

Oweninny Wind Farm Phase 3

Environmental Impact Assessment Report

Appendix 18.5 Archaeological Code of Practice

Code of Practice



Code of Practice between
the Department of Arts, Heritage and the
Gaeltacht, the National Museum of Ireland
and Bord na Móna

BORD NA MÓNA 

museum

National Museum of Ireland
Ard-Mhúsaem na hÉireann



*An Roinn
Ealaíon, Oidhreachta agus Gaeltachta*

*Department of
Arts, Heritage and the Gaeltacht*

National Monuments Service
Department of Arts, Heritage and the Gaeltacht
February 2012

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www.archaeology.ie



Minister's Foreword

As Minister with responsibility for Ireland's rich natural and built heritage I am delighted to publish this Code of Practice developed by my Department in co-operation with the National Museum of Ireland and Bord na Móna. This publication brings the existing *Agreed Principles for the Protection of Wetland Archaeology in Bord Na Móna Bogs* into an updated format

similar to the Codes of Practice already agreed between my Department and other utility service providers.

In a dryland context organic material such as wood, leather, cloth and human tissue decomposes. In wetlands, however, the most fragile of materials may be preserved by surrounding anaerobic conditions. Peat itself is, in fact, a repository of environmental information which can be used to re-create both the local and the regional environment. Distinct types of monuments, toghers platforms and post rows were built to traverse, access and use the resources of these wetland environments. From prehistoric times many valuable artefacts have been deposited or lost in bogs. During the later prehistoric period ritually sacrificed individuals or 'bog bodies' were placed in boggy pools, only to be rediscovered many centuries later. The archaeological deposits and features recovered from bogs are a key resource of knowledge and learning, giving us information which, with careful handling and interpretation, tells us so much about the past.

My Department's involvement with archaeology in Bord Na Móna raised bogs dates back to the 1980s and the significant excavations at Corlea Bog which identified, and enabled the subsequent conservation of, a section of Iron Age roadway built in 148 B.C. across the boglands of Longford. This oak road is one of the most impressive of its kind to have been uncovered in

Europe and an eighteen-metre stretch of the preserved togher is now on permanent display at the Corlea Visitor Centre in Longford with a further portion of the roadway preserved in-situ in adjacent peatland. Since the excavations at Corlea my Department has continued to fund the identification and survey of wetland monuments in Bord na Móna lands.

The importance of archaeology has long been recognised by Bord na Móna. Both my Department and the National Museum of Ireland have had very positive experiences in working with the Bord over the years and I believe that this Code successfully formalises the co-operation required to manage ongoing peat extraction, while affording our valuable archaeological heritage the care and protection it deserves. I look forward to the practical implementation of the guiding principles set out in this document over the coming years.

Jimmy Deenihan

Jimmy Deenihan TD
Minister for Arts, Heritage and the Gaeltacht
February 2012



A Message from the Director of the National Museum of Ireland

As Director of the National Museum of Ireland I applaud the professional progress embodied in this Code of Practice, and the partnership it formalises between the Minister, the National Museum of Ireland and Bord na Móna. It sets a positive trajectory for the future treatment of Ireland's peatland archaeology.

Finds from peatland contexts are amongst the most prized in the national assemblage with one of the first reports of the discovery of trumpets in an Armagh bog dating to 1799. With reports now numbering almost three thousand entries, they show the wealth of archaeological material retrieved from Irish bogs and underline the archaeological potential of Ireland's peatlands. Artefacts preserved in the unique anaerobic conditions offered by peat ecosystems succeed in a tangible fashion in bridging the time gap between the archaeological moment of deposition and the present day student.

Since the foundation of the Museum the archaeological exploration of peatlands and the study of artefacts from peatland contexts have been amongst its core goals. The flood of information that has come from our recent accession of Iron Age bog bodies and the Early Medieval Faddan More Psalter, parallels the well-established involvement of the Museum in the investigation of antiquities from wetlands. The Museum has witnessed changing trends in the numbers of artefacts accessioned from peatlands reflecting adaptations in work practices in the industrial exploitation of Ireland's peatlands and legislative changes which offer greater protection to monuments and artefacts alike. In the period 1945-1985 awareness of the archaeological potential of peatlands increased through museum

Code of Practice

4

fieldwork pioneered by Ellen Prendergast, Etienne Rynne, A. T. Lucas and Michael Ryan's Lough Boora excavation co-funded by Bord na Móna. The contribution of Bord na Móna officials, such as P.J. Ruddy, T.A. Barry and J. Cooke, were most helpful to the Museum. The great part played by the late Barry Raftery and his excavation at Corlea in promoting Irish peatland studies has to be acknowledged. The 1980s saw a dramatic expansion in peat processing which led to National Monuments Service's licensing of excavations initially conducted by UCD's Irish Archaeological Wetland Unit (IAWU) and subsequently by archaeological contractors funded by Bord na Móna.

This Code of Practice endorses the current practice of cooperation between the Minister, The National Museum of Ireland and Bord na Móna in the Archaeology Management Liaison Committee. In this light we must applaud the framework set out in this Code and must strive to stay abreast of diversification in peatland usage and trends in the care of peatland archaeology. Through the auspices of these practices we can progress towards attaining the highest standard of monument and artefact care in the future preservation of our nation's peatland heritage. I look forward to a closer engagement, facilitated by this Code of Practice, between the Minister, Bord na Móna and the National Museum of Ireland and hope that it will further our growing appreciation of the peatlands as a national resource.

Ar aghaidh leis an obair,



Patrick F. Wallace
Director
National Museum of Ireland



A Message from the Managing Director, Bord na Móna

Bord na Móna is pleased to be associated with this new Code of Practice on peatland archaeology, which outlines the principles to be applied for the protection of Ireland's peatland archaeological heritage. This Code was developed by Bord na Móna in cooperation with the National Monuments

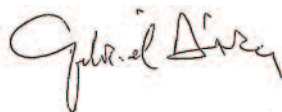
Service of the Department of Arts, Heritage and the Gaeltacht and the National Museum of Ireland.

Bord na Móna is Ireland's leading environmentally responsible integrated utility service provider encompassing electricity, heating solutions, resource recovery, water, horticulture and related services. Our Feedstock Business consists of the production and supply of milled peat for power generation and the manufacture of peat briquettes and horticultural grade peat for a range of growing media products.

Peatlands are a very important source of archaeological information in Ireland as objects are preserved in peatlands because of the acidity of peat and the anaerobic environment which exists within peatland deposits. For many years Bord na Móna has played its part as best it could to properly deal with archaeological finds in its bogs and has worked with the relevant authorities and agencies to preserve this unique heritage. The company's recently adopted vision for the future: A New Contract with Nature elevates the good practices of the past onto an entirely new plane of responsibility on which this Code of Practice elegantly sits.

The purpose of this Code is to provide a framework within existing legislation, policy and practice to enable Bord na Móna to proceed with our programme of peat extraction within the framework of Government strategy, whilst carrying out appropriate archaeological mitigation having regard to a set of principles and actions agreed by all three parties. The Code also highlights that Bord na Móna is fully committed to ensuring that all its activities are carried out in an environmentally sensitive manner that ensures the safeguarding of the State's archaeological heritage.

Bord na Móna is looking forward to working with the Department of Arts, Heritage and the Gaeltacht and with the National Museum of Ireland, as agreed in this Code, with a view to protecting our archaeological heritage.



Gabriel D'Arcy
Managing Director
Bord na Móna plc



Code of Practice agreed between the Department of Arts, Heritage and the Gaeltacht, the National Museum of Ireland and Bord na Móna

The purpose of this Code is to provide a framework within existing legislation, policy and practice to enable Bord na Móna to progress with its programme of peat extraction within the framework of Government strategy, whilst carrying out archaeological mitigation having regard to a set of principles and actions agreed by all parties. The Code draws from *Agreed Principles for the Protection of Wetlands Archaeology in Bord na Móna Bogs*, and refers exclusively to the extraction of peat from peatlands where this extraction lies outside the scope of the Planning and Development Acts.

The Code is guided by the following agreed principles

1. The Minister for Arts, Heritage and the Gaeltacht has a responsibility to protect the archaeological heritage and to exercise powers of preservation, under the National Monuments Acts 1930-2004, taking account of the European Convention on the Protection of the Archaeological Heritage (Valletta).
2. The Minister's statutory responsibilities include the maintenance of the *Record of Monuments and Places*, with the aim of providing protection to all known archaeological monuments including those uncovered in Bord na Móna bogs.
3. The Director of the National Museum of Ireland has a responsibility to enforce state ownership of all archaeological objects and to safeguard the treatment of all archaeological objects before their accession into the State's repository, under National Monuments Acts 1930-2004 and the National Cultural Institutions Act 1997, taking account of the European Convention on the Protection of the Archaeological Heritage (Valletta).

4. Bord na Móna plc is a company with a statutory mandate, under the Turf Development Acts 1946-1998, to develop the national peat resource.
5. The development of peatlands has considerable archaeological implications which must be addressed given that the archaeological heritage is a non-renewable resource.
6. Bord na Móna has a statutory duty under the Turf Development Act 1998 (section 56) to afford appropriate protection for the environment and the archaeological heritage.
7. Bord na Móna will finance a balanced and cost effective approach to archaeological investigation, excavation, post-excavation and mitigation on the basis of the *developer pays* principle and in keeping with the Minister's stated policy in this regard.
8. Bord na Móna will engage a Project Archaeologist to develop archaeological strategy and to oversee the smooth running of the archaeological response to peat extraction in Bord na Móna bogs.

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9. The adoption of a partnership approach between the Minister, the Director and Bord na Móna in pursuit of the delivery of Government policy taking account of the implications for archaeology. To this end the Archaeology Management Liaison Committee has been set up consisting of representatives of the Department of Arts, Heritage and the Gaeltacht, the National Museum of Ireland and Bord na Móna, including the Project Archaeologist and Consultant Archaeologists working on Bord na Móna peatlands. The Committee will meet regularly to agree overall strategies in relation to the mitigation of peat extraction.
10. Appropriate strategies will be developed by the Archaeology Management Liaison Committee to minimise direct impacts on archaeology taking account of Bord na Móna's contractual obligations, annual production plans, design and safety implications, environmental and other impacts and costs.
11. All parties agree that mitigatory planning at the earliest opportunity minimises the impact on the archaeological heritage.
12. Bord na Móna will strive, as far as is reasonably possible, within its statutory remit, to avoid negative impacts on archaeological monuments. In cases where it is not possible to avoid impacting on monuments Bord na Móna, the Minister and the Director will cooperate to ensure, as far as possible, that appropriate archaeological mitigation is carried out in advance of peat extraction.
13. Prospecting for archaeological monuments, archaeological objects and other such remains, other than in circumstances approved by the Minister, in consultation with the Director, is limited to the confines of the area under peat extraction.
14. All parties are committed to dealing with the archaeological implications of peat extraction in a balanced and cost-effective manner consistent with

- a. Observing Bord na Móna's requirement to extract peat on an extensive scale
 - b. Annual production targets in relevant bogs
 - c. A level of excavation, post-excavation and recording of archaeological monuments and archaeological objects, impacted upon by peat extraction, that is acceptable to the Minister, having consulted with the Director, and preservation in-situ of monuments in those particular circumstances where required by the Minister and which would be reasonable in practice.
15. Each party reserves the right to review decisions.
16. All parties agree that the Archaeology Management Liaison Committee will monitor the operation of this Code of Practice and carry out a formal review within three years of its adoption and at agreed intervals thereafter.



Agreed Actions

Bord na Móna will

1. Engage a Project Archaeologist. (The role of the Project Archaeologist is defined in Appendix I. Appendix II sets out the relationship between the Project Archaeologist and the Consultant Archaeologist.)
2. Maintain the network of Archaeological Liaison Officers. (The role of the Archaeological Liaison Officers is defined in Appendix III.)
3. Disseminate a set of Archaeological Protection Procedures (Appendix IV) for employees engaged in peat drainage, extraction and associated activities.
4. Ensure that any monuments or archaeological objects discovered during peat extraction are protected in an appropriate manner by following the Archaeological Protection Procedures.
5. Ensure that any newly discovered monuments on Bord na Móna lands are reported in a timely manner to the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht.
6. Ensure that any archaeological objects discovered on Bord na Móna lands are reported immediately to the Duty Officer of the National Museum of Ireland. (Appendix V)
7. Prioritise monuments for investigation taking account of monument vulnerability, contractual obligations and peat production targets.
8. Prepare tenders for archaeological mitigation of impacts on monuments, to include excavation and recording, in consultation with the Project Archaeologist and the Minister.

9. Engage professional Consultant Archaeologists to carry out mitigation of monuments, including the required palaeo-environmental assessment and post-excavation studies.
10. Provide the necessary finance to fulfil the post-excavation requirements of the Minister and the Director including the conservation of archaeological objects and the provision of scientific analyses and dating, as well as the production of reports on all archaeological work, to a standard which will meet the approval of the Minister.



The Minister for Arts, Heritage and the Gaeltacht (through the National Monuments Service of the Department) will

1. Be responsible for commissioning archaeological surveys on active production lands owned by Bord na Móna.
2. Ensure that the results or outcomes of such surveys are made available to Bord na Móna.
3. Respond to consultations from the Project Archaeologist and Consultant Archaeologists in a timely manner.
4. Agree with the Project Archaeologist an appropriate final methodology for the preservation in-situ or excavation and recording of archaeological monuments prior to the tender document stage. This to be applied by the Project Archaeologist subject to overall control and monitoring by the Minister.



5. Issue licences for archaeological excavation within 3 weeks of receipt of an application from the Consultant Archaeologist.
6. Agree that a single site director will be sufficient for excavating sites where the subject sites form part of a discrete complex or are in close proximity to each other, having regard to the recommendations of the Project Archaeologist.
7. Specify the format and standard of the reports to be submitted on foot of the licences issued.
8. Assist the National Museum of Ireland in the carrying out of training, on a periodic basis, to ensure that the skills and knowledge of the Archaeological Liaison Officers are kept up to date.

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The Director of the National Museum of Ireland, or a designated member of his staff, will

15

1. Be responsible for the care of any archaeological object found on Bord na Móna lands once it has been accepted into the State's repository.
2. Respond to consultations from the Project Archaeologist and Consultant Archaeologists in a timely manner.
3. Agree to be available for consultation with the Project Archaeologist and the Minister, should the need arise, on the appropriate final methodology for the preservation in-situ or excavation and recording of archaeological monuments prior to the tender document stage.
4. Provide comments to the Minister in relation to the issuing of licences for archaeological excavation within 3 weeks of receipt of an application from the Consultant Archaeologist.
5. Agree to process licences to Alter an Archaeological Object and Export an Archaeological Object within 3 weeks of receipt of an application from the Consultant Archaeologist.
6. Agree, subject to consultation with Department of Arts, Heritage and the Gaeltacht, to facilitate the issuing of National Museum of Ireland excavation (E) numbers for the registration of artefacts found during excavations on Bord na Móna lands. The museum will issue guidelines in relation to the application of these numbers and the registration of artefacts under the issued National Museum of Ireland excavation number.
7. Respond, if requested, to consultation from the Minister on the specifications of the format and standard of the reports to be submitted on foot of the licences issued.

8. Carry out training, with assistance from the Department of Arts, Heritage and the Gaeltacht, on a periodic basis to ensure that the skills and knowledge of the Archaeological Liaison Officers are kept up to date.
9. Agree to keep the Project Archaeologist and the Consultant Archaeologists informed of any amendments to the National Museum of Ireland Advice Notes to Excavators or the required Excavation Finds Register Database.
10. Keep an up to date inventory of the archaeological objects found on Bord na Móna's lands and ensure that appropriate finder's rewards are issued within a reasonable time period.



Appendices

17

- I. Role of the Project Archaeologist
- II. Relationship between the Project Archaeologist and the Consultant Archaeologist
- III. Role of the Archaeological Liaison Officer
- IV. Archaeological Protection Procedures
- V. Report of Discovery of Archaeological Objects in Bogs



Appendix I

Role of the Project Archaeologist

As part of the Code of Practice, Bord na Móna agrees that all archaeological activities on its peatlands will be carried out under the supervision of a professional archaeologist in consultation with the Department and the National Museum of Ireland. To this end, Bord na Móna agrees to engage the services of a Project Archaeologist with immediate effect.

The Project Archaeologist will

1. Advise Bord na Móna on all aspects of archaeology relating to its estate and assist in the development of a post-survey archaeology strategy for its peatlands.
2. Liaise with the Department in relation to archaeological surveys carried out on Bord na Móna's lands.
3. Agree with Bord na Móna the priority monuments for investigation, taking account of site vulnerability and Bord na Móna's contractual obligations and peat production targets.

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4. Agree methodologies with the Department, subject to consultation by the Department with the Director, and prepare tender documents for the excavation and recording of archaeological monuments, by Consultant Archaeologists, on Bord na Móna's peatland areas.
5. Be responsible for ensuring that the applications for excavation licences are in order before they are submitted to the Department and the National Museum of Ireland.
6. Ensure that work is carried out in line with specifications outlined in the tender submission documents, method statements and conditions of excavation licence and within the agreed timescales, without prejudice to the role of the Minister and that of the Director to monitor the work.
7. Oversee the conduct of all archaeological excavations, palaeo-environmental assessment and post-excavation analysis by Consultant Archaeologists, and ensure that all excavation reports are completed to a standard acceptable to the Minister and the Director and submitted in a timely manner.
8. Assist with the certification and validation of all archaeological costs.
9. Assist with the development of a GIS database of archaeological monuments and find spots of archaeological objects on Bord na Móna's lands, which will be updated as surveys and excavations are completed.
10. Advise Bord na Móna on the long term management of monuments that are set aside and preserved in-situ.

Appendix II

Relationship between the Project Archaeologist and the Consultant Archaeologist (Licence Holder) in the conduct of Archaeological Excavations

1. The Project Archaeologist will, in cooperation with the Consultant Archaeologist, draw up method statements for the archaeological excavations required and will ensure that the licence applications are in order before they are submitted to the Department. The method statements will specify the way in which the excavations are to be conducted, as well as the timescales and personnel involved in the recording of the monuments.
2. Both the Project Archaeologist and the Consultant Archaeologist will have the responsibility to ensure that monuments being excavated are recorded to a standard acceptable to the Minister and in a manner consistent with the rescue nature of the excavations. The Project Archaeologist will provide periodic progress reports on the archaeological programme to the Department.
3. The Project Archaeologist will liaise with the Consultant Archaeologist to ensure the appropriate reports are submitted to the Department and the National Museum of Ireland in accordance with the conditions of the licence. Such reports will be submitted to the Department and the National Museum of Ireland via the Project Archaeologist.



Appendix III

21

Role of the Archaeological Liaison Officer

1. To communicate this Code of Practice and the *Archaeological Protection Procedures* (Appendix IV) to all personnel operating on the bog.
2. To ensure that all notices relating to the *Archaeological Protection Procedures* are posted and maintained at appropriate locations on the bog.
3. To report any stray finds, presented to the Liaison Officer from his/her group of bogs, to the Duty Officer of the National Museum of Ireland.
4. To provide for the appropriate protection of the stray find, whether in-situ or removed from the bog, as directed by the Duty Officer of the National Museum of Ireland.



5. To arrange for the delivery or collection of the stray find, as directed by the Duty Officer of the National Museum of Ireland.
6. To complete the Report of Discovery of Archaeological Object(s) in Bogs (Appendix V), as directed by the Duty Officer of the National Museum of Ireland.
7. To maintain a file of all stray finds and associated documentation and provide copies to the Project Archaeologist.
8. To provide assistance, where required, to the Department during archaeological surveys.
9. To provide assistance, where required, to Bord na Móna's Consultant Archaeologists, during investigation and mitigation of monuments.
10. To report to the Bord na Móna members on the Archaeology Management Liaison Committee any planned developments or new activities on cutaway peatland areas within his/her group of bogs.



Appendix IV

Archaeological Protection Procedures

WHAT TO EXPECT

Thousands of archaeological monuments and objects survive within and under our bogs. The most common type of site which will be encountered is the trackway, or togher, which can be made of planks, roundwoods, brushwood, gravel or flagstones. Brushwood platforms, rows of wooden posts and traces of timber huts may also be discovered. Ancient cooking places (fulachta fiadha) are often found close to bog margins, and can be recognised by the presence of large quantities of burnt stone.

Monuments are also found on the mineral soil underneath the peat, particularly under the blanket peats in western regions. These include stone banks, mounds, megalithic tombs, standing stones, and stone circles and rows.

Many objects have either been lost or deposited in our bogs over the centuries. These include tools, implements and weapons made from wood, stone or metal; ornaments made from bronze or even gold; wooden vessels, which sometimes contain bog butter; wooden deer traps and wheels and items of clothing made from leather or textile. Occasionally human bodies, or parts of bodies, as well as animal remains are found preserved in the peat.

All objects, sites or monuments, no matter how fragmentary, are important elements of our heritage.

WHAT TO DO

- Check whether there are any known archaeological monuments in your area.
- Be vigilant at all times - objects or traces of structures can be found on the field surfaces, in the drain faces, on the bog margins or caught within the mechanics of machinery.

Code of Practice

- If an object is found leave it in place, if it is safe to do so, note its position and immediately contact your Archaeological Liaison Officer who will assess the situation and contact the Duty Officer of the National Museum of Ireland. Resist the temptation to investigate the find spot as this may disturb fragile archaeological deposits.
- If the object is already dislodged or is in imminent danger, remove it carefully, mark its find spot and report it immediately to your Archaeological Liaison Officer.
- Objects made of wood, leather or textile, which are removed from peat should be kept in conditions similar to those in which they are found. This can be done by packing them in peat or, if waterlogged, placing them in a clean basin of water and sealing the container. Resist the temptation to clean or remove peat from the object.
- If timbers or other materials, such as gravel or stones, which could be part of a man-made structure are noted on the bog, mark the location and report it immediately to your Archaeological Liaison Officer. If you suspect the find is of archaeological importance, resist the temptation to expose it any further as this could result in damage to the structure.



- Report anything that looks unnatural in the bog - your Archaeological Liaison Officer will decide whether it should be referred to the appropriate authorities.

REMEMBER

Our archaeological heritage is a finite, non-renewable resource. Once a site is destroyed its information is lost forever and we have lost the chance to understand a little more about our past, where we have come from and perhaps the opportunity to learn for the future.

Your Archaeological Liaison Officer is



Appendix V

The Report of Discovery form is to be accompanied by a detailed map illustrating the bog and the drainage patterns, the find spot is to be clearly marked on the map and a grid reference supplied where possible. The form should be returned to the Duty Officer of the National Museum of Ireland, Kildare Street, Dublin 2.

Report of Discovery of Archaeological Object(s) in Bog

NMI File No: _____

Bord na Móna Works: _____

Archaeological Liaison Officer's name _____

ALO address: _____

Tel. No(s) _____

Finder(s) name(s): _____

Finder(s) address(es): _____

Tel. No(s): _____

Brief description of object(s) with measurements (add rough sketch if possible)

Name of Bog/Area Number: _____

Bord na Móna reference (drain no. etc.): _____

Townland (if different from bog name): _____

Parish: _____ O.S. 6" co-ordinates: _____

Barony: _____ County: _____

Details on how discovered: _____

Depth beneath present surface: _____

Estimated amount of peat removed above present surface (if any): _____

Total depth of peat in vicinity (if known): _____

Nature of peat in immediate vicinity (e.g. sphagnum etc): _____

Are there any monuments in the vicinity? (e.g. trackways, mound, fort): _____

Are there other finds of archaeological objects known from the vicinity?: _____
