



Community Wetlands Forum submission on EU Just Transition Fund and draft Territorial Plan

Our recommendations:

- The Just Transition funding process provides an equitable platform to allow smaller applicants to contend with larger ones and encourage multi-stakeholder partnerships.
- The draft Territorial Plan clarifies the future of peatlands once restored or rehabilitated, and indicate the role peatland communities play in the management of their local peatlands.
- Community groups are included in the decision-making process and receive sincere engagement from Bord na Móna.
- The Heritage Council or similar body be tasked with the coordination of auditing, storage of BnM/ESB archives and explore possible digitisation of same.
- decentralisation of museums/interpretive centres is considered in the Plan to accommodate community ownership of their industrial peatland heritage and identity.

1. Just Transition fund application process

This section is based on Community Wetlands Forum's experience accessing the National Just Transition Fund and takes a community-centred perspective.

One of the main issues with the National Just Transition Fund that was open for application in 2020 is that it wasn't staggered to allow for different levels of access to the funding. In this round of funding, community groups and small non-governmental organisations competed against larger bodies such as local authorities, and state and semi-state bodies. The funding round was stacked against smaller projects, and the biggest chunk of funding was allocated to larger bodies over smaller community groups.

Therefore, the funding process should be more democratised and provide an equitable platform for smaller community groups to contend with larger applicants. To help address this, Just Transition funding opportunities should encourage multi-stakeholder partnerships, to deliver equal status for community or civil society groups.

The concept of Just Transition means more than just Climate Action but comprises social inclusion and justice. We recommend that the scope of the funding be widened to include social

transformation and justice, protection of all aspects of heritage, and better natural environmental outcomes rather than just the Climate Action umbrella.

2. Clarity on the future land use of restored peatlands

The draft Territorial Just Transition (JT) Plan details the transition of Bord na Móna (BnM) from a brown to green energy producer and climate solutions company. At the moment, BnM is delivering extensive rehabilitation and restoration works at several peatland sites across the Midlands. However, it is unclear in the Plan what will become of these peatland sites once they are restored or rehabilitated. This has not been sufficiently explored or answered but raises questions about these peatlands' future management and protection.

There is also the question of where do peatland communities fit into the draft Territorial JT Plan and the future of their peatlands? The wishes of peatland communities are important in this context as BnM is a publicly owned company therefore the peatland sites are publicly owned. Communities feel that they should be benefitting from their presence, as they have in the past economically and socially, and wish for this to continue. The ethos of Just Transition must underpin the Territorial JT Plan which means the inclusion of peatland communities in the decision-making processes that affect their quality of life and their localities.

There is significant potential for peatlands as carbon sinks, knowledge and information sites for research, as well as places of amenity, tourism, and heritage. BnM has also identified several sites for renewable energy generation. Once again, this should benefit peatland communities if it is their wish to have renewable energy sites, in the form of community energy. BnM needs to develop a clear plan on the future of their peatlands once they have been restored and rehabilitated, which should be outlined in a Just Transition Strategy of their own as well as the Territorial JT Plan.

3. Community engagement and transparency

Agencies, stakeholders, and community groups have to be at the same decision-making table for the successful delivery of Just Transition.

Unfortunately for community groups like our members, engagement with BnM is quite difficult and many have struggled with issues of transparency and communication. In general, BnM is more inclined to engage with legal entities or well-known organisations, leaving community groups behind. BnM's lack of community engagement and poor communication has been noted by some of our members who live near BnM bogs or have engaged with them on some level. They are disheartened and feel as though the level of community engagement from BnM is a tokenistic and tick box exercise for the company. As mentioned previously, Just Transition is about social inclusion, and the communities in our membership do not feel included in the decision-making process.

It is concerning that BnM does not have a formalised Just Transition Strategy – which surely should be a top priority for a public company that is leading a large-scale transition from fossil fuels to renewable energy generation. This raises serious questions about BnM's commitment to a Just Transition and its transparency.

The draft Territorial JT Plan details the efforts of BnM and the ESB to phase out peat extraction and burning as well as plans for peatland restoration and renewable energy, which they set out in their Brown to Green Strategy. The Plan however does not list the shortcomings mentioned above, particularly the need for a Just Transition Strategy and the inclusion of peatland communities in the decision-making process.

4. Industrial heritage preservation and exhibitions

Concerns about the preservation of the cultural and industrial heritage of the Midlands have been raised by our members in this region.

Communities affected by the closure of Shannonbridge and Lanesborough Power Stations, and the ending of peat extraction, find themselves facing uncertain futures. For many, the focus on climate change, carbon sinks, and sustainability is upending old certainties. Not only is their right to a living undermined as are their identities.

The draft Territorial JT Plan references NESC (2021) and ‘the importance of recognising the historical and cultural context of places and communities in a just transition process’. However, the plan’s focus on tourism initiatives runs the risk of reducing the shared history of the Greater Midlands Region to a commodity. There are two broad risks here, the first is that Kieran Mulvey’s suggestion that the history of BnM and the ESB in the Greater Midlands Region be held in one central photographic/oral history archive or museum is acted upon and communities are essentially excluded from ownership of their past and their identities; the second risk is that County Councils and/or communities find themselves competing for the resources to present part of the overall story in a series of standalone and disconnected heritage projects.

There is a particular opportunity for the already existing Irish Heritage Railway sector to assist BnM in the process of identifying items of historic significance and to provide a safe future for such items allowing them to be preserved in operational condition. Thus far the approach from BnM has been to auction off such items and the prices have been vastly out of reach of such voluntary organisations many of which have charitable status.

There is a need to take a systematic approach to capturing and telling the story of BnM from the pre-war years, through the Emergency, and its 70-year long partnership with the ESB. While this does not rule out commercial tourism initiatives or a central archive/museum it does require the Territorial JT Plan to find ways of acknowledging the fact that the lives and identities of communities across the Greater Midlands have been bound up with that of BnM and the ESB. As former workers in BnM/ESB and midland communities negotiate their way through the transition from peat extraction, it is essential that their experiences and stories are part of how the region reframes itself.

It would be beneficial if BnM is contacted by the Heritage Council to assess the possibility for a survey to be carried out recording the visual status of the various sites as they cease use as peat production areas. For example, a very worthwhile project would be to examine if a mini project such as fitting “go pro” cameras to peat train locomotives in selected areas to record the driver’s eye view could be carried out. Using remote technology such as this would limit safety implications and permit extremely detailed visual recording of the infrastructure and landscape with little intrusion into BnM activities.

We propose that the Heritage Council or a body of similar standing and capacity be asked to take a coordinating role to ensure:

- that BnM and ESB archives relating to the Greater Midlands Region, whether held centrally or dispersed across depots/old work centres, are stored safely and an audit undertaken to establish the range and depth of materials therein.

- that a long-term arrangement for their safe storage be identified
- Records relating to the cartography of the peat production areas showing railway lines, drains and location of buildings used by staff need to be protected as a historical record
- that the possibility of digitalising these records be explored noting. It may then be possible to use anonymised details from wage cards to map the migration of people into the Greater Midlands to work for the ESB or BnM. This would have the benefit of preserving records, providing hard data for demonstrating the socio-economic impact of BNM and the ESB on the Greater Midlands region, and, in the long term, creating a genealogical treasure house.
- that a systematic approach is taken to gathering the alternative/unofficial archives held in local histories and newspapers.
- that a coordinated approach, via a structured Oral History Project, be taken across the Greater Midlands aimed at capturing the lived experience of those who worked for and benefited from the presence of BNM/ESB in their communities. This could be undertaken by former ESB and BnM workers given the appropriate training and support. Co-operation from the archives at BnM HQ in Newbridge would hugely benefit this idea by incorporating visualisation. Pictures have the potential to open up conversations and jog memories of former staff for interviewers. Access for researchers to the archives would improve the quality of any feedback from former staff.

This approach seeks to present the complex and layered BnM/ESB story in a way that respects and values workers and their communities while allowing for the emergence of several museums/interpretative centres. Each museum/interpretative centre could focus on a particular theme or era such as The Emergency Years and the Turf Camps, the Evolution of ESB Power Stations, Migration to the Greater Midlands. Such an approach would reduce the risk of unnecessary competition and facilitate greater cooperation across the Greater Midlands Region. It also recognises the need to prevent a concern with County or local priorities taking precedence over the need to protect, preserve and celebrate a shared common history and identity.

Addendum It is worth noting that BNMs narrow gauge railway system, associated machine runs and gravel roads have the potential to serve not only as green roads but to link the Royal, Grand and Barrow Greenways drawing tourists into the communities most affected by the end of peat extraction.

Who we are and what we do

The Community Wetlands Forum (CWF) is a representative platform for community-led wetland groups based on community development principles. Our mission is to support the protection, management, and wise use of wetlands for sustainable communities by providing a network to support community groups to share knowledge, ideas, research, and best practice. There are currently over 30 members of the CWF across the island of Ireland, with a growing membership.

We are partnered with Irish Rural Link to deliver a Strand 2 Just Transition project 'Connecting Communities with Peatlands' which is a capacity-building project for community groups engaging with peatlands in the wider Midlands region.

We are also partnered with other national and European wetland projects and networks, such as FarmPEAT, Eurosite, and WaterLANDS.