

Supplement to The Review of Policy Relating to Bord na Mona Peatlands Since 1990 (June 2013)

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This document is intended as a supplement to the Review of Archaeological Survey and Mitigation Policy relating to Bord Na Mona Peatlands Since 1990 (June 2012; Final Report June 2013). Firstly, we think it is important to reiterate Recommendations 1-7, following BNM's comments indicating that they did not feel the original review brief had been fulfilled in terms of recommendations for '...a clear pathway to the future.' We disagree with this statement and on the contrary suggest that Chapter 10 presents a clear 'map' to facilitate this process. However, in this document we outline some general practical recommendations regarding future strategies for peatland archaeological mitigation.

1. **Establish timeline for report completion:** All and any outstanding archaeological (and palaeoenvironmental) reports should be completed and a timeline for submission established as a matter of urgency. Any future strategy is dependent upon the results of the entire body of work to date; it is by definition almost impossible to produce a properly informed future strategy without these data. This should be the first step on *any* 'pathway to the future'. We also re-affirm our conclusions that the development of a RF is an essential step and should include input from different stakeholders. This need not be a resource-heavy or extended process.
2. **Survey:** There is a clear and pressing need to re-establish archaeological survey and mitigation within BNM peatlands. We recommend this is best done on a "clean slate basis" i.e. all BNM bogs, regardless of current production status should be subject to survey. Survey priorities should be identified on the basis of BNM production schedules. NMS and BNM should share responsibility for these surveys as they will incorporate new and existing archaeological sites and provide data for the development of mitigation strategies. Mitigation should follow on immediately from survey and should be informed by the survey results.
3. **Survey scope:** Expand the survey remit to include some level of resolution as appropriate in agreement with the relevant authorities. Similarly, all surveys should include some level of gross stratigraphic survey and recording. Clearly, the detail of this will vary but should include recording of peat faces and auger survey. Flexibility is the key to successful and informative fieldwork and we conclude that the loss of this capacity in both survey and excavation has had a negative impact on the past programme overall.
4. Concurrent with the initiation of survey, we re-state that a DBA to collate and review all past archaeological and palaeoenvironmental data and reporting is an essential part of the requested: 'pathway to the future' which cannot yet be arrived at given the current deficiencies of the data. We regard this step as high

priority, but it is of course dependent on the delivery of completed reports as per point 1).

5. **GIS:** Development of a bespoke GIS utilizing common data standards to ensure both analytical flexibility and long term archiving and data use. The agent or agents for survey and mitigation should be responsible for the development of this GIS.
6. **Dissemination:** We once again draw attention to the importance of rapid publication and dissemination of peatland data.
7. **Excavation:** Commence excavations in line with BNM production schedules and level of threat; the latter being the primary reason for excavation. We do not feel that any other rationale for excavation (e.g. period, site class) is warranted at this stage but this can be re-assessed following the completion of points 3 and 4 (above).
8. **Level of Resolution:** The LOR for all sites excavated needs to be increased across the board; it is very difficult to draw broad conclusions regarding 'appropriate' resolutions for peatland sites from the very limited data available. Indeed, it may arguably never be possible to reliably establish such a threshold. The fundamental principle that sites should be fully resolved needs to be upheld. Greater numbers of sites must be excavated at a higher resolution in order to achieve preservation by record. These sites should be targeted solely as per point 7 (above).
9. **Standards and Protocols:** Clear protocols for survey and excavation need to be formulated and followed in advance of any further phases of work. The formulation of these could be built into the tender process. Alternatively, consideration could be given to the production of a set of standardised guidelines prior to any future award of survey or mitigation. Any set of guidelines should also specify the roles of regulatory bodies, with particular reference to the process governing the post-recovery management of finds. Mechanisms should be put in place to ensure accessibility of data generated by survey and excavation projects (above and beyond the needs of the ASI).
10. **Palaeoenvironmental programme:** In terms of the palaeoenvironmental programme, we feel that sampling and analyses should be driven very much from the level of the individual site. Questions regarding the relationship between bog development, archaeological sequences and climatic factors are essentially a product of informed and targeted sampling strategies which take account of site-specific variation and character. In other words, answers to specific 'big' questions will only emerge following properly integrated and executed survey, excavation and palaeoenvironmental analyses. To this end, the importance of direct specialist guidance in the field cannot be over estimated as there is no 'one size fits all' approach to palaeoenvironmental sampling, assessment and analysis. The presence of an environmental archaeologist on the ground should make for significant cost effectiveness and tailored sampling strategies.

11. **Regulation:** All and any strategies aside, successful outcomes depend on increased levels of enforcement and regulation and compliance by the clients and their agents.
12. **Coles (2000):** Many of the recommendations made in the Coles (2000) review still stand and remain pertinent to any future programme of work.