

REVIEW OF STATUTORY SECTORAL ADAPTATION PLAN MAKING 2025



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Summary

Ten new Sectoral Adaptation Plans (SAPs) were published on the 14th of November 2025, as required by the 2024 National Adaptation Framework (NAF). Under the Climate Action and Low Carbon Development (Amendment) Act 2021, lead government departments and agencies for the SAPs must consult with the Climate Change Advisory Council (CCAC) when preparing these plans. The CCAC has engaged closely with each of the lead Departments and Agencies in the preparation of each of the SAPs. The main feedback provided by the Adaptation Committee and CCAC is summarised in this document. The following are overall conclusions:

1. Financial resources for adaptation remain insufficiently specified. 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.
2. Sectoral visions of resilience remain generic, and specific resilience targets are not defined.
3. 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 adaptation plans.
4. SAPs lack outcome-oriented indicators, and most lack specific actions and defined milestones. This will make it challenging to track and monitor progress and evaluate the effectiveness and impacts of implementation.
5. The SAPs continue to focus heavily on risk identification and information gathering, with limited commitment to tangible adaptation actions.
6. Stakeholder engagement took place during the development of the SAPs, and the consultation processes are well documented. However, it is not always clear whether stakeholders have agreed to take ownership of the actions.
7. Governance within planning teams has strengthened through expanded core and planning teams since the first iteration of the SAPs.
8. There is a greater recognition of cascading and cross-sectoral risks; however, sectors remain heavily dependent on others to manage these risks, and clear mechanisms for collaboration are still lacking. An increased emphasis on transboundary risks is required.
9. There are no clear commitments outlining how the human resource base will be strengthened to support the implementation of the plans. Skills gap analyses and capacity building are needed across all sectors, including semi-state companies and the private sector, for successful implementation of the plans.
10. Overall, while the 2025 SAPs show some progress in addressing the weaknesses identified in the 2019 SAPs, they continue to fall short in key areas such as resource allocation, monitoring, and cross-sectoral coordination.

1. Introduction

This report provides a summary review of the Climate Change Advisory Council of the 2025 statutory SAP making process. This is an update of a similar exercise that was carried out after the publication of the first iteration of 9 SAPs in 2019¹.

Ireland's second statutory NAF was published on 5 June 2024². The 14 priority sectoral levels identified in the 2024 NAF has resulted in the development of 10 SAPs clustered around four themes as listed in Table 1. Two additional sectoral levels, Tourism, and Built Environment / Planning³, were included in the 2024 NAF. The 10 SAPs were published on the 14th of November 2025, and it is set out in the 2024 NAF that the SAPs are to be reviewed at least every five years⁴.

Table 1: Overview of 2025 Sectoral Adaptation Plans according to their sectoral levels, themes and lead Government departments and agencies (Source: National Adaptation Framework (2024)).

| Theme | Sectoral Level | Lead Dept / Agency |
|--------------------------------------|-----------------------------------|--|
| Natural Environment | Biodiversity | Department of Housing, Local Government and Heritage (DHLGH) |
| | Water Quality ⁵ | DHLGH |
| Built environment and infrastructure | Communication Networks | Department of Culture, Communications and Sport |
| | Electricity and Gas Networks | Department of Climate, Energy and the Environment (DCEE) |
| | Flood Risk Management | Office of Public Works |
| | Built Environment and Planning | DHLGH |
| | Transport | Department of Transport |
| | Water Services Infrastructure | DHLGH |
| Human | Built and Archaeological Heritage | DHLGH |
| | Health | Department of Health |
| Economy | Agriculture ⁶ | Department of Agriculture, Forestry and Marine (DAFM) |
| | Forestry | |
| | Seafood | |
| | Tourism | Department of Enterprise, Tourism and Employment |

¹ [Climate Change Advisory Council Review of Sectoral Adaptation Plan Making 2018 2019.pdf](#)

² [national-adaptation-framework-2024-0fa761a3-84e5-4bcf-ac40-0f91f6431ae8.pdf](#)

³ The DHLGH committed to undertaking a scoping exercise for the sectoral level of built environment / planning sector and has not developed a SAP. Note that the scoping document has not been shared with the CCAC Secretariat at time of publication.

⁴ [Department of Climate, Energy and the Environment](#)

⁵ The sectoral levels of water quality and water services infrastructure are combined in one Sectoral Adaptation Plan under DHLGH.

⁶ The sectoral levels of agriculture, forestry and seafood are combined in one Sectoral Adaptation Plan under DAFM.

The Climate Action and Low Carbon Development (Amendment) Act of 2021 requires lead Departments and Agencies responsible for the development of SAPs to consult with the CCAC in their preparation. The CCAC has engaged closely with each of the lead Departments and Agencies in the preparation of each of the SAPs.

Initial individual meetings, involving members of the CCAC's Adaptation Committee and CCAC Secretariat, were held with each of the SAP leads to set out the engagement process and to discuss key issues and priorities for each of the sectors. The CCAC Secretariat provided an issues paper for each of these meetings based largely on findings from the Adaptation Scorecard over the period 2021-2025. The CCAC Secretariat and Adaptation Committee members also reviewed both the first draft and public consultation drafts of the SAPs⁷, providing written feedback to guide sector improvements against a criteria document setting out the 'Procedures and Basis for Assessment for Consultation Process for Sector Adaptation Plans by the Climate Change Advisory Council'. This criteria document was aligned with the Sectoral Planning Guidelines for Climate Change Adaptation published by DCEE⁸, which also draw on the most up-to-date national approaches to change risk assessment (such as the NCCRA and sources of climate and adaptation information (such as, the Irish Climate Change Assessment Report (ICCA), the National Framework for Climate Services (NFCS), and Climate Ireland⁹).

2. Key findings from review of draft sectoral adaptation plans

The CCAC undertook a review of the 2019 iteration of SAPs¹⁰ and has been carrying out the adaptation scorecard review since 2021. These instruments found that the main challenges in developing and implementing the 2019 SAPs were a lack of adequate human and financial resources within lead departments, agencies, and local authorities, insufficient monitoring and evaluation mechanisms, and inadequate coordination and measures to address cross-sectoral and cascading risks. Our review of the 2025 SAPs was based on a 13-point checklist (see Appendix 1) and our key findings are presented and summarised in this section according to the main categories of our checklist.

2.1 Level of ambition and actionability

All SAPs, with the exception of health, contain a vision and broadly follow the hierarchy set out in the SAP guidelines for all plans to have a vision, goals, objectives and actions. However, the Council is concerned with the overall ambition of the SAPs. Several of the visions use weak language and need greater clarity and urgency, and many of the 424 actions across the

⁷ In the case of the Biodiversity SAP, only the public consultation draft was reviewed due to delays in the process.

⁸ [Sectoral Planning Guidelines for Climate Change Adaptation](#)

⁹ [EPA Climate Ireland | Home](#)

¹⁰ [Climate Change Advisory Council Review of Sectoral Adaptation Plan Making 2018 2019.pdf](#)

SAPs lack clear, time-bound milestones, with timelines often marked as “ongoing” or to be completed only by 2030.

Four sectors (Agriculture, Forestry and Seafood; Electricity and Gas Networks; Water Quality and Services Infrastructure; and Biodiversity) followed a system of classifying their adaptation actions as either building adaptive capacity or delivering adaptation measures, while the other sectors adopted different approaches. Actions that build adaptive capacity include research, training, awareness-raising, funding mechanisms, and stakeholder engagement. Actions that involve the implementation of green and grey practical adaptation measures are included under delivering adaptation action. Based on internal analysis across all the SAPs, approximately 65% of the 424 SAP actions focus on building adaptive capacity, while 35% are directed toward delivering adaptation. This indicates a continued focus on enabling measures rather than delivering practical adaptation solutions to address identified risks and enhance the resilience of infrastructure, communities, and ecosystems.

2.2 Costing and finance for implementation

One of the major shortcomings identified in the SAPs is the insufficient detail on the costing of and budgeting for adaptation actions. None of the SAPs contain costed estimates for planned actions in their implementation plans and information on investments needs is sorely lacking. Only three SAPs (Communication Networks; Tourism; and Transport) contain assessments of whether additional resources are required for their planned actions. Several plans highlight the need for additional resources, but these requirements are not quantified in all cases. All SAPs do contain planned actions to secure financial resources and investment for implementation or planned actions to identify indicators to track financial resources for adaptation. However, with the exception of the SAPs for Flood Risk Management and Electricity and Gas Networks and Transport, it is not clear if adequate existing funding is in place to support the implementation of the actions within these plans.

The lack of detail around costing of activities, investment needs and funding commitments to support implementation is concerning as lack of financing was identified as a key constraint to the implementation of the first iteration of SAPs. This underlines the need for lead Departments and agencies to prioritise the funding of adaptation and resilience measures, including at local level, in relevant budget sub-heads and to better integrate these measures in relevant funding schemes and supports.

2.3 Indicators and Monitoring

The SAP guidelines state that a high-level set of adaptation indicators is a mandatory requirement for each SAP. These are critical to understand if the actions being taken are effective in enhancing resilience and reducing climate risks and vulnerabilities. Five of the SAPs (Built and Archaeological Heritage (includes a suggested list); Communication Networks (includes a tentative list); Flood Risk Management; Tourism; and Transport) contain a high-level set of outcome-based indicators. The challenge of data readiness is recognised in most cases and systems and mechanisms need to be established to collect this information and to ensure that baselines are developed and that there is regular tracking of these indicators. Four SAPs (Agriculture, Forestry and Seafood; Biodiversity; Communication Networks (commitment to refine existing indicators); Electricity and Gas Networks) contain planned actions to develop improved adaptation and resilience indicators. Two SAPs (Health; and Water Quality and Services Infrastructure) contain only process and output-focused indicators and do not contain planned actions in their SAPs to develop outcome-based indicators.

The implementation plans are a key part of the SAPs and there is considerable variability in how these are structured. There is a notable disparity across the SAPs with the number of actions ranging from 17 to 101 in the respective plans. These inconsistencies make direct comparison across sectors challenging and highlight the need for clearer and more standardised guidelines for future SAPs. The next set of SAP guidelines should clearly set out the structure of the implementation of actions (objectives, milestones, KPI, owner, timeframe, estimated costs etc.) to ensure greater consistency and allow for a common approach to standardise monitoring and evaluation of the plans.

While all actions include an indicator column, with mainly process and output-focused indicators to assist in monitoring, many of the actions were observed to be generic and lacking the necessary specificity and defined milestones. All sectors are encouraged to review progress in implementation and to conduct annual reviews of implementation. Planning teams should actively coordinate and oversee the implementation of actions and this is not clearly indicated or evident in most of the SAPs.

2.4 Coordination of stakeholders

It was observed that stakeholder engagement has generally been positive across sectors, with expanded representation of stakeholder groups in the planning teams and various consultations organised during the development of each of the SAPs. Almost all lead departments and agencies demonstrated a high level of coordination and engagement with stakeholders within the sector during the planning stage. All lead departments and agencies are strongly encouraged to sustain their planning teams so that they actively coordinate, oversee and monitor the implementation of the SAPs and ensure close collaboration with semi-state agencies, local authorities and private sector stakeholders. The ownership of actions in the SAPs is diverse, and this requires a high level of coordination to ensure effective implementation.

2.5 Human resource needs

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 presented an ideal opportunity to address this recommendation but actions to conduct comprehensive skills and resource gap assessments across sectors are largely absent. It is noted that only five sectors (Tourism; Electricity and Gas Networks; Biodiversity; Transport; and Built and Archaeological Heritage) have included a commitment to conduct a skills gap assessment in their set of actions, as was required in the SAP guidelines. Lead departments and agencies are encouraged to urgently undertake an assessment for all sectors to identify and address climate adaptation skills needs across each sector, including in semi-state companies, local authorities and the private sector.

2.6 Identification and consideration of risks and vulnerabilities

Sectors were observed to have considered risks identified in the NCCRA to varying extents during the SAP planning process. Only two of them (Transport; and Flood Risk Management) clearly link these risks with the prioritisation of actions in the implementation actions. It would have been expected to see cascading and critical risks more thoroughly integrated and prioritised within the actions. Transboundary risks are also not given priority within the SAPs. The SAPs are marked by an absence of vulnerability assessments, including the spatial analysis of the vulnerability of different demographic groups to a range of risks. Greater effort is required to collate vulnerability and exposure data within sectors.

The EPA Technical Guidance for Sectoral Risk Assessments¹¹ was developed to assist sectors in implementing climate change risk assessments that are consistent with the NCCRA Methodology. Sectors should conduct their own climate risk assessments to provide a more detailed and specific analysis of climate risks at the sectoral scale.

2.7 Cross-cutting issues

Cross-cutting policy issues were identified in the 2024 NAF and were to be considered in each of the SAPs. These include coastal issues, built environment, urban environment, health impacts and disaster risk reduction. Specific and explicit actions to address these issues are largely absent. It is of concern that there is still no policy instrument to encourage greater consideration of adaptation and resilience issues in the residential sector, issues such as coastal erosion are not dealt with by any particular SAP and that there is little reference of integrating adaptation with the ongoing work of the Report of the Inter-Departmental Group on National Coastal Change Management Strategy.

¹¹ https://www.epa.ie/publications/monitoring--assessment/climate-change/EPA_NCCRA_Sectoral_Technical_Guidance_Published.pdf

The SAP guidelines require all SAPs to demonstrate how the principles of just resilience and nature-based solutions have been considered. Nature-based solutions are included in all SAPs. Just resilience is referenced in all SAPs, but mainly in relation to awareness and research actions. More specific actions to address the needs of local and vulnerable groups would have been expected.

2.8 Research gaps and needs

Sectors have included various research actions within their plans. Only five sectors (Biodiversity; Built & Archaeological Heritage; Communications Networks; Electricity and Gas Networks; and Flood Risk Management) have included an action to conduct a research gap analysis, and a common recommendation is to prioritise studies that directly address the sector-specific challenges identified, especially those NCCRA risks noted as needing further investigation.

It is also important that all research gaps identified in Ireland's Climate Change Assessment, NCCRA, and NAF are addressed by the different sectors in a coordinated manner and incorporated into their research actions.

2.9 Co-benefits

All SAPs include some actions that co-address mitigation issues and also entail some mitigation co-benefits, but there should be a clearer explanation of how adaptation and mitigation efforts in the sector will be integrated and reinforce each other. Only four SAPs (Biodiversity; Built and Archaeological Heritage; Transport; and Tourism) identify mitigation co-benefits.

2.10 Long-term planning

Despite the identification of significant long-term risks extending to 2050 and 2100, SAPs across sectors focus on actions expected to be accomplished within the next five years, and not on strategies extending beyond 2030. Although certain monitoring activities may naturally continue into the longer term, explicit commitments to address priority risks in the decades ahead are missing. Additionally, overshoot scenarios are not considered in any of the SAPs. This creates a gap in the continuity needed for effective adaptation and next set of SAP guidelines should require sectors to develop strategies that ensure sustained action on critical vulnerabilities well into the future.

2.11 Mainstreaming

The degree to which adaptation is integrated into policies, funding frameworks, and strategic planning varies among sectors. Several other plans, programmes and policies relevant to climate resilience are under implementation and development in sectors such as Biodiversity;

Agriculture, Forestry and Seafood; Electricity and Gas Networks; and Water Quality and Supply Infrastructure sectors. How adaptation and resilience are being integrated and strengthened through the design and implementation of these policy instruments needs to be carefully monitored and evaluated by lead departments and agencies.

While some sectors show ambition in their proposed measures, most have not clearly identified which specific policies or strategies will mainstream adaptation. To achieve the desired outcomes, clear outcome-based indicators are essential for tracking and ensuring the effectiveness of these other policies, programmes and policies in enhancing climate resilience.

3. Recommendations

Based on our review of the 2025 SAPs and to overcome some of the observed challenges, the Council has the following recommendations:

1. 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.
2. It is essential that governance 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 responsible in the governance mechanisms for each sector. The structure and responsibilities of the implementation teams should be clearly defined, with greater senior management involvement and leadership and regular meetings to facilitate internal reporting to address barriers and ensure coordinated progress and impactful adaptation action. There is also a need to coordinate actions in SAPs with the Local Authorities Climate Action Plans (LA CAPs) to ensure integration of climate action across scales.
3. Strengthened monitoring and evaluation systems are needed to ensure the effective implementation of the SAPs and cross-cutting measures to enhance our resilience to extreme weather events and climate change impacts. SAP planning teams are encouraged to oversee monitoring and evaluation of the SAPs and that these teams engage closely with decision-makers within the lead departments and agencies. 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.
4. 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.

5. Lead departments and agencies for SAPs should urgently conduct comprehensive skills and resource gap analyses to identify and address climate adaptation skills needs across all sectors, including in semi-state companies and the private sector.
6. Sectors should consider the use cross-sectoral mechanisms, including the National Adaptation Steering Committee and the Adaptation Taskforce, to deliver actions to ensure that cross-sectoral risks are adequately addressed.
7. DCEE should review and update the guidelines for the next iteration of Sectoral Adaptation Plans to ensure a more consistent and harmonised approach, in particular by providing instructions for headings that must be used in the implementation plans.
8. Sectors should also ensure that specific funding is available to support research and address adaptation knowledge gaps within sectors, as well as research gaps identified in the ICCA, NCCRA, and NAF.

Appendix 1 - Checklist

| | Issue | Factors to look out for |
|----|--|---|
| 1. | Level of ambition | Are high levels of ambition demonstrated in vision, targets and KPIs? Actions should be designed to clearly deliver outcomes and should include milestones if high level. Where it is not possible to demonstrate clear ambition, commitment should be made to collecting outcome-based information. |
| 2. | Key performance indicators | Are KPIs specific, measurable, ambitious, realistic and timebound? Do they cover impacts, outcomes and process elements? |
| 3. | Costing of implementation | Are budget estimates provided for actions and measures in the Plan? Check for indications that sources of finance are available for the costs of implementation and delivery of actions and associated measures. |
| 4. | Human resource needs | Has an assessment of human resource needs within sectors been conducted? This should consider the broader needs within the sector to implement the actions listed within the plan. A specific action to address human resource needs should be included as necessary in the implementation plan. |
| 5. | Clear implementation and monitoring plan | The SAP should contain commitments to regularly monitor, evaluate and learn lessons in the implementation of the plan. Adaptation is an interactive / learning process and lead departments and agencies should be flexible to reprioritise actions and develop new actions as needs require. |
| 6. | Identification and consideration of risks and vulnerabilities | Have risks and vulnerabilities identified in the NCCRA (including scenarios and timeframes) been prioritised in the SAP. Are there clear actions in the implementation plan to reduce vulnerability and exposure to these risks? and prioritisation of critical risks? Check for actions that ensure non-critical risks are regularly reviewed. |
| 7. | Cross-cutting issues | Have cross-cutting issues been identified and considered in the SAP? Have satisfactory actions been included to |

| | | |
|-----|-------------------------------------|---|
| | | <p>ensure that cross-cutting issues are addressed. Examples of cross-cutting issues include:</p> <ul style="list-style-type: none"> • Disaster risk reduction • NBS • Just resilience • Avoiding maladaptation • Health • Coastal zone management • Transboundary climate risk |
| 8. | Research gaps and needs | Are key research gaps and needs identified and prioritised for action? |
| 9. | Coordination of stakeholders | Have key stakeholders in the sector been engaged in the formulation of the plan and key actions for which they are responsible been incorporated in the action plan? |
| 10. | Actionability | To what extent are the actions identified likely to lead to tangible outcomes and local level activities? For example, are owners identified for specific actions? |
| 11. | Co-benefits | Are potential co-benefits and trade-offs with respect to climate change mitigation and other policy objectives considered? For example, air quality, water resources. |
| 12. | Long-term planning | Does the implementation plan include actions that show the sector is planning for the long-term climate impacts (e.g. 2050, 2100 and beyond)? |
| 13. | Mainstreaming | Is commitment shown to mainstreaming adaptation into other policies, plans and programmes in the relevant sector, including funding mechanisms? |