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19th February 2024

Re: Consultation on Review of the National Adaptation Framework

Our Ref: EPAC-0224

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We acknowledge your notice, dated 19th January 2024, in relation to the National Adaptation Framework. The Environmental Protection Agency (EPA) welcomes this opportunity to provide input into the Public Consultation on the National Adaptation Framework.

This submission builds on our previous EPA submissions to Department of Environment, Communications and Climate (DECC) in relation to the National Adaptation Framework. This comprises of overarching comments regarding the NAF and the EPA's role on adaptation and comments specific to the text of the draft document.

I am also attaching the EPA's previous EPA submissions as an Appendix to this letter to be considered as part of the EPA's response to this public consultation.

- EPA submission on National Adaptation Framework Draft, 4th December 2023.
- EPA submission on consultation on review of the National Adaptation Framework, 25th July 2022.
- EPA submission on early-stage consultation on review of the National Adaptation Framework, 25th July 2022.

1. EPA's role in Climate Adaptation

The EPA's strategic plan 2021-2026 identifies the EPA's role in climate adaptation and resilience in Ireland. ***Our evidence and data on the impacts of climate change will inform Ireland's approach to adaptation and enable the transition to a climate-resilient environment, economy, and society.***

This work as set out in the EPA's Climate Change Adaptation Strategy (attached) is central to the EPA's climate change remit which also includes emissions statistics, climate science, climate research, behavioural insights and engagement.

The EPA plays a key role in adaptation governance and implementation structures by delivering across the areas of climate risk, climate services and evidence and knowledge.

This includes providing technical support for climate adaptation in Ireland by developing and delivering **Climate Ireland** (www.climateireland.ie) to its full potential, Ireland's National Adaptation Platform, and associated guidance and tools for policy makers, local authorities (planners, climate officers, engineers) and sectoral adaptation leads and development of Ireland's climate adaptation network.

The EPA's work in the area of Climate Risk informs and supports decision making under uncertainty and adaptation planning at National, Sectoral and local government levels. The EPA is leading the delivery of Ireland's First **National Climate Change Risk Assessment** to prioritise climate change impacts and actions across all sectors.

The EPA provides and supports development of timely **evidence and knowledge** to drive adaptation planning and implementation in Ireland through its delivery of EU and UNFCCC adaptation reporting, participation and leadership in national adaptation fora and at EU level in EEA EIONET.

The EPA develops research capacity in climate adaptation through the **EPA Research Programme** and support adaptation planning through their **environmental monitoring and reporting programmes**.

The EPA works to integrate climate resilience and adaptation priorities across EPA work areas to optimise co-benefits for the environment and public health. In particular, focusing on **water quality and quantity (Water Programme), Environmental Licensing, and incorporating climate change risk into emergency preparedness**.

2. The new national adaptation framework should seek to address the challenge of policy and sectoral integration in its preparation and implementation.

The EPA's State of the Environment Report (SoER) published in 2020 identified the need for an overarching national environmental policy position that integrates and delivers across multiple related strategies, plans and programmes. This recognises that environmental issues and challenges such as climate change, air quality, water quality and biodiversity cannot be looked at in isolation as they are complex, interconnected and need to be tackled in an integrated way.

It also identified that 'mitigation and adaptation action that is planned, coordinated and prioritised is required to build the resilience of society and the economy in the face of current and projected climate change impacts'.

The NAF should clearly establish the links required between specific plans and policies such as the River Basin Management Plan, the National Biodiversity Action Plan, and National Peatlands Strategy with attention placed on nature-based solutions to adaptation where appropriate.

It should also should clearly articulate the interdependencies of the long-term objectives of these plans and policies and the successful National Adaptation Framework.

3. The new National Adaptation Framework is an opportunity to address current adaptation deficits and put in place fit for purpose structure that supports the development of a climate resilient Ireland. Ireland's Climate Change Assessment and its findings should be considered and reflected within the finalised National Adaptation Framework.

Ireland's Climate Change Assessment (ICCA) was published in January 2024. ICCA for the first time provides a comprehensive and authoritative assessment of the state of knowledge around all key aspects of climate change, with a central focus on Ireland.

This assessment is clear Ireland is currently experiencing the impacts of climate change. Ireland needs to be resilient to ongoing and future climate change impacts. Immediate and sustained transformative mitigation and adaptation actions are likely to have widespread benefits for health, wellbeing and biodiversity in Ireland while reducing vulnerability to the adverse impacts of climate change.

- Adapting to climate change and ensuring a climate resilient Ireland highlights that *Ireland needs to be resilient to ongoing and future climate change impacts. This requires increased focus upon and investment in adaptation that can protect us from future climatic impacts. Current implementation of adaptation is too slow and fragmented. Doing better requires financing,*

working with people and nature, monitoring and evaluating outcomes, and increasing public and private sector involvement.

- *Driving transformation forward Effective and just transformative actions will have mitigation and adaptation benefits and bring broader benefits for health, wellbeing, nature and sustainable economic development. The state has a central role to play in enabling the necessary transformations, supported through action across society. Decisions taken this decade will reverberate for generations to come.*

4. Objectives

The Low Carbon Development and Climate Action Act 2015 (as amended) commits the Government to achieving a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The draft NAF retains the definition of resilience from the 2018 NAF. Beyond defining resilience, the NAF would be strengthened by specifying the Representative Concentration Pathway or Global Warming Level pathway that Ireland is planning to be resilient to by 2050. Internationally, there is a move towards specifying upper and lower projection pathways or minimum standards for adaptation planning which enable stakeholders to more clearly understand what range of potential futures should be planned for. For example, the Environment Agency (UK) require regulated entities to remain resilient at stages along a climate projection of at least a 2°C global mean temperature rise by 2050. Such target ranges should be contained in the NAF, be iterative and dynamic, and updated as required based on climate observations and emissions inventory and projections updates.

5. The EPA welcomes the expanded scope of the draft NAF. However, the inclusion of finance and commerce at a sectoral level would strengthen overall sectoral adaptation plan development and implementation.

The draft NAF emphasises the pivotal importance of the financial and commercial sectors both in terms of ensuring the climate risks they face are appropriately assessed and managed, and in financing and implementation of adaptation action across sectors. While financial and commercial considerations can be included at a thematic level under Economy (and if so, should be explicitly referenced as so in the NAF), the inclusion of finance and commerce at a sectoral level similarly to their inclusion at European level, would strengthen overall sectoral adaptation plan development and implementation.

6. Climate impact monitoring

The NAF should include a section setting out what observational networks are required to identify climate change impacts, such as the EPA/local authority and OPW hydrometric network for example. The NAF should set out that these networks should be appropriately resourced and maintained, as they are critically important to identify where adaptation actions are required at a national and local level.

7. Comments on the draft NAF document

- The document would benefit from the inclusion of a schematic/diagram to visually represent the Framework and an accompanying summary document.
- Sections 2.2.2 Climate Ireland, 2.2.4 Ireland's Climate Change Assessment and 2.2.5 National Climate Change Risk Assessment. The EPA will separately provide updated text to reflect and update the status of these activities more accurately.
- Section 3.5.6 should read “...responsibility to the EPA for coordinating environmental research in Ireland”.
- Section 3.6.1.2 and table 3. Greater clarity is needed regarding what is meant by inclusion of planning as a scoping exercise, within the built environment, for a potential sector. Greater clarity is needed regarding the intention to include planning as a sector within the timeframe of this NAF. It is noted that the draft document makes reference to urban planning, greater clarity is needed regarding consideration of planning and the built environment in rural as well as urban settings.
- Section 3.6.1.3 Thematic areas: It is suggested that each thematic area would benefit by assigning a lead Department or Departments for its implementation supported of the National Adaptation Steering Committee, rather than assigning responsibility to the NASC itself.
- Section 3.6.1.4 Nature Based Solutions: ICCA identifies that resourcing of adaptation needs to move beyond the limits of traditional cost–benefit analysis. Aside from the material impacts, climate change threatens cultural heritage, sense of place, wellbeing and nature – all non-economic losses that are rarely captured in traditional economic assessments. The National Biodiversity Action Plan obliges Ireland to ensure, by 2027, that systems and standards for natural capital accounting (NCA) are being developed and implemented in Ireland. It is suggested that the NAF support the use of NCA and updated assessment of cost benefit analysis

in adaptation planning as they become available to ensure multiple benefits are achieved across sectors.

- Section 3.6.3 Adaptation indicators; The economic and service level impacts of climate change can be better reflected in adaptation planning processes through improved capturing of data by sectors and local authorities. It is suggested that this section also reference the need for relevant sectoral bodies (including Departments, Agencies and Local Authorities) to maintain records to support assessments of climate impacts and adaptation spending. These will also support the development of resilience indicators and the reporting of actual spend and support improved spending projections.
- Section 4 Key Actions under the Framework. It is suggested that the actions identified in this section be clearly mapped to relevant sections within the Framework.
 - It is suggested that this section include additional actions to reflect:
 - International reporting obligations on adaptation,
 - Development of a roadmap for climate adaptation finance to set out how the costings of climate change impacts and financing future adaptation needs will be addressed in detail.
 - Development of a mechanism to capture details of adaptation costs and financing information from sectors and local authorities.
 - Development of common framework for decision making under uncertainty to support dynamic or threshold-based decision making from national to sectoral and local levels., providing clarity for stakeholders and improve the consistency of actions and adaptation outcomes across sectors.
- Action 7 NFCS: It is suggested to update the proposed KPI as the NFCS has already been established.
- Action 8 Drive community outreach, educating the public on risks, opportunities and impacts of climate change in Ireland and globally. The EPA would welcome engagement with DECC to obtain clarity on this action and associated KPIs and outcomes.
- Action 11 Skills It is suggested that the NAF incorporate a section on skills, knowledge and capacity building to support this action. This should consider the requirement to train and retain specialists and mainstreaming adaptation or 'future-proofing' considerations amongst relevant

professionals such as, but not limited to: planners, engineers, civil and public servants, financial professionals and health managers.

- Action 16 NCCRA: It is proposed that the outcome be separated into two distinct actions. The first action KPI being the delivery of the NCCRA first iteration output reports and guidance, and the second action being the establishment of an enduring NCCRA process structure that can be updated iteratively as required. This process structure will be set out in the NCCRA main report.
- Action 17 Climate Ireland: It is suggested that the KPI and outcome be updated to replace 'number of reviews and updates made to the platform' with 'number of registered Climate Ireland Adaptation Network (CIAN) members and annual seminar held'.

Finally, you should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment (SEA) Directive, its implementing regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the plan-preparation process.

We also refer you to the EPA Good Practice Guidance for SEA Screening to assist you in considering whether SEA is required for the Framework. <https://www.epa.ie/publications/monitoring--assessment/assessment/sea-screening-good-practice-2021.php>

The EPA looks forward to working with you as you finalise and implement the new National Adaptation Framework .

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