



GOOD ENERGIES ALLIANCE
IRELAND

Public Consultation on
NATIONAL ADAPTATION FRAMEWORK

Submission to Department of Communications,
Climate Action and Environment

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Introduction

Good Energies Alliance Ireland (GEAI) is a non-profit Environmental NGO in Ireland with a principal focus on energy sources and uses. GEAI is based in Leitrim but its remit is all-island. Its mission is through research, advocacy, education and campaigning to influence public opinion and decision-makers in Ireland against the continued use of fossil fuels and towards practical policies on energy sources and uses that combat climate change and respect the environment, the planet and people. GEAI is a member of the Environmental Pillar and Stop Climate Chaos.

Extreme events such as storm and floods have always been some of the recurring features of Ireland's climate. No doubts remain that these events are driven by a changing climate and that we are experiencing and witnessing an increased magnitude in their severity as Hurricane Ophelia has shown

It is evident that the adaptation planning process in Ireland is at an early stage. Government has begun a statutory process to adapt the country to future climate change impacts. It is certainly a great opportunity for Ireland to have a fresh start and learn valuable lessons from countries with years of experience in the adaptation planning process. This means that Ireland has the opportunity to start out "on the right foot" by applying a proactive approach to disaster risk reduction, rather than the usual reactive way to deal with climate related disasters.

However, on reading the draft Plan and especially the suggested questions, it becomes evident that it includes an element of "passing the buck". Local authorities are expected to be the main actors in adaptation and the main questions seem to be focussed on the empowerment of local authorities to respond. Whereas we agree that this is a vital part of the Plan, we wish to point out that leadership must come from the Department and from Government. So far, this Government has not shown itself to take climate change seriously enough. Ireland is third highest emitter per capita of CO₂ in and its carbon emissions are currently rising instead of falling. Numerous reports with grandiose statements have been written and speeches made talking about Ireland being a "Leader in Climate Change"; yet our actions fall far short of what is required if we are to achieve even our 2030 targets – currently we have given up on our 2020 targets and the approach of our Government in Europe is to ask for derogation of those targets.

If Government is not seen to provide leadership on Ireland's response to Climate Change; if it does not legislate for appropriate measures to combat climate change; if it does not tackle through legislation the three main causes of our high carbon emissions – the use of fossil fuels in energy generation and heating; meat production without adequate waste treatment measures; and our fossil fuel-guzzling transport sector – then it is not reasonable to expect adequate response (or even interest) from regional or local levels. Government must step up to the challenge and show

by its actions that it is taking the issue seriously and is prepared to put in place appropriate measures to truly become a leader in climate change. The time is right now – Hurricane Ophelia has provided a wake-up call for us all and there is no better time to show that we as a nation can respond to the challenge.

Having said all the above, the draft National Adaptation Framework provides a fairly comprehensive overview of Ireland’s observed and projected climate change impacts and outlines the governance process to be put in place to ensure the success of this national policy. This submission seeks to support the current Government’s effort in the process of adaptation to climate change by pointing out some considerations for further reflection to be included in the final draft of the National Adaptation Framework.

Recommendations

1. That Government takes its own ambition of being “Leader in Climate Action” seriously and shows courage and determination in setting appropriate goals and targets to achieve this.
2. To arrange a full debate on the National Mitigation Plan in the Oireachtas with the purpose of ensuring that it is fit for purpose.

National level authority

How best can climate change adaptation be successfully integrated and mainstreamed into key national, regional and local policies?

At present, sadly, the situation on the ground is that climate change adaptation is far down the list of priorities in policies in Ireland. As a nation, we have not come to terms with the fact that climate change is actually happening and that it has real consequences for our country with implications for policies. There is no real planning for change from the top down. An example of this is the National Mitigation Plan¹ that states that “Ireland is likely to exceed its annual targets in 2016 or 2017, and over the remainder of the period to 2020” and fails to set goals and targets to address this failure. There is no sense of urgency communicated from national to regional and local sectors. As a result, climate change is not even on the agenda of some local authorities, there is no awareness of the imperative for Ireland to respond to climate change and adaptation consists of local responses to local extreme weather events without consideration of wider implications of such events.

More effective communication is vital, and not in the context of a debate on whether global warming is occurring. The debate is over and it is the responsibility of the authorities now to

¹ <https://static.rasset.ie/documents/news/national-mitigation-plan-2017.pdf>

communicate the determination of this country to respond to the challenge of climate change and our transition to a low carbon economy. The time for reports is over; the time for action is NOW.

Key to a successful integration of climate change adaptation into sectorial policies at any level is the information sharing process. The more fluent and continuous this process can be, the better is to ensure integration among policies at different levels.

Recommendations

3. To implement a national-wide publicity campaign to communicate the urgency of implementing measures to adapt to climate change in Ireland.
4. To build on structures already in place – PPNs, social agreement pillars, IFA, etc. to share information and inform the general public.
5. To initiate a series of “conversations”, using a similar format as the “Climate Conversations” (2016), at all levels – national, regional, local and inter-sectoral, to discuss our response to climate change and adaptations that must be put in place.

How should the costs of adaptation be considered in economic decision making and how should options be prioritised?

So far, in Ireland the economics of climate change has not been duly considered as shown by the missed opportunity to reach the 2020 CO₂ emission reduction national targets. The Stern Review, published in 2006, outlined that if we managed to stabilise CO₂ emissions under a certain threshold (between 450ppm and 550ppm CO₂ equivalent), there would still be hope to avoid the worst impact of climate change. “This is a major challenge, but sustained long-term action can achieve it at costs that are low in comparison to the risks of inaction”². This is to say that the costs of inaction due to a missed opportunity to adapt and prepare to climate change impacts and effects can severely affect Ireland’s economy.

Adaptation costs in Ireland mean primarily dealing with flooding, as more intense rainfall patterns are expected to be one of the biggest climate change impacts along with increasing storm intensity. As ex-hurricane Ophelia³ has shown, climate change impacts can cause severe disruption of public services and transport, leaving thousands of households without power for days in some counties.

²

http://webarchive.nationalarchives.gov.uk/20120704151641/http://www.hmtreasury.gov.uk/d/CLOSED_SHORT_executive_summary.pdf

³ <https://www.irishtimes.com/news/environment/hurricane-ophelia-three-dead-and-295-000-without-power-as-storm-enters-final-hours-1.3257434>

The Statement of Strategy⁴ 2016-2019 expressed that "we will scale up climate finance [...] and the current level of support from 2016 to 2020 will ensure €175 million of public funding, mainly for adaptation [...]". However, further considerations on how this amount will be broken down into clear and effective adaptation measures cannot be found.

This indicates that climate change adaptation in Ireland is not being taken as seriously as it should. The recently published Budget 2018 of DCCAE fails completely to address climate adaptation.

Recommendations

6. Carry out research as well as sectoral economic assessments and estimates to start a proper adaptation process.
7. Cooperation with and involvement of insurance companies in the adaptation process to ensure the establishment of effective insurance mechanisms which specifically take into account climate-related events.
8. Focus on establishment of local smart grids to protect power supplies in the event of extreme weather conditions.
9. Substitute indigenous renewable energy sources for imported fossil fuels to protect Ireland in the event of geopolitical natural disasters.
10. Implement careful and planned budget allocation at the beginning of the adaptation process.

How can we best ensure effective monitoring and evaluation of adaptation policies?

Establishing accurate monitoring and evaluation procedures throughout the whole adaptation process is essential to ensure a smooth outcome of adaptation activities and measures undertaken. This process requires constant reporting and the establishment of appropriate indicators.

The Framework only mentions the setup of national-level vulnerability indicators. The development of such indicators is a crucial step as accurate assessments and data gathering allow better understanding of the measures needed to adapt the country and its economic sectors to climate change.

Furthermore, a national monitoring system for tracking the progress of adaptation must be developed with the involvement of all relevant stakeholders. Good practices and ideas in this field can be found in the UNDP DTU report *Good Practice in Designing and Implementing National Monitoring*

⁴<http://www.dccae.gov.ie/en-ie/news-and-media/publications/Documents/20/Statement%20of%20Strategy%202016-2019.pdf>

*Systems for Adaptation to Climate Change*⁵ where successful examples are provided by other countries (e.g. Germany and Finland).

Recommendations

11. To establish accurate monitoring and evaluation procedures throughout the whole adaptation process
12. Develop national-level vulnerability indicators.
13. Establish a national monitoring system for tracking the progress of adaptation with the involvement of all relevant stakeholders

Is additional guidance required to assist in the development of climate change adaptation responses?

Yes, Ireland should evaluate climate change adaptation options by drawing lessons from the international experience of countries with valuable initiatives put in place. Denmark and the UK, for example, have extensive experience in dealing with climate related events such as flooding, storms and coastal erosion. EU-funded multinational research and capacity building projects produce good opportunities to establish platforms for information sharing which can be used to exchange valuable lessons learned.

Recommendations

14. To evaluate climate change adaptation options by drawing lessons from the international experience of countries with valuable initiatives put in place.

Have you any views on how adaptation can be coordinated and managed efficiently in fragmented areas such as emergency planning?

Emergency planning plays a vital role in the country's response to weather and climate related impacts. Surprisingly, the National Adaptation Framework fails completely to acknowledge and to plan for any integration of climate change adaptation (CCA) with disaster risk reduction (DRR).

The latest available *National Framework for Major Emergency Management* was developed in 2005 and adopted by the Government in 2006⁶. More than 10 years have passed and this policy document has not even been revised after the publication of the *2012 National Strategy for Climate Change Adaptation*, the first government effort to begin a national adaptation process.

⁵

https://www.ctcn.org/sites/default/files/National%20Monitoring%20Systems%20for%20Adaptation_Final_for_upload_0.pdf

⁶ <http://mem.ie/wp-content/uploads/2015/05/A-Framework-For-Major-Emergency-Management.pdf>

The *2012 National Risk Assessment for Ireland*⁷, published by the Office of Emergency Planning, outlines that “storms are experienced in the west and northwest of Ireland, typically two or three times each year, but their impact is usually very low. Storms can usually be forecast with good accuracy [...] but damage to infrastructure (buildings, power lines) and disruption to transport (air, marine and surface) is usually unavoidable”. Judging by the actions undertaken during the last few years, the impression is that the government’s perception of a changing climate is very limited and, even though climate change is being acknowledged it seems to be not considered as seriously as it should be.

Analysing Ireland’s international commitments on DRR, it emerges that the *2015 Sendai Framework for Disaster Risk Reduction* is not even mentioned in any emergency-related official document and no progress report at country level has ever been presented⁸. On the other hand, Ireland’s international development cooperation programmes, such as the *Irish Aid’s International Partnerships on Climate Change*⁹, show the country’s commitment to support climate-friendly projects and initiatives in developing contexts. Therefore, one could observe that the Irish Government seems more interested to tackle climate change challenges in other parts of the globe than to solve the issue at home. Certainly, in some areas, especially tropical zones, climate change impacts are much more visible and are becoming part of people’s daily lives. Nonetheless, this is not an excuse to delay prevention and mitigation actions. Climate Change is a global issue with localised effects.

At policy level, it is really important to mainstream climate change adaptation (CCA) and disaster risk reduction (DRR) concepts into sectoral policies and plans. The main reason for this is that climate change adaptation considers uncertainty of future impacts while disaster risk reduction is focused on the present challenges represented by weather- and climate-related disasters. An update of the Framework for Major Emergencies envisaging a new approach to DRR is urgently required.

Recommendations

15. To integrate climate change adaptation (CCA) with disaster risk reduction (DRR) plans.
16. To mainstream CCA and DRR concepts into sectoral policies and plans.
17. To update the Framework for Major Emergencies, envisaging a new approach to DRR.

⁷<https://emergencyplanning.ie/media/docs/A%20National%20Risk%20Assessment%20for%20Ireland%20Published.pdf>

⁸<http://www.preventionweb.net/english/professional/policies/v.php?id=54296>

⁹https://www.climatelearningplatform.org/sites/default/files/resources/irish_aid_climate_change_international_partnerships_results_frameworks_2016_-_2018.pdf

Local level authority

Do you have any comments on adaptation at local authority level to date?

The National Adaptation Framework acknowledges that “gaps in structure and competence to deal effectively with climate change impacts have been identified”, however no further considerations on how to overcome these challenges have been discussed. At county council level it seems that, at the moment, no clear role has been established with specific competences on adaptation to climate change.

Clear multi-level governance must be established if we want to achieve the goal of making Ireland climate resilient. The draft document provides an overview of the various actors and stakeholders involved in adaptation governance and points out that local authorities are expected to play a key role in the adaptation process. How is this going to be supported? It is not enough to delegate responsibilities to the local authorities. What kind of resources will there be available to support their efforts?

Recommendations

18. To establish a full-time staff member in every county and an office designated to climate change.
19. To have three or four counties geographically close to each other coordinated at a higher level to ensure more effective information sharing process and, consequently, more cooperation.
20. To provide the resources required to support their efforts.

How can adaptation considerations be further integrated into the planning system?

Full assessment of infrastructure at risk and revised land use policies must be undertaken. To ensure coherence between the national policy and the local level planning, it is necessary to bring information providers and users together by establishing opportunities for information sharing.

Recommendations

21. To organise events designed to bring information providers and users together and provide opportunities for information sharing.

Is a regional approach the best way forward for local authorities in addressing climate adaptation?

The proposal of the framework is to “advance proposals to establish regional climate action offices to coordinate the Local Authority response to climate change in parallel with the National Mitigation Plan”.

We welcome this approach, such coordination is vital, but the idea of regions must be carefully considered. A regional approach modelled on the existing NUTS 3 regions would not be appropriate, as these are statistical divisions and are not connected with topographical considerations, the most important element in adaptation to climate change. One suggestion is that three or four local authorities with common challenges could form a “Climate Action and Resilience Group” to share information and resources and cooperate to implement climate adaptation measures.

Recommendations

22. To establish Climate Action and Resilience groups of 3 to 4 local authorities to share information and resources and cooperate to implement climate adaptation measures.
23. That such Climate Action and Resilience groups should have statutory status and command adequate resources to carry out their role adequately.
24. That such resources should include budget to tackle gaps in information at community as well as local authority level.

Are additional legislative provisions required to allow local authorities maximise their impact in driving the climate adaptation agenda at local or regional level?

Yes.

Recommendations

25. That legislation should be brought forward to establish Climate Action and Resilience groups of Local Authorities with adequate resources and structures to tackle climate adaptation effectively in their area.

Civil Society and Stakeholder Engagement

How can Government further promote dialogue and understanding of the need to adapt to a changing climate?

The framework states “the process of making Ireland climate resilient must be open, transparent and inclusive. Interested organisations and stakeholders, at sectoral, local, regional and national levels, must be given early and adequate opportunity to input to the process of preparing the framework, sectoral plans and local strategies” (pg.75). According to this statement, the role of interested stakeholders should be extensively considered in the whole adaptation process.

Nonetheless, if we take a closer look to the document, it seems that the role of civil society and community engagement is underestimated.

Certainly, the National Dialogue on Climate Action along with the Citizens Assembly provide good opportunities for discussion and representation at national level but these two bodies are themselves not enough to raise awareness at the community level. In the document it is stated that “the position of local government, as the level of government closest to the citizens, puts it in an effective position to provide local leadership.” (pg. 81). No or very little attention is given on how to support awareness raising at the community level. What is needed is investment in community-based programmes which directly target climate action and sustainable lifestyle.

Education plays a key role in raising awareness in the civil society. Even though some work has been done with primary and secondary schools, the outcome of separate projects cannot be considered a sufficient effort. Instead, new overarching school curricula on climate action and climate justice should be developed and continuously implemented at all stages of education, perhaps as modules in the CSPC course, senior level Biology and Climate Justice integrated into Religious Studies by inclusion of the Encyclical “Laudato si” in the curriculum.

The Framework’s proposal is to “implement programmes of awareness raising, capacity building and training at local and regional level in partnership with the National Dialogue on Climate Action and the Citizens’ Assembly”. This is not enough – such programmes must extend down to grassroots and community level through, for example, greater deployment of the knowledge resources of the Environmental Pillar. Furthermore, the country-wide Public Participation Networks could represent a good vehicle to boost climate action and to provide room for discussion at county and regional level. Raising awareness through those channels would ensure a more effective spreading of information at community level.

Climate action related publicity must also be considered. As happens in supermarkets, people tend to choose a well-publicised product over an anonymous one; this is because the consumer unconsciously reacts to the marketing and advertisement that penetrates his/her daily life. This marketing power could be applied to climate action initiatives. The more publicity is developed around the concept of climate action, the more people will pay attention to this topic. Publicity should be boosted at all levels. Adaptation initiatives should be publicised and made visible to citizens.

Lastly, partnership between civil society organisations and universities have to be further developed. Bringing together the technical expertise of researchers and the solid experience of

NGOs active in community engagement represent a good opportunity to boost climate action. These efforts have to be supported through more investment in communications and public events.

As an NGO dealing with communities, we can testify to the lack of correct information and awareness related to climate change and the consequences that people can expect, therefore big efforts are needed to raise awareness on this topic.

Recommendations

26. Investment in community-based programmes that directly target climate action and sustainable lifestyle.
27. New overarching school curricula on climate action and climate justice to be developed and continuously implemented at all stages of education.
28. Implement new modules on Climate Change and adaptation in the CSPC course and junior and senior science subjects
29. Include Climate Justice and the Papal Encyclical “Laudato si” into the curriculum of Religious Studies at second level.
30. Increase 3rd Level funding of Climate Adaptation research at local, regional and national levels.
31. Increase the subvention to the Irish Environmental Network to allow greater deployment of the knowledge resources of the network towards Climate Action.
32. Use the Public Participation Networks as a vehicle to boost Climate Action and provide opportunities for discussion at county and regional level.
33. Put more resources into publicity around Climate Action and Adaptation at all levels.
34. Publicise adaptation initiatives and make them visible to citizens.

How do we encourage efficient cross sectoral cooperation between relevant stakeholders?

Workshops and meetings at regional and local level would provide an enabling environment for discussion among different stakeholders. Nowadays, there seems to be no debate around issues and solution to the climate crisis. Public consultations like this one are important opportunities, nonetheless they are not debated and discussed with other stakeholders.

Recommendations

(Already addressed)

Are some groups particularly vulnerable to the impacts of climate change and how can the NAF address these concerns?

Around the world, it is demonstrated that climate change impacts are likely to affect the most vulnerable layers of the civil society. As regarding to Ireland, the categories most likely to suffer from the climate crisis and severe weather impacts include people living in fuel poverty and in poor quality houses. Rural areas must be given special attention as the quality of services provided, especially transportation and electricity supply, do not in general match the services in cities.

Other vulnerable groups include people living in coastal areas prone to storms (e.g. Lahinch, Galway); people living in areas prone to flooding (e.g. Athlone, Clonakilty); people living in isolated areas prone to outages during stormy weather (e.g, West Cork and Kerry).

Such areas and groups of people should be particularly targeted with clear and understandable information on how to adapt to climate change at household level. This can be done by strengthening the links with national and local telecommunication and broadcasting systems as well as press agencies and community groups.

Recommendations

35. Ensure that plans are made at local level to tackle adaptation to climate change, focusing on vulnerable communities.
36. Ensure that resources are made available for adaptation measures directed at prevention as well as reaction to extreme weather impacts.
37. Make resources available for information campaigns directed at groups of people and communities vulnerable to climate change, giving details of how to adapt at household level. Such campaigns to operate at local as well as regional and national levels.

Summary of Recommendations

1. That Government takes its own ambition of being “Leader in Climate Action” seriously and shows courage and determination in setting appropriate goals and targets to achieve this.
2. To arrange a full debate on the National Mitigation Plan in the Oireachtas with the purpose of ensuring that it is fit for purpose.
3. To implement a national-wide publicity campaign to communicate the urgency of implementing measures to adapt to climate change in Ireland.
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5. To initiate a series of “conversations”, using a similar format as the “Climate Conversations” (2016), at all levels – national, regional, local and inter-sectoral, to discuss our response to climate change and adaptations that must be put in place.
6. Carry out research as well as sectoral economic assessments and estimates to start a proper adaptation process.
7. Cooperation with and involvement of insurance companies in the adaption process to ensure the establishment of effective insurance mechanisms which specifically take into account climate-related events.
8. Focus on establishment of local smart grids to protect power supplies in the event of extreme weather conditions.
9. Substitute indigenous renewable energy sources for imported fossil fuels to protect Ireland in the event of geopolitical natural disasters.
10. Implement careful and planned budget allocation at the beginning of the adaptation process.
11. To establish accurate monitoring and evaluation procedures throughout the whole adaptation process
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18. To establish a full-time staff member in every county and an office designated to climate change.

19. To have three or four counties geographically close to each other coordinated at a higher level to ensure more effective information sharing process and, consequently, more cooperation.
20. To provide the resources required to support their efforts.
21. To organise events designed to bring information providers and users together and provide opportunities for information sharing.
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34. Publicise adaptation initiatives and make them visible to citizens.
35. Ensure that plans are made at local level to tackle adaptation to climate change, focusing on vulnerable communities.
36. Ensure that resources are made available for adaptation measures directed at prevention as well as reaction to extreme weather impacts.

37. Make resources available for information campaigns directed at groups of people and communities vulnerable to climate change, giving details of how to adapt at household level. Such campaigns to operate at local as well as regional and national levels.