



Cumann Lucht Bainistíochta Contae agus Cathrach  
County and City Management Association

Submission to the Department of the  
Environment, Climate and Communications  
on

National Adaptation Framework Public  
Consultation

Submitted on behalf of the CCMA Climate Action,  
Transport, Circular Economy and Networks  
Committee

19<sup>th</sup> February 2024

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## Introduction

This submission has been prepared at the request of the County and City Managers Association (CCMA) Climate Action, Transport, Circular Economy and Networks committee, who welcome the public consultation of the updated draft National Adaptation Framework.

The necessity of adaptation is apparent. The increasing frequency and intensity of extreme weather events happening in Ireland and their negative impacts on people and communities can no longer be ignored. The tangible effects of climate change have become evident, and it is imperative for Ireland to proactively strategise and strengthen its ability to withstand climate-related uncertainties.

At a high level, the revised Framework recognises the evolution of the local authority role since the initial version drawn up in 2018, and the positive strides made by the local government sector in terms of climate adaptation, as evidenced by the Climate Change Advisory Council Scorecard. This provides a platform for continued focus and further advancement on adaptation, alongside mitigation measures across the sector.

## Single adaptation plan approach

Adaptation to climate change requires a coordinated, interdisciplinary, and comprehensive approach involving all sectors of society. A sectoral approach is not sufficient and will result in gaps and maladaptation – which has been highlighted as a concern. EPA funded research, CCAC Annual Reports and working papers have highlighted the necessity of, and demand for, a single adaptation plan. Further, the local authority plans demonstrate the value of a single plan that breaks down the silos of a sectoral approach and enables a systems approach.

The CCMA welcomes the acknowledgement of the key role of local government in local adaptation planning, as stated in section 2.3.3. Furthermore, the outline of the specific statutory responsibilities serves to highlight the opportunity for local government leadership in this area. However, adaptive governance is about collaboration, which is being missed by the indication of 12 separate sectoral plans that appear to only communicate when necessary.

## Misalignment

It is critical to ensure consistency and coordination of the various sectoral adaptation plans with local authority Climate Action Plans (LA CAPs). This will allow the local government sector to maximize the potential opportunities and synergies for optimal strategies and approaches. Currently, there is a misalignment between the framework and LA CAPs, as highlighted to the Department of the Taoiseach's Senior Officials Group on adaptation by the CCMA on 13<sup>th</sup> December 2023, and again in the submission made to the Group this year. While the LA CAPs aim to address both adaptation and mitigation, the urgency to achieve energy efficiencies and reduce emissions places a higher priority on mitigation actions.

## Funding

The report notes the importance of “Just Resilience”. However, this does not appear to align to the approach to climate finance, which currently focusses on sectors and is disbursed based on applications submitted. This increases the risk that finance will only reach those who apply for it, rather than areas that need it - in other words, it is inequitable. The plan must leverage the vast amount of data available to determine the location of adaptation projects and who needs to be involved to implement them.

In section 2.3.3.4 *Local Authority Staffing and Training*, it is stated “LAs must be equipped with the appropriate skills and resources to plan, develop and implement climate adaptation measures”. This, along with an outline of the resources and supports provided to the sector to date - such as Climate Action Officer roles- should be accompanied by firm commitments in relation to future long-term funding from central government for both operational resources and capital projects in local authorities. Given the continued challenge of climate change and the increasing severity of its impacts, sustained action and commitment are essential.

## Recommendations

CCMA would welcome the opportunity to discuss the following recommendations in more detail:

- There is a single adaptation plan – an interdisciplinary, co-ordinated and collaborative approach
- Alignment is required with LA CAPs
- Allocation of funding to meet the requirement for ‘Just Resilience’
- Commitment to long-term funding and permanent contracts of LA climate resources / projects to ensure delivery of targets and assist with retention
- One Health collaborative, multisectoral, and transdisciplinary approach should be considered
- Costs avoided/savings made are highlighted following climate adaptation e.g. health costs
- Update the text to incorporate the:
  - recently published EPA Climate Assessment Report
  - that the EPA has already developed the Climate Ireland Adaptation Network
- Examples of adaptation should reflect priority of nature based solutions
- Suggesting that adaptation is an opportunity for tourism and increased growing seasons implies that climate change is something that should be welcomed, with little consideration to the global impacts and interconnectedness.

## Conclusion

Collaboration can be maximised when underpinned by a comprehensive approach involving both the whole of government and society. Commitment to adaptation is vital, demonstrated by proper

alignment between national and local levels, as well as by the horizontal alignment of the various sectors, with clarity on responsibilities, roles and interactions, particularly in light of the expansion of sectors included in the National Adaptation Framework as cited in section 3.6.1.2 of the draft framework.

Recognising the connection between local authorities and our local communities is integral for effective climate adaptation measures. This aspect could be further recognised and harnessed as an important success factor in the framework, particularly in the context of the commentary in section 2.6.1. Climate Change in the Irish Mind.

The CCMA will continue to support the local government sector in its role of delivering action in terms of critical infrastructure and resilience solutions at a local level, which in turn contributes to national adaptation. However, clarity must be given on roles and responsibilities to ensure responses are consistent and effective. It is also integral that expectations are set out across all levels of government and sectors for a coherent direction.