this Peatlands Strategy.

It is important that communities are included in any proposed work to be carried out in their area. Training needs to be provided on how to carry out restoration work which could provide the opportunity for job creation. At the same time the benefits of restoration such as water retention and ecotourism must be highlighted to gain vital community support. This needs to be included in the National Peatlands Strategy’s actions. The implementation of any strategy will not be possible without buy in from those living in the immediate vicinity of peatlands and working now to create an inclusive plan is certain to provide significant benefits in community relations in the future. The draft strategy claims that it is a document aimed at “peatland owners, users and the broader community” yet none of the actions promote community involvement in achieving sustainable peatland conservation nor do they involve communities in the lists of responsible bodies.

## 12. National Peatlands Strategy Formatting and Layout

Before the final document is published we would be grateful if the editors would ensure that our name is correct, ie. it is Irish Peatland Conservation Council and **not** Irish Peatlands Conservation Council. Also as the document refers to the Intergovernmental Panel on Climate Change which has the same acronym (IPCC) as ourselves we would prefer that when referring to either group the full names are used.

There are many photographs included in the plan but only one has a caption. This needs to be amended for all as captions are one of the most widely read portions of any publication. Cleverly constructed photo captions is a means of getting the key messages of the National Peatlands Strategy across to the readers.

We would also recommend a spell check we notice the spelling of Principle as Principal in Appendix VII.

Thank you for taking the time to read this submission.

Yours sincerely,



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Tadhg O Corcora MSc  
Conservation Officer, IPCC



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Dr. Catherine O'Connell  
Chief Executive, IPCC

# Appendix 1: Case Study: Clonroosk Little Bog (Ballysooghan Bog)

Prepared by Irish Peatland Conservation Council April 2014



**Figure 1: Google Earth Map showing the location of Clonroosk Little Bog, Cos Kildare and Offaly outlined in red - a site proposed for inclusion within the Natural Heritage Area Network in 2013/14.**

Clonroosk Little Bog (Ballysooghan Bog) was first identified by the IPCC as being of conservation value in 2005 when we undertook a habitat survey of the Bog of Allen. The site which straddles the Kildare-Offaly border (Grid Ref: N645 225) is a raised bog remnant of 69ha in extent, the majority of which is owned by Bord na Móna and located within the Ballydermot works in Co. Kildare, approximately 4km north west of Rathangan village and 2km upstream of the River Barrow and Nore cSAC (Figure 1). Directly adjacent to the intact site on its eastern boundary sod moss is actively being

produced. Further east is a large-scale milled peat production area. Part of the bog to the west and south is privately owned. Farmland occurs along the northern margin of the site. The site has never been part of the active peat production areas in these works despite Bord na Móna having a presence in the area for more than 50 years.

IPCC surveyed this peatland in 2005 and identified it as one of five raised bog remnants within the Bog of Allen that had a habitat and biodiversity value (Figure 3). Ref: Hurley, C. (2005) *Bog of Allen Habitat and Heritage Survey*, IPCC, Co. Kildare ISBN 1874189269.

Following the completion of the survey we met with Bord na Móna to highlight the importance of this and other sites in their ownership in the Bog of Allen.

As part of the Draft Rehabilitation Plan for the Ballydermot Bog Group, Bord na Móna identified this site as an area to be retained as remnant raised bog habitat (Ref: Draft Ballydermot Rehabilitation Plan prepared by Bord na Móna as part of condition 10 of the IPPC license, ref 502, revised January 2013).

In 2011 the Peatlands Council was set up with a view to developing a National Peatland Strategy. As part of this the Irish Government gave an undertaking to review the status of raised bog in Ireland. A contract was subsequently awarded to RPS Consultants. As part of this project in April 2013 RPS contacted IPCC for a list of raised bog sites to be considered for inclusion within the NHA review. Clonroosk Little was included in our submission.

A field survey of the site was undertaken in October 2013 as part of the Kildare Wetland Survey. This survey recorded *Sphagnum pulchrum* on the site (its only station in Co. Kildare). The site was found to contain 4ha of active raised bog and to be one of the most eastern examples of raised bog habitat remaining in Ireland. The site was still intact at that stage. Bord na Móna gave permission for the survey workers to enter the bog and they are aware of these findings.

In January 2014, RPS and NPWS published the draft Raised Bog SAC Management Plan and the Raised Bog NHA Review for public consultation. Clonroosk Little is one of the undesignated sites under review in these documents.

IPCC visited Clonroosk Little Bog on the 3rd April 2014 and we found that it had been completely drained for peat production (see Figures 2 and 4). 1m deep drains were inserted across the site at 9m intervals. The drains were actively removing water and peat sediment from the raised bog and appeared to flow towards the River Barrow and Nore cSAC. Extensive damage was done to the acrotelm surface of the bog. On every second 9m section, the living moss layer had been completely obliterated (Figure 3). The outfall drains extended directly into an area of bog woodland at the perimeter and again substantial damage to mature trees and the woodland structure had been done to insert the drains. We



**Figure 2: Air photograph looking south showing the extent of the drainage works undertaken on Clonroosk Little Bog, Cos Kildare and Offaly some time between October 2013 and March 2014.**



**Figure 3: Clonroosk Little Bog, Cos Kildare and Offaly. The surface of the bog in 2005 when the site was surveyed by the IPCC. Priority active raised bog habitat was present on the site. In 2013 the Kildare Wetland Survey verified that *Sphagnum pulchrum* was a component of the vegetation. This was its only known location in Kildare.**





**Figure 4: Clonroosk Little Bog, Cos Kildare and Offaly. An on the ground shot showing the destruction of the site arranged by Bord na Móna in the period between October 2013 and the IPCC site visit on the 3rd April 2014. The hydrology of the bog has been destroyed, the acrotelm obliterated over extensive areas and the soft peat surface has been compressed by the machinery used.**

could find no indication that standard water protection measures (such as silt pond installation) were adhered to / followed as would normally be required of Bord na Móna or other licensed peat development operators when undertaking such works. The peat stratigraphy of the site shows a richness of moss peat so the operation may be with a view to producing horticultural products. This was subsequently confirmed by Bord na Móna at a meeting with IPCC on the 9th April 2014.

This case study of Clonroosk Little Bog raises serious issues of public concern which need to be addressed in the NHA Review and in the Raised Bog SAC Management Plan:

- 1 It is very disappointing that a site earmarked for conservation by IPCC, Bord na Móna, Independent Consultants and NPWS has been developed. There has been no regard for the conservation value of the site despite it being in play as part of the Raised Bog NHA Review. As it stands a site which may be scheduled for designation as an NHA has been ditched and drained for the production of sod moss peat.
- 2 The development of the site contravenes the Draft Rehabilitation Plan for the Bord na Móna site which has been lodged with the EPA as part of the IPPC licensing process (Licence Ref. 502 of 2013). This fact has been acknowledged by Bord na Móna at a meeting with the IPCC on the 9th April 2014 and in correspondence of the 10th April 2014 in which they state that the damage was an error and was wholly due to internal system failure which is being corrected within the company.
3. A further related issue to Point 2 above is how the EPA oversee their IPPC licences. This case highlights a need for a system of regular site inspection by the EPA. IPCC are concerned that the development on Clonroosk Little may have gone unnoticed by the regulators but for the vigilance of a member of the public. In this case there may be potential for restoration (which Bord na Móna have committed to on the 9th April 2014), but how can we be sure that in the past there have not been other examples which did go unnoticed and that there will not be further cases in the future. A change of operational management is needed in Bord na Móna. IPCC acknowledge and welcome Bord na Móna's commitment (given to IPCC on the 9th and 10th April 2014) to reviewing operations internally but they need to be guided at a national level through the Peatland Policy Unit of the NPWS, the Peatland Strategy Implementation Group in addition to the EPA.

4 IPCC need assurances that Bord na Móna's Biodiversity Action Plan 2010 to 2015 is a real Corporate Social Responsibility that is adhered to by every worker in the company.

5 Although Clonroosk Little Bog is within the licenced IPPC land, it is a condition of licenses based on draft rehabilitation plans (i.e where peat production is still underway) that all drainage activities on previously undrained land be subject to planning permission and EIA. IPCC would see this development as being totally illegal on the grounds that an assessment for drainage projects of 10ha or more in extent on a peatland is required. This development which far exceeds 10ha and therefore required planning permission from Offaly County Council and Kildare County Council. Other peat development projects of this scale by companies or individuals who are not IPPC licensed are subject to planning permission and assessment.

6 This development contravenes six stated principles for Bord na Móna within the recently published draft National Peatland Strategy (NSP) (including : NPS P5, NSP P12, NSP P14, NSP P15, NSP P30 and NPS A21). NSP Principle 14 which states: " *the policy of Bord na Móna is not to open up any undrained bogs for peat production*" and NSP Principle 30 states "*Coillte and Bord na Móna as the managers of significant tracts of peatlands on behalf of the Irish people will continue to show leadership in responsible management, rehabilitation and restoration of peatlands*".

7 This development by Bord na Móna lends weight to the claims of turf cutters in Kildare that the responsibility for protecting raised bog habitat in the county rests entirely with private landowners while Bord na Móna have already developed large areas of raised bog in the county for financial gain with little responsibility for nature conservation. This action by Bord na Móna is extremely damaging in the eyes of the public and must be fully undone and compensated for in order to restore public confidence in them.

8 This site development by Bord na Móna is in direct contradiction to the code of practice set down by the International Peat Society in their publication: *Strategy for Responsible Peatland Management* (2010) and which has been adopted by the peat industry.

9 This site development for horticultural products highlights the need for better regulation of this business in Ireland. There are many different peat producers who harvest horticultural products operating within the country at present that should be controlled within the EPA licensing system. Most of the moss peat industries focus on raised bogs which is another pressure on this almost extinct habitat.

10 IPCC are very disappointed to see this development as a first result of our engagement in the Raised Bog NHA Review in Ireland as it realises our worst fears in relation to the indirect impacts of the Raised Bog NHA Review. Over 200 sites were submitted to the RPS and NPWS teams in good faith as possible candidates for NHA status. The outcome of the NHA review is that over 150 sites are deemed not to be of sufficient quality to be included in the NHA network. IPCC are deeply concerned this decision will give the green light for the development of these sites once their location is published. Is one of the impacts we can expect from the NHA review to be another "brown gold rush" of peat development across the country?

This case study demonstrates the need for strict guidelines and strong regulation on the wise management of peatlands outside of the designated site networks but which still retain a nature conservation value at local level. Such sites contribute to achieving targets in terms of biodiversity protection and greenhouse gas emissions. It is not good enough for the NPWS to concern themselves only with designated sites and to ignore the reality of the findings of the EPA funded BOGLAND report, that the sustainable management of all peatland resources in Ireland is fundamental to achieving a healthier environment in which people can live, conduct their business and protect their natural resources. Joined up thinking and action is required across all stakeholders going forward.