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Dear John,

RE: Draft Agriculture, Forest and Seafood Sectoral Adaptation Plan

In line with Section 6 and Section 11 of the Climate Action and Low Carbon Development Act 2015 (the Climate Act), it is a function of the Climate Change Advisory Council to provide advice and make recommendations in relation to adaptation policy and Ministers are required to consult with the Council in the preparation of their sectoral adaptation plans.

The Council welcomes the publication of the draft Agriculture, Forest and Seafood Sectoral Adaptation Plan and believes that the sectoral adaptation planning process offers a valuable opportunity for sectors to build resilience to the impacts of climate change by identifying vulnerabilities, adaptive capacity, risks and opportunities, and developing adaptation plans to address them.

The Council has agreed criteria of assessment for sectoral adaptation plans and the draft Agriculture, Forest and Seafood Sectoral Adaptation Plan has been considered by the Climate Change Advisory Council and its Adaptation Committee with reference to these.

The Council wishes to outline the following observations on the draft.

General Comments

- The Council welcomes the intention to provide a shorter, more accessible plan building on the Department's non-statutory 2017 adaptation planning document and the use of case studies. The emphasis below is on aspects that the Council consider

require further consideration. Some case studies, while illustrative, risk drawing conclusions from recent events when a longer time period may be more appropriate.

- A statement at the beginning of the plan demonstrating how the Climate Act, National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation have been considered would be useful.
- Overall, the draft plan provides welcome detail on proposed measures to increase the sectors' adaptive capacity but the final version should further consider how the Department can reduce the sectors' exposure and sensitivity to climate change.
- The clear identification and review of existing policies, incentives and schemes that may be in conflict with adaptation objectives is required.
- The adaptation plan is strongly focused on current activities within the sector and the potential impact on production. There is a need to stress test the future shape of the three sectors against climate change scenarios to ensure their resilience and also further consider the impact of multiple extreme events on the sectors.
- The actions to integrate adaptation considerations into education, training and advisory services are welcome. The 'Bluefish' case study of using art to make climate change more accessible is interesting but overall more information should be provided on how farmers, foresters and fishers were involved in informing the draft plan.
- Further information on the economic costs of wildfires, pests and diseases in all three sectors should be provided.
- Further information should be provided on the guidance the Department provides regarding species selection in a changing climate.
- Further consideration of the impacts of climate change on international agricultural trade and supply chains is required. Further consideration should also be given to the potential impact of climate change on the consumption and markets for forestry products in particular.

- Some of the case studies include actions and steps in building resilience but these do not appear to be reflected in Appendix II. The status of these should be clarified. For example the ocean acidification case study suggests a measure requiring ‘all future shellfish aquaculture to account for potential future vulnerability’ but it is not clear what the status of this measure is and how it might be demonstrated.
- Similarly, the seafood background document in particular contains a number of ‘recommended adaptation actions’ but these do not appear in the draft plan’s implementation plan – some, such as ensuring that climate change adaptation is included in sea-fisheries, aquaculture and seafood governance systems – may be very significant but their status is unclear.

Process

- The Council note the background documentation provided as part of the consultation but consider that more detail on how the assessment of climate vulnerabilities and impacts was developed should be provided and how actions were prioritised should be clarified.
- In the draft plan and accompanying seafood sector background document further information should be provided on the range of projections and potential scenarios considered. In general, actions proposed under the current cycle of adaptation plans should consider a full range of potential impacts of climate change under a variety of scenarios, including those of potential higher warming, in addition to cost-effective risk management. The Plans should demonstrate due regard to lifespan of proposed projects and measures and likely exposure to impacts of climate change. The plans should reference the scenarios considered and the justification for this choice should be provided.
- How the proposed (action 5) periodic review of impact and vulnerabilities will feed into adaptation planning and the Department’s work should be clarified, while more information should be provided on action 14 regarding the use of flood risk mapping to inform decision making.

Coherence and Cross Sectoral Considerations

- Links with other plans, particularly those in the same theme of the National Adaptation Framework remain underexplored, as do linkages with the flood risk management and water sectors. Issues with seascapes and coastal habitats are

raised but linkages with the ongoing Marine Spatial Planning process require further consideration.

- Further information on the links between adaptation planning and emergency planning should be provided.
- The Advisory Council's 2018 Annual Review recommended that future iterations of adaptation plans for the agriculture and forestry sectors should consider the implications of large-scale deployment of renewable energy on agricultural lands and the conversion of land for energy crop production. This is not evident in the draft plan. Similarly, how potential land use changes may impact on built heritage should also be considered further.
- Further consideration of the lessons from the all-of-Government approach to mitigation and a national level risk assessment referenced in the document should be presented. The final plan should further consider ways to promote the linkages between climate-resilient and low-emission practices and technologies. Any implications of changes in precipitation patterns for soil carbon stores and sequestration potential should be set out.
- Regarding seafood infrastructure, it is not clear how much engagement there has been with local authorities, and the critical infrastructure sectors such as electricity and gas, transport and communication networks.
- The potential for joint monitoring of pests relevant to this plan and the built heritage and biodiversity sectors may merit exploration.

Research

- Consideration of international research, such as the JRC PESETA III project on the possible biophysical and economic consequences of future climate change for European agriculture amongst other sectors, should be included. It is not clear if the findings of the 'National Risk Assessment of Impacts of Climate Change' research project have been considered.
- More information should be provided on any current research into ocean acidification or any research gaps and how they will be addressed should be specified.

- The use of insurance as a risk management tool in agriculture is considered in the European Commission's 2018 evaluation of the EU strategy on adaptation and its applicability to Ireland may merit consideration.

The Council looks forward to the publication of the final statutory sectoral adaptation plan in the coming months.

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council

Cc. John O'Neill, Department of Communications, Climate Action and Environment