



## Progress towards a Climate-Resilient Ireland:

Review of Statutory Sectoral Adaptation Plan Making 2018-2019

**December 2019**

*Submitted to the Department of the Taoiseach and the Department of Communications, Climate Action and Environment on the 10<sup>th</sup> December 2019*

## 1. Introduction

Ireland's first National Adaptation Framework (NAF) was published on 19 January 2018.<sup>1</sup> It identifies 12 key sectors under the remit of seven Government Ministers where sectoral adaptation plans were to be prepared by 30 September 2019 for approval by Government. These have a five year lifespan in line with the NAF which is to be reviewed at least every five years.<sup>2</sup>

Pursuant to the Climate Action and Low Carbon Development Act 2015 ('the Climate Act'), Departments tasked with the development of sectoral adaptation plans are required to consult with the Climate Change Advisory Council on their preparation.<sup>3</sup> As part of this, Departments received a criteria document setting out the 'Procedures and Basis for Assessment for Consultation Process for Sector Adaptation Plans by the Climate Change Advisory Council'. Draft sectoral adaptation plans were considered by the Council with reference to this. As some Departments produced drafts covering more than one sector, the Council provided advice and recommendations on nine draft plans addressing the 12 sectors (see Appendix 1).

As the Council's Annual Review 2019 notes, adaptation is a continuous learning and improvement process.<sup>4</sup> This review is based on the advice and recommendations provided to Departments on their draft sectoral adaptation plans by the Council.<sup>5</sup> It is not an assessment of the final sectoral adaptation plans approved by Government, rather it is intended to examine the lessons that can be learned from the first cycle of statutory adaptation plan making under the Climate Act 2015 and NAF. The amendment of the Climate Act as part of the implementation of the Government's Climate Action Plan 2019<sup>6</sup> may provide an opportunity to act on some of these recommendations.

Each year, the Council's Annual Review considers the implementation of adaptation policy and assesses our progress towards climate resilience. The implementation and funding of the sectoral adaptation plans and local adaptation strategies will be considered in future Annual Reviews.

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<sup>1</sup> DCCAE (2018), National Adaptation Framework: Planning for a Climate Resilient Ireland, <https://www.dccae.gov.ie/documents/National%20Adaptation%20Framework.pdf>

<sup>2</sup> Approved sectoral adaptation plans are available at <https://www.dccae.gov.ie/en-ie/climate-action/topics/adapting-to-climate-change/national-adaptation-framework/sectoral-adaptation-planning/Pages/Sectoral.aspx>.

<sup>3</sup> Under the NAF, local authorities were requested to prepare local adaptation strategies, also by 30 September 2019. Local authorities were not required to consult with the Council on these strategies.

<sup>4</sup> CCAC (2019), Annual Review 2019, <http://www.climatecouncil.ie/media/Climate%20Change%20Advisory%20Council%20Annual%20Review%202019.pdf>

<sup>5</sup> The letters from the Council providing advice and recommendations on draft sectoral adaptation plans are available at <http://www.climatecouncil.ie/councilpublications/otherpublications/submissionsandcorrespondence/>

<sup>6</sup> Government of Ireland (2019), Climate Action Plan 2019, [https://www.dccae.gov.ie/en-ie/climate-action/publications/Documents/16/Climate\\_Action\\_Plan\\_2019.pdf](https://www.dccae.gov.ie/en-ie/climate-action/publications/Documents/16/Climate_Action_Plan_2019.pdf)

## 2. Key findings from review of draft sectoral adaptation plans

The sectoral approach set out in the Climate Act and National Adaptation Framework 2018 is useful for accountability with each Minister responsible for the preparation of the sectoral adaptation plan allocated to them. The National Adaptation Steering Committee addresses some of the risks of siloization that arise from this approach, however **coordination, reporting and prioritisation in the preparation and implementation of the sectoral plans and in mainstreaming can continue to improve.**

The Council notes that the 12 key sectors identified **do not cover some important areas**, for example housing and planning, emergency management, the financial sector, tourism and sport. There are no sectoral adaptation plans in place for these sectors. The current sectors also do not fully address all aspects of coastal change that may be expected due to climate change.

**A core set of priorities and actions that would have the biggest impact on resilience in the sector was not always evident in the draft plans.** As noted in the Council's Annual Review 2019 it is unclear how actions from these plans will be prioritised to address the key risks and maximise co-benefits.

The NAF anticipates that sectors will reflect their key priorities within the annual budgetary and estimates processes. This will likely lead to fragmentation and **more coherence to resourcing the adaptation transition is required.** In most cases it was not clear what resourcing requirements, both current and capital, were required to deliver the draft plans. The involvement of the Department of Public Expenditure and Reform (DPER) in the plan making process is welcome but further action is needed to **integrate climate action** in Government policy, programmes and investment decisions and the role of DPER and the Department of Finance in championing adaptation should be strengthened. This will aid effective mainstreaming.

Very few sectors included a **vision for adaptation/resilience** in their sector in the draft plans. This is significant as in general draft plans were strong at setting out the current state of the sector and the risks it faces from future climate change, however they were less effective at assessing the vulnerabilities of future networks, systems etc. and considering the future shape and demography of Ireland against future climate - taking into account the implications of the National Planning Framework, for example.

Links to national and international research to inform adaptation planning by sectors could be strengthened and how research findings are disseminated to policy makers remains a

consideration. **Knowledge gaps** in key areas such as Sea Level Rise appear to remain though it is recognised that efforts to address this continue.

**Links with mitigation** and the Climate Action Plan 2019 (noting that some drafts were published before the final Climate Action Plan) were weak overall.

Though deepening links between adaptation planning, **disaster risk reduction**, the work of the **Office of Emergency Planning** and the implementation of the **Sustainable Development Goals** is part of policy under the NAF, **in practice their integration appeared limited**. Ensuring cooperation and coordination across these communities is a recognised challenge.<sup>7</sup>

Though the Council was not required to provide advice on draft local adaptation strategies, the four **Climate Action Regional Offices (CAROs)** show the benefits of resourcing adaptation and the opportunities for deepening coordination that exist in adaptation planning at all levels.

In general, more information should have been provided on **the cost of climate/weather related damage** to date and the application of build back better principles. Overall there was limited information on the potential costs of climate change for sectors and potential benefits of adaptation action.

In some sectors much of the infrastructure, operations etc. are privately or commercial semi state controlled and the opportunity for Government Departments to effect change may be limited. This requires an **additional emphasis on the companies themselves and industry regulators** to drive resilience.

Overall how sectors intended **mainstreaming adaptation** within their own Department's plans and policies was unclear.

Some draft plans gave very limited information on what **climate change scenarios** were being considered. This is particularly important when considering potential impacts and the lifespan of infrastructure etc. within the sector.

Overall, draft plans focused on increasing **adaptive capacity** but not necessarily on how to reduce exposure and sensitivity.

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<sup>7</sup> E.g. EEA (2017), Climate change adaptation and disaster risk reduction in Europe: Enhancing coherence of the knowledge base, policies and practices, <https://www.eea.europa.eu/publications/climate-change-adaptation-and-disaster>

Some **risk assessments** included in the draft plans may have been more robust than others, depending on factors such as data availability, time, resource and expertise availability etc.

**Climate risks are unevenly distributed** across the society and there was limited consideration of this overall in the draft sectoral adaptation plans.

The **consultation requirements under the Climate Act** are complicated but do not necessarily deliver effective cross sectoral coordination and collaboration. The joint deadline of 30 September 2019 for local strategies and sectoral plans was an opportunity to ensure coherence, however their differing capacities and approval processes caused practical difficulties with limited time to share early drafts etc.

### 3. Recommendations

The projected impacts of climate change often seem distant from everyday life, but Ireland experienced several notable weather and climate events in recent years which have shown vulnerabilities in our society and systems that may be exacerbated as our climate changes further. Therefore, there is a **need to move from adaptation planning and process-based efforts to more adaptation action** in Ireland.

Now that they are in place, a review of the sectoral adaptation plans should be undertaken to **identify priority risks** which need to be addressed and resourced over their five-year lifespan.

Climate adaptation is expensive, but inaction will likely cost more. Climate action – both mitigation and adaptation - needs to be fully integrated across all Government plans, policies and programmes including **appropriate resourcing** and implementation of the National Planning Framework and the National Development Plan. The role of the Regional Spatial and Economic Strategies as an investment framework to prioritise funding for the delivery of Project Ireland 2040 may provide a model.

Though the Government's Climate Action Plan 2019 includes some climate adaptation measures, to ensure that adaptation is adequately integrated into national decision-making, further clarity is required on the interaction and reporting between national, sectoral and local governance structures, including the **role of the Climate Action Delivery Board**. This oversight should ensure adaptation is properly mainstreamed in policy making. To date **awareness of the need for adaptation remains poor**, with corresponding low levels of willingness to take necessary actions. This is reflected in Government policy, where the

need for adaptation remains under-recognised. This should be addressed in future Climate Action Plans. Adaptation should be considered when policies and investments are being prepared and when mainstreaming is most likely to succeed. The Departments of Finance and Public Expenditure and Reform will have a key role in this.

The sectoral approach ensures identified Departments consider adaptation, but **gaps remain**. The elaboration of the themes in the National Adaptation Framework 2018 may be an opportunity to address these.

The preparation of future **local or regional adaptation strategies** should be placed on a statutory footing.

As noted in the Council's Annual Review 2019, the development of a **common set of climate projections** that capture the range of change in future climate projections for use in adaptation, infrastructure and investment planning to 2050 and beyond should be advanced. The availability of this would likely increase coherence, reduce the workload on sectors and local authorities when developing the next cycle of plans and strategies and lead to more robust outcomes. Their establishment and maintenance will require appropriate governance structures. The Climate Action Plan 2019 includes an action to advance the Irish Climate Information Platform as an operational support for climate adaptation and climate action in Ireland and this would likely be a suitable platform to explain and distribute these agreed national projections. Further coordination is required to build on International activity and Ireland's existing **climate services** initiatives and deliver more user-tailored climate services.

Information, tools, technical assistance and expert analysis are important in effectively delivering mainstreaming across Government. The preparation of a regular **national climate risk assessment** by Government should be considered to inform future National Adaptation Frameworks and any plans and strategies prepared under it. The Irish Climate Information Platform could play a key role in the preparation of this. This could reduce some of the burden on sectors, local authorities etc. and ensure scenarios and impacts are better understood and considered by policy makers. This would help identify the climate impacts which are considered the most urgent to address, with sectors then providing detail on the relevant impacts and necessary actions in their area of responsibility.

Sequencing is important to ensure policy is both evidence led and cohesive. For example, a national climate risk assessment (if this is to be produced), in conjunction with data for common projections, might need to precede the publication of draft plans/strategies by a

number of months, while these in turn might be published a number of months before finalisation to allow greater time for coordination and consideration of observations.

The **Office of Emergency Planning** and **Strategic Emergency Management** structures should become more engaged in adaptation planning.

It may be useful in the future if any final plans, frameworks etc. the Council provides advice on are required to include a statement demonstrating **how the advice has been considered**.

The 'Sectoral Planning Guidelines for Climate Change Adaptation'<sup>8</sup> and 'Local Authority Adaptation Strategy Development Guidelines'<sup>9</sup> published by the Department of Communications, Climate Action and Environment are useful and should be updated for the next cycle of adaptation planning to reflect learnings and also recent developments in International standards, with flexibility provided for sectors or local government to adopt slightly different processes and structures as might be suitable in their own context. There may be merit in putting any **revised guidelines for sectoral and local adaptation planning** on a statutory footing.

As highlighted in the Council's Annual Review 2019, the private sector and citizens bear primary responsibility for the protection of their well-being and property, and their **adaptation investment will be very important at local and individual levels**. This will need to be progressed in parallel with the implementation of plans, strategies and the National Adaptation Framework.

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<sup>8</sup> DCCAE (2018), Sectoral Planning Guidelines for Climate Change Adaptation, <https://www.dccae.gov.ie/documents/SPG%20Climate%20Change%20Adaptation.pdf>

<sup>9</sup> DCCAE (2018), Local Authority Adaptation Strategy Development Guidelines, <https://www.dccae.gov.ie/documents/LA%20Adaptation%20Guidelines.pdf>

**Appendix 1 - National Adaptation Framework Sectors, Departments Responsible for the Preparation of Sectoral Adaptation Plans and Engagement with the Climate Change Advisory Council**

Sector	Lead Department	Draft Received	Council Response Issued <sup>†</sup>
Seafood	Department of Agriculture, Food and the Marine	21 May 2019	9 July 2019*
Agriculture			
Forestry			
Biodiversity	Department of Culture, Heritage and the Gaeltacht	19 February 2019	9 May 2019
Built and Archaeological Heritage		14 May 2019	10 July 2019*
Transport Infrastructure	Department of Transport, Tourism and Sport	16 July 2019	28 August 2019
Electricity and Gas Networks	Department of Communications, Climate Action and Environment	28 February 2019	9 May 2019
Communications Networks		31 July 2019	28 August 2019
Flood Risk Management	Office of Public Works	19 July 19	28 August 2019
Water Quality	Department of Housing, Planning and Local Government	3 May 2019	10 July 2019*
Water Services Infrastructure			
Health	Department of Health	13 September 2019	19 September 2019

<sup>†</sup> *The responses from the Council are available at <http://www.climatecouncil.ie/councilpublications/otherpublications/submissionsandcorrespondence/>*

<sup>\*</sup> *The Department of Agriculture, Food and the Marine, Department of Housing, Planning and Local Government and Built and Archaeological Heritage sectors also met with the Council's adaptation committee in May 2019 to discuss their draft plans.*