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Dear Megan,

**RE: Draft National Adaptation Plan for the Communications 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 publication of the draft National Adaptation Plan for the Communications 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 National Adaptation Plan for the Communications Sector 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 plan provides a useful description of the sector, its constituent parts and the context within which it operates. The increasing reliance on telecommunications by other sectors is significant and should be elaborated on within the final plan. The final plan would also benefit from the inclusion of relevant case studies and particularly from examples of the impact of past severe weather events on the sector.

- 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.
- Further information should be provided on potential linkages with Disaster Risk Reduction and the Sustainable Development Goals.
- Further detail could be given in terms of consultation with the sector and how views were integrated, especially in prioritisation and the identification of adaptation options. This helps establish whether this draft is representative of the views of key stakeholders.
- A vision/goal for adaptation for the sector should be identified at the outset. This is important to enable appropriate assessment of the subsequent plan for its suitability. This should align with the definitions of resilience, mitigation and adaptation provided in the Climate Act and national policy.

#### Methodology and Data

- The Council consider that a wide range of plausible climate change outcomes should be considered. Overall it is not sufficiently clear whether future climate impact is being assessed for any future time period or scenarios in particular. Further information on how the presented key climate impacts for the sector were derived is required. The plan itself has numerous references to 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)
- It is unclear as to how the draft plan would allow for prioritisation of actions that would provide sufficient protection of assets and the broadcasting and communications networks, or if and how sequencing actions would be undertaken at different locations, recognising differentiated vulnerabilities and risks. The section on prioritisation requires more detail to confirm its robustness.
- Though one is referenced, it is not clear how the findings of the 'Critical Infrastructure Vulnerability to Climate Change' or the 'National Risk Assessment of Impacts of Climate Change' research projects have been considered. These may contribute relevant information including on climate change risks for timber pole networks.

- Though referenced, more consideration of slow onset climate changes should be included.

#### Cross sectoral and Other Considerations

- Acknowledgement of the links with other critical infrastructure sectors is welcome but the Council note that the plan does not necessarily link with other draft plans in the theme to date. For example, the draft transport sectoral adaptation plan proposes a midterm review of all critical infrastructure plans. This is not included as an action in the draft communications sectoral adaptation plan.
- While there is reference to emergency planning further information on what this means in practice for the sector should be provided. Further information is required on how climate change is considered in operators' business continuity planning at present.
- Interdependencies between the electricity and gas networks sectoral adaptation plan require more consideration in particular.
- The final plan should focus more on the means of developing interactions and communication between the key stakeholder groups (Department, operators, regulator, other sectors etc.) and on finding ways for the practical integration of the work to be undertaken by these groups.
- Further consideration of how weather and climate related disruptions across the sector are recorded, shared and lessons learned in the plan would be important to build the resilience of the sector. Data sharing between operators, sectors, local authorities etc. merits further consideration overall.

#### Implementation

- Overall the actions presented require further development with more detailed success criteria and associated timescales.
- The potential vulnerability of evolving technologies to climate change is referenced as requiring further consideration however this is not adequately reflected in the actions. Similarly, gaps in modelling relevant to communications infrastructure and regarding the operating parameters of communications infrastructure in a changed climate are noted in the text but do not appear to be addressed in the actions.

#### Other Recommendations

- Though section 1.4 is useful, further information on the anticipated role of planning legislation should be provided.

- Though European legislation and commitments are referenced extensively, there is limited evidence of lessons from other European jurisdictions being incorporated into the plan.
- Information on the costs and benefits of adaptation within the sector is limited and there is limited reference to co-benefits.
- Further links to mitigation in the objectives and actions would have been expected. The role of broadband as outlined in the Government's Climate Action Plan 2019 is not discussed for example, nor is the future role of fossil fuel generators in ensuring the resilience of networks, or any vulnerabilities for the sector arising from the referenced adoption of smarter energy grids and the Internet of Things that may be exacerbated by climate change.
- The Council would expect the final plan to assess each part of the active and passive broadband infrastructure to identify which parts are most vulnerable and how this should be addressed.
- Further consideration should be given to the adaptive capacity and preparedness of small broadband providers specialising in certain rural areas.
- Further consideration of the impacts of erosion is required. Also, any impact of drought on underground cable systems should be further considered.
- Lessons from the climate resilient design standards applied to the broadcasting network should be shared.

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