



National Adaptation Framework (NAF) Public Consultation  
Aarhus, Climate Adaptation, Citizen Engagement and Local Government Division  
Department of the Environment, Climate and Communications  
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By email

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### **IrBEA response to National Adaptation Framework (NAF) Consultation**

Dear Sir/Madam,

Thank you for the opportunity to contribute to this consultation on behalf of our members.

IrBEA is the representative organisation for the bioenergy sector in Ireland with members also in Northern Ireland. Our membership spans the differing bioenergy sectors of solid biomass, biogas/biomethane, biofuels, biochar, wood fuels and energy crops.

IrBEA recognises the increased importance of enhancing approaches to climate change adaptation and mitigation measures to coincide with our continued efforts to decarbonise our society. It is worth noting that the consensus from respected sources including the International Energy Agency (IEA) and the Intergovernmental Panel on Climate Change (IPCC) is that bioenergy, in its various forms, will continue to be a very important part of our energy mix well into the future. Most projections for meeting net zero by 2050 include bioenergy.

However, bioenergy is not often given the rightful recognition that it deserves within national policies, roadmaps, frameworks and consultations. The fact that bioenergy is the largest source of renewable energy globally is not widely recognised or understood.

The need to co-operatively develop adequate adaptation mechanisms is likely to become increasingly evident in the coming years. Already, previously considered extreme weather events are happening with seemingly increased frequency. The cooperation between various stakeholders, government departments, local authorities and civil society will need to be



further developed and its visibility increased – this will require effective communication, which is not always evident.

The IPCC have identified several negative emissions technologies (NET) capable of carbon dioxide removal at scale. Included in these NETs are biochar production and use as well as the deployment of Bioenergy Carbon capture and storage (BECCS). These two removal methods for carbon should be mentioned and further supported in developing this climate adaptation plan.

Both NET's mentioned above require sustainably sourced biomass as feedstock. There is an abundance of indigenous sustainable Irish biomass available currently and into the future. Unfortunately, Ireland continues to fall well short of the stated afforestation ambitions. This is an area that needs addressing to enable future roll out of these Carbon Dioxide Removal (CDR) technologies at scale.

Biochar can assist with climate adaption by assisting with nutrient and water retention within agricultural soils which may become more common as climate continues to warm and we are subjected to increased frequencies of drought.

While forest fires aren't that common in Ireland, it's possible in the future that there will be volumes of material that is either a fire hazard or is fire damaged which would lend itself to biochar production, as is evidenced in North America.

The NAF document highlights the importance of Climate resilience, which is the capacity of a system, whether physical, social, or ecological, to absorb and respond to climate change. Bioenergy, if deployed more widely in Ireland has the capacity to contribute to a climate resilient renewable energy system.

Box 7 refers to the fact that continued GHG emissions will lead to increasing global warming. The deployment of more renewable energy and specifically bioenergy in Ireland in the form of solid biomass, gaseous biofuels and liquid biofuels can contribute to a reduction in GHG emissions through the displacement of fossil fuels with renewable fuels. The displacement of fossil fuels will contribute to a discernible slowdown in global warming

The Irish Bioenergy Association agrees that nature-based solutions (NBS) are important at both sectoral and local levels in the pursuit of climate resilience. There are many bioenergy related sectors that can contribute towards addressing climate challenges effectively. Biochar, agroforestry, forestry, short rotation coppice crops (willow) and biogas production to name but a few are all solution that can contribute.

Appendix 7 refers to the sectoral impacts and opportunities of climate change. We welcome the emphasis on forestry and agriculture here and the impacts and opportunities highlighted. This section could be broadened to highlight the opportunities that increased deployment of



renewable energy, with particular focus on bioenergy and the emerging bioeconomy, can bring in reducing emissions, decarbonisation and climate change adaptation.

As an organisation representing the various bioenergy disciplines, we firmly believe that bioenergy can provide opportunities across a wide range of sectors and society and that this should be mentioned and recognised in the NAF. We would welcome an opportunity to engage with the department further as this NAF is finalised.

Yours sincerely,

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