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28<sup>th</sup> Oct 2025

## Independent Advisory Committee on Nature Restoration

Dear Dr Ní Shúilleabháin,

We would like to thank the Independent Advisory Committee on Nature Restoration [the Committee] for the opportunity to outline BnM strategy to the Committee at the meeting in the Customs House in September. As discussed at that meeting, we include below additional information to clarify BnM's mandate and corporate strategy to support Ireland's decarbonisation initiatives, achieve climate targets, deliver the Energy transition, and embed resilience in the electric power system. In addition, we describe the rehabilitation and biodiversity initiatives the company is working on and has completed as well as detail our support in principle towards the NRL. We also answer the specific questions raised by the committee at the September meeting.

BnM, is and has been since its incorporation, fundamentally, an Energy company, albeit one that historically used fossil fuels to meet the needs of Irish industry and consumers. However, since 2021 the company pivoted 180 degrees towards renewable energy and is today Ireland's leading generator of green electricity and helping to power the country's 'net zero future'.

Working with our landbank, strategic partners and local communities we are building a 5GW renewable energy pipeline, including onshore and offshore wind, solar, biomass and biogas projects – enabling industrial growth while contributing to our sustainable future. This aligns the company's strategy with the mandate from Government to '*accelerate renewable energy generation*' with the greatest growth rate targeted for the Midlands region<sup>1</sup> *vide infra*, the region which makes up the majority of BnM's landholdings.

Central to both Government policy and the company's business model is the BnM land-use strategy of integrated land-use which incorporates renewable energy projects on cutaway peatland and, developing a landscape of wetland, peatland and woodland habitats interspersed with infrastructure. This strategy allows BnM to continue optimising co-benefits for renewable energy and local communities, along with re-wetting of cutaway peatlands for climate action and biodiversity.

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<sup>1</sup> Climate Action Plan 2025 at pp 89, retrieved from [https://assets.gov.ie/static/documents/c491032e/DECC\\_Climate\\_Action\\_Plan\\_2025\\_Main\\_Report\\_-\\_Final\\_Web.pdf](https://assets.gov.ie/static/documents/c491032e/DECC_Climate_Action_Plan_2025_Main_Report_-_Final_Web.pdf)



The United Nations Intergovernmental Panel on Climate Change (IPCC) has stated<sup>2</sup> that *“Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020. Global greenhouse gas emissions have continued to increase, with unequal historical and ongoing contributions arising from unsustainable energy use...”*. The UN IPCC also confirmed<sup>3</sup> with a very high degree of confidence that *“Climate change is a threat to human well-being and planetary health”*. In response to this global and existential threat, UN Secretary-General António Guterres opened the UN General Assembly Eightieth Session (24<sup>th</sup> September 2025) with the following call to arms...

*“Excellencies, dear friends,*

*As we have just heard, it is still possible to limit global temperature rise to 1.5 degrees by century’s end. We know what permanently breaching that limit would mean for people and planet. The science compels climate action. So does the economics. Clean energy is powering jobs, growth and sustainable development. Generating the fastest and cheapest electricity. Insulating economies from volatile fossil fuel markets. Providing energy security and sovereignty. And helping to deliver clean and affordable energy for all. Despite vast fossil fuel subsidies distorting markets, clean energy received double the investment of fossil fuels last year. The bottom-line: clean is competitive, and climate action is imperative. Excellencies, The Paris Agreement has made a difference. In the last ten years, projected global temperature rise has dropped from four degrees Celsius to less than three - if current NDCs are fully implemented. Now, we need new plans for 2035 that go much further, and much faster:*

*Delivering dramatic emissions cuts aligned with 1.5 degrees; covering all emissions and sectors; and accelerating a just energy transition globally.*

*Your new plans can take us a significant step forward. A UN report will calculate their impact for global emissions. If they fall short, we must create the conditions for a decade of Acceleration. We know it can be done. China met its 2030 wind and solar target six years ahead of schedule. India reached 50% electricity capacity from non-fossil fuels five years early.*

*We are in the dawn of a new energy era. We must seize this moment of opportunity. COP30 in Brazil must conclude with a credible global response plan to get us on track.*

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<sup>2</sup> UN IPCC AR6 Synthesis Report, retrieved from <https://www.ipcc.ch/report/ar6/syr/resources/spm-headline-statements/> at A.1

<sup>3</sup> Ibid., at C.1



*Five areas are crucial: First, energy. Fossil fuels still dominate. **We must supercharge the clean energy transition** [emphasis added]. Investing in grids and storage to unlock the full potential of renewables...”*

Both the European Union and the Irish Government are embracing this need to supercharge and accelerate the clean energy transition. The former by, *inter alia*, recasting the Renewable Energy Directive to include a provision that creates the legal presumption that renewable energy projects are *in the overriding public interest* to accelerate permitting and delivery of capacity. The latter, through binding Renewable Electricity targets in the Climate Action and Low Carbon Development Act, the six Climate Action Plans to date, the recently established Accelerating Renewable Electricity Taskforce Implementation Plan and the ongoing revision to the National Planning Framework (NPF). In short, Ireland has adapted a binding policy commitment to reach 80% renewable electricity, and through the NPF it is planned that the fastest growth area for green electricity capacity (onshore wind and solar PV) will be in the east and Midlands region, the regions where the majority of the BnM landbank is located.

BnM’s mandate and corporate strategy is focused on decarbonising our power system, which was in 2023, globally, the largest single source<sup>4</sup> of Greenhouse Gases (GHGs); hence the clean energy transition is the most effective lever in mitigating, what naturalist Sir David Attenborough describes<sup>5</sup> as “*Our greatest threat in thousands of years. Climate change.*”

BnM has been the most successful developer of renewable electricity infrastructure on the island of Ireland over the past decade, these projects when sequenced correctly can also deliver complimentary and integrated benefits across land use change, rehabilitation, biodiversity net gain and nature restoration.

Mountlucas Windfarm is a text book example of how good sequencing and the integration of infrastructural developments together with integrated land use including rehabilitation and nature restoration can deliver win-win-win outcomes. The Mount Lucas site consists of cutaway which accommodates 28 wind turbines, internal service roads that also now provides public amenity, future plans to build a Hydrogen plant & other renewable energy infrastructure, and where a mosaic of developing cutaway wetland, peatland and woodland habitats are now emerging following successful rewetting initiatives that commenced once the turbines had been fully consented. It should also be noted that the built infrastructure and associated drainage occupy less than < 5% of this site, leaving the remainder suitable for the mosaic of integrated use.

Currently, BnM has developed 1 GW capacity of operational electricity assets and has a corporate strategy aligned with Government, EU and UN policies to develop 4GW energy capacity *via* wind, solar, thermal and

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<sup>4</sup> Emissions Gap Report 2024 retrieved from <https://wedocs.unep.org/handle/20.500.11822/46404>

<sup>5</sup> Retrieved from <https://www.bbc.com/news/science-environment-46398057>



others sustainable generation technologies (biomass, Hydrogen, biogas, battery storage etc) as well as the associated grid infrastructure. BnM has an incredibly ambitious timeline for this strategy as it plans to have these 4GW of projects energised and generating clean electricity by 2040. It is envisaged that by 2040 up to 25% of Ireland's installed on-shore renewable capacity will likely sit on BnM's landbank, playing a vital role in security of energy supply for the state

While BnM has ambitious plans to build out this renewable energy infrastructure towards 2040, ultimately it will take a relatively small footprint of its overall landbank. Taking a conservative approach (i.e. assuming a maximum area to accommodate this infrastructure), this footprint may represent between 10,000-20,000 ha by 2040. This leaves a significant BnM landbank that will ultimately have a primary land-use of supporting nature and biodiversity, of which the majority will be re-wetted cutaway peatland.

The vast majority of the BnM landbank that has potential for the development of renewable energy infrastructure, will also deliver complimentary and integrated benefits across land use change, rehabilitation, biodiversity net gain and nature restoration. However, not all BnM sites will be developed in this way. Some discrete sites like the proposed Derrygreenagh Energy Park will be a cluster of renewable energy producers and industrial off-takers, and will have a greater infrastructure footprint and little to no potential to contribute towards the NRL. At a high level, the following mosaic of land use is envisaged across the BnM estate

- Sites where no renewable energy projects are proposed. These include sites where there is already high ecological and biodiversity value (e.g. raised bog restoration – Annex I habitat). These would also include some of the areas rehabilitated/ restored under the Enhanced Decommissioning, Restoration and Rehabilitation Scheme (EDRRS) also referred to as the Peatlands Climate Action Scheme (PCAS).
- “Typical windfarm” sites which may have less than < 5% of the landbank used for infrastructure, with the remainder **subsequently** suitable for rehabilitation, biodiversity net gain and nature restoration
- Sites where there may not be any renewable energy generation assets, but there may be future grid infrastructure across or along the margins. This may include some areas of peatlands rehabilitated under EDRRS where any impact on the areas rehabilitated will be addressed in accordance with the Scheme Agreement requiring compensatory lands to be provided.
- Discrete sites like the proposed Derrygreenagh Energy Park - a cluster of renewable energy producers and industrial off-takers, and will have a greater infrastructure footprint and little to no potential to contribute towards the NRL.



As with all critical infrastructure in the state, the vagaries of regulatory consenting is a significant challenge for BnM's development of renewable energy projects and the role out of the above strategy. Notwithstanding BnM's ambitious timelines to develop 4GW of capacity, and noting that some sites have been definitively identified for renewable energy development in the immediate future (before 2030), it is not possible nor feasible to conclusively classify the land-use of every single hectare of BnM's estate for strategic and policy aligned renewable energy projects between 2030 and 2040. There are known-unknowns here. Therefore setting specific high level targets for the whole BnM land-bank to quantify the amount of land that will be 'deemed' and allocated or potentially managed primarily for nature is not practicable at present. Again it must be stressed that this inability to absolutely commit to this quantum is a function of the current consenting regime in the state. Flexibility is required to plan and develop various projects through 2030-2040, as amendments to planning and renewable energy legislation hopefully reduces the labyrinthine complexity of the consenting process. BnM will continue to prioritise its renewable energy strategy in line with existing policy obligations and in response to the climate emergency, however, the company will support other initiatives such as the NRL, provided they can be aligned with the delivery of this strategy.

Currently there is uncertainty around the rule set for NRL in Ireland, particularly in relation to land-use. If a conservative NRL rule-set is implemented, where renewable energy sites are not deemed compatible, then a smaller amount of future BnM land use (see bullets above) will have the potential to be committed to the NRL. This approach would likely see NRL committed lands managed like nature reserves or NATURA sites, with strict rules around land-use within these sites to protect particular habitats and or species.

If a more flexible rule set could be developed, greater complementarity with the BnM strategy can be achieved resulting in a higher potential for a greater proportion of BnM lands to eventually be committed towards the NRL. This more flexible rule set for the NRL would need to expressly include provisions to facilitate BnM build out its renewable energy strategy.

There are several potential solutions that could be incorporated into a more flexible rule-set for the NRL. One solution is the option to commit areas of land with land-use buffers. For example, 70% of Mountlucas Windfarm could potentially be committed towards the NRL. Thirty percent of the site would be retained by BnM as a buffer that would include the current infrastructure and drainage, along with a portion of land for future renewable energy and associated development. Likely future developments at Mountlucas could include battery storage, additional grid connections or other renewable infrastructure (requiring smaller portions of land between 5-20 ha) and the re-powering of the site in 2045 (assuming a 30 year wind farm life) potentially requiring modified roads and hard stands (but again, requiring a relatively small amount of additional land in the context of the totality of the site). The overall area of Mountlucas Bog is 1220 ha. A thirty percent buffer would be 366 ha, which would be sufficient land to allow for all future renewable



energy and associated development at Mountlucas. Taking this approach, potentially 854 ha could be committed to the NRL. However, this 30% buffer would not be prescriptively demarcated immediately within Mountlucas, rather 70% of the site (854 ha) would be **deemed included** in the NRL, allowing BnM flexibility to design future projects and adjust to impending constraints, albeit within the nominal 30% of the site's footprint. This proposed option would require further discussion with key stakeholders.

The above proposed option is a pragmatic approach to facilitate a larger area of BnM land that could potentially be included in Ireland's commitment towards NRL, without negatively impacting BnM's renewable energy strategy, the State's Climate obligation and the global imperative to decarbonise energy. BnM appreciates that renewable energy does not have zero negative impacts on biodiversity. However, the company does and will continue to adopt a proactive approach during planning & development stages to reduce and minimise these overall impacts on biodiversity where there is integrated land-use and renewable energy or amenity... While there is likely to be some overall residual negative impact for some species due to renewable energy – in particular some breeding and wintering bird species – peatland, wetland and woodland habitats will still develop and many other species will thrive

Returning to the Mountlucas Windfarm, this site already supports rare Red Data list plant species. Round-leaved Wintergreen was unknown within Co. Offaly until it was found at Mountlucas Windfarm and has now spread across the site, and now spread to adjacent cutaway bogs. The construction of the windfarm did not, and any future development on this site will not impact on the status of this species at Mountlucas. Blue Fleabane, another Red Data list species, is frequently found at Mountlucas and is now spreading onto the newly constructed windfarm hardstands and roads. Small wetlands within Mountlucas are now developing as rich fen habitat. This habitat development is continuing alongside the previous construction and now the day to day operation of the windfarm. Scarce butterfly species such as Marsh Fritillary and Wall Brown have been recorded on this site. Birch woodland and scrub is continuing to develop across this site. This native woodland will make a significant contribution towards Ireland's afforestation targets. This has already been identified in the latest National Forest Inventory by the Forest Service, who have outlined how BnM cutaway bogs are making a significant contribution towards woodland targets.

Mountlucas is used as an example here to make the point that integrated land-use on cutaway bog is already supporting a significant amount of biodiversity. This BnM integrated land-use strategy looks to achieve win-win-wins, (1) for Ireland's renewable energy, energy security and for climate action targets, (2) for local communities and others with the delivery of amenity alongside these developments, and (3) for biodiversity and nature by re-wetting cutaway peatlands and encouraging and supporting the development of these habitats across the BnM land-bank, and which with practical flexibility could be subsequently included in the NRL.



The NRL already has embedded this type of flexibility in relation to specific land-uses. By way of comparison to Coillte's landbank, forestry is still a compatible land-use for NRL, with NRL recommendations to improve the biodiversity value of forests. Different types of agriculture are still a compatible land-use for NRL, with recommendations to increase organic farming for example. Urban areas are included with recommendations to increase urban green spaces with ecological features. The main point being made here is that the NRL does not exclude forestry, agriculture and urban land-uses to impose a strict designation type commitment, and there is capacity for integration of measures to improve biodiversity condition or the restoration of biodiversity along with other land-uses.

The NRL already has embedded this type of flexibility in relation to land-use and renewable energy. Quoting section 68 *"Considering the importance of addressing consistently the dual challenges of biodiversity loss and climate change, the restoration of biodiversity should take into account the deployment of renewable energy and vice versa. It should be possible to combine restoration activities and the deployment of renewable energy projects, wherever possible, including in renewables acceleration areas and dedicated grid areas."*

Flexibility has also been embedded within the EDRRS agreement where there is a clause allowing the substitution of lands that have been previously re-wetted to support other land-uses. This mechanism will have to be implemented at Mountlucas in the near future to support the construction of the Uisce Eireann Water Supply Project – Eastern and Midlands Region, which is the proposed water pipeline to transport water from the Shannon *via* the Midlands to Dublin, being critical infrastructure to address national issues including the current housing crisis. This proposed pipeline through the midlands crosses several cutaway bogs including Mountlucas. This project was considered during the planning of EDRRS re-wetting at Mountlucas, but changes to pipeline's route requires some additional cutaway land that has since been included in PCAS. A portion of land included in PCAS (< 10 ha) is now needed for the pipeline with a proposal to replace with an area previously constrained for the pipeline. This is another example of the type of flexibility and practicality that is required to support development of key state infrastructure projects and deliver national policy objectives.

For the avoidance of doubt, BnM has no intention to reverse the widespread positive impacts of EDRRS and re-drain large tracts of cutaway bog that have already been re-wetted. Large wetland sites will remain as large wetland sites. Restored bogs will remain as restored bogs. BnM may consider the integration of infrastructure across sections of sites that does not have significant impact on re-wetting. An example here could be to use some of the dry former industrial railways as corridors for grid infrastructure, again critical for decarbonisation and addressing the housing crisis. BnM is already integrating greenways through some PCAS sites in partnership with local authorities and with Tourism Ireland. BnM will also consider the substitution of a small portion of lands at some sites already included in EDRRS as part of its future strategy.



An example here would be the removal of small areas of lands (< 20 ha) adjacent to key infrastructure such as electrical sub-stations to support battery storage in keeping with the recently adopted Electricity Storage Policy Framework<sup>6</sup>.

The proposal above by BnM in relation to integrated land use, flexibility to deliver the BnM renewable energy strategy and a commitment to support and manage biodiversity on significant proportion of this land-bank at a high level reflects the sentiment embedded within the NRL.

Timing is a key issue here. Currently a portion of the BnM landbank that already has biodiversity value (for example – restored raised bogs) which are not potential candidate sites for any renewable energy projects could in theory be committed towards 2030 NRL targets. However, BnM would have to carry out a consultation process first to reach internal agreement on a proposal for a list of sites that can be recommended to senior management for this near term ‘commitment’. This is likely to be an initial recommendation in the order of 10,000-15,000 ha and will by definition not include any sites with renewable energy infrastructure or sites being considered for future renewable energy and integrated land-use, or sites adjacent to areas being considered for some element of renewable development in the future (including grid infrastructure).

Furthermore, it is expected that if a flexible ruleset is adopted for the NRL (as per the above example) large portions of sites redlined for renewable energy development will have considerable parcels of land within their site boundary that could be **subsequently** ‘deemed’ committed to the NRL.

Please find attached BnM’s response to the individual questions posed by the Independent Advisory Committee. Should you have any further questions please do not hesitate to contact me directly

Sincerely

Regards

**Mark McCorry**  
Ecology Manager

On behalf of

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<sup>6</sup> Retrieved from <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/electricity-storage-policy-framework/>



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## 1. What does BnM see as the most significant challenges/obstacles to supporting the goals of the NRL?

- The key challenge for BnM in delivering its renewable energy strategy, contributing towards the States Climate obligation and supporting the global imperative to decarbonise energy are potentially conflicting policies for future land-use. However, as mentioned in the body of this submission, there can be wins for renewables & decarbonisation objectives together with wins for rehabilitation and nature restoration so long as the sequencing of developments and initiatives are properly planned and there is sufficient flexibility in the design of regulatory regime, specifically those whose design and implementation is within the control of the state, eg the NRL ruleset.

Again it must be noted that BnM is a Renewable Energy company that has a corporate and policy driven mandate to build out its renewable energy strategy across the land-bank that was formerly used for industrial peat extraction in support of the state's renewable energy targets, the National Climate Action Plan, the Climate Action and Low Carbon Development Act , and Ireland's binding European commitments and obligations as a signature to the Paris accord.

Unfortunately, there are different views from various external stakeholders about the future use of BnM land. Simply put, some stakeholders feel that BnM lands should be committed towards biodiversity and amenity at the exclusion and detriment of all other policy initiatives and commercial opportunities, and that by definition the future development of renewable energy should be severely restricted, and that the integrated, sequential and flexible land-use as proposed by BnM does not support the restoration of nature sufficiently. However, and again to re-iterate, BnM's corporate and policy mandate is to deliver its renewable energy strategy and this is the company's key strategic priority. Biodiversity, nature restoration and other Public Good initiatives can be supported and incorporated into many of BnM future developments (see bullets above) when the design, planning and implementation of these projects are properly sequenced and there is practical flexibility in how these additional benefits are measured and reported. Again it should be stressed that a smaller portion of BnM land that does not interact with our renewable energy strategy is potentially available for NRL commitment in the near term, subject to the considerations discussed above. However, the larger portion of the BnM estate which will have integrated land-use for the delivery of renewable energy and decarbonising local industry and any inclusion will require land-use flexibility as discussed above, if the large portions of these landbanks are to be deemed eligible for commitment to the NRL in the period to 2040.



- It is becoming increasingly evident that clarity is required as to how Government Departments and Agencies will deploy NRL within the planning process to support or oppose various projects including renewable energy and other climate positive initiatives. Already, NPWS have quoted the NRL as one reason to oppose the development of greenways across BnM cutaway peatland in Co Longford in a submission to the local authority. This amenity project was subsequently granted planning consent by Longford County Council. There is a risk that some agencies and groups using the NRL to oppose future BnM (or other developer's) decarbonisation and climate projects in direct contradiction of Governments legal-binding Climate obligations, EU renewable energy targets, and commitments to the community of nations under the Paris accord. A consistent approach in relation to land use is required and possible (proper sequencing and flexibility) here where different sections of government can be working together to achieve different targets (renewable energy, re-wetting, biodiversity, nature restoration). There is potential for competing/conflicting land-use needs, failed policies and missed targets without a joined up strategic approach.  
BnM has clearly outlined its position for an integrated land-use strategy to balance and optimise, *via* proper sequencing and flexibility, the delivery of the additional benefits (re-wetting, biodiversity, nature restoration, amenity etc) while focusing in the near term on decarbonising our power system.
- Not all land included in EDRRS can immediately be committed to NRL. In particular, EDRRS sites such as Mountlucas, Cloncreen, Templetouhy and Timahoe North that also have integrated renewable energy infrastructure can not immediately be committed until there is more clarity around the ability of BnM to develop other renewable energy infrastructure and eventually re-power renewable projects across these sites. The BnM requirement for land-use flexibility to support the NRL is discussed above. Additional EDRRS sites such as Blackwater and Timahoe South where portions of these sites have been constrained for future renewable energy development cannot be proposed for the NRL until there is more clarity in relation to planning consent for these projects.
- Clarity is required on the starting date to count or commit sites towards NRL targets. Re-wetting since PCAS started seems to be an obvious date to start counting, as overall EDRRS (2021-2026) overlaps with the development of NRL (2024). However, a significant portion of BnM sites that could contribute towards the restoration of Annex I raised bog habitats were restored prior to 2021.
- Clarity is also required on future restoration management and the need for additional funding. One approach is that various wetland sites that have been re-wetted or restored, can now be simply left to re-wild or recover with no additional management. Another approach is to actively manage sites and dynamically carry out additional initiatives to further improve the condition of these sites to support various objectives. One example of this would be scrub control to support breeding waders. There has been no discussion of how this type of management would be funded. It is not feasible



to expect BnM to commit land towards various NRL targets with the assumption that BnM will also fund any additional management and monitoring for biodiversity in the future.

- Furthermore, clarity is required about how other land-uses across the BnM state will be treated by the NRL given the diversity of use-cases both planned and extant. For example, consider the internationally recognised Lough Boora Discovery Park (LBDP). The LBDP is an amenity site with multiple land-uses. Several areas of LBDP have been included in EDRRS, but the LBDP lands also contain infrastructure such as greenway and other public amenities. Will these amenities negate these lands from being included in the NRL? In other areas of the LBDP, site access through re-wetted lands (with potential to be proposed for NRL) to support forestry management of adjacent lands by Coillte would be required in the future.. It would certainly be counterproductive to exclude the lands in this small sample of real world use-case examples? Can we take a general, pragmatic and flexible approach to the inclusion of site areas, or does there have to be a rigid, specific approach where any land that does not have biodiversity value and cannot be restored be removed from the area targets? (This could include built land and land used for turf cutting – turbarry).
- Clarity is required in how the NRL is to be administrated and how this is expected to be funded. Significant time and resources have been required already to answer some of the specific questions outlined herein. If, subject to the caveats contained in this submission, BnM makes a proposal of land to be committed towards the NRL, will there be an administrative, monitoring and assessment requirement imposed on BnM, and if so who will provide the funding to support these additional costs?
- Fundamentally, and at the core of this submission is the need for clarity regarding the potential to commit lands (to the NRL) where rehabilitation, restoration or biodiversity management is proposed in the **future**. For example, the LBDP contains areas of cutaway habitat that have been re-wetted by EDRRS and these areas should qualify for potential NRL commitment. However, there are also other areas of re-wetted cutaway within the NRL where there are no EDRRS measures. If the main land-use across this portion of land that has already been re-wetted is biodiversity (within some integrated amenity), can this portion of lands be proposed towards the NRL? There may not be any direct biodiversity management proposed, but there is a potential to commit that these areas will continue to be allowed to naturalise. Would this sort of passive management commitment qualify towards Article 4.1, “improving to good condition” where woodland and wetland habitats are allowed to continue to develop?
- Clarity is also required on how the various government departments and BnM agree the criteria to determine what BnM lands potentially contribute to different Articles of the NRL. Which Government Department gets priority? It is assumed that if more BnM land is potentially committed



towards Articles 4 (NPWS targets), less land will be potentially committed towards Article 11 (DAFM targets). How will this be communicated to different stakeholders?

**2. What's needed to overcome them, how will these needs be reflected in the organisation's future plans and strategies, and how can the IAC support this work?**

- As discussed above, a key issue for BnM is priority towards the development of renewable energy. At present, only a smaller portion of BnM lands can potentially be committed towards the NRL. Ultimately this may be seen as a potential failure for NRL, as the larger portion of BnM lands already has some biodiversity value, will have re-wetted peat and will have improving to good condition in the future from the starting point of drained bare peat and ceased industrial peat extraction. There will be significant biodiversity across the larger portion of the BnM land-bank that will not contribute towards the NRL targets between 2040 and 2050.
- If a flexible approach to integrated land-use can be considered and developed by all parties, then a larger portion of BnM lands could potentially be committed towards the NRL.
- As noted earlier in this submission, one of the key issues impacting on the delivery of re-wetting across the BnM land bank is the planning and consenting regime. This has already had a significant negative impact on BnMs ability to achieve a re-wetting target of 33,000 ha in PCAS by 2026. Planning consent for renewable energy projects needs to be accelerated.
- There needs to be a greater understanding that with nature restoration in Ireland “perfect should not be the enemy of good”. There are plenty of measures that we can implement now that will improve biodiversity condition, but may not completely restore various habitats to pristine condition. There is a risk of paralysis by analysis here in relation to developing a National Restoration Plan.
- Currently, our legislation can have an inhibiting (but perhaps unintended) impact on implementing nature restoration. One example is the need to carry out drain blocking on bogs where there are potential breeding bird constraints during a period of Sept-Feb. The bird nesting season is restricted, *via* the Wildlife Act and the need to avoid disturbing vegetation during the bird nesting season. This legislation was written to manage and control potential impacts from various types of land-use but never considered nature restoration. Ironically, some forms of development get a derogation to work through the summer months. The best time of the year to carry out re-wetting of peatlands is during the summer and ultimately this will also support breeding birds that are dependent on this habitat. More work and regulatory amendments are required to remove these blockages from the process.



3. In light of Coillte's recent announcement, is there an overall percentage of the BnM estate that the organisation is aiming to manage for nature by a certain date?

Coillte have made several announcements in the recent past in relation to their strategic vision. Quoting from the Coillte website: *"This Strategic Vision aims to balance and deliver the multiple benefits from our forests, bring more focus to climate action, biodiversity and recreation while continuing to deliver for the forest and wood product industry."* Like BnM, this strategic vision looks to balance commercial activity (timber production and renewable energy) across its landbank with other benefits for nature and climate.

- *"Forests for climate"* highlights Coillte's activity around peatland restoration (3500 ha restored) and renewable energy (30% of Irish windfarms located on Coillte land, along with the ambition to create carbon sinks with woodland management (28 m tonnes of CO<sub>2</sub> sink to be created by 2050).
- *"Forests for nature"* states that Coillte are on a journey towards "50% Forests for Nature" and that currently 20% of its estate is managed primarily for nature, increasing to a target of 30% by 2030.

Coillte, like BnM, look to develop multiple uses from their landbank. Forests can be used for commercial timber production while also be used for amenity and renewable energy (Sieve Bawn Wind Farm). Many of the sites "being managed for nature" by Coillte will have some level of ongoing timber management in the future, highlighting the need for integrated land-use. The NRL also references this requirement by stating:

*"The new EU Forest Strategy for 2030, set out in the communication of the Commission of 16 July 2021, outlined the need to restore forest biodiversity. Forests and other wooded land cover over 43,5 % of the Union's land space. Forest ecosystems that host rich biodiversity are vulnerable to climate change but are also a natural ally in adapting to and fighting climate change and climate-related risks, including through their carbon-stock and carbon-sink functions, and provide many other vital ecosystem services and benefits, such as the provision of timber and wood, food and other non-wood products, climate regulation, soil stabilisation and erosion control, and the purification of air and water."* (Section 60).

- BnM has not set specific targets for the overall area of its estate that will be 'deemed' and allocated primarily for nature. As outlined above, there is potential to commit, in the near term, a portion of its land bank (10,000-15,000 ha) that does not interact with current or future renewable energy strategy.
- By 2040, it is likely that the majority of on-shore wind development on BnM land will be completed or through planning. By this stage, potentially 15,000-20,000 ha will be committed directly towards infrastructure and the remaining lands will be allowed to naturally develop a mosaic of wetland, peatland and woodland habitats, after rehabilitation. BnM can also consider the inclusion of additional land towards the NRL commitment at this stage, should the rule-set facilitate such lands.



4. To what extent might it be possible to ensure that sites prioritised for restoration and/or rehabilitation overlap with important areas for birds and safeguard vulnerable species such as breeding waders?

- A proportion of BnM lands re-wetted via EDRRS and with potential to be committed towards the NRL will overlap with important bird areas and have potential to safeguard vulnerable species such as breeding waders. This includes sites where there are breeding waders already and sites where there is potential for future development habitat that would be suitable breeding waders.
- Note that the inclusion of sites to safeguard vulnerable species such as breeding waders will require additional management and external funding. BnM experience is that breeding waders are initially attracted to the large open species of cutaway bogs after re-wetting and colonisation of pioneer vegetation. However, as cutaway habitats mature (after 30 years), the value of these areas towards some breeding waders diminishes as habitats mature and a mosaic of scrub and woodland develops. One issue is the development of trees that can attract predators such as crows, which predate eggs of ground-nesting species. Here additional management and funding is required to manage these areas specifically for breeding waders (removal of trees, predator control). Potential management measures could include measures already being implemented at sites like the NPWS Grey Partridge Conservation Area at Boora, which also supports breeding waders like Lapwing, and measures proposed by the Breeding Waders EIP to support breeding waders.

5. Has BnM identified the areas it will restore (and/or rehabilitate) to support the implementation of the NRL.

- As outlined above, BnM is a renewable energy company with a mandate and corporate strategy focused on decarbonising our power system *via* the deployment of renewable energy, delivery of low carbon initiatives for industry and enabling the greening & strengthening of our electricity grid. BnM are happy to support commitments such as the NRL where it aligns with this primary strategy.
- BnM have carried out an initial review of its land-bank to consider what land can be committed towards the NRL. This includes land that has been restored or re-wetted since 2021 under EDRRS.



- BnM also suggest considering the inclusion of other sites that have been restored between the period 2009-2020, where possible, to support the various targets of the NRL.
- BnM has identified several bogs for re-wetting as part of EDRRS in 2026 and these will be considered for inclusion with the NRL commitment.
- Beyond 2026, BnM does not have a definitive list of what bogs will be re-wetted and when this will be carried out. In general, the majority of the remaining land-bank that has not been included within PCAS already is under active consideration for renewable energy development in the short and medium term. This portion of the BnM land-bank will include integrated renewable energy infrastructure, if it is to be considered in the future for inclusion in BnM commitments towards the NRL.
- Some bog units may become available for inclusion within a BnM NRL commitment at a later date, but this will be depend on the delivery of our renewable energy strategy and where it is deemed lands are then not needed for renewable energy development.

a. **If so, how many hectares over and above the 33,000 already committed to restoration work are planned?**

- There are no plans for additional “restoration”. As already stated, BnM will largely complete its raised bog restoration programme in 2026, with the restoration of approx. 4500 ha of raised bog in that year.
- The PCAS programme originally had a high level target to re-wet 33,000 ha of BnM land by 2026. This overall target has now been revised to 24,500 ha. The main reason for not achieving the initial target was the need to integrate a significant portion of this re-wetting across renewable energy projects that are in the design, planning and consenting process. Delays in this programme and in the planning process now mean these lands are not available for re-wetting in the immediate future. BnM plan to obtain planning consent first for these renewable energy projects and then implement any rehabilitation and re-wetting initiatives.
- BnM are happy to commit to the delivery of the original 33,000 ha PCAS target. However, some flexibility with timing will be required to reach this target.
- BnM will ultimately rehabilitate all of its former industrial peat extraction areas included in the IPC Licenses issued by the EPA. In the past this rehabilitation of cutaway bog has included the



development of agricultural land and forestry. Future rehabilitation initiatives will, where appropriate, focus on the integration of renewable energy and re-wetting residual peat.

- Re-wetting peat will be a part of the rehabilitation of this remaining land-bank in the future. Re-wetting will be integrated, where appropriate, with the renewable energy infrastructure.
- A portion of the remaining landbank (not rehabilitated) will not be re-wetted due to underlying environmental factors (e.g. topography and elevated areas where potential for successful re-wetting is limited) and a commitment not to block boundary drains and a commitment not to affect the hydrology of adjacent lands. This means compromises are required and some lands will not be re-wetted but encouraged to develop drier habitats.

**b. As per Article 4, what is the extent and existing condition of Annex 1 habitat types that occur on the BnM estate?**

- There is between 100-200 ha of Annex I active raised bog habitat (7110) across the restored 4500 ha of BnM raised bog habitats. Much of this raised bog was high bog that was drained but not utilised extensively for peat extraction. Some active raised bog was raised bog that was not drained, and some is recovering from direct drainage and is in poorer condition. Annex I Active raised bog is likely to increase in the short term (next 10 years) due to the restoration measures carried out and potential for development of more Annex I active raised bog to develop from Annex I degraded raised bog capable of regeneration (7120). Associated with this active raised bog is the Annex I habitat Rhynchosporion depressions (7150). The latest NPWS Article 17 report on the status of Annex I habitats to be published shortly will give a more detailed breakdown of this active raised bog habitat and its condition.
- Several BnM bogs have been monitored during this year using raised bog ecotope mapping via EDRRS, and the final assessment of this monitoring will help define a more specific current area of Annex I Active Raised Bog on the BnM estate.
- Other Annex I habitats associated with these restored raised bog sites or intact bog remnants include small amounts of Transition mire (7140), Alkaline fen (7230) and Annex I bog woodland. Areas of these habitats range between 5-10 ha.
- A significant portion of this Annex I raised bog habitat is found on BnM sites that were restored by BnM prior to 2021.
- There is a small amount of Annex I bog woodland (91D0) developing across the BnM estate on cutaway bog. This is a sub-type of the more common Birch woodland (WN7) that is generally



developing across the estate. Small patches of *Sphagnum*-rich Birch woodland are now developing. Generally these are small in extent (< 0.5 ha). Some of these may qualify now as Annex I habitat and some may require more development and an increased diversity of species to qualify in the future. More monitoring and assessment is required to specifically define the area and condition of the Annex I bog woodland developing on the cutaway. It is estimated that the area of potential Annex I habitat is between 5-10 ha.

- Some rich fen (PF2) analogous to Annex I Alkaline Fen (7230) is developing across the BnM estate on cutaway bog. Again, this is rudimentary, may not have all qualifying species and appropriate structure and bryophyte cover, and may not immediately qualify as Annex I habitat at this stage. However, several external ecologists have indicated that a portion of this rich fen could shortly qualify as Annex I habitat. It is estimated that the area of potential Alkaline fen Annex I habitat is between 5-10 ha.
- In addition, *Cladium mariscus* is developing across the BnM midlands cutaway. At some sites these clumps are merging to form larger denser stands. Stands of *Cladium* do not qualify as Annex I habitat unless they are associated with Alkaline Fen (7230). However, there is potential for this to occur on some midland BnM sites in the near future (10-30 years).
- BnM also retains intact, drained and restored blanket bog habitat on its sites in Co. Mayo. There are several intact or drained and restored areas of blanket bog habitat across the windfarm at Oweninny. In addition, a drained area of blanket bog at Tullaghashammer (Ballycroy) (230 ha) has been committed for restoration within the Wild Atlantic Nature Project. This restoration has not been implemented yet and is anticipated to start in 2026. Some of this blanket bog habitat may align with Annex I Blanket Bog (Active 7130). However, further monitoring and assessment is required to determine the specific area and condition of Annex I Blanket Bog.

c. Has BnM assessed the potential of these habitats to contribute to the objectives and targets of Article 4, specifically:

- Article 4.1 - in relation to improving to good condition
- Article 4.4 - in relation to re-establishing Annex 1 habitats types
- Article 4.7 - in relation to restoration measures for species, including birds .



- BnM has carried out an initial high level assessment of potential BnM NRL sites to contribute to the various Articles described above. Potential BnM NRL sites were categorised according to biodiversity value (low, medium, high).
- High biodiversity sites are those with restored raised bog habitat, sites that contain large wetlands that support breeding/wintering wetland birds, or sites that have extensive areas of developing mosaic of peatland, wetland and emerging woodland habitat.
- Low biodiversity sites include sites that are mostly re-wetted bare peat and where the development of pioneer vegetation is ongoing. Vegetation cover is currently low.
- Medium biodiversity sites are those sites that have a mosaic of these conditions. All sites should be able to contribute towards one of these Articles.
- Low biodiversity sites have been re-wetted, are of low biodiversity value and could potentially contribute towards the Article 11 target.
- Medium Biodiversity sites could either contribute towards Articles 4.1 or Article 11, depending on the definition of “improving to good condition”.
- High biodiversity sites could potentially contribute Articles 4.1, 4.4 and 4.7.
- Additional external funding would have to be committed before any sites are committed to Article 4.7 of the NRL. It is assumed here that additional and ongoing management is required to improve and maintain habitat condition for wetland bird species. This would include management actions such as scrub maintenance for example. This sort of site management is outside of the scope of requirements for rehabilitation under the IPC Licenses and the EDRRS agreement.
- BnM has also carried out an assessment of Potential Future Habitats across the cutaway. This is an ongoing and iterative process. At present there would be high level understanding of which parts of sites will develop woodland, which areas will develop wetland and which areas will develop *Sphagnum*-rich vegetation on residual deep acidic peat. Within wetland sites a portion of this habitat will develop as fen. However, much more research, modelling and monitoring is required to determine how much fen will eventually develop. Currently, our best prediction is that fen habitat will be a part of the mosaic of other wetland habitats on shallow cutaway.
- This approach can also be used to predict at a high level the amount of *Sphagnum*-rich embryonic raised bog could develop across the BnM land-bank in the future. The trajectory of transition from bare peat to *Sphagnum*-rich vegetation on cutaway towards habitat that looks like pristine raised bog is not fully understood. NPWS predict that it could take up to 100 years for cutover bog around



the margins of raised bog to develop back to raised bog. It is likely that over the next 100 years this *Sphagnum*-rich vegetation on cutaway will be a mosaic of Heather dominated vegetation, Birch, scrub and woodland, and sections that will increasingly look like pristine raised bog. Modelling this in detail at this stage is not practical and would only come with wide range of uncertainty. It is not practical to predict at this stage how much raised bog will return to BnM lands.

- Note that there are no guidelines issued by NPWS or by DAFM in relation to how different potential areas could contribute to different articles of the NRL.
- The next main step here is for BnM to carry out internal discussion and agree a suite of sites (10,000-15,000 ha in total) that could be proposed by BnM for an initial commitment towards the NRL. Once this is agreed, more detailed analysis can be carried out to determine which lands support which Articles.

c. **As per Article 11, how does BnM plan to contribute to meeting the targets under Article 11 in relation to rewetting?**

- See above

