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1st November 2017

Dear Minister Naughten,

RE: Draft National Adaptation Framework

The Climate Change Advisory Council is mandated to provide independent advice to help Ireland achieve its national transition objective on adaptation as outlined in the National Policy Position (2015). The Council believes that the sectoral 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.

In response to the consultation on the draft Framework, the Council wishes to outline some observations on the draft National Adaptation Framework:

Cross Cutting

- The draft NAF lacks urgency in asserting the need for adaptation actions. Climate change is having discernible impacts, and these will likely increase in intensity and frequency. Decisions in planning and development in both the private and public sector influence our vulnerability to impacts.
- The draft NAF should provide the broader context of the transition to a climate-resilient, low-carbon environmentally sustainable society and economy. This should include the relationship between mitigation and adaptation, but also their relationship with sustainable development.

- International factors including mobility and travel is only considered in the context of tourism opportunity. The NAF should also consider climate change as a driver of migration and of changes in investments flows and within the financial and economic sectors.

Governance and structures

- The draft NAF proposes that the high level National Mitigation Plan Steering Group established under the NMP and chaired by the Minister for Communications, Climate Action and Environment, will also provide steering on adaptation. The Council stresses that this must represent a core function of the group. Ownership and responsibility for implementation of adaptation actions resides with the key sectors and local authorities. This structure can ensure integration of mitigation and adaptation policies and reduce the risk of inconsistencies. However, it remains unclear what decision framework will be used to determine adaptation priorities and how ownership for adaptation actions is to be assigned in areas where there are multiple actors, fragmentation of responsibilities, and potentially conflicting objectives.
- It is recommended that Department of Finance and Department of Public Expenditure and Reform are represented on the Steering Groups.
- The draft NAF identifies four thematic areas. There is a risk that certain, important infrastructures (such as private and community assets), and climate/weather hazards (wind, drought) are not considered under the framework. It may be useful to broaden the scope of Theme 2 'Critical Infrastructure to the Built Environment' to include residential, heritage, SME and commercial sectors to address this.
- Barriers to implementation are mentioned in the framework, but are not elaborated or addressed. Addressing these barriers is an essential element of an adaptation planning process. This should inform the development of indicators that comprise a monitoring and evaluation plan. The next iteration of the framework should clearly identify and address these barriers.

Principles and Approach

- The draft NAF identifies the principles, challenges and barriers to effective implementation of least regret, cost effective adaptation to climate change. However, it has weaknesses with respect to commitment to specific actions and processes which would ensure the principles are adhered to and issues addressed. This should be addressed in the final framework.
- A list of the guiding principles for adaptation at a national level is provided but should be further elaborated and expanded. There is a need to ensure appropriate accounting of uncertainty, which can improve the robustness of decision making.
- The Council previously recommended that it would be appropriate for the NAF to provide clarity on a definition of resilience. The draft NAF does not provide this clarity. Key concepts relating to resilience are presented. In particular, the IPCC (2012) definition is a plain language starting point from which to develop robust approaches to adaptation. A common approach to defining this concept is critical to ensuring consistency across sectoral and local authority planning for adaptation.
- The NAF should mandate a risk management approach to adaptation. This can be based on capacity and learning developed by the flood management sector.
- The NAF should provide criteria for prioritization of adaptation actions, including guidelines on methodologies for cost benefit analysis, indicative timeframes, indicative global emissions and removals scenarios, and indicative national transition pathways. This direction is required to ensure plans and actions are developed with a shared vision of the transition objective, a shared understanding of potential climate change impacts and a common set of criteria for prioritisation of measures and actions.
- The Public Expenditure Code (PEC) is a critical component in the evaluation and assessment of investment in the public sector and an important signal to the private sector in the assessment of investment priorities. A review of the discount rate is recommended. Perhaps of more fundamental importance, the PEC should require people to first determine how they expect the investment in question to be impacted by climate change. Guidance should be provided in this area including action to be taken if climate change will impact on

investments. This would enhance the integration of climate change into key decision making processes that need to be considered in light of adaptation.

- The draft NAF highlights where EEA Scorecard analysis identified several areas of further progress that is required by Ireland. The draft NAF is not clear on how these specific issues are to be addressed.

Engagement

- The role of the private sector is noted, as well as the need for supports to enable engagement, but there is little detail on how this may be achieved. Public policy, through investment and revenue measures, must play a very important role in building a climate resilient society, however the private sector, households and companies, have a responsibility to undertake appropriate actions to protect themselves and their neighbours. The Framework needs to spell out these responsibilities to provide guidance to all those involved. The role of financial services (e.g. Insurance industry) are understated and by extension the role of financial regulation.
- It is notable that Climate Services are not mentioned, which is an important area of potential opportunities. Climate Services are the responsibility of the private and public sector. Recognizing and reflecting an appropriate balance and relationship between these two sectors' responsibilities within the NAF would be useful in providing an enabling environment.
- The Committee welcomes the draft NAF proposal to establish the Climate Ireland platform on an operational basis to provide an authoritative national portal for climate data, analysis and decision making tools. It is important that the necessary resources are also available to support on-going monitoring and analysis of climate and up-dates to global and regional model projections of climate change. The Climate Ireland Platform is important because it can provide guidance to all of those involved in adaptation as to the range of climate scenarios that need to be considered in making Ireland resilient to climate change. This is an important contribution from the public sector to the provision of climate services.

The Council looks forward to the publication of the final National Adaptation Framework before the end of 2017.

Should you wish to clarify any of the points above, please contact myself directly or via Claire Camilleri at the Climate Change Advisory Council's Secretariat, C.Camilleri@epa.ie or phone 01 2680145.

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council