

Submission by [REDACTED] on NAF 24**1. Ensure Genuine Consultation**

I have studied national climate policies over the past 20 years, and have observed that it is quite seldom that a policy or plan presented in a public consultation has been altered in any significant way based on submissions from the public or other stakeholders. It is highly unlikely that the large number of people who have made submissions over the past 20 years are all making irrelevant points not worthy of consideration. This reluctance to seriously consider submissions is a major weakness in the national approach to climate change policies, both mitigation and adaptation.

2. Reduce Document and Procedural Overload

As a general comment, the documentation and procedures in the NAF are quite lengthy and represent a substantial study burden for the relevant actors, bodies and members of the public. I am not suggesting that you edit down the NAF, as I do not wish any more time spent on it, but please keep this comment in mind for future NAFs. If there is a clear set of national objectives there is little justification for a NAF document to exceed 20 pages say. Within the proposed NAF there is considerable scope for reducing bureaucratic and reporting overload. This would free up the time of those charged with identifying and implementing beneficial actions.

A proactive mentality in Local Authorities (LAs) will be critical to the success of our adaptation efforts. As described in the NAF there is an overemphasis on reporting. This will inevitably lead to a cascade of long climate adaptation reports (LACAPS) from the LAs, repeating much of what is in the NAF, adding little new in terms of specific actions. These LACAPS may be supplemented by behemoth SEAs and Appropriate Assessments of several hundred pages which create the impression of every last stone being turned, but frequently omit obvious major aspects. Production of reports is the comfort zone of those who do not have a clear idea of what should be done. The large number of actors and bodies involved, leads to organisational confusion, lack of clarity on objectives, and undermines the confidence of those at LA level who are reluctant to suggest simple actions that are not backed up by hundreds of pages of reports. The result is organisational freeze and decision paralysis, not to mention the hundreds of thousands of euro spent by LAs on producing shelf loads of reports that few read.

Some simple modifications to NAF could help. Instead of requiring LAs to produce their own individual plans independently based on the existing drawn-out LACAP guidelines, provide a short reporting template. This would enable LAs and CAROs to identify priorities for their areas under a list of relevant climate adaptation headings, along with actions being considered, resources required, projected timelines, and any identified obstacles. Such a compact LACAP could be most efficiently developed in a workshop format with the relevant personnel present (including the critical frontline staff who have practical experience of the practical issues, such as urban drainage workers, emergency services, road maintenance, WWTP etc). The output would be in a short clear format for ready incorporation by CAROs, and for review by DECC/CCAC. It would also be readily understood by councillors and the general public, without having to wade through hundreds of pages. The reporting template could be updated by DECC annually based on any new data and feedback from CCAC, and could be rapidly revised as appropriate by LAs.

3. Lack of Clear National Policy or Indicative Strategy

One difficulty with the above proposal is that it is hard to extract an appropriate list of relevant climate adaptation aspects and potential actions from the NAF. To a large extent the NAF describes the governance framework and kicks for touch leaving the specifics of the adaptation plans to the relevant sectoral ministers and LAs, with proposed expert input from Climate Ireland. The projected impacts of climate change in Ireland have been clear for many years, have been referred to in numerous government and LA documents over at least two decades, and have recently been confirmed in the recent very comprehensive EPA ICCA report. There is nothing new in the projections, and the NAF should set out clearly the main aspects to be addressed. The following are the aspects and possible actions which appear to me to be most relevant, in order of urgency:

- Flooding (already happening) – planning zoning, nature-based solutions, flood defences, managed retreat
- Changes in rainfall and intensity patterns (already happening) – building design, nature - based solutions, drainage infrastructure
- Increased Storms (already happening) – building design/regulations, nature-based solutions, drainage, planning
- Temperature rise (maxima already happening) – building standards, urban design and regulations
- Sea level rise (inevitable in long-term) – long-term zoning planning and managed retreat of coastal urban centres
- Climate induced migration (already happening) – implications for housing, infrastructure, services

In comparison with the most affected countries the projected impacts for Ireland are relatively benign, and can readily be addressed in an orderly manner over the coming decades. All of the above aspects are mentioned in the NAF, with the exclusion of climate induced migration which I believe to be a significant consideration as discussed later.

4. Combining Top-down Plans with Bottom-up LACAPs

It would be helpful to bring the governance chapter to the beginning of the NAF document. The structure as shown in Figure 16 shows a top-down approach, which is also implied in the list of actions in Table 6. This is consistent with the requirements of the Climate Action and Low Carbon Development Acts 2015 - 2021. Consistency with legislation does not always imply an efficient governance, but in this case I am of the view that a top-down approach will be most efficient and effective. Given the small geographical scale of the state all of the climate change and adaptation aspects will be broadly similar, and projected small local variations in climate and local vulnerabilities can easily be taken account of in the LACAPs.

There is confusion in the NAF as to the governance model. In section 3.6.2.1 it is stated that sectoral adaptation plans should wait for LACAPs, and align with these. Whereas in Chapter 4 the governance

described implies that the sectoral plans would be prepared first, which would be the most logical and effective approach, and in compliance with legislation.

The current framework however puts an emphasis on bottom-up whereby the LAs produce LACAPs following a highly prescriptive long drawn out set of guidelines. This would be an unnecessary onerous burden and encourages prevarication, and as suggested above a short LACAP reporting template would simplify matters. The proposal to assign CAROS the role of compiling statistics on regional progress has some appeal, but in its present form there is no visibility on the nature of the actions being reported, and consequently the statistics compiled are not useful to anyone. Worse, they create the impression that a lot of work is being done, whereas many of the “actions” are merely consultations, studies, scopings and reports. The impression of work and progress can easily be achieved by generating simple administrative tasks that can be quickly ticked off. The cherry on this bureaucratic cake must surely be the requirement for the CCAC to produce scorecards. If CCAC has expertise in the area of climate adaptation or indeed project management it should incorporate this advice in the NAF and spend its efforts advising the sectoral ministers directly. This would be a much better use of their time than producing marking schemes and scorecards. What these scorecards would be used for is questionable. Unfortunately they may end up being used in a game of whack a mole on LAs whose efforts do not meet the standards. This will result in a box ticking approach by LAs and government departments to ensure they get a good score, and take their eye off the need for genuine robust adaptation planning.

5. Climate Migration

The only mention of migration in the NAF is increased tourism. I suggest this will be the least of our concerns. The greatest climate impacts on Ireland will be inward migration due to the degradation of the climate in other states. The devastating effects of climate change are already evident in southern Europe and in other hot areas of the world, in particular developing countries. Many of these affected regions have been for some time on the margins of survivability due to temperature extremes and droughts. Countries with fragile government and governance structures are particularly vulnerable and are prone to societal collapse, break-down of public order, and wars. There is no need to go into this further, as it is all well described in the IPCC reports.

As a member of the EU, Ireland with its temperate climate will provide an important future role in receiving climate migrants from southern parts of the EU. This is already happening, initially with wealthy people choosing to buy or rent homes and spending summers in Ireland, but as the crisis intensifies, there will inevitably be larger scale population movements northwards within the EU. All of these climate refugees will be entitled to arrive and seek a livelihood in Ireland. Consideration of this aspect would come under the heading of Just Resilience and the principle of “leaving no one behind” (NAF, p. 13), unless we mean “leaving no Irish people behind”.

In addition there will be increasing numbers of refugees from non-EU countries seeking a new life. It is difficult to assign a quantitative measure to the role of climate change in the current flow of refugees into Europe from Africa and Asia. In many cases they are escaping due to economic reasons, such as inability make a living in drought regions, living conditions which are intolerable, and breakdown of law and order. Being a climate refugee is currently not grounds for being granted

residency and this policy will need to be reviewed. It is certain that climate change will increase these push factors and will increase this flow of people. Ireland has achieved the remarkable feat of taking in over 100,000 refugees over the past few years, a result which would have been considered impossible prior to the Ukraine war.

We need a national debate and a policy decision on whether we plan for increased climate driven migration from non-EU countries, or alternatively drop the Just Transition principle and adopt a Fortress Europe response. If the former, we need to realistically assess the number of climate refugees we can absorb. Would it be 1 or 2 million? This has profound implications for housing policy, the economy, land-use planning, and Irish society in the decades ahead. The recent EPA ICCA report touched very briefly on the issue, and called for further research. I suggest that the evidence is already before our eyes and that it is time to discuss and develop a policy in response.

6. Presentation of Climate Change Impacts

In section 1.5 a graph is presented in Figure 3 showing the average global temperature which has been rapidly rising in recent years. The graph reaches over +1.2 C (relative to pre-industrial) and extrapolation of the clear upward trend would indicate that breaching the Paris aspiration of +1.5 C will be inevitable. Yet in the text, a temperature increase of just 0.9 C is mentioned, which was based on averaging over two decades. This may mislead readers into thinking that we have some time left before breaching +1.5 C. Multi-decadal averaging is standard for describing climate, however when the temperature is changing so rapidly, there is no possibility of a stable or quasi stable climate over the coming years, and decadal averaging is misleading. The expectation of a continued rapidly rising global temperature is supported by climate projection models, and the evidence of continued global GHG emissions and consequent accumulation of CO₂ in the atmosphere. I suggest that the latest determined global average temperature anomaly should be stated in the NAF, which was +1.5 C in 2023 (without averaging). This gives a much better sense of the urgency for action. In this decade it is likely that the world will experience more exceedances of 1.5 C and extrapolation of the long term trend shows that by 2032 the 1.5C Paris goal will be exceeded, and by 2057 the 2 C limit will be breached¹. The NAF is updated in 5 year cycles. In just two update cycles of NAF the global temperature anomaly is highly likely to exceed 1.5 C. This underlines the need for urgency in adaptation response.

In Appendix 4 the “very likely range” of sea level rise is presented for various climate scenarios. If, as looks credible we are currently on an SSP2 or SSP3 scenario then the upper estimate of the “very likely” sea level rise would be 0.76 to 0.9m by 2100. Higher estimates could be arrived at by considering the low probability (say 5% chance) estimates which would mean that a sea level rise of 2m could not be ruled out in 2100². In planning infrastructure that we expect to survive into the next century the precautionary principle should apply, and if there is say a 5% probability of sea level rise of 2m this should be the basis of infrastructural planning to 2100. In the longer-term further sea level rise is inevitable, and may be substantial in the event of very high GHG emissions:

¹ <https://berkeleyearth.org/global-temperature-report-for-2023/>

² 2-metre sea level rise 'plausible' by 2100: study (2019, May 21) retrieved 8 February 2024 from <https://phys.org/news/2019-05-metre-sea-plausible.html>

“Due to deep uncertainty linked to ice-sheet processes, global mean sea level rise above the likely range – approaching 2 m by 2100 and in excess of 15 m by 2300 under the very high GHG emissions scenario (SSP5-8.5) (low confidence) – cannot be excluded.”³

CFRAM maps prepared by OPW are based on a sea level rise of 1m in the High-End Future Scenario. The usual response of our governance system in the face of scientific uncertainty is to wait for more evidence. However it is highly unlikely that scientific uncertainties will be ironed out within a decade. Consequently whether the CFRAM maps are revised to account for a 2m sea rise in 2100 is essentially a national policy decision. Does the state think it prudent to plan on the basis of a low probability worst case outcome of a 2m sea rise, or will it hope for the best and accept the risk of planning on the basis of a 1m sea level rise? Such a policy decision needs to be made now, as the OPW quantified flood risks are required as an input to LACAPs.

7. Exploiting “Opportunities”

On page 12 of the NAF, in the context of resilience, there is reference to taking advantage of positive outcomes from climate change, and later in the document reference is made to the prospect of extended growing season, high value seafood, and increased foreign direct investment (p. 41). In a submission I made on a previous NAF I asked for the reference to exploitation of climate adaptation opportunities to be removed. I am referring here to commercial opportunities which can clearly arise in the midst of any disaster. Adventitious business and policy opportunities do not need to be set out in national policy – the economic forces will automatically respond as appropriate.

In my view the open promotion of climate adaptation opportunities in the face of collapse of the world climate indicates a failure to understand or to properly internalise the scale of the decimation which humanity faces within the present generation. Admittedly, reading the dry considered scientific text in the IPCC reports, and in the EPA ICCA reports it is not immediately impressed upon the reader that the world faces decimation on a catastrophic scale within this generation. The future prospects of humanity were quite accurately and succinctly expressed by UN Secretary General António Guterres who summed up the thousands of pages of IPCC reports as follows:

“We are on a highway to hell with our foot on the accelerator”

I ask the DECC to reconsider national policy on promotion of climate change opportunities from an ethical perspective. I note that there are no references to ethical considerations in the NAF references.

8. Flood Insurance

The emphasis on nature-based solutions is welcome such as ensuring flood plains are fully utilised and not encroached upon. Current engineering solutions for flood protection entail high GHG

³ IPCC AR6 Synthesis Report, SPM, B.3.3

emissions, and in some cases eliminate the natural flood plains. It will not be cost-effective to guarantee that all properties are protected from floods.

Homes and businesses currently subject to flooding are in most cases unable to obtain insurance. In high profile cases the government has provided flood relief payments. But for lower profile incidents the home and business owners are left to fend for themselves. Consideration could be given to a national insurance scheme for such properties who can document an insurance refusal. This could be funded by a levy on all policies, with an element of government subsidy.

9. Resources for Adaptation Planning

I am concerned that appropriate resources may not be available for LAs to efficiently engage with adaptation planning. I would question whether the EU Mission Adaptation Platform will be of practical use or relevant to Ireland. The Climate Ireland adaptation resources are also quite general, and academic in tone. I believe it would be much better to establish a specific resource for LAs where practical advice can be obtained. This could be established in conjunction with the CAROS, Regional Assemblies and LAs. There is no need to duplicate expertise in all LAs in the area of adaptation. A small team operating out of a single LA adaptation resource office could provide useful advice, and visit LAs to consult on adaptation in planning. Over time a range of adaptation measures would be identified, with access to this practical knowledge available to all LAs.

10. Other Actors and Stakeholders

There is little reference to Uisce Eireann in the governance framework. As this body has national responsibility for water supply and wastewater treatment it is important that it is firmly incorporated in the NAF. Recent intense rainfall events have already shown the vulnerability of water supplies, a number of which failed as a result of heavy rainfall. Uisce Eireann should be required to produce a climate adaptation plan along the lines of the LACAPs.

The land of the state is owned almost entirely by farmers. The implementation of nature-based solutions will rely heavily on the cooperation of landowners who may have to sacrifice lands adjacent to watercourses for water attenuation and flood protection. Similarly climate mitigation efforts in the land use sector will involve raising water tables, and reducing existing drainage, which has a benefit also for climate adaptation. Other than in the Just Transition Taskforce, I do not see an opportunity within the NAF for farm representative groups to fully participate in adaptation planning. If nature-based adaptation plans are presented to farmers as a *fait accompli* there will certainly be trouble. Monetary compensation may not be sufficient to ensure success. As has been found for water-table management, nature-based solutions cannot be easily implemented at individual field or farm level, and must cover the entire relevant watercourse or wetland area, involving multiple landowners. I believe that a structure should be put in place to ensure input from farm representative bodies at the early planning stages. At a high level they should be involved in the SAP under the Dept. of Agriculture. At local level they could be involved through the CAROs or in the LACAPS workshops.