

Dr. Deirdre Lynn
National Parks & Wildlife Service
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09 May 2019

Dear Dr. Lynn,

RE: Draft Biodiversity 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 biodiversity 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 biodiversity 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 document summarises well the current status of biodiversity in Ireland, however the final plan would benefit from additional case studies and particularly from examples of green infrastructure. The draft also contains limited assessment of the risk and adaptation requirements for biodiversity in the urban environment.
- 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.
- A clear 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.
- Much of the text in the draft is taken from both the sectoral and local authority guidelines which may lead to inconsistency in tone and style. A statement at the beginning of the final plan demonstrating how the Climate Act, National

Adaptation Framework and the relevant adaptation guidelines have been considered would be useful. It may be useful for the reader if text from the guidelines is not restated unnecessarily and more appropriate chapter titles are used in the final plan.

- The final plan should further address the risk to biodiversity of potential mitigation actions. Information on the costs and benefits of adaptation within the sector is limited and there is limited reference to co-benefits.

Projections and Risk

- The period identified for climate impact screening is narrow and the assessment of impacts of climate events is not systematic.
- The draft plan provides limited information on the range of climate scenarios/uncertainty that have been considered. The Council consider that a wide range of plausible climate change outcomes should be considered. It is not clear whether future climate impact is being assessed for any future time period or scenarios in particular.
- 'Priority Impact Assessment' is one of the steps contained in the sectoral adaptation planning guidelines. The Council note that no priority impact assessment has been conducted as part of the draft due to data constraints, the absence of vulnerability assessment for ecosystems and biodiversity and the cross cutting nature of biodiversity. The sectoral adaptation guidelines note that 'where quantitative data is lacking or deficient' previous experience of climate and weather-related impacts and expert understanding of how biophysical impacts are manifest can be employed. The absence of a priority impact assessment means the draft plan does not address urgent and future climate risks in depth. This is very important for such a potentially vulnerable sector and should be addressed in the final plan.
- The 2013 research which suggested upland habitats, peatlands and coastal habitats may be most vulnerable to climate change impacts is cited but the draft plan does not discuss these further in any depth.
- The final plan should also consider the implications of societal developments such as changes in population and urbanisation patterns etc. further.

Ownership and Implementation

- Much of the text on monitoring and evaluation in the draft is drawn from the guidelines, with little detail on how it will be applied in the context of the sector.
- The draft plan presents adaptation actions that at times could be more focused and many of the adaptation actions identified are for others to implement and cost. There is limited information on how these bodies were engaged in devising the actions or how implementation will be overseen. This approach risks a low level of commitment to implementation from responsible bodies.

- In future, to progress integration in the implementation process, more of the key decision makers, from central and local Government and at senior levels, should be involved. The role of the Department of Agriculture, Food and the Marine as a key stakeholder in particular should be considered further.
- The draft plan states that ‘Due to the cross-cutting nature of biodiversity it is vital that ALL sectoral and local adaptation plans: 1) Emphasise the importance of natural capital, including biodiversity, to resilience building in all sectors; 2) Systematically evaluate and implement (where viable) nature-based adaptation actions’, however it is weak on how this is to be achieved. Further detail should be given on the proposed structures to be used to integrate biodiversity considerations into other sectoral plans and local strategies (e.g. via the National Adaptation Steering Committee, or new structures?).
- 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.
- To ensure implementation and change can be monitored, it is essential that appropriate indicators are identified and systems put in place to enable these to be updated and tracked. In addition, monitoring is critical to ongoing improved understanding of future impacts and the sensitivity of key ecosystems and species to climate change, both in terms of slow onset changes and extreme events. The draft plan does not propose appropriate actions to address the need for these indicators. There are useful international examples to inform this issue. For example, the recent evaluation of the EU adaptation strategy discusses transferable lessons learned that may improve climate change adaptation evaluation practices in areas including biodiversity.
- The role of the Department of Culture, Heritage and the Gaeltacht and of the National Parks and Wildlife Service in biodiversity and adaptation could be explained in more detail to deepen the understanding of responsibilities in the sector.
- The draft plan does not identify the range of potential resources available to enable adaptation actions. For example, LIFE funding is discussed but the draft is limited on how the sector could integrate/benefit from the other research funding processes. Also, the Climate Action Fund is not noted.

Mainstreaming and Cross Sectoral Issues

- Mainstreaming is a key aspect of building resilience and while the draft plan discusses cross sectoral adaptation planning in the context of the adaptation plans of other sectors, it is not shown how it will be reflected in other Department of Culture, Heritage and the Gaeltacht documents, plans and policies and how they intend to promote it in wider Government policy.

- How climate change adaptation will be considered by the National Parks and Wildlife Service in its role in development consultations and if this has been considered as a way of mainstreaming is not clear. Any particular implications of climate change for Natura 2000 sites should also be addressed in the final plan.
- Links with other plans, particularly those in the same theme of the National Adaptation Framework (i.e. seafood, forestry, agriculture) remain underexplored, as do linkages with the flood risk management and water quality sectors. Issues with seascapes and coastal habitats are raised but linkages with the ongoing Marine Spatial Planning process are not considered.
- Further information should be provided on what citizens and the private sector can do to contribute to the resilience of biodiversity.
- Further information should be provided on potential linkages with the Sustainable Development Goals.

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