

Colm Ó Conaill
Department of Health
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13 September 2019

Dear Colm,

RE: Draft Sectoral Adaptation Plan for the Health Sector

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 draft climate change adaptation plan for the health sector 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 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 provided:

General Comments

- The plan provides a useful description of the overall health of the population, the sector and the three main categories of vulnerabilities for the sector identified. Older people, people in ill health, children and migrant and deprived populations are amongst the most vulnerable to the health impacts of climate change however further work is required to show that the plan addresses the sensitivity, adaptive capacity and exposure of all these groups.



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- Chapter 7 of the Council's [Annual Review 2019](#) contains advice and recommendations relevant to the development of sectoral adaptation plans and these should be considered in the preparation of the final plan.
- 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.
- Much of the text in the draft is taken from the Sectoral Planning Guidelines for Climate Change Adaptation which may lead to inconsistency in tone and style. It may be useful for the reader if text from the guidelines is not restated unnecessarily.
- Further information should be provided on potential linkages with Disaster Risk Reduction and the Sustainable Development Goals. While there is reference to emergency planning further information on what this means in practice for the sector and in future service plans should be provided.

Methodology and Data

- Further detail could be given in terms of consultation with the sector and how views were integrated, especially in risk assessment and the identification of adaptation options. This helps establish whether this draft is representative of the views of key stakeholders. This is particularly important given the wide range of actors the plan is to apply to as set out in section 1.1. How these actors are to be involved in the leadership and governance arrangements should be explained further.
- Very useful detail is given on the adaptation planning process of establishing a core team, its responsibilities and the services derived from academic and other sources however the final plan should reflect how the key skills required were decided upon and deployed.
- The Council consider that a wide range of plausible climate change outcomes should be considered. Overall it is not clear whether future climate impact is being assessed for any future time period or scenarios in particular. Further information on how any presented key climate impacts for the sector were derived is required. The draft references the report 'Ireland's Climate: The Road Ahead' (Gleeson et al. 2013). However more recent and comprehensive climate projection reports should be considered, e.g. EPA research report No. 159 'Ensemble of regional climate model projections for Ireland' (2015).
- The draft references 'six main climate scenarios' however these do not appear to be linked to future GHG emissions or scenarios of projected changes in Ireland's climate. The terminology should be reconsidered to make clear what these six

scenarios consider and represent and more information on how they were selected should be provided.

- More information on the climate impact chains developed during the preparation of the plan should be provided otherwise it is not possible to assess their robustness.
- Though referenced, further information on the potential impact on supply chains in the sector should be provided.
- It is not clear if international research, such as the JRC PESETA project which reviews the consequences of future climate change for human health amongst other sectors, have been considered.
- It is not clear how the findings of the 'National Risk Assessment of Impacts of Climate Change' research project which examined public health have been considered.
- The 2013 EU Strategy on adaptation to climate change discusses human health and the Commission published an evaluation of the strategy in November 2018. It is not clear if this has been considered in the draft plan.
- The risk to health posed by increasing temperatures releasing toxic chemicals, such as mercury, from melting permafrost (Schuster et al., 2018) may merit consideration. Further information on the potential impacts of climate change on the food chain for humans should be provided.

Cross sectoral issues

- The draft plan has had the benefit of the consultation drafts of the other 11 sectoral adaptation plans being available, however practical linkages with other sectors remain under considered. For example, the interdependencies between health service infrastructure and other critical infrastructure sectors, though referenced, are underexplored.
- Links to the transport sector in terms of both active travel and overheating on transport are underexplored.
- The relationship between changes in wildfires, air pollution and health as discussed in the Agriculture, Forest and Seafood Sectoral Climate Change Adaptation Plan should be explored further, as should links with changes in food yields and nutrition and in pest and disease monitoring.
- Regarding pathogens, further information on the engagement with the Department of Housing, Planning and Local Government as they develop water adaptation plans should be provided.
- The mental health aspects of climate change, in relation to flooding for example, should be addressed further.

- Given that many health impacts of climate change will depend on how well the built environment is adapted to the future climate (homes, urban spaces, hospitals etc.), it is important that further consideration of this is included in the final plan.
- The Council would expect the final plan to consider the impacts of the Urban Heat Island effect on the health sector. It is not clear how the work of the 'Large Urban Area Adaptation (Urb-ADAPT)' research project, for example, has been considered in this regard.

Implementation

- Overall the actions presented require further development with more detailed success criteria. The proposed monitoring may be effective in assessing if actions are progressing but not how overall resilience is increasing. Chapter 7 of the Council's Annual Review 2019 addresses adaptation indicators and this discussion should be considered when developing this aspect of the plan further.
- The Adaptation Planning and Action Group (APAG) should be convened as soon as possible, rather than in 2020 as proposed.
- The final plan should focus more the means of developing interactions and communication between the key stakeholder groups and of finding ways for the practicable integration of the work to be undertaken by these groups.
- Though section 4.2 discusses data and research requirements, it is unclear how uncertainties and knowledge and research gaps identified throughout the document are to be prioritised.
- Information on the costs and benefits of adaptation within the sector is limited in the draft and there is limited reference to co-benefits. Overall, there is a need to identify responsibilities and resources (human and financial) associated with each action.
- Further information should be provided on how climate change impacts will be taken into account when developing major health infrastructure projects. It is critical that an approach to stress testing such investment/infrastructure be put in place or at a minimum included in the adaptation plan as an action to be taken forward.

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

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council

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