



National Raised Bog SAC Management Plan 2017 - 2022

SEA Statement

MDEI13IRp0004



TABLE OF CONTENTS

1	INTRODUCTION.....	1
2	SUMMARY OF KEY FACTS	2
3	SUMMARY OF SEA PROCESS	3
3.1	SCREENING	3
3.2	SCOPING AND STATUTORY CONSULTATION	3
3.3	ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT.....	4
3.4	STATUTORY CONSULTATION ON DRAFT NATIONAL RAISED BOG SAC MANAGEMENT PLAN	4
3.5	APPROPRIATE ASSESSMENT AND NATURA IMPACT STATEMENT	5
3.6	SEA STATEMENT	6
3.7	ADOPTION OF NATIONAL RAISED BOG SAC MANAGEMENT PLAN.....	6
4	INFLUENCE OF SEA ON NATIONAL RAISED BOG SAC MANAGEMENT PLAN	7
4.1	SUMMARY OF SEA ASSESSMENT	7
4.2	OVERALL SUMMARY ASSESSMENT	8
4.3	INTEGRATION OF SEA PROCESS.....	10
4.4	RECOMMENDED MITIGATION MEASURES.....	11
4.5	HOW CONSULTATION FEEDBACK HAS INFLUENCED THE FINAL PLAN	16
4.5.1	Key Issues Raised	17
4.5.2	SAC Boundaries	18
4.5.3	Clarifications in the Plan.....	18
4.5.4	Conservation Goals.....	18
4.5.5	Resourcing	19
4.5.6	Responsibilities.....	19
4.5.7	Need for Additional Supports.....	20
4.5.8	Air Quality.....	20
4.5.9	Continued Turf-cutting.....	20
4.5.10	Licensing, Permitting and Consent.....	21
4.5.11	Compensation	21
4.5.12	Small Scale, Localised Turf-cutting.....	21
4.5.13	Role for Turf-cutting in Conservation of Raised Bogs	22
4.5.14	Cultural Tradition of Turf-cutting.....	22
4.5.15	Uses for Cutover Bog	23
4.5.16	Community Gain	23

4.5.17	Farming	24
4.5.18	Fear of Flooding	24
4.5.19	Role of Peatlands in Flood Attenuation	25
4.5.20	Link to Other EU Directives	25
4.5.21	Impacts on Other Habitats and Species	26
4.5.22	Value of Ecosystem Services	26
4.5.23	Climate Change and Carbon Storage	26
4.5.24	Tourism and Recreation	27
4.5.25	Carbon Credits.....	27
4.5.26	Other Inter-related Issues.....	28
5	PREFERRED SCENARIO AND REASONS FOR CHOOSING THE FINAL PLAN.....	29
5.1	ALTERNATIVES CONSIDERED	29
6	MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF IMPLEMENTING THE PLAN.....	32
6.1	RESPONSIBILITY FOR MONITORING	32
6.2	SOURCES OF INFORMATION FOR MONITORING	32
7	SCREENING OF CHANGES TO THE FINAL CONSERVATION PROGRAMME.....	36
8	CONCLUSIONS AND NEXT STEPS	39

1 INTRODUCTION

This Strategic Environmental Assessment (SEA) Statement has been prepared as part of the SEA of the National Raised Bog SAC Management Plan in accordance with national and EU legislation. This document provides information on the decision-making process and documents how environmental considerations, the views of consultees/stakeholders and the recommendations of the Environmental Report and the assessment carried out under Article 6 of the Habitats Directive have been taken into account by, and influenced, the final adopted plan.

The National Raised Bog SAC Management Plan and the associated environmental documents have been developed by the Department of Culture, Heritage and the Gaeltacht (DCHG). This SEA Statement has been prepared in accordance with Schedule 2, Section 16(2) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004) as amended and having regard to Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment and Circular Letter PL 9/2013, Department of Environment, Community and Local Government.

The structure of the SEA Statement is as follows:

- Introduction;
- Summary of key facts;
- Summary of the SEA process;
- Influence of the SEA on the National Raised Bog SAC Management Plan;
- Preferred scenario and reasons for choosing the final plan;
- How consultation feedback has influenced the National Raised Bog SAC Management Plan;
- Measures to monitor significant environmental effects of the implementation of the National Raised Bog SAC Management Plan;
- Screening of changes; and
- Next steps and conclusions.

2 SUMMARY OF KEY FACTS

Title of Plan:	National Raised Bog SAC Management Plan 2017-2022
Purpose of Plan:	To provide a roadmap for the effective preservation of Irelands designated raised bogs while providing clarity to all parties on how these sites will be managed into the future in cooperation with all stakeholders and in compliance with requirements of EU and national legislation.
Competent Authority:	National Parks and Wildlife Service of the Department of Culture, Heritage and the Gaeltacht.
Period covered:	The National Raised Bog SAC Management Plan addresses management over the 6 year period from 2017 to 2022, although it takes into account of the longer term horizon also.
Area of Plan:	The National Raised Bog SAC Management Plan 2017-2022 is a national plan.
Nature/Content of Plan:	The plan outlines the current condition of Ireland's raised bog network; identifies the conservation objectives for the designated raised bogs and presents a programme of conservation measures to achieve the stated objectives. Furthermore the plan addresses the needs of those affected by the plan including landowners and turf-cutters.
Date Plan Came into Effect:	December 2017
Main Contact:	Department of Culture, Heritage and the Gaeltacht, Peatlands Management Unit, National Parks and Wildlife Service, Newtown Road, Wexford, Ireland.

3 SUMMARY OF SEA PROCESS

The National Raised Bog SAC Management Plan has been subject to a process of SEA, as required under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. This has included the key steps described in the following sections.

3.1 SCREENING

Screening was carried out to establish if an SEA was required for the National Raised Bog SAC Management Plan. This process was undertaken by RPS on behalf of the Department of Culture, Heritage and the Gaeltacht as the competent authority for the plan in Q2 of 2013. Consultation was undertaken with the statutory consultees for SEA in Ireland. Based on submissions received and in the context of the S.I. 435 of 2004 (as amended), it was determined that the National Raised Bog SAC Management Plan would require SEA.

3.2 SCOPING AND STATUTORY CONSULTATION

Scoping was carried out to establish the level of detail appropriate for the strategic environmental assessment of the National Raised Bog SAC Management Plan. A draft scoping report was prepared and this was used as the basis for statutory and non-statutory consultations which took place from 1st September to 1st October 2013. Statutory consultation was undertaken with the five statutory consultees for SEA in Ireland as follows¹:

1. Environmental Protection Agency (EPA);
2. Department of Arts, Heritage and the Gaeltacht (DAHG);
3. Department of Agriculture, Food and the Marine (DAFM);
4. Department of Communications, Energy and Natural Resources (DCENR); and
5. Department of Environment, Community and Local Government (DECLG).

In addition, a scoping meeting was arranged with the statutory consultees on November 15th 2013 and this was attended by the EPA.

Members of the public and interested parties were also offered the opportunity to comment on the SEA Scoping Report. To facilitate this, a stakeholder pack was prepared notifying interested parties of the SEA, scoping and the opportunity to submit comments. This was sent to a cross section of stakeholders including those stakeholders that had already submitted observations on the Peatlands Strategy; local bog committees associated with SAC bogs; local authority Directors of Service and Heritage Officers; and others. The SEA Scoping document, outlining the framework of the plan and the environmental issues being considered was made available at www.npws.ie

¹ Note number of Departments changed names and reallocated responsibilities in mid-2016 following national elections however the SEA Regulations have not been updated to reflect this. It is also noted that this consultation occurred prior to the changes.

One group submission was received, along with nineteen submissions from individuals, eight emails and two phone calls. These submissions have been summarised in the *National Raised Bog SAC Management Plan Communications Phase 1 Summary Report*. Submissions received were reviewed by the plan team and where relevant this feedback influenced the development of the draft plan and the associated environmental assessments. All of the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment.

3.3 ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT

An SEA Environmental Report for the National Raised Bog SAC Management Plan was produced in 2014. The purpose of this Environmental Report was to:

- Inform the development of the National Raised Bog SAC Management Plan;
- Identify, describe and evaluate the likely significant environmental effects of the National Raised Bog SAC Management Plan and its reasonable alternatives; and
- Provide an early opportunity for the statutory authorities and the public to offer views on the draft National Raised Bog SAC Management Plan and associated documents, through consultation.

The preparation of an Environmental Report in 2014 set out the likely significant effects on the environment of implementation of the National Raised Bog SAC Management Plan and included consideration of:

- Baseline data relating to the current state of the environment;
- Links between the draft National Raised Bog SAC Management Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- Key environmental problems affecting raised bogs;
- Likely significant effects of the draft National Raised Bog SAC Management Plan on the environment (both positive and negative);
- Measures envisaged for the prevention, reduction and mitigation of any significant adverse effects;
- An outline of the reasons for selecting the alternatives chosen; and
- Monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing appropriate remedial action to be taken.

3.4 STATUTORY CONSULTATION ON DRAFT NATIONAL RAISED BOG SAC MANAGEMENT PLAN

In January 2014 the draft document, National Raised Bog SAC Management Plan, was put on display for public consultation alongside the SEA Environmental Report and the AA Natura Impact Statement. The deadline for receipt of submissions was the 18th April 2015.

In parallel to consultation on the draft National Raised Bog SAC Management Plan, a number of other related documents were also on public display including the Raised Bog Conservation Study, the Peatlands Strategy, and the NHA Review. Over 1500 submissions were received by the Department of Arts, Heritage and the Gaeltacht [now the Department of Culture, Heritage and the

Gaeltacht] as part of the public consultation process for these peatlands documents. Responses were received from a wide range of stakeholders and interested parties including members of the public; Turf Cutters and Contractors Association (TCCA); turf cutting groups; bog-specific groups; wind/renewable energy groups - both opposition and pro; scientists/ecologists/professionals; voluntary and charitable organisations; NGO's; government and state bodies; local authorities; and industrialists (peat harvesting etc.).

A copy of these submissions is available to view on request to the Department of Culture, Heritage and the Gaeltacht or in the Department/NPWS offices in Wexford. They are also summarised in the *National Raised Bog SAC Management Plan Communications Phase 2 Summary Report* which is available on www.npws.ie Further details of the key issues raised are presented in Chapter 4 of this SEA Statement.

3.5 APPROPRIATE ASSESSMENT AND NATURA IMPACT STATEMENT

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the National Raised Bog SAC Management Plan, individually or in combination with other plans or projects, is likely to have significant effect on a European Site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives. The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that:

"Any plan or project not directly connected with or necessary to the conservation of a 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 recognition of this, a screening for Appropriate Assessment was carried out, in parallel with the SEA process. Despite the fact that the National Raised Bog SAC Management Plan is in fact directly connected with or necessary to the conservation of a site, it was concluded in the AA screening that AA was required *due to the potential for impacts to other qualifying interests and features, apart from raised bogs, either at the raised bogs SAC themselves or at other Natura 2000 sites within the vicinity*. From this a Natura Impact Statement was prepared to inform an Appropriate Assessment process. The Appropriate Assessment of the National Raised Bog SAC Management Plan has been carried out in the context of the scope and content presented in the National Raised Bog SAC Management Plan.

The AA has been completed on the final National Raised Bog SAC Management Plan and it has been concluded by the NPWS of the Department of Culture, Heritage and the Gaeltacht, as the competent authority for the plan, that the National Raised Bog SAC Management Plan is compliant with the requirements of Article 6 of the EU Habitats Directive.

3.6 SEA STATEMENT

In accordance with article 16 of S.I. 435 of 2004 as amended, the Competent Authority is required to prepare a statement summarising:

- a) How environmental considerations have been integrated into the plan or programmes, or modification to a plan or programme;*
- b) How (i) the environmental report, prepared pursuant to article 12, (ii) submissions and observations made to the planning authority in response to a notice under article 13 and (iii) any consultations under article 14 have been taken into account during the preparation of the plan or programme;*
- c) The reasons for choosing the plan or programme, in light of other reasonable alternatives dealt with, and*
- d) The measures decided upon to monitor, in accordance with article 17, the significant environmental effects of implementation of the plan or programme.*

The main purpose of this SEA Statement is to provide information on the decision-making process for the National Raised Bog SAC Management Plan in order to illustrate how decisions were taken, making the process more transparent. In so doing, the SEA Statement records how the recommendations of both the Environmental Report and the Natura Impact Statement, as well as the views of the statutory consultees and other submissions received during consultation have influenced the preparation of the final plan. The SEA Statement also provides information on the arrangements put in place for monitoring and mitigation. The SEA Statement will be available to the public, along with the Natura Impact Statement and the adopted National Raised Bog SAC Management Plan.

3.7 ADOPTION OF NATIONAL RAISED BOG SAC MANAGEMENT PLAN

The formal adoption process for a plan of this nature involves approval by Government. The National Raised Bog SAC Management Plan was approved by Government in July 2017.

4 INFLUENCE OF SEA ON NATIONAL RAISED BOG SAC MANAGEMENT PLAN

The SEA and the AA processes have been undertaken in parallel to the preparation of the draft National Raised Bog SAC Management Plan. Thus, from the outset, considerations of the environmental consequences of the alternatives have been taken into account. The iterative process ensured that the SEA/AA and the preparation of the National Raised Bog SAC Management Plan were integrated in order to meet the environmental objectives and the objectives of the plan.

Efforts have been made through the plan, SEA and AA processes to integrate environmental considerations into the development of the National Raised Bog SAC Management Plan. This commenced with the preparation of the national conservation objective through to the measures proposed to facilitate the transition of the designated raised bogs from being considered a commodity to places of biodiversity to be enjoyed by the wider community.

In addition to the development of the conservation objectives for the raised bogs, there has also been focus on implementation of five core policy areas:

- To understand and describe the conservation status and the ecological and hydrological conditions of our raised bogs;
- To put in place a robust raised bog national network that will be sustainable into the future;
- To develop mechanisms to restore and rehabilitate protected habitats within the network of designated raised bogs;
- To manage protected raised bogs in a manner compatible with their uses and the concerns of stakeholders whilst maintaining their biodiversity and natural function; and
- To raise awareness and understanding of the benefits and values of raised bogs and encourage community involvement to inform future decisions.

The findings of the SEA and AA have been directly integrated into the plan through recommended mitigation measures for specific policy actions.

4.1 SUMMARY OF SEA ASSESSMENT

The approach used for the assessment in the SEA is termed an “objectives led assessment”. In this case, each of the draft plan measures were tested against defined SEA Strategic Environmental Objectives (see **Table 4-1**) which covered all SEA environmental topics under the relevant SEA legislation, e.g. population, biodiversity, material assets, etc. A matrix format was used for the assessment, which permitted a systematic approach and comparison of alternatives.

Table 4-1 Strategic Environmental Objectives from SEA Environmental Report 2014

Obj. 1 Biodiversity Flora and Fauna:	To restore the favourable conservation status of active raised bog in Ireland.
Obj. 2 Biodiversity Flora and Fauna:	To preserve, protect and maintain the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.
Obj. 3 Population and Human Health:	To provide ecosystem services for communities and contribute to sustainable management of the natural resource.
Obj. 4 Soils:	Avoid damage to the function and quality of the soil resource.
Obj. 5 Water:	Ensure that the status of water bodies is protected, maintained and improved.
Obj. 6 Climatic Factors:	Minimise contribution to climate change by reducing emissions of greenhouse gasses associated with Plan implementation.
Obj. 7 Material Assets:	Support economic activities such as eco-tourism without conflicting with the objectives of the Habitats Directive.
Obj. 8 Cultural Heritage:	Protect and maintain cultural heritage resources.
Obj. 9 Landscape:	Protect and maintain the national landscape character.

4.2 OVERALL SUMMARY ASSESSMENT

The measures assessed from the National Raised Bog SAC Management Plan are primarily directed at (1) reducing pressures at source, to ensure cessation of damaging activities and (2) restoration and/or provision of compensatory habitat to address losses to the resource since the 53 bogs were designated.

The following scenarios were assessed:

- National Toolkit of Measures
- Individual Programme of Measures
- Business as Usual

To assess the national toolbox of measures, a detailed high-level objectives led assessment was carried out, which was primarily qualitative in nature, with some assessment based on expert judgement. This qualitative assessment compared the likely impacts of each measure against the strategic environmental objectives. A further assessment was then undertaken for the programme of measures. This assessment focussed on the proposed national strategy to address the key pressures identified and to achieve the conservation objective and targets set for raised bog SAC in Ireland. A business as usual scenario was also assessed.

It is anticipated that the implementation of the National Raised Bog SAC Management Plan will result in improvement in the status of raised bogs in Ireland generally and in the raised bog SAC resource specifically leading to positive impacts to biodiversity, flora and fauna as well as water, soils

and landscape. Negative impacts will be experienced in relation to material assets due to restrictions e.g. prevention of certain damaging activities such as turf cutting, peat extraction, forestry etc on these SAC sites in the immediate future. The requirement for education and awareness among all stakeholders using the raised bog resource is essential. Negative impacts have been identified in relation to cultural heritage, specifically loss of traditional practices such as turf cutting. This is addressed through a compensatory scheme which includes the option for relocation of turf cutting rights or financial compensation.

The assessment of policies and related policy actions which are set out in the plan are summarised in **Table 4-2**.

Table 4-2 – Summary Assessment Table from SEA Environmental Report 2014

Measure	Overall Impact	Mitigation Measures Recommended (Y/N)
POM_1 Protection and Restoration of current SAC network	+/-	Y
POM_2 Additional Raised Bog Selection and Restoration to Fulfil SAC Area Objectives	+/-	Y
POM_3 Demonstration Project – Rewetting of Cutover Bog to restore the high bog and to evaluate the rewetting of a proportion of the cutover bog.	0	
POM_4 EU LIFE Proposal and Project implementation	0	N
POM_5 Support for other conservation works – making funding available to individuals and organisations to carry out approved restoration works	0	N
POM_6 Mid-cycle Review of the National Raised Bogs SAC Plan	+	N
POM_7 Preparation of Second National Raised Bogs SAC Plan	+	N
POM_8 Review of the NHA Network Designation Status (additional NHAs and de-designation of sites of low conservation value)	0	N
POM_9 Preparation of a national Raised Bog NHA Management Plan and site specific NHA Restoration and Implementation Plans affording protection and restoration measures akin to those in the SAC Network with supporting Code of Practice and Guidance Documents	+	N
POM_10 Raised Bogs Education and Awareness Programme	+	N
POM_11 Raised Bogs Monitoring Programme	+	N
POM_12 Habitats Regulations implementation to prevent damaging activities	+	Y
POM_13 Environmental Impact Assessment Regulations and Environmental Liabilities implementation to prevent damaging activities.	+	Y
POM_14 Ensure legislative and policy linkage to other plans and programmes including River Basin Management Plans and Catchment Flood Risk	+	Y

Measure	Overall Impact	Mitigation Measures Recommended (Y/N)
Management Plans		

In addition, some general mitigation was also included under the SEA and further mitigation from the AA process was also included in the Environmental Report. See Section 4.3.1 for detail of mitigation measures.

4.3 INTEGRATION OF SEA PROCESS

The SEA and AA processes were ongoing throughout the development of the National Raised Bog SAC Management Plan, with the corresponding project teams working together to identify potential environmental issues/constraints at the earliest possible stage in the plan-making process. The SEA and AA teams were involved in the:

- Development of the alternatives;
- Evolution of measures; and
- Recommendation of mitigation measures to address the potential impacts arising from the alternatives considered.

The SEA and AA processes have ensured that potential environmental impacts (both positive and negative) associated with the National Raised Bog SAC Management Plan have been given due consideration in the preparation of the plan. **Table 4-3** shows how environmental considerations and the input of the SEA and AA have been taken into account in the National Raised Bog SAC Management Plan.

Table 4-3 – How Environmental Considerations Have Been Taken into Account in the National Raised Bog SAC Management Plan

Environmental Consideration	How has this been accounted for in the Plan?
Identification of environmental constraints	The SEA team undertook an audit of baseline environmental conditions nationally with reference to population, human health, climate, air landscape, cultural heritage, biodiversity, flora and fauna, material assets and water. This information was used to focus the SEA objectives, develop alternatives and assess positive and negative impacts associated with the implementation of the proposed National Raised Bog SAC Management Plan.
Assessment of alternatives	The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative. The SEA team and the plan team liaised on possible alternatives during preparation of the SEA scoping document and subsequently as the National Raised Bog SAC Management Plan evolved.
Recommendation of mitigation measures to address impacts on the wider environment	Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of

Environmental Consideration	How has this been accounted for in the Plan?
	policies and policy actions in the plan and inclusion of new actions to reflect protection of the environment and human health. A key aspect of this was consideration of the cultural impacts associated with a cessation of turf cutting.
Required Environmental Monitoring Programme	A monitoring programme was presented in this SEA Environmental Report. This programme will facilitate the on-going monitoring of the implementation of the National Raised Bog SAC Management Plan.
Consultation	<p>Statutory consultation was undertaken with the environmental consultees for SEA in Ireland in relation to scoping of the environmental report. Issues raised were used to inform the overall scope and context of the environmental assessment. Public consultation was undertaken at the scoping stage and this stakeholder feedback also helped to shape the environmental assessment.</p> <p>Subsequently, the SEA Environmental Report, the Natura Impact Statement (from the Appropriate Assessment process) and the draft National Raised Bog SAC Management Plan were put on public display. Submissions received have been reviewed by the SEA and plan teams and amendments have been made where appropriate. All changes to the conservation programme have been screened by the SEA to determine if they would result in significant effects (see chapter 7).</p>

4.4 RECOMMENDED MITIGATION MEASURES

The assessment of the alternatives and the preferred strategy for the National Raised Bog SAC Management Plan resulted in the recommendation of 21 mitigation measures. Thirteen of these related to SEA mitigation for the plan (**Table 4-4**). The remaining eight related to mitigation from the Natura Impact Statement (**Table 4-5**).

Table 4-4 – Proposed Mitigation Measures - SEA

Ref.*	Mitigation Measures Proposed in SEA	How is this included in the final plan?
NT	It is recommended that a new measure be added under Replacement to expressly address the relocation of turf cutting rights.	Reference is made in Table 7.1, Measure 3 to Cessation of Turf-cutting Compensation Scheme (financial compensation, turf deliveries and relocation). A cost of €26.1m has been allocated to this.
NT	A specific national toolkit measure should be added to develop Site Specific Management Plans for the 53 raised bogs.	Reference is made in Table 7.1, Measure 2 to restoration plans. Further clarity is provided in the text in Chapter 4 on Site-Specific Restoration Plans for the Raised bog SAC Network. The plans

Ref.*	Mitigation Measures Proposed in SEA	How is this included in the final plan?
		<p>comprise of three key elements:</p> <ul style="list-style-type: none"> i. <i>Details of physical restoration measures proposed</i> ii. <i>Proposals for drainage management to be integrated into restoration plans</i> iii. <i>Information on how community benefits of the restoration plans will be optimised.</i>
NT	<p>Site Specific Management Plans should undergo an environmental assessment taking in to account at a minimum, Biodiversity Flora and Fauna (BFF), Water (W), Material Assets (MA), Population and Human health (PHH), Cultural Heritage (CH), Landscape (A) and Soils (S).</p>	<p>Text has been added to the plan in Chapter 4 which commits to consideration of other environmental considerations. The text includes reference to: <i>a broader environmental assessment will be undertaken for each of the 53 SACs and the two new SACs, to complement and fully inform the site-specific restoration plans.</i></p> <p><i>The broader environmental assessment will consider the potential for site-specific measures to impact on biodiversity; flora and fauna which may use the sites but are not the subject features of the site; archaeology, architectural and cultural heritage features within or adjacent to the site; adjacent aquatic and terrestrial habitats which interact with the site; landscape character features; adjacent land uses; and soil quality as a minimum</i></p>
NT	<p>Site Specific Management Plans should include a Construction Environmental Management Plan (CEMP) which clearly sets out the protocols for working within the SAC with a view to minimising the potential for contamination of ground water and / or surface water as a result on engineered activities, protection of cultural heritage and protection of qualifying features other than raised bog which may also be in / adjacent to the designated sites.</p>	<p>Text has been added to the plan in Chapter 4 which commits that <i>in cases where significant impacts or risks are identified, these will be addressed through specific mitigation measures which may include avoiding work at unsuitable times (e.g. bird nesting or breeding season); compilation of a construction environmental management plan to guide construction works; presence of suitably qualified personnel to oversee works e.g. archaeologists; liaison with local stakeholders; and water quality protection measures.</i></p>
NCO	<p>The national conservation objective for raised bogs should include a reference to sustainability (National Conservation Objective)</p>	<p>This amendment has not been made in the final plan. However, it is noted that the measures presented in the final plan do address social and economic issues including measures to address the needs of turf-cutters and dedicated resources being made available to implement the plan. It is further noted that under the Habitats Directive there is an obligation to set national conservation objectives based on scientific information available.</p>

Ref.*	Mitigation Measures Proposed in SEA	How is this included in the final plan?
PoM	It is recommended that a timeline for roll out of the individual measures included in the POM is included in the plan to allow a proper audit in the mid-term review	Table 7.1 in the final Plan outlines further detail on timelines and responsibilities. A set of deliverables for the management plan is also included at end of Chapter 7.
PoM	A specific measure committing to the Site Specific Management Plans should be included in the Programme of Measures for transparency. Consideration should be given to preparing the management plans at the scale of multiple connected bog complexes and / or catchment based management plans at the River Basin District level (General)	<p>Reference is made in Table 7.1, Measure 2 to restoration plans. Further clarity is provided in the text in Chapter 4 on Site-Specific Restoration Plans for the Raised bog SAC Network. The plans comprise of three key elements:</p> <ul style="list-style-type: none"> <i>i. Details of physical restoration measures proposed</i> <i>ii. Proposals for drainage management to be integrated into restoration plans</i> <i>iii. Information on how community benefits of the restoration plans will be optimised.</i> <p>It is further noted that the approach taken in the plan is based on a network solution rather than individual bogs, taking into account issues of range and connectivity. Linkages are being made with the River Basin Management Plans (RBMPs) and as water dependant habitats, these designated raised bogs directly fall under protected areas in the RBMP, thereby providing the link at the catchment level. Furthermore Measure 12 in Table 7.1 accounts for specific linkages to other plans and programmes including River Basin Management Plans and Catchment Flood Risk Management Plans.</p>
PoM	It is recommended that an environmental assessment be undertaken by a suitable qualified practitioner as part of the development of Site Specific Plans and a qualified archaeologist be present onsite during implementation of restoration measures to ensure the archaeological resource is protected.	Text has been added to the plan in Chapter 4 which commits that <i>in cases where significant impacts or risks are identified, these will be addressed through specific mitigation measures which may include avoiding work at unsuitable times (e.g. bird nesting or breeding season); compilation of a construction environmental management plan to guide construction works; presence of suitably qualified personnel to oversee works e.g. archaeologists; liaison with local stakeholders; and water quality protection measures.</i>
PoM	It is recommended that NPWS provide a targeted information and awareness pack to planning authorities in the first instance to explain the importance of the bogs and their protection, Ireland's obligations under the Habitats and EIA Directives and corresponding national legislation and the conservation objectives and targets which must be met.	Measure 8 in Table 7.1 of the final plan includes for the support of a community engagement, education and awareness programme and recognises that public authorities, DCHG and other stakeholders have a role in this measure. DCHG will consider an information and awareness pack to planning authorities in this context.

Ref.*	Mitigation Measures Proposed in SEA	How is this included in the final plan?
PoM	It is recommended that eco-tourism facilities related to the SAC designation of sites would recognize not only the biodiversity value of newly designated SAC raised bogs but also the industrial archaeology and architectural heritage related to the Bord na Móna activities over the decades and any archaeology which may have been identified within and adjacent to these bogs over the years with particular reference to the evolution of domestic turf cutting over the 20 th and 21 st century.	<p>A section has been included in Chapter 5 of the final plan to deal with recreation. Specifically it states that <i>Substantial opportunities exist for the enhancement of raised bogs as sustainable tourism and recreation amenities and to return a community dividend.</i> It goes on to state that ...<i>Through consultation with the local community and other stakeholders, through the site-specific restoration plans, it will be possible to develop ideas for maximising socio-economic benefits for the local community through conservation and restoration.</i></p> <p>Furthermore, the final plan also recognises the role raised bogs have played in Cultural Heritage Preservation and through paleo-archaeological studies provides a source of historic knowledge.</p>
PoM	Similarly it is recommended that eco-tourism facilities relating to any of the existing 53 raised bogs would recognize the industrial archaeology and architectural heritage and any archaeology which may have been identified within and adjacent to these bogs over the years	See above
PoM	It is recommended that the Site Specific Plans developed for each of the 53 raised bog SAC are extended to include these newly designated sites also. These site specific plans shall include a full environmental assessment of the implications of each Site Specific Plan once known.	Measure 2 in Table 7.1 commits to restoration plans for the 53 SAC bogs and the 2 bogs to be designated.
PoM	Individual Site Specific Plans shall undergo an environmental assessment which will include at a minimum an assessment of the implications of site specific measures once known on: landscape, water, ecology, cultural heritage and community. Site specific mitigations measures can then be proposed (General).	<p>Text has been added to the plan in Chapter 4 which commits to consideration of other environmental considerations. The text includes reference to: <i>a broader environmental assessment will be undertaken for each of the 53 SACs and the two new SACs, to complement and fully inform the site-specific restoration plans.</i></p> <p><i>The broader environmental assessment will consider the potential for site-specific measures to impact on biodiversity; flora and fauna which may use the sites but are not the subject features of the site; archaeology, architectural and cultural heritage features within or adjacent to the site; adjacent aquatic and terrestrial habitats which interact with the site; landscape character features; adjacent land uses; and soil quality as a minimum.</i></p>

* NT: National Toolkit; NCO: National Conservation Objective; PoM: Programme of Measures

Table 4-5 – Proposed Mitigation Measures - AA

Ref.	Mitigation Measure Proposed in AA	How is this included in the final plan
AA	Site-specific AA should be undertaken at the compensatory sites as well as the raised bog SACs.	It is noted in the final plan that: <i>Consent in general will be subject to AA and if screened in as needing an AA, the project/plan will be required under current legislation to go through the planning process and will be subject to the consent of the relevant competent public authorities.</i>
AA	Site-specific AA should be undertaken by a suitably qualified ecologist, supplemented as necessary by additional expertise, using the best scientific evidence and methods.	This stipulation has not been included in the final plan, however, it is noted that work to date on site specific AA has included a team of professional ecologists and hydrogeologists.
AA	Site-specific AAs should identify the nature, extent and significance of likely impacts and recommend detailed site-specific mitigation measures to ensure that impacts on qualifying features and interests of Natura 2000 sites are avoided or minimized to the point that they do not affect the integrity of Natura 2000 sites.	Although not stipulated in the plan this is currently being applied to site specific AA. For example the Appropriate Assessment undertaken for Lough Ree Bog SAC specifically identifies such impacts and the NIS for Lough Ree SAC has done this.
AA	Avoid undertaking works at unsuitable times, for example, during bird nesting or breeding season.	Text has been added to the plan in Chapter 4 which commits to consideration of other environmental considerations. The text includes reference to: <i>a broader environmental assessment will be undertaken for each of the 53 SACs and the two new SACs, to complement and fully inform the site-specific restoration plans.</i> <i>The broader environmental assessment will consider the potential for site-specific measures to impact on biodiversity; flora and fauna which may use the sites but are not the subject features of the site; archaeology, architectural and cultural heritage features within or adjacent to the site; adjacent aquatic and terrestrial habitats which interact with the site; landscape character features; adjacent land uses; and soil quality as a minimum.</i>
AA	Avoid impacting on other habitats associated with raised bog.	Text has been added to the plan in Chapter 4 which commits to consideration of other environmental considerations. The text includes reference to: <i>a broader environmental assessment will be undertaken for each of the 53 SACs and the two new SACs, to complement and fully inform the site-specific restoration plans.</i> <i>The broader environmental assessment will consider the potential for site-specific measures to impact on biodiversity; flora and fauna which may</i>

Ref.	Mitigation Measure Proposed in AA	How is this included in the final plan
		<i>use the sites but are not the subject features of the site; archaeology, architectural and cultural heritage features within or adjacent to the site; adjacent aquatic and terrestrial habitats which interact with the site; landscape character features; adjacent land uses; and soil quality as a minimum.</i>
AA	Establish appropriate buffer zones around existing <i>Vertigo</i> populations in order to protect factors on which the site depends including the hydrological and ecological environment. The buffers should be established with reference to hydrological data for the site. In the absence of this data, a minimum 50 metre buffer is recommended or as determined with national experts.	This has not been stipulated in the final plan but will form part of site specific appropriate assessment mitigation measures if relevant.
AA	Establish appropriate buffer zones around turloughs or sink holes to ensure that the works do not impact on surface water that can interact with the hydrogeological regime and groundwater quality.	This has not been stipulated in the final plan but will form part of site specific appropriate assessment mitigation measures if relevant.
AA	Tensions may arise between the conservation requirements of individual qualifying interests whereby measures necessary for the conservation of one could adversely impact on the status of another. In such instances, the NPWS will develop a protocol to identify the appropriate response in view of site and national conservation priorities. In addition, the restoration of areas of a bog to active raised bog status is likely, over time, to lead to ecological changes that may in turn affect species of flora and fauna that use the site in its degraded state. In the process of restoration these changes will be monitored and the impacts on habitats and species of conservation interest, both at site level and nationally, will be tracked, so that any significant negative long term impacts at site or national level can be addressed by appropriate mitigation measures in view of the site and national conservation priorities.	It is accepted the potential for change and potential adverse impact and NPWS will develop a protocol in line with AA mitigation in view of national and site conservation priorities.

4.5 HOW CONSULTATION FEEDBACK HAS INFLUENCED THE FINAL PLAN

The key issues raised in the submissions received from stakeholders are summarised in this section. Following a comprehensive review and consideration of all the submissions, the plan team has responded with changes to the final National Raised Bog SAC Management Plan and where relevant

this has been noted below. As noted earlier, a copy of these submissions is available to view on request to the Department of Culture, Heritage and the Gaeltacht or in the offices of the National Parks and Wildlife Service, of the Department in Wexford. They are also summarised in the *National Raised Bog SAC Management Plan Communications Phase 2 Summary Report* which is available on www.npws.ie.

4.5.1 Key Issues Raised

A review of the submissions relevant to the National Raised Bog SAC Management Plan found that major common issues identified across a range of stakeholders included:

- SAC Boundaries
- Clarifications in the Plan
- Conservation Goals
- Resourcing
- Responsibilities
- Need for Additional Supports
- Air Quality
- Continued Turf-cutting
- Licensing, Permitting and Consents
- Compensation
- Small Scale Localised Turf-cutting
- Role for Turf-cutting in Conservation of Raised Bogs
- Cultural Tradition of Turf-cutting
- Uses for Cutover Bog
- Community Gain
- Farming
- Fear of Flooding
- Role of Peatlands in Flood Attenuation
- Link to Other EU Directives
- Impacts on Other Habitats and Species
- Raised Bogs Outside the Designated Network
- Value of Ecosystem Services
- Tourism and Recreation
- Climate Change and Carbon Storage
- Carbon Credits
- Other Inter-related Issues

These issues are further interrogated in the following sections and information is presented on how the final plan has been influenced by the consultation responses.

4.5.2 SAC Boundaries

Issue Raised – SAC Boundaries
A number of stakeholders suggested that the opportunity should be taken to review SAC boundaries as these are considered inappropriate in some cases.
Influence on the Final National Raised Bog SAC Management Plan
This issue will be considered by the Department of Culture, Heritage and the Gaeltacht in the context of the Special Area of Conservation Designation Programme.

4.5.3 Clarifications in the Plan

Issue Raised – Clarifications in the Plan
It was proposed that the name of the plan should reflect the time period covered by the plan to provide clarity. It was also suggested that there would be merits in linking monitoring of the plan to SEA monitoring. Clarifications were sought on the total area of raised bog habitat within the designated network of bogs.
Influence on the Final National Raised Bog SAC Management Plan
<p>The plan has been amended to ensure that the timeframe covered by the plan is included within the overall title.</p> <p>A reference to SEA monitoring has been included in the plan to ensure that there are linkages between monitoring proposed by the plan and monitoring set out by the SEA.</p> <p>The plan outlines in detail the breakdown of high bog, active raised bog and degraded raised bog within the designated network. Table 2.1 provides a detailed breakdown of the area of high bog, active raised bog and degraded raised bog within the existing SAC, NHA and non-designated network of sites based on best available information. Chapter 2 also provides details of the area of “intact” high bog nationally as well as the area of high bog within the new SAC and new NHA network. An estimate of the area of cutover bog within the SAC and NHA network is provided. This is estimated as there are a complex range of habitats surrounding the high bog which have not been mapped in significant detailed. Table 4.1 provides a detailed breakdown of the area of active raised bog and degraded raised bog within the new SAC and new NHA network.</p>

4.5.4 Conservation Goals

Issue Raised – Conservation Goals
A number of stakeholders noted that the peatlands documents need to be strengthened to deliver on conservation goals.
Influence on the Final National Raised Bog SAC Management Plan
The plan has been amended to ensure that ambitious, yet realistic and achievable targets are set in the conservation and restoration of the raised bog network. This recognises that all of the restoration measures needed cannot be carried out during one six year planning cycle. However, specific actions and estimated costs have been set out for the conservation measures to be delivered during the first six year cycle. This includes providing details of restoration to be undertaken through the €5.4m EU LIFE project (<i>Restoring Active Raised Bog in Ireland's SAC Network 2016-2020</i>) as well as funding of €12m over the next six years for restoration measures on SACs and NHAs to support national conservation objects, developing restoration plans and restoration incentive measures, development of site-specific conservation objectives

for raised bog NHAs and supporting guidance documents and code of practice (Measure 2. Table 7.1).

4.5.5 Resourcing

Issue Raised –Resourcing

Numerous stakeholders commented that NPWS should be given more staff and a larger budget to tackle the issues of peatlands conservation.

Influence on the Final National Raised Bog SAC Management Plan

The plan recognises that one of the most important features of successful peatland restoration and conservation is having the supports in place to maintain the benefits of the programme into the future. The plan notes that this will take large scale co-operation, resources and funding to maintain the investment in the SAC (and NHA) network for this plan to succeed.

The plan clearly identifies the need for adequate funding and resources to be available to meet the objectives of the plan (Chapter 7). Details of various sources of funding for restoration and conservation are outlined within the plan. This includes details of sources of funding including EU funds under the new EU Multi-Annual Financial Framework 2014–2020, in particular through a use of the EU agriculture, fisheries and cohesion funds and the LIFE fund.

The plan also identifies that the Partnership Agreement 2014 to 2020 between the Irish Government and the European Commission outlines that the cost of delivering strategies for peatlands restoration will be €25m over 10 years. On top of the funding under the Active Raised Bog LIFE project, a further €9m has been committed in the Government's Capital Investment Framework to 2016-2021 for peatlands restoration. Funding of €1m was provided for by the Government for peatlands restoration in 2015 and again in 2016. The *Programme for a Partnership Government* published in May 2016 also committed further resources to resolve the issue of turf-cutting on raised bogs in Ireland.

4.5.6 Responsibilities

Issue Raised – Responsibilities

A number of stakeholders commented on the need for further details on implementation of the plan and who will be responsible for various measures and how progress will be tracked.

Influence on the Final National Raised Bog SAC Management Plan

The plan has been amended to provide much clearer timelines on specific measures and responsible parties. Chapter 7 of the plan outlines the next steps in the implementation of the plan. This outlines that the Department of Culture, Heritage and the Gaeltacht will oversee the implementation of the Plan in conjunction with a number of state and semi-state bodies including: the Department of Housing, Planning, Community and Local Government; Department of Communications, Climate Action and the Environment; local authorities; Coillte; and Bord na Móna, with co-operation from all stakeholders including the Peatlands Council, turf-cutters, residents, landowners and environmental groups.

It is noted in Chapter 4 of the plan that on-going monitoring of each restoration plan will be undertaken to ensure that the intended restoration measures are successfully contributing to the achievement of site-specific conservation objectives.

Furthermore, the Department of Culture, Heritage and the Gaeltacht will oversee implementation of this Management Plan and will report on progress to the Peatlands Council and Government. A mid-term review will be undertaken in 2020 and a final report will be initiated in 2022. The implementation of the plan will complement the work of the Peatlands Strategy Implementation Group and will be guided by on-going research and monitoring (Chapter 7).

4.5.7 Need for Additional Supports

Issue Raised – Need for Additional Supports

A number of stakeholders indicated that they felt that there must be more support and greater guidance for actions relating to the promotion of peatland education. This point was raised particularly in relation to the consultation on the National Peatlands Strategy and how it informed the finalisation of that document.

Influence on the Final National Raised Bog SAC Management Plan

The plan includes specific actions in relation to education and awareness including a specific measure for a Raised Bogs Community Engagement, Education and Awareness Programme within the conservation programme (Measure 8, Table 7.1). In addition wider education and awareness of raised bogs has been included as a key aspect of the €5.4m EU LIFE project (Restoring Active Raised Bog in Ireland's SAC Network 2016-2020).

4.5.8 Air Quality

Issue Raised – Air Quality

Some stakeholders pointed out that the issue of air quality deterioration was not mentioned within the plan and should be included.

Influence on the Final National Raised Bog SAC Management Plan

The plan has been amended to include information on the impact of poor air quality of raised bog habitats (Chapter 2). In addition, in setting site-specific conservation objectives air quality has been included as an attribute (Chapter 3).

4.5.9 Continued Turf-cutting

Issue Raised - Continued Turf-cutting

A significant number of consultees responded with their desire to continue to cut turf. There were also a number of submissions supporting turf-cutters and affirming their right to cut turf. This included a very significant number of petitions and campaign letters.

Influence on the Final National Raised Bog SAC Management Plan

The plan recognises traditional rights of turf cutters and outlines that while the Government has no intention of ending the traditional right to cut turf for a person's own domestic use, it is necessary to deal with the management challenges which have arisen in recent times for protected peatlands. In many areas, such activity can continue into the future. However, where turf-cutting conflicts with conservation objectives and obligations on the State, it needs to be curtailed. The aim of Government policy is to ensure that where this is necessary, in the interests of the common good, the rights of turf-cutters are fully addressed through

monetary compensation to all affected or to facilitate turf-cutters to cut turf on alternative non-designated bogs if possible.

The plan also recognise that, in some cases, there are turf-cutters that wish to continue to cut turf but there are no feasible relocation sites available or not enough plots in a relocation site to accommodate all individuals. In this scenario, the State in this Plan explores the options of utilising the provisions of Article 6(3) and Article 6(4) of the Habitats Directive to provide for consent to cut turf within defined areas of a small number of SACs (Chapter 5).

4.5.10 Licensing, Permitting and Consent

Issue Raised – Licensing, Permitting and Consent

Numerous consultees were unhappy that turf-cutting requires any form of licensing, permit or consent.

Influence on the Final National Raised Bog SAC Management Plan

The plan clarifies Ireland's legal obligations to provide protection to the designated network of raised bogs. The plan acknowledges, as does the National Peatlands Strategy, that the management and use of peatlands takes place in a very complex regulatory environment with overlapping sectoral policies, legal frameworks and licence and consents requirements. The Plan recognises that in order to protect ecologically important sites, certain potentially harmful works are restricted within European Sites. Explanation of how certain activities/works are managed within the designated raised bog network is given in Chapter 5 through consents from the Minister of Culture, Heritage and the Gaeltacht and other consent authorities.

4.5.11 Compensation

Issue Raised – Compensation

Numerous turf-cutters and landowners called for compensation to be paid for the restoration of bogs. A number of consultees felt that the needs of landowners were not being addressed.

Influence on the Final National Raised Bog SAC Management Plan

The plan recognises that a "one size fits all" solution will not work in the context of turf-cutting on SAC designated bogs. The plan therefore outlines that, in order to address concerns, site-specific restoration plans will be developed further in partnership with stakeholders including landowners and local communities. It also clearly outlines that restoration measures will only be implemented in agreement with landowners (Chapter 4). The plan outlines that prior to restoration measures being implemented a system of restoration incentives including compensation, voluntary land purchase or management land agreements will be developed (Chapter 4).

4.5.12 Small Scale, Localised Turf-cutting

Issue Raised – Small Scale Localised Turf-cutting

There were claims from some individuals and groups that small scale domestic turf cutting is a localised activity, is sustainable, is a centuries old established land use, is within the carrying capacity of the bogs and does not threaten the integrity of the bogs.

Influence on the Final National Raised Bog SAC Management Plan

The plan outlines that national conservation status of active raised bog habitat has been assessed as 'Unfavourable Bad-Declining', which is the worst possible rating under the reporting system. The main pressures on this habitat were identified as peat extraction, drainage, lowering of groundwater levels, artificial planting of non-native trees and fires (Chapter 2).

Details of the impacts of marginal drainage and turf-cutting are presented in detail in Chapter 2 of the final plan. This outlines that turf-cutting at the periphery of the high bog will, in almost all cases, have a disproportionate impact on the remaining ARB and DRB. Details of the impact of turf-cutting and drainage are provided and a range of scenarios presented explaining the reasons for various rates of active raised bog habitat loss depending on geological and hydrogeological conditions. In addition reference is made to the research of van der Schaff (2002), who demonstrated that turf-cutting can have an impact extending far into the bog (Chapter 2).

4.5.13 Role for Turf-cutting in Conservation of Raised Bogs

Issue Raised – Role for Turf-cutting in Conservation of Raised Bogs

Some consultees pointed out that the plan demonstrates the active raised bog habitat is increasing in several bogs in co-existence with small scale domestic turf cutting, that several bogs devoid of any turf cutting have suffered a decline in active raised bog habitat, and that the bogs which have suffered the greatest reduction in active raised bog habitat have no turf cutting on them at all.

Influence on the Final National Raised Bog SAC Management Plan

The plan outlines that in addition to turf-cutting and drainage there are several other activities that have impacted on the conservation status of active raised bog in Ireland including lowering of groundwater levels, artificial planting of non-native trees and fires (Chapter 2). In addition the plan outlines that at several raised bogs, restoration measures have been implemented resulting in successful expansion of active raised bog habitat. In several cases this includes sites which have been subject to significant turf-cutting pressures (Chapter 4).

Details of the area of active raised bog based on the latest ecological survey undertaken, along with the area at the time of the earliest ecotope survey (if one was carried out), for each raised bog SAC is included within Appendix 3 of the plan. This allows local bog owners to evaluate the changes in extent of active raised bog relative to the changes in area of high bog.

Furthermore, the plan highlights that in some cases marginal drainage can result in subsidence that leads to the formation of localised patches of active raised bog in lower lying hollows that intersect the water table, which may explain why there have been some small increases in active raised bog at some sites where turf-cutting is continuing (Chapter 2). It must be noted however, that such increase will almost always be at the expense of more widespread drying out which may have occurred in the past.

4.5.14 Cultural Tradition of Turf-cutting

Issue Raised – Cultural Tradition of Turf-cutting

There was criticism from a number of consultees that turf-cutting / cultural tradition of turf-cutting was included as a raised bog service / benefit.

Influence on the Final National Raised Bog SAC Management Plan

The plan has been amended to reflect that turf-cutting is a non-sustainable benefit in terms of cultural tradition. This is in contrast to sustainable benefits such as clean water, climate regulation, flood and erosion control etc (Chapter 6).

4.5.15 Uses for Cutover Bog

Issue Raised – Uses for Cutover Bog

It was proposed by some consultees that uses for cutover bog should be considered as part of the plan. It was proposed that an assessment of the use of cutover bog for grazing, woodland (including native woodland) and recreation should be carried out. In addition septic tanks within cutover bog areas should be addressed.

Influence on the Final National Raised Bog SAC Management Plan

The plan has been amended to include a section on managing raised bog SACs for other land uses. The plan outlines that a series of land uses can take place, mostly on the surrounding cutover bog areas of the raised bog SAC network, once these are compatible with the conservation objectives of the site. Details of various activities are outlined including agriculture, fire management, forestry, waste management, heritage management, water management and recreation are addressed (Chapter 5). The plan outlines that in most cases, such activities may require consent by the relevant consent authorities and this may require Appropriate Assessment to be undertaken (Chapter 5).

It was not possible to address the potential suitability of cutover bog areas on individual bogs for these various uses as this would require detailed site-specific information and assessments that would not be feasible at the level of the plan. Furthermore the plan outlines that at a site-level draft restoration plans will be developed further in partnership with stakeholders including landowners and local communities. This may offer an opportunity to assess the suitability of different areas of cutover bog within each of the raised bog SACs for the various activities outlined.

In order to ensure that in future any activities (such as installation of septic tanks) which may impact on water quality and impact on site-specific conservation objectives, water quality has been included as a specific attribute within site-specific conservation objectives for each raised bog SAC.

4.5.16 Community Gain

Issue Raised – Community Gain

Some stakeholders outlined the importance of ensuring that communities are included in any proposed work to be carried out in their area. Some proposed that training should be provided on how to carry out restoration work which could provide the opportunity for job creation.

Influence on the Final National Raised Bog SAC Management Plan

The plan outlines that draft site-specific restoration plans have been prepared for each of the 53 raised bog SACs and 2 new SACs yet to be nominated. These are considered long-term plans and will be developed further in partnership with stakeholders including landowners and local communities. This will ensure that restoration is carried out in such a way that the conservation requirements of the site can be met, while maximising liaison with and realising benefits to the local community (Chapter 4). This includes promoting community involvement in the long-term management of these sites both during and after restoration measures are carried out.

In addition there is a commitment within the conservation programme outlined within the plan to support other organisations/individuals for conservation measures in the raised bog SAC network. This provides individuals and groups with the opportunity to seek support to carry out restoration measures on their own bog (Measure 5. Table 7.1).

4.5.17 Farming

Issue Raised – Single Farm Payments

Landowners called for no penalties of single farm payments on farmland because of bog re-wetting. Many landowners also felt that there should be no restriction on farming activities within SAC areas e.g. grazing of livestock; spreading of slurry, lime or fertiliser; drainage work; construction of fencing etc.

Influence on the Final National Raised Bog SAC Management Plan

The plan outlines that restoration measures are focused on areas of high bog and cutover bog areas, and only in very rare occasions, where it is absolutely essential, includes agricultural land. The Department will consult with DAFM and other stakeholders regarding any potential impact to eligibility under the single farm payment scheme in relation to restoration measures. A system of restoration incentives including compensation, voluntary land purchase or management land agreements will be developed to ensure that landowners are not financially impacted by the restoration measures. Furthermore, restoration measures will only be implemented in agreement with landowners (Chapter 4).

4.5.18 Fear of Flooding

Issue Raised – Fear of Flooding

A significant number of submissions stated categorically that they are not in favour of the restoration, blocking of drains or any form of re-wetting of bogs as they fear flooding of their land or homes.

Influence on the Final National Raised Bog SAC Management Plan

The plan outlines that national conservation status of active raised bog habitat has been assessed as 'Unfavourable Bad-Declining', which is the worst possible rating under the reporting system. The main pressures on this habitat were identified as peat extraction, drainage, lowering of groundwater levels, artificial planting of non-native trees and fires (Chapter 2). In 2011, the European Commission commenced infringement action against Ireland for alleged failures to adhere to the Habitats Directive (relating to the regulation of turf-extraction from its SACs) and the Environmental Impact Assessment (EIA) Directive. Ireland formally replied to this Reasoned Opinion in 2011 and outlined the various measures taken to implement the Directives in Ireland, including the phasing out of turf-cutting on 53 Raised Bog SACs and introducing a compensation system for eligible turf cutters.

As a result of the current conservation status and potential infringement action from the European Commission, the national plan outlines that urgent action is necessary to implement measures to protect, restore and increase the area and condition of the designated network of raised bogs (Chapter 4). This is necessary not only to meet legal obligations, particularly in relation to the Habitats Directive, but also to ensure that Ireland protects a representative sample of raised bogs for future generations (Chapter 1).

In order to address concerns the plan outlines that site-specific restoration plans will be developed further in partnership with stakeholders including landowners and local communities. It also clearly outlines that restoration measures will only be implemented in agreement with landowners (Chapter 4).

In addition the plan outlines a commitment to develop an integrated drainage management plan in conjunction with local stakeholders for any bog where there are concerns from locals that restoration may lead to undesirable hydrological impacts on land or property. This will ensure that the main periphery drains surrounding a bog can be maintained in a way that will not have an adverse impact on the bog (Chapter 4 and Measure 3 within Table 7.1).

4.5.19 Role of Peatlands in Flood Attenuation

Issue Raised – Role of Peatlands in Flood Attenuation

Some stakeholders suggested that the possible role of peatlands in flood attenuation should be highlighted where relevant.

Influence on the Final National Raised Bog SAC Management Plan

Further information is provided in the plan on the potential role of peatlands, and raised bogs in particular, in flood attenuation. This is highlighted throughout the plan in a number of key locations including Chapter 5 in relation to water management and Chapter 6 in relation to ecosystem services of water purification and flood attenuation. In addition, in order to evaluate these ecosystem services the plan includes flood attenuation as a research topic that will be supported by the Department during the first planning cycle (Chapter 7).

4.5.20 Link to Other EU Directives

Issue Raised – Link to Other EU Directives

A number of stakeholders indicated that there should be stronger links to the Water Framework Directive (WFD) / River Basin Management Plans and Floods Directive / Catchment Flood Risk Assessment and Management (CFRAM) Studies. Some stakeholders noted that where there is a loss of statutory drainage outfall, compensation mechanisms should be developed. These points were raised particularly in relation to the consultation on the National Peatlands Strategy and informed the finalisation of that document.

Influence on the Final National Raised Bog SAC Management Plan

The plan includes a specific action to ensure legislative and policy linkages to other plans and programmes including River Basin Management Plans and Catchment Flood Risk Management Plans within the conservation programme (Measure 12, Table 7.1).

In relation to the Water Framework Directive, the plan outlines that under the National Peatlands Strategy, policies and decisions relating to the use of peatlands shall take full consideration of potential impacts on water quality and the attainment by the State of mandatory water quality standards. Maintaining and restoring Irish raised 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. Raised bog restoration will help Ireland meet different regulatory targets including the Water Framework Directive which sets targets to achieve 'good ecological status' in European water bodies (Chapter 5). In addition details of the River Basin District and specific sub-catchment(s) that each raised bog SAC is within is outlined within Appendix 3 – Technical overview of the raised bog network.

In relation to flood risk, the plan outlines a commitment for DCHG to work with relevant authorities including local authorities and the Office of Public Works (OPW), in conjunction with local stakeholders to develop, where necessary, an integrated drainage management plan for each bog. This will ensure that the main periphery drains surrounding a bog can be maintained in a way that will not have an adverse impact on the bog (Chapter 4 and Measure 3 within Table 7.1).

On the wider issue of flood risk management the plan also states that the DCHG will work in the future with OPW in exploring options where restoration measures on raised bogs may contribute to flood risk management (Chapter 5).

The plan outlines that where agricultural land is adversely impacted that restoration will only be carried out in agreement with landowners and that there will be a system of restoration incentives including compensation, voluntary land purchase or management land agreements (Chapter 4)."

4.5.21 Impacts on Other Habitats and Species

Issue Raised – Impacts on Other Habitats and Species

Some stakeholders noted that restoration can lead to changes in habitat that may impact non-raised bog habitats and species network and this should be considered prior to implementation of restoration measures. It was suggested that issues such as biodiversity value and raised bogs outside the designated network should be addressed.

Influence on the Final National Raised Bog SAC Management Plan

The plan has been amended to include information on environmental considerations of restoration measures. This includes a commitment to subject restoration measures to Appropriate Assessment (AA) as well as a wider environmental assessment. AA should identify potential conflicts with other qualifying interests of the SACs or any other European Site and recommend appropriate site-specific mitigation measures. The broader environmental assessment will consider the potential for site-specific measures to impact on biodiversity; flora and fauna which may use the sites but are not the subject features of the site; archaeology, architectural and cultural heritage features within or adjacent to the site; adjacent aquatic and terrestrial habitats which interact with the site; landscape character features; adjacent land uses; and soil quality as a minimum (Chapter 4). The importance of non-designated peatlands and their contribution to wider biodiversity and carbon storage is addressed through the National Peatlands Strategy. The National Raised Bog SAC Management Plan focuses on the future management of the designated network of raised bogs.

4.5.22 Value of Ecosystem Services

Issue Raised – Value of Ecosystem Services

It was proposed that the ecosystem services benefits of the plan should be quantified to enable cost-benefit analysis of the plan to be carried out.

Influence on the Final National Raised Bog SAC Management Plan

Although the plan sets out in considerable detail the various ecosystem services benefits that implementation of the plan will achieve (Chapter 6) a detailed quantification of these services was not considered possible based on available information. However, the plan does outline a commitment from the Department of Culture, Heritage and the Gaeltacht to support further research into quantifying ecosystem services associated with the plan (Chapter 7). This includes:

- Research into the use and calculation of the economic value of ecosystem services.
- Research into the socio-economic benefits of raised bog conservation at local and national level.
- The impact of raised bogs for flood attenuation and climate change mitigation

In addition a number of case studies are presented which aim to increase understanding of the ecosystem services benefits of peatland conservation and restoration. One of the deliverables of the EU LIFE Irish Raised Bogs Restoration Project is to assess the socio-economic benefit of the project actions on the local economy and population surrounding the 12 SAC sites.

4.5.23 Climate Change and Carbon Storage

Issue Raised – Climate Change and Carbon Storage

Some stakeholders stated that more information is required on impact of peatlands in relation to climate change and carbon storage. These points were raised particularly in relation to the consultation on the

National Peatlands Strategy and informed the finalisation of that document.

Influence on the Final National Raised Bog SAC Management Plan

The plan also has been amended to include further background information in relation to climate change and the role of raised bogs in climate regulation and mitigation against climate warming through removal of carbon dioxide (CO₂) from the atmosphere. This includes a case study on the role of raised bogs in climate change (Chapter 6). The role of raised bogs in climate change mitigation is also included as a research topic that will be supported (Chapter 7). As above, one of the deliverables of the EU LIFE Irish Raised Bogs Restoration Project is to assess the socio-economic benefit of the project actions on the local economy and population surrounding the 12 SAC sites.

4.5.24 Tourism and Recreation

Issue Raised – Tourism and Recreation

Some stakeholders noted the potential for economic benefits through using the bogs for tourism, and recreation. A number of submissions suggested that tours be offered on bogs by local people and that the money raised should be passed to the bog owners.

Influence on the Final National Raised Bog SAC Management Plan

The plan recognises that there are opportunities for the enhancement of the raised bogs network as tourism and recreational amenities and to provide a community dividend. The plan outlines that through consultation with the local community and other stakeholders, through the site specific restoration plans, it will be possible to develop ideas for maximising socio-economic benefits for the local community through conservation and restoration. These might include building or improving existing facilities (i.e. tracks, board walks, bog bridges), encouraging the creation of small tourism enterprises, promoting the benefits to human health and well-being and enhancing the value of a site as an educational resource (Chapter 5).

The approach proposed by the plan is to support the development of community based conservation and management groups which can act as custodians of these local bogs. This would allow local communities the opportunity to develop eco-tourism enterprises which may provide economic benefits to local communities (Chapter 7).

4.5.25 Carbon Credits

Issue Raised – Carbon Credits

Some submissions suggested that the concept of carbon credits should be addressed by the plan.

Influence on the Final National Raised Bog SAC Management Plan

Further research on the role of peatlands restoration and carbon sequestration is required before the concept of carbon credits can be fully explored. This can be considered further in future updates of this plan. In addition, the National Raised Bog Management Plan commits to Climate Change mitigation research.

In the National Peatlands Strategy the State commits to undertaking an assessment of the value of identifying a number of priority peatland sites as part of a network of climate change related indicators and their

establishment as EU and global monitoring sites.

4.5.26 Other Inter-related Issues

Issue Raised – Other Inter-related Issues

The publication of the suite of peatlands documents was broadly welcomed by many stakeholders who feel that they begin to address the long overdue need to achieve realistic peatland conservation goals. However, the view was expressed that the documents do not adequately address all of the issues relevant to peatland conservation. In particular many stakeholders commented that the plan need to recognise that turf cutting is not the only issue facing peatlands in Ireland. Issues such as climate change, wind farm development, forestry and others need to be given a more robust policy direction.

Influence on the Final National Raised Bog SAC Management Plan

Many of these issues are directly relevant to wider peatlands management and fall in particular under the scope of the National Peatlands Strategy and therefore influenced the finalisation of the Strategy (published June 2016). This includes commitments to review policy in relation to many of these issues.

As a result of these consultation responses further emphasis was given within the National Raised Bog Management Plan to factors affecting raised bogs beyond turf-cutting including agriculture, forestry, burning, abstraction, climate change and air quality (Chapter 2). In addition further details of management in relation to agriculture, fires, forestry, waste, heritage, water and recreation are presented in Chapter 5.

5 PREFERRED SCENARIO AND REASONS FOR CHOOSING THE FINAL PLAN

The consideration of alternatives is a requirement of the SEA Directive (2001/42/EC). It states under Article 5(1) that:

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

Annex 1 (h) of the Directive clarifies that the information to be provided on alternatives under Article 5(1) is *inter alia* an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Article 9 of the Directive requires that a statement shall be prepared providing information on the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.

Annex 1 (f) details the environmental topics to be considered in the evaluation of the alternatives, which is the same as that addressed in the assessment of the plan itself: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

In summary, the directive emphasises that the SEA process must consider alternatives that are “reasonable”, and take into account “the objectives” of the plan, and “the geographical scope of the plan”.

5.1 ALTERNATIVES CONSIDERED

The Project Team (including raised bog, SEA and AA specialists) had early discussion of possible alternatives in order to inform the scoping for the draft National Raised Bog SAC Management Plan, which was the subject of public consultation. Further meetings were held by the Project Team to advance generation of alternatives and development of measures. In the first instance, consideration was given to a strategic assessment of the reasonable approaches to delivering the protection of the 53 raised bog SACs as required by the Habitats Directive. The following scenarios were therefore assessed in this SEA:

- Business as Usual;
- Development of a National Programme of Measures.

In certain cases a ‘do nothing’ option is one of the alternatives considered as part of the strategic environmental assessment process. However, in this case the ‘do nothing’ option, i.e. no Plan, was not considered a realistic alternative as the Habitats Directive and EC judgements against Ireland required that action be taken with regard to the status of this protected habitat. Therefore, a ‘do nothing’ option was not assessed. Instead a ‘do minimum’ was considered wherein those activities

identified as damaging to the Raised Bog SAC would cease with immediate effect and no restoration or relocation options would be considered to address the historical loss of area / range and no compensation is provided for turf-cutters. The do minimum alternative would, in effect, deliver protection only with no requirement for restoration or replacement of lost and damaged habitat.

In the case of a national programme of measures, this would be developed to achieve the relevant National Conservation Objective identified for the raised bogs: *To restore the favourable conservation status of active raised bog in Ireland.*

The measures proposed would address Protection, Restoration and Replacement. The protection measures related principally to cessation of damaging activities currently in place on the 53 raised bog SACs. The restoration options were focussed on active intervention through engineered solutions, while the replacement options were focussed on identifying NHA and other non-designated bogs which could be used as compensatory habitat for raised bog SACs which has been lost / damaged beyond repair. This national toolkit of measures would address the specific pressures impacting on the raised bogs in the 53 designated SACs. It was intended that the measures in this toolkit would be implemented alone, or in combination, if and where required in the various SACs, and at those sites where investigations and risk assessment show that specific pressures need to be remediated to maintain and restore raised bog to favourable conservation status.

A summary of the assessment of alternatives is included in **Table 5.1**.

Table 5.1 – Summary Assessment of Alternatives

	BFF 1	BFF 2	PHH	S	W	CF	MA	CH	L
Do Minimum, Protection Measures Only	+	+/-	+	+/-	+	+	+/-	+/-	+
National plan with a National Toolkit of Measures	+	+/-	+	+	+	+	+	+	+

BFF (Biodiversity Flora and Fauna); PHH (Population / Human Health); S (Soils); W(Water); CF (Climatic Factors); Material Assets (MA); CH (Cultural Heritage); and L (Landscape). Positive impact (+); Negative impact (-); Both positive and negative impacts (+/-); and Neutral (0).

The preferred scenario identified was development of a National Management Plan with a national toolkit of measures to address protection, restoration and replacement measures.

The do minimum alternative deals with cessation of damaging activities on the 53 raised bog SAC in line with the requirements of the Habitats Directive to protect the Natura 2000 network, without any attempt to restore or replace damaged or lost raised bog habitat. Under the Habitats Directive, Member States must show the steps taken to achieve the Directives objectives as well as avoiding deterioration in those natural habitats and habitats of species for which an area has been designated. Already the European Commission has commenced infringement proceedings against Ireland for alleged failures to adhere to the Habitats Directive and the Environmental Impact

Assessment Directives as they adhere to SAC and NHA designated raised bogs. While the do minimum scenario and targeted alternative would both result in positive medium term effects in regard for BFF, the do minimum alone would not fully address the short comings in application of the Habitats Directive that have been identified and would not in any way go to restoring the full area and range of raised bog habitat which was originally designated. As such the positive effects in the long-term would be somewhat diluted. By developing a national plan with a toolkit of measures, other environmental aspects can also be adequately addressed e.g. dislocation of cultural and economic interests which have used the bogs over decades for the purposes of extraction of turf. Without a targeted plan, the application of protection measures only would likely result in significant short, medium and long term impacts to material assets and cultural heritage in particular, and would require consideration of significant mitigation to offset these losses. Furthermore, in the absence of a targeted plan with a toolkit of measures to deal with restoration and replacement, additional negative impacts associated would be expected for biodiversity, flora and fauna where changes to hydrology (in particular to water levels) indirectly impact on habitat requirements for other Qualifying Interests and Qualifying Features of some of the 53 Raised Bog SAC sites, e.g. *Vertigo*, Marsh Fritillary and Red Grouse. Disturbance and habitat loss for bird species of SPAs in / adjacent to the Raised Bog SAC that use the raised bog habitat as feeding / breeding grounds could also result in negative impacts for biodiversity, flora and fauna. As such, a robust and inclusive plan is the preferred scenario.

6 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF IMPLEMENTING THE PLAN

Article 10 of the SEA Directive requires that monitoring be carried out in order to identify, at an early stage, any unforeseen adverse effects due to implementation of a Plan or Programme, and to be able to take remedial action. Monitoring is carried out by reporting on a set of indicators, which enable positive and negative impacts on the environment to be measured. The environmental targets and indicators of relevance to this National Raised Bog SAC Management Plan were identified from the SEA process. These targets and indicators will be used to identify unforeseen adverse effects from implementation of the National Raised Bog SAC Management Plan.

6.1 RESPONSIBILITY FOR MONITORING

Coordination of monitoring of the National Raised Bog SAC Management Plan will be carried out by the National Parks and Wildlife Service of the Department of Culture, Heritage and the Gaeltacht.

6.2 SOURCES OF INFORMATION FOR MONITORING

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the National Raised Bog SAC Management Plan. Where possible, indicators have been chosen based on the availability of the necessary information and the degree to which the data will allow the target to be linked directly with the implementation of the National Raised Bog SAC Management Plan. **Table 6-1** presents the environmental monitoring and reporting programme to track progress towards achieving the strategic environmental targets, and includes sources of relevant information

Table 6.1 - Environmental Monitoring and Reporting Programme

Strategic Objective	Target	Indicator	Sources & Responsibilities
Biodiversity Flora and Fauna_1: Objective_1 To restore the favourable conservation status of active raised bog in Ireland	See national conservation objective targets in final plan	Range and Area of active raised bog in designated sites.	Midterm report in 2020 and final report in 2022 on the implementation of the NRB SAC Management Plan
Biodiversity Flora and Fauna_2: Objective_2 To preserve, protect and maintain the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.	No protected habitats or species associated with raised bog habitat in Ireland in worsening conservation status; majority of habitats or species moving towards, favourable conservation status by 2020.	The status of raised bogs as reported to the EU (report due every 6 years, first report in 2007).	The Status of EU Protected Habitats and Species in Ireland report. Published every 6 years.
Population and Human Health: Objective_3 To provide ecosystem services for communities and contribute to sustainable management of the natural resource	Shared responsibility for the conservation of raised bogs and the sustainable use of its components to be full recognised, and acted upon, by all stakeholders [Based Objective 1 of the National Biodiversity Action Plan 2017-2021]. Enhance appreciation of the value of biodiversity and ecosystem services amongst policy makers, businesses, stakeholders, local communities, and the general public [Based Objective 4 of the National Biodiversity Action Plan 2017-2021].	Percentage of site specific restoration and management plans created and extent of implementation. Level of public awareness of raised bogs and ecosystem services and surrounding issues increased compared with previous years.	Review of National Raised Bog SAC Management Plan and site-specific restoration and management plans [NPWS/DCHG] Department of Culture, Heritage and the Gaeltacht

Strategic Objective	Target	Indicator	Sources & Responsibilities
Soil: Objective_4 Avoid damage to the function and quality of the soil resource.	Achieve risk reduction targets as detailed in the future Soil Framework Directive for areas identified as at risk.	Monitoring programme as established under the requirements for the Soil Framework Directive.	Teagasc /EPA / DAFM
Water: Objective_5 Ensure that the status of water bodies is protected, maintained and improved.	No deterioration in water body status in the catchment of an SAC raised bog or downstream as a result of the plan in line with the objectives protected areas under the 2 nd cycle RBMP. Achieve water quality on the high bog and in transitional areas close to natural reference conditions	Status of water bodies as reported by the EPA.	Water Quality in Ireland report. EPA. Published every 1 to 2 years.
Air Quality and Climatic Factors: Objective_6 Minimise contribution to climate change by reducing emissions of greenhouse gasses associated with Plan implementation. Ensure that air quality surrounding designated raised bogs is close to natural reference conditions.	Targets and indicators will be informed by on-going research and field studies in this area.	Targets and indicators will be informed by on-going research and field studies in this area.	Targets and indicators will be informed by on-going research and field studies in this area.
Material Assets: Objective_7 Support economic activities such as eco-tourism without conflicting with the objectives of the Habitats Directive .	Minimise impacts to economic activity due to Plan implementation without conflicting with the objectives of the Habitats Directive. Provision of alternative sources of fuel or	Percent change in ecotope types due to Plan implementation. Percentage of turf-cutters	NPWS/DCHG ecotope surveys

Strategic Objective	Target	Indicator	Sources & Responsibilities
	compensation to all those affected by protection of raised bog SAC.	applying for compensation/relocation schemes.	Cessation of turf cutting compensation scheme statistics (NPWS/DCHG)
Cultural Heritage: Objective_8 Protect and maintain cultural heritage resources.	Provision of alternative sites for turf cutting which will allow traditional turf cutting practices to be continued without damage to EU or national designated sites.	Percentage of turf-cutters applying for relocation/compensation schemes.	The Status of EU Protected Habitats and Species in Ireland report. Published every 6 years. Cessation of turf cutting compensation scheme statistics (NPWS/DCHG)
Landscape: Objective_9 Protect and maintain the national landscape character.	Conservation of peatland landscapes in line with NLS principles.	Protection afforded to peatland landscapes in relevant CDP.	Relevant Planning Authorities

7 SCREENING OF CHANGES TO THE FINAL CONSERVATION PROGRAMME

An Environmental Report was prepared in 2014 which recorded the strategic environmental assessment of the draft National Raised Bog SAC Management Plan. That report and draft plan were the subject of a statutory public consultation and on foot of this consultation, the plan has been updated to reflect concerns raised. It is further acknowledged that the layout of the final plan is significantly evolved however, the amendments proposed are not of such an extent that changes to the content or outcome of the assessment contained within the Environmental Report will be required. **Table 7.1** presents a review of the changes made to the Conservation Programme and screens the proposed changes for SEA. Separately, the NIS has also been updated to include the changes to the final plan.

Table 7.1 – Screening of Proposed changes to Conservation Programme

Ref.	Measure	SEA and AA Screening
1	Notification and designation of two new SACs	The original measure in the draft plan proposed additional raised bog selection and restoration at the two most suitable complexes out of possible ten sites identified. The measure has been amended to remove reference to the 10 possible sites and clarifies that it will be predominantly on Bord na Móna lands. The clarification does not alter the assessments contained in the Environmental Report or NIS. No significant negative impacts.
2	<p>Restoration through implementation of best practice restoration techniques of the raised bog designated network entailing: (refer to Chapter 4 for further details)</p> <ul style="list-style-type: none"> Implementation of EU LIFE Project – ‘Restoring Active Raised Bog in Irelands SAC Network 2016-2020’ Restoration measures on SACs and NHAs to support national conservation objectives for the raised bog network, development of restoration plans and restoration incentive measures. Development of site-specific conservation objectives for raised bog NHAs. Supporting guidance documents and code of practice 	<p>The measure has been reorganised to bring issues of restoration together within one defined measure. The original reference to an EU LIFE proposal has been updated to take account of the fact that the project is already underway. No significant impacts.</p> <p>Furthermore, the restoration measure has been expanded to provide greater clarification on the approach to be taken i.e. restoration plans; restoration incentive measures; site-specific conservation objectives; guidance and codes of practice. No significant negative impacts.</p>
3	Preventative measures (cessation of damaging activities including drainage and turf-cutting, planting of commercial forestry, spread of fires,	In addition to the preventative measures assessed in the draft plan, additional measures have been included in the final plan. These relate primarily to exploring opportunities to continue turf-cutting

Ref.	Measure	SEA and AA Screening
	<p>and other human activities).</p> <p>Other measures:</p> <p>Pursue applying provisions of Article 6(3) through scientific analysis to identify areas in SACs suitable for turf-cutting which will not impact on the integrity of the sites (See Chapter 5)</p> <p>Explore applying provisions of Article 6(4) for certain SACs, if necessary</p> <p>Continue with enforcement measures and aerial monitoring of SACs</p> <p>Development of drainage management plans</p>	<p>under the provisions of Article 6(3) and 6(4) of the Habitats Directive. While it is acknowledged through the measures that this may lead to exploring provisions of Article 6(4) the measure is one based on information gathering, evidence base and exploration of issues and does not remove the requirement for AA on a site by site basis. As such the protection of BFF is at the forefront of the plan as is the commitments to work with landowners and stakeholders to move forward which is positive for PHH, CH and MA. No significant negative impacts.</p>
4	Implementation of Review of Raised Bog NHA Network	<p>The <i>Review of Raised Bog Natural Heritage Area Network</i> was published in January 2014. It provides for the reconfiguration of the raised bog NHA network through the continued designation of existing NHAs, the de-designation of certain NHA sites and the designation of new NHA sites. The Wildlife (Amendment) Bill 2016 will give legislative effect to the proposals set out in the 2014 NHA Review.</p> <p>In addition, site specific management plans, which will primarily relate to the restoration of each site, will be developed for each NHA site being retained in the reconfigured NHA network.</p> <p>The National Peatlands Strategy, the 2014 NHA Review and the associated Wildlife (Amendment) Bill 2016, and the provisions in relation to raised bog NHAs contained in the National Raised Bog SAC Management Plan will provide the overarching framework for the management of a reconfigured NHA network. No significant negative impacts.</p>
5	Support to other organisations/individuals for conservation measures in raised bog SAC network	This measure has been clarified to note that support will be available to organisations/individuals for conservation measures in raised bog SAC network. No significant negative impacts.
6	Mid-cycle Review of the National Raised Bogs Special Areas of Conservation Management Plan	No change to measure.
7	Preparation of Second National Raised Bogs Special Areas of Conservation Plan.	No change to measure.

Ref.	Measure	SEA and AA Screening
8	Raised Bogs Community Engagement, Education and Awareness Programme	Minor amendments to wording of this measure to clarify commitment to community engagement. No significant negative impacts.
9	Raised Bogs Ecotope Surveying and Monitoring Programme	A new, stand-alone monitoring measure has been included. No significant negative impacts.
10	European Communities (Birds and Natural Habitat) Regulations 2011–2015, Environmental Impact Assessment Regulations and Environmental Liabilities Regulations implementation to prevent damaging activities, where relevant and appropriate	Minor amendment to wording of the measure to include reference to birds directive also and to Environmental Impact Assessment Regulations and Environmental Liabilities Regulations. No significant negative impacts.
11	Raised Bogs Research Programme	Minor amendment to wording of the measure to clarify purpose of the programme. No significant negative impacts.
12	Ensure legislative and policy linkage to other plans and programmes including River Basin Management Plans and Catchment Flood Risk Management Plans.	This measure was included in the draft plan. No changes have been made.
N/A	Environmental Impact Assessment Regulations and Environmental Liabilities Regulations implementation to prevent damaging activities.	This measure has been moved to No. 10.
N/A	Demonstration Project – Rewetting of Cutover Bog to restore the high bog and to evaluate the rewetting of a proportion of the cutover bog.	This measure has been deleted. Although no longer stipulated within the programme of measures, it is stated in Chapter 7 of the final plan that <i>the programme also includes demonstration projects to support this Plan's implementation</i> . Furthermore it is noted that under the implementation of EU LIFE Project - "Restoring Active Raised Bog in Irelands SAC Network 2016-2020" rewetting will be applied at over 12 sites as part of these demonstration projects. As such, the removal of this measure is not considered to be significant.

8 CONCLUSIONS AND NEXT STEPS

The SEA and AA processes carried out during the preparation of the National Raised Bog SAC Management Plan have ensured that the potential significant environmental impacts associated with implementation of the plan have been identified and that they have been given appropriate consideration. Consultation on the draft Plan, Environmental Report and NIS has further contributed to the development and finalisation of the adopted National Raised Bog SAC Management Plan.

It is envisaged that monitoring and reporting of environmental impacts, both positive and negative, resulting from implementation of the National Raised Bog SAC Management Plan will continue over the course of the 6-year cycle for the plan. It is also envisaged that results of the SEA monitoring programme will be included as part of the interim report describing progress in the implementation of the planned programmes of measures, proposed for 2020. This will allow appropriate remedial action to be taken quickly should any unforeseen environmental effects be identified.

The monitoring programme currently being carried out for the National Raised Bog SAC Management Plan will form a substantial element of the Environmental Monitoring Programme required under the SEA; thereby ensuring that the Environmental Monitoring Programme will be implemented and data will be gathered regularly.