

daa cpt
Trí, An Fhaiche
Lárcheantar Aerfort Bhaile Átha Cliath
Aerfort Bhaile Átha Cliath
Sord, Contae Bhaile Átha Cliath
K67 X4X5

T: 353 1 944 1111
www.daa.ie

daa plc
Three, The Green
Dublin Airport Central
Dublin Airport
Swords, Co Dublin
K67 X4X5



Department of the Environment, Climate and Communications
29-31 Adelaide Rd,
Saint Kevin's,
Dublin,
D02 X285

Date: 19th February 2024

Dear Sir/ Madam

Reference: National Adaptation Framework Public Consultation

daa plc welcomes the opportunity to contribute to the public consultation on the review of the National Adaptation Framework by the Department of the Environment, Climate and Communications. Below we have detailed our comments and concerns on the consultation document proposed.

The Review comes at a time when the effects of climate change are becoming more pronounced across the globe, with increasing temperatures and unstable weather conditions affecting vulnerable communities the most. The IPCC Sixth Assessment Report details irreversible loss in ecosystems, extinction of species, reduced food/water security and extreme weather events as a result of climate change. It further warns that climate change is escalating so rapidly, its impacts may soon overwhelm nature and human capacity to adapt.

Noting the expansive area covered by the consultation document, some of which are beyond the scope of our operation at daa, this submission will focus on concerns in of direct relevance to our operations.

Section 3.5.4 Role of the Commercial Semi-State Sector: *“The Commercial Semi-State Sector has a role to play in supporting the delivery of an enabling environment for adaptation and resilience through, for example, safeguarding its own operations and services as well as supporting the wider implementation of adaptation actions. The addition of a 6th commitment to the NewERA Framework for the Commercial Semi-State Sector (outlined in Section 2.5.2.2) to address climate action objectives, specifically relating to climate adaptation, would be beneficial in explicitly considering adaptation within the sector.”*

As a commercial semi-state organisation, daa currently reports our climate and sustainability actions through the Climate Action Framework and additionally to the Department of Transport’s Climate Adaptation MREL Framework (2023) and will be obliged to report under the Corporate Sustainability Reporting Directive (CSRD) from 2026 (for 2025 data). daa also voluntarily discloses climate and sustainability information to the (ACA) Airport Carbon Accreditation scheme, a global carbon management programme, and the UN Global Compact. We request that any new reporting commitments under the NewERA framework align with existing reporting under current national government requirements, referencing any additional reporting (e.g. Department of Transport

Climate Adaptation MREL Framework), in order to avoid putting additional and repetitive reporting requirements on commercial semi-state organisations.

Section 2.2.5, National Climate Change Risk Assessment: *“To support the planning and implementation of targeted, relevant adaptation actions, the CAP 2023 (Action AD/25/2) called for the development of Ireland’s first National Climate Change Risk Assessment (NCCRA) by Q1 2025. Led by the EPA, the NCCRA will set out the priority impacts of climate change for Ireland. The NCCRA will cover the multitude of risk types such as direct, indirect, cascading and transboundary risks to identify risks within, across and outside of existing adaptation sectors. The NCCRA will also set out national and sectoral risk assessment criteria to ensure consistency in the estimation of risk within and across sectors “.*

daa supports the development of the EPA-led National Climate Change Risk Assessment (NCCRA). The NCCRA will assist daa with planning for adaptation to climate change impacts. However, daa will also complete its own climate risk assessment in 2024, aligning with requirements under CSRD. We would urge sufficient consultation where we can address issues collectively as we are actively engaged in this work.

Section 1.10.5 Climate-related disclosure regulation and standards: *“There has been significant progress made in relation to the development of a range of climate-related disclosure regulations and standards that support improved transparency on climate-related risks, impacts and progress.”*

daa fully supports the transposition of the CSRD into Irish law and is preparing to disclose its information under the requirements of the directive. daa is taking action to prepare for these requirements to ensure accuracy and transparency in alignment with the directive. We have initiated the double materiality assessment and are working towards a draft in 2024. We encourage the government to constantly monitor, and update (where needed) government supports to help organisations to deliver on this reporting. Support would also be welcome in progressing any specific actions required to meet the targets, such as via the Green Transition Fund and the Climate Toolkit 4 Business guidance, and in relation to any implementation guidance issued by the European Financial Reporting Advisory Group (EFRAG) and the Commission re the CSRD.

Section 2.4.3 Ireland Strategic Investment Fund’s Climate Investment Strategy *“Overall, the Climate Investment Strategy plays a crucial role in guiding Ireland’s investment decisions towards climate-friendly, sustainable projects that contribute to both environmental protection and economic development, which can be aligned with critical adaptation infrastructure needs. As outlined in ISIF’s Climate Update (2023)⁵⁴ as part of the selection process for the Investment Strategy, it is committed to 1) reassessing current metrics and targets to become future-proofed, given the need for a radical emissions reduction; 2) aligning portfolio alignment metrics for the Irish portfolio and 3) developing more sector or industry expertise to allow for robust assessment of climate risk within companies, sectors and sub-sectors, in line with legislative requirements (EU Taxonomy guidelines, the Climate Action Plan and the Climate Act Carbon Budgeting provisions). “*

daa fully supports Ireland's Strategic Investment Fund's Climate Investment Strategy, including the two-fold approach:

- To support sustainable infrastructural requirements of the Irish economy towards 2030 in key areas where carbon emissions are prevalent (as per the CAP).
- To fund development of new technologies and business models that align with a low carbon economy towards 2050.

In December 2023, daa submitted our Dublin Airport Infrastructure Application to Fingal County Council which seeks to improve facilities, services and passenger experience at Dublin Airport, and to grow the capacity of Dublin Airport sustainably from 32 million passengers to 40 million per year. We recognise the considerable challenges that lie ahead, particularly with respect to ensuring carbon and climate factors are appropriately assessed within any proposals for airport growth. We will provide infrastructure on the ground to allow airlines to transition to more sustainable forms of fuel and energy, in both aviation and ground transport. The government should also consider the total amounts of additional funding that could be made available to facilitate sustainability objectives, as well as the types of initiatives that might be funded e.g. investment in solar farms and LEVs, funding for airport carbon accreditation audits, support for research and feasibility assessment reports etc. Additionally, we are members of the governments National SAF Taskforce, focussed on accelerating the development of a SAF production industry in Ireland. It is widely acknowledged that SAF will play a critical part in the future sustainability of the aviation industry, and the initial mandates for SAF uptake will be in place from 2025. The decision to grow international connectivity at Dublin Airport was made in the national interest. Aviation is acknowledged as a hard to decarbonise sector and given Ireland's island location and the criticality of aviation to our economic viability, any initiatives to support a more sustainable aviation future require critical support. We will continue to work to minimise environmental impacts and the carbon emissions of our operations and activities and play our part in reaching Net Zero emissions.

Kind regards,

[Redacted signature block]