



Raised Bog Conservation Study

Communications Phase 1 Summary Report

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1 INTRODUCTION

This report outlines the consultation activities that took place in relation to Phase 1 of the Scientific Basis for Raised Bog Conservation in Ireland Study (the Raised Bog Conservation Study).

Phase 1 of the study covers the period March 2013 to November 2013. This phase coincides with technical tasks that culminate in the development of the Draft National Raised Bog SAC Management Plan and associated Strategic Environmental Assessment (SEA) Environmental Report. Other technical documents produced during this phase of the study include the SEA Screening Statement and Scoping Report and the Appropriate Assessment (AA) Screening Statement and Natura Impact Statement.

In terms of consultation activities, this phase is characterised by the following:

- Statutory consultation with statutory consultees in relation to the SEA Screening Statement and Scoping Report;
- Non-statutory consultation with the public and all interested parties in relation to the SEA Scoping Report.

1.1 PRINCIPLE AIMS OF CONSULTATION

The principle aims of Phase 1 consultation activities were to:

- Raise awareness of the study, its outputs and the mechanisms and opportunities for consultation and engagement;
- Provide early opportunities for stakeholders to comment and influence the process through statutory and non-statutory consultation activities;
- Identify and tie-in with the consultation and engagement framework (information dissemination mechanisms, stakeholder fora etc) already established in relation to peatlands issues;
- Brief NPWS divisional managers on the study and encourage their buy-in for NPWS facilitation of workshops with local groups;
- Feed into the identification of a sample of SAC Raised Bogs representative of the range of issues to be addressed by the National Raised Bog SAC Management Plan.
- Provide scientific support to NPWS for a series of workshops with Local Bog Committees with a view to eliciting their views and local knowledge.

2 COMMUNICATIONS ACTIVITIES

Communications activities associated with Phase 1 included the development of communications materials and the planning and execution of communications methods.

2.1 COMMUNICATIONS MATERIALS

The communications materials which were developed in relation to Phase 1 of the study are listed in Table 2.1. These materials facilitated the achievement of Phase 1 objectives and the planning and execution of communications events and activities.

Table 2.1 Phase 1 communications materials

Materials
Development, population and launch of study website
Development of study branding (study logos and banner images)
Set-up of study email address
Development and population of Stakeholder Register
Development and maintenance of Communications Register
Development and maintenance of Communications Risk Register
Development of key messages and FAQs
Development of study newsletter no. 1 (using key messages and FAQs)
Preparation of presentations for briefings/meetings/workshops etc
Development of supporting materials (letters, invitations, advertisements) for promotional purposes
Preparation of summary report (this report)

2.2 COMMUNICATIONS METHODS

Communications methods undertaken in relation to Phase 1 of the study included:

- Statutory consultation activities;
 - Notification of statutory authorities;
- Non-statutory consultation activities;
 - Preparation and dissemination of stakeholder pack;

- Notification emails;
- Web-based consultation;
- Coordination with existing information dissemination mechanisms;
- Briefings for relevant personnel, groups etc:
- Direct communications with stakeholders;
- Preparation of summary report (this document).

2.2.1 Statutory consultation activities

The statutory authorities listed in SI 435 of 2004 were given notice that a determination was being made in relation to whether SEA would be carried out on the Plan and were given four weeks to comment (20th June 2013 to 18th July 2013). The determination was then recorded in an SEA Screening Statement which was made available on the study website, the NPWS website and in hard copy at NPWS offices.

An SEA scoping report, outlining the intention to prepare an Environmental Report in relation to the Plan and the level of detail of the information to be included in the Environmental Report, was developed and issued to the statutory authorities listed in SI 435 of 2004. The statutory authorities were given four weeks to comment (1st September 2013 to 1st October 2013).

The statutory consultees for SEA are established within the legislation as being:

- Environmental Protection Agency;
- Department of the Environment, Community and Local Government;
- Department of Arts, Heritage and the Gaeltacht;
- Department of Communications, Energy and Natural Resources; and
- Department of Agriculture, Food and the Marine.

2.2.2 Non-statutory consultation activities

Members of the public and all interested parties were also offered the opportunity to comment on the SEA Scoping Report and the scope of the proposed National Raised Bog SAC Management Plan. Consultation with the public at this stage is not required by the legislation but is considered good practice and provides an opportunity for the views of the public and all interested parties to influence the development of the draft Plan.

2.2.2.1 Preparation and dissemination of stakeholders pack

A stakeholder pack was prepared and issued to stakeholders to raise awareness of the study and invite submissions in relation to the SEA Scoping Report and the scope of the National Raised Bog SAC Management Plan. The pack included:

- A letter inviting comments on the SEA Scoping Report and Plan with reference to the location of the SEA Scoping Report on the study and NPWS websites and at NPWS offices;
- Study newsletter no. 1.

Examples are included in Appendix A.

The pack was issued to the following stakeholders:

- The Peatlands Strategy consultees;
- Local bog committees associated with the SAC Bogs;
- Local authority directors of services (environment and planning) and heritage officers;
- Peat producers;
- Any other relevant stakeholders listed in the study's Stakeholder Register.

The consultation period was the same as for the statutory authorities i.e. from 1st September 2013 to 1st October 2013. The circulation of the packs, and all related correspondence, was recorded in the Communications Register.

2.2.2.2 Notification emails

Notification emails were sent to a number of individuals/groups to inform them that the non-statutory public consultation period was taking place and, in some instances, to identify possible additional promotional opportunities. Recipients included:

- Study team members;
- Study Steering Group members;
- Peatlands Council members;
- NPWS divisional and regional managers;
- Scientific Advisory Group members.

2.2.2.3 Web-based consultation

An invitation to comment on the SEA Scoping Report and the scope of the plan was added to the study and NPWS websites. The SEA Scoping Report was uploaded to the websites, as well as the SEA Screening Statement and AA Screening Statement. A facility was set up on the study website to allow users to comment directly through the website.

2.2.2.4 Coordination with existing information dissemination mechanisms

The key stakeholders identified in Table 2.2 were asked to include information in relation to the study and the period of non-statutory public consultation on their websites, facebook accounts, twitter accounts, publications, etc. The stakeholders were issued with pre-prepared content, including a short article for websites and publications, and announcement text for Facebook and Twitter accounts (Appendix A). Customised content was also offered but none of the stakeholders availed of it.

Table 2.2 Existing information dissemination mechanisms

Organisation	Details	Level
National Parks and Wildlife Service	www.npws.ie	National
Peatlands Council	www.peatlandscouncil.ie Peatlands Council newsletter	National
Irish Peatland Conservation Council	www.ipcc.ie Facebook page YouTube channel Peatland News newsletter Action for Bogs online newsletter	National to local
Irish Environmental Network 30,000 members within member organisations	www.iem.ie IEN weekly newsletter Facebook Twitter Distributed information to all member organisations	National to local
Irish Rural Link	www.irishrurallink.ie	National to local
Bord na Móna	www.bordnamona.ie	National
An Taisce	www.antisce.org www.facebook.com/antisce www.twitter.com/antisce	National to local

Organisation	Details	Level
	An Taisce e-zine	
Birdwatch Ireland	www.birdwatchireland.ie	National
Teagasc	www.teagasc.ie	National
Coillte	www.coillte.ie Facebook Twitter News feed	National
Friends of the Irish Environment	www.friendsoftheirishenvironment.net	National to local
Irish Wildlife Trust	www.iwt.ie	National to local
CELT (Centre for Environmental Living and Training)	www.celtnet.org	National
International Peat Society	www.peatsociety.org www.facebook.com/peatsociety	International

2.2.3 Briefings and workshops

Table 2.3 lists the briefings, meetings and workshops which took place during Phase 1 of the study. RPS provided updates of study activities at these events. The Steering Group in particular influenced the activities and outcomes of the study. The briefings were recorded in the Communications Register.

Table 2.3 Briefings and workshops

Group	Date
Minister for Arts, Heritage and the Gaeltacht	
Briefing	16 May 2013
European Commission	
Briefing	2 July 2013
Study Steering Group (Department of Arts, Heritage and the Gaeltacht, Bord na Móna, Irish Farmers Association, An Taisce, Irish Peatlands Conservation Council, Trinity College Dublin, University College Dublin)	
Workshop 1	3-4 April 2013
Workshop 2	26 April 2013

Group	Date
Workshop 2	4 June 2013
Workshop 3	26 June 2013
Workshop 5	23 August 2013
Workshop 6	9 October 2013
Workshop 7	20 November 2013
Peatlands Council (Department of Arts, Heritage and the Gaeltacht, Bord na Móna, Irish Farmers Association, An Taisce, Irish Peatlands Conservation Council, Coillte, Irish Rural Link)	
Briefing 1	8 May 2013
Briefing 2	9 July 2013
Briefing 3	18 October 2013
Briefing 4	11-12 November 2013
NPWS divisional managers	
Briefing	4 June 2013
Irish Environmental Network	
Briefing	22 July 2013

2.2.4 Direct communications

Incoming and outgoing communications by email, letter, or via the website were recorded in the Communications Register and the correspondence, and any attachments, were kept on file.

3 SUBMISSIONS AND RESPONSES

Table 3.1 summarises the numbers of submissions received in response to the invitation to comment.

Section 3.1 summarises the main issues raised by consultees, the submissions themselves are included in Appendix B. In relation to the group submission detailed below, one copy of each of the generic letters is included as an example within the appendix.

Table 3.1 Summary of number of responses and submissions

Type	Number	Stakeholder category	Notes
Group submissions	1 (210)	Concerned residents & Kildare Turf Cutters Association Members	Cover letter with 210 individual letters including 4 original letters and 206 signed copies of 3 generic letters Recorded in Communications Register
Individual letters	19	11 members of the public (all turf cutters or bog owners) 1 Local Authority 1 business owner 1 state agency 3 NGOs 1 bog committee 1 government department	Recorded in Communications Register
Emails	8	2 Local Authorities 1 member of the public (turf cutter) 1 association of turf cutters 2 NGOs 1 government department	Recorded in Communications Register
Phonecalls	2	2 members of the public (turf cutters)	A phone number was not provided for the consultation but nevertheless a couple of phonecalls were received. These individuals were encouraged to provide their comments in writing. Recorded in Communications Register
Total	28 (237)		Not including phonecalls

3.1 SUMMARY OF MAIN ISSUES RAISED

The promise to consider submissions on the Peatlands Strategy was acknowledged by many stakeholders.

Many consultees expressed their satisfaction that work is being done, and that progress is taking place, in relation to peatlands issues.

3.1.1 Members of the public

The majority of the submissions received from members of the public were from turf-cutters and bog owners.

The majority of turf cutters expressed their wish to continue cutting turf and emphasized that their families have cut turf for generations. Some raised concerns in relation to how they would heat their homes without continuing to cut turf, particularly as the price of other sources of fuel continues to rise. Many stated their intention to continue to cut turf.

The majority of the consultees stated categorically that they are not in favour of the re-wetting of bogs as they fear flooding of their homes and/or lands. Some mentioned the risk of bog bursts.

Some expressed the opinion that Ireland's people are more important than its bogs and that the needs of bogs are being put before the needs and wants of Ireland's people.

The natural heritage, recreational and agricultural value of cutaway peat areas was highlighted by a small number of consultees within this category. One consultee suggested that tours be offered on bogs by local people and the money raised should be passed to the bog owners.

Many reported that their bogs have been drained and maintained by the OPW and/or Local Authorities in the past, including access roads, for the purposes of cutting turf. Turf cutters have received financial grants in the past to cut and deepen drains. In some instances, turf cutters have made financial contributions to the cost of drainage and maintenance schemes. They now question why such bogs are the subject of conservation efforts.

One consultee expressed the opinion that bogs are not a type of habitat, they are more like an abandoned compost heap, and that none of Ireland's raised bogs are active. This consultee suggested that it is not necessary to conserve 53 raised bogs, which was perceived by this individual as a very large number in this context, and that perhaps five to six nationally would adequately represent bogs in Ireland. This consultee stated the belief that it is impossible to reduce the level of water in a bog with drainage etc due to the cohesion principle of water.

3.1.1.1 Bog-specific comments

Nure Bog.

It was pointed out that considerable drainage has taken place for decades at this bog, with the involvement of OPW and Westmeath County Council as well as local stakeholders. The consultees believe that, as a result of these works, the bog is now not suitable for conservation. One consultee recommended that a guidance document be issued to each bog plot owner to ensure that minimum damage is inflicted on the bog as a result of harvesting turf for their own use. Adherence to the guidance could be a condition of payment in relation to the Area Aid grant.

Mouds Bog

Many people in the area are members of the Kildare Turf Cutters Association, a constituent part of the Turf Cutters and Contractors Association. Strong objections were expressed to the re-wetting of the bog due to the fear of resultant flooding and the risk it poses to farmland, turf banks, cutaway areas, properties and septic tanks located in the natural floodplain. Some expressed their intention to hold the government liable for any damage to their property that may arise if re-wetting were to take place. Many consultees stated that the government has no right to interfere with, or cause impact upon, their private property or rights. Many raised objections to the terms of the legal contract that has been circulated to some local turf bank holders in the area and emphasized that they have not themselves signed any legal agreement with authorities in relation to their property. Some objected to what they describe as an ongoing campaign of harassment, bullying and intimidation to coerce turf bank and turbarry right owners into signing a legal agreement. The belief amongst some consultees is that the government will allow some turf cutting to continue on SAC bogs and that Mouds bog will be one such bog. The situation between the government and the locals in relation to this bog was described as being at an impasse that only the continuation of turf cutting could overcome. It was stated that a national agreement charting the way forward is needed before a national plan can be developed. It was stated that only a national agreement will secure the cooperation of the local people. It was further stated that, in the absence of a national agreement, any attempt to enter onto, or impact upon, private property in the area will be regarded as an act of trespass and will receive an appropriate response. Many requested that representatives of the study or the Minister stay away from Mouds Bog until an acceptable solution for all turf bank owners and holders impacted by the SAC designations is in place.

Moanveanlagh Bog

Strong objections were expressed in relation to the re-wetting of the bog due to the fear of resultant flooding and bog bursts. In relation to bog bursts in particular, it was pointed out that the natural screen of forest and scrub around the edges of the bog is no longer there to protect the surrounding area against such events.

Cloghan Demesne Raised Bog

It was stated that there is no commercial activity on the bog, just cutting for personal use. People in the area are not aware of any potential suitable relocation sites within a reasonable distance. Concerns were expressed as to whether surrounding farmland would be flooded by the blocking of drains on the bog. The ring road around the bog is of high amenity value to people in the area and concern was expressed that the amenity value could be lessened were turf cutting to cease on the bog as the ring road would deteriorate. Members of the local bog committee are willing and anxious to meet with the study team to discuss their concerns and develop workable solutions.

3.1.2 Local Authorities

A number of omissions in the legislation, plans, policies and programmes section of the SEA Scoping Report were highlighted.

It was stated that the conservation of SAC raised bogs must be given priority and should be respected by all members of the community – regulators, national agencies, international developers and farmers.

It was stated that in order to conserve the bogs, appropriate changes must be made to national policies and the way they are interpreted, including policies for the development of wind farms, forestry, mineral exploitation and agricultural intensification.

It was highlighted that development outside the designated areas can have detrimental effects due to the lowering of the water table. It was suggested that the extension of the designated area to include a buffer zone around the bogs be considered. Certain activities should be excluded from the buffer zone and any development allowed would be subject to the requirement to design a drainage system that would have no impact on the level of the water table at the periphery of the bog.

3.1.3 Non-Governmental Organisations

Some omissions in the legislation, plans, policies and programmes section of the SEA Scoping Report were highlighted. Some newly published management and action plans were brought to the attention of the study team, for example, a species action plan for Red Grouse in Ireland.

It was suggested that issues such as forestry, the threat of invasive species, agriculture, climate change, illegal dumping, hunting, shooting, tourism, adjacent land reclamation, fire prevention, moss transfer and pollution be considered in the National Raised Bog SAC Management Plan. In short, the plan should seek to address all influences on raised bog biodiversity.

Concern was raised that there is currently insufficient action to protect and restore raised bog and the provision of necessary protective measures is now urgent. Stricter enforcement and regulation is needed to ensure that illegal turf cutting and drainage activities cease immediately.

It was suggested that it may be time to consider purchasing sites as some bogs are proving so problematic that purchase may be the only viable solution. This would perhaps need to be done by compulsory means.

The importance of raised bogs as breeding habitat and wintering habitat for many protected bird species was raised and it was stated that marked population declines and loss of habitat requirements for birds have been highlighted in ECJ rulings against Ireland.

The importance of raised bogs for butterfly and moth species was also highlighted, some of the species are restricted to bogs and some species that utilise bogs are endangered.

The importance of Natural Heritage Area (NHA) raised bog should be highlighted in the plan. Care should be taken not to raise false hopes with respect to future cutting at these protected sites. These bogs were designated pursuant to a settlement agreement in respect of an EU infringement action brought by the European Commission. It was suggested that the government will need to be very careful that it does not unpick the terms of this settlement in seeking to facilitate cutting on NHAs.

Concern was expressed that meeting the needs of turf cutters may emerge as the key driver in developing the plan rather than the conservation of the raised bog sites. It was categorically stated that the needs of turf cutters are not compatible with conservation requirements and that nature conservation is an ecological necessity to ensure the continued existence of raised bogs and other peatland types in Ireland.

It was stated that not enough reference is being given to habitat removal being the main cause of reduction in bog vegetation.

The exact meaning of a 'difficult bog' should be defined and should incorporate factors such as difficulty with ceasing turf cutting, hydrological issues and prohibitive cost issues.

A potential risk was highlighted whereby those engaging in activities that damage the bog to the point that it is considered non-restorable could essentially be rewarded if the activity is allowed to continue on that site. It was suggested that this would be a worrying precedent.

Where restoration of raised bog is not possible, an assessment of the appropriate use of degraded peatlands should be carried out it was suggested.

It was stated that bog margins are frequently extremely rich in biodiversity and that some rare species breed on these areas, for example, the endangered Marsh Fritillary butterfly, and therefore bog margins should be protected and must continue to be part of SAC and NHA designated areas.

Potential risks associated with failure to protect the bogs were highlighted included loss of income from tourism, increased flooding, increased water pollution, loss of biodiversity and loss of cultural identity.

Awareness should be raised amongst the general public in relation to the local and national value of raised bogs other than for turf, for example, flood management, water quality etc.

Walkways and signage should be installed to promote tourism and interest in bogs. Interpretive facilities could be located in public libraries, council offices and NPWS offices.

Clear and comprehensive mapping is recommended for future outputs.

Relocation of turf cutting to non-designated sites will, over time, have a negative effect on those bogs and will cause further wider countryside damage. The possibility for negative carbon impacts associated with potential relocation to NHA bogs or other bogs should be assessed.

Management Agreements should be put in place between the government and turf cutters through agri-environmental schemes in an effort to cease turf cutting and preserve these sites.

Drain-blocking, sphagnum-growing and tree and scrub removal were suggested as potential measures to restore designated sites.

Management of these sites into the future requires comprehensive consultation and engagement with a wide range of stakeholders including environmental NGOs and local communities.

It was suggested that protected sites be monitored with the use of cameras and aerial photography to ensure compliance with legislation.

It was stated that, in the interests of fairness, those whose turbary rights are affected should be compensated. This could include providing employment for affected persons as guides to showcase bogs, or as contractors to block drains or clear trees and scrub. Trees removed could be provided as an alternative source of fuel to those affected by the cessation of turf cutting.

3.1.4 Government Departments and State Agencies

Some omissions in the legislation, plans, policies and programmes section of the SEA Scoping Report were highlighted.

It was stated that, of necessity, the first requirement for the management of SAC raised bog sites is the cessation of turf cutting.

It was highlighted that the proposal to relocate turf cutters to other bogs has implications for the receiving bogs which are important habitats in their own right and also wetlands. It was queried whether the process will look at impacts on other wetland sites, and downstream impacts, as a result of relocation.

Consideration should be given to the possible merits of preparing management plans at the scale of multiple connected bog complexes, where relevant, and to the development of catchment-based management plans at the River Basin District level.

The assessment of cumulative effects on bogs of multiple uses and measures should be carefully considered. The assessment of effects should be quantitative where possible.

Convening workshops with relevant stakeholders and statutory authorities should be considered, a workshop for the consideration of alternatives was specifically mentioned. Consultation with relevant stakeholders is of utmost importance.

Some very specific comments on the SEA environmental objectives were provided in some of the submissions in Appendix B and are not copied here.

It was proposed that development control be covered in the proposed site-specific raised bog management plans including an assessment of cumulative impact of one-off housing development, arterial drainage, farming practices (slurry spreading) and development of cut-over. An initial assessment of the likely importance of various types of land management/development should be part of the scope of the National Raised Bog SAC Management Plan.

The accuracy and robustness of the figures for the area of SAC bogs lost since designation is extremely important.

3.2 INFLUENCE OF CONSULTATION ACTIVITIES

The following recommendations and points to note are made:

- A measure should be included in the Plan in relation to awareness-raising and education. Attempts should be made to raise awareness of the negative implications on bogs associated with illegal dumping, the setting of fires and the introduction of invasive species. Awareness should also be raised of the positive benefits of bog conservation, for example, for flood control, tourism, recreation etc. The Plan itself could be an effective awareness-raising and education tool.
- Commitments to undertake further assessment, for example, in relation to the cumulative impact of one-off housing development, arterial drainage, farming practices and development of cut-over, in future management plan cycles should be included in the first Plan.
- Management of these sites into the future will require ongoing and comprehensive consultation and engagement with a wide range of stakeholders including environmental NGOs and local communities.
- Particular attention should be paid to the concerns of people living in and around bogs in relation to potential hazardous consequences of conservation measures including:
 - potential flooding;
 - the potential for bog bursts.

- Attention must also be paid to the concerns of people living in and around bogs in relation to potential loss of amenity and loss of cultural heritage and identity associated with the introduction of conservation measures.
- All submissions should be taken into consideration by all members of the plan-making team.