



Minister Darragh O' Brien  
Department of Climate, Energy and the Environment  
Tom Johnson House  
Haddington Road  
D04 K7X4

18<sup>th</sup> December 2025

Dear Minister O' Brien,

**Re: Publication of the Climate Change Sectoral Adaptation Plans**

The Climate Change Advisory Council and its Adaptation Committee note the publication of the Sectoral Adaptation Plans (SAPs) on 14<sup>th</sup> November 2025. As part of the preparation of the SAPs, the Secretariat and Committee members engaged in meetings with the departmental leads for each sector, where specific recommendations were provided. In addition, written comments on both the initial and public consultation drafts of the SAPs were provided.

The Council views the second iteration of SAPs as a critical opportunity to move from planning to the implementation of effective measures that enhance our climate resilience. Having reviewed the final published sectoral adaptation plans, the Council is extremely disappointed that an opportunity has been missed to substantively advance us towards achievement of the climate resilient element of the national climate objective. There is some positive evidence of specific localised resilience being developed. However, without greater ambition, resourcing and a more systemic approach, the suffering of our vulnerable communities will increase further and the economic, health and environmental impacts from extreme weather events will continue to mount. Making substantial investment in proactive adaptation measures now will help us to avoid significantly higher costs in future.

In particular:

- There remains deep uncertainty around the levels of finance available to support meaningful adaptation action. There is no clear costing of activities included within the SAPs, no indication of investment needs and no clear commitment of available funding to support implementation in most cases. This is concerning, as lack of financing was already identified as a key constraint to the implementation of the first iteration of SAPs. It is essential that within the government budgetary process, adaptation is identified as a discrete funding line, or at least clearly identified and mainstreamed in other funding lines and funding mechanisms. This will provide transparency on adaptation investment and assign greater accountability to Government, Departments and agencies leading the SAPs. This will support the overall need

for adequate and sustained funding to vital climate adaptation measures, including at local level. Sectors should also ensure that specific funding is made available to support adaptation research and address knowledge gaps within sectors.

- The new SAPs have considered the risks identified in the recent National Climate Change Risk Assessment (NCCRA) during their planning stage. However, it is not clear how these risks are reflected in the prioritisation of actions within the SAPs. Greater effort is required to collate vulnerability and exposure data within sectors. There is a recognition of cascading and cross-sectoral risks; however, sectors remain heavily dependent on others to manage these risks and no clear mechanisms for collaboration or ownership of necessary actions are defined. Transboundary climate risks have also been largely overlooked in the SAPs, despite our exposure to risks from climate impacts beyond our borders. Sectors should consider the use of cross-sectoral mechanisms, including the National Adaptation Steering Committee and Adaptation Taskforce, to deliver actions to ensure that cross-sectoral risks are adequately addressed.
- The majority of SAPs lack high-level outcome-oriented indicators, despite this being a mandatory requirement in the SAP guidelines. Actions in most of the SAPs are not specific enough and lack defined milestones, which will make it challenging to monitor progress and evaluate effectiveness and impacts of implementation. In 2026, a national process is needed to identify the most relevant outcome indicators for each sector. Necessary systems must also be put in place to collect this information so that baselines, trends and quantitative targets can be set out for future SAPs. This can be aligned with the UNFCCC process to develop indicators under the global goal on adaptation.
- It is noted that governance mechanisms, through expanded core and planning teams, have been strengthened and there is evidence of good stakeholder engagement in the development of the SAPs. However, there are still concerns around these mechanisms not having high level support beyond these teams and the need for greater senior management involvement and leadership. It is essential that these teams remain operational and are strengthened to drive SAP implementation, oversee regular reporting and monitoring, address challenges including finance, and ensure coordinated progress on adaptation actions. Strong coordination is particularly needed with local government, semi-state agencies and private entities in the governance mechanisms for each sector.
- The 2024 report of the Institute of Public Administration emphasised the need to prioritise climate adaptation across the whole of government and to assess the level of additional capacity required across the system to deliver effectively in the long term on climate resilience. The SAPs were an ideal opportunity to address this recommendation, but actions to conduct comprehensive skills and resource gap assessments across sectors are largely absent. This is required urgently to identify and address climate adaptation skill needs across all sectors, including in semi-state agencies and the private sector.
- It is noted that the Built Environment/Planning sector has not progressed beyond the scoping stage. This is particularly disappointing, given the sector's significant importance and its strong cross-cutting aspects relating to the resilience of housing and the need for integration of climate risks into the broader planning system.

The Department of Climate, Energy and the Environment (DCEE) should ensure that the actions from each of the SAPs that will make the greatest contribution to climate resilience outcomes are included in future Climate Action Plans. Further information on our review of the SAPs is available on the Council website here: [CCAC Review of Statutory Sectoral Adaptation Plan Making 2025](#). The Council's Adaptation Committee extends an invitation to Minister O'Brien and his officials to attend one of its upcoming meetings for an exchange of views on the SAPs and look forward to continuing to work constructively with your officials on building Ireland's resilience to the inevitable and worsening impacts of climate change.

Regards,



Marie Donnelly  
Chairperson  
Climate Change Advisory Council



Peter Thorne  
Chairperson  
Adaptation Committee

Cc:

Micheál Martin, Taoiseach

Jack Chambers, Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation

James Browne, Minister for Housing, Local Government and Heritage

Jennifer Carroll MacNeill, Minister for Health

Martin Heydon, Minister for Agriculture, Food, Fisheries and the Marine

Patrick O' Donovan, Minister for Culture, Communications and Sport

Peter Burke, Minister for Enterprise, Tourism and Employment