Dear Maria,

Re: Draft Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan

As you are aware, regarding the preparation of sectoral adaptation plans Section 6(3) of the Climate Action and Low Carbon Development Act 2015 states ‘...in the preparation of such plan, each such Minister of the Government shall consult ... with the [Environmental Protection] Agency’. The comments below on behalf of the Environmental Protection Agency may be of assistance as you finalise your plan.

Ireland’s Environment

The scale of the environmental challenges facing Ireland, including the need to address climate change and to protect and improve our water quality and biodiversity, cannot be underestimated. Our Ireland’s Environment; An Assessment 2016 (EPA, 2016) report identifies climate change as one of three key systemic issues that need to be tackled in Ireland. This report highlights the need for us to accelerate mitigation actions to reduce greenhouse gas emissions and to implement adaptation measures to increase our resilience to the adverse impacts of climate change. We suggest that you consider this report in the preparation of your plan.

Additional considerations

We suggest that the sectoral adaptation plan should:

- Begin with a statement setting out how the plan meets the requirements of the Climate Action and Low Carbon Development Act 2015, National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation (DCCAE, 2018).
- Describe the links with the UN Agenda 2030 for Sustainable Development and the relevant Sustainable Development Goals (SDGs). This is important so that climate adaptation planning is framed within the wider sustainable development agenda. In identifying measures to respond to climate change, the plan should seek to align with and support progress in implementing the relevant SDGs at the sectoral level, with reference to the National SDG Implementation Plan.
- Consider how it aligns with national commitments on climate change adaptation and the other sectoral and local adaptation plans and strategies.
- Consider the relationship with the National Planning Framework in terms of fulfilling national climate change commitments and seeking to grow the economy and accommodate an additional 1 million people by 2040. This will have implications for the sector. The relationship of the plan to the National Marine Planning Framework process should also be considered.
• Particularly consider knock on, ‘domino’ effects - where a weakness in one sector can reduce the resilience of another. Cross sectoral coordination is particularly important in this regard.
• Similarly, actions should be developed and responsibility for their delivery allocated, with the input of all relevant stakeholders, bodies and agencies.
• In preparing and implementing the plan, you should seek to maximise the many potential co-benefits of climate adaptation measures across human health, biodiversity, water quality, flood risk management, land use planning (including land use zoning), and other interrelated areas.
• In considering and assessing the range of adaptation options available, we recommend that those measures with the potential to yield multiple environmental and societal benefits are prioritised.
• In finalising and implementing the plan, any potential negative environmental impacts should be avoided, reduced or mitigated. We recommend that the plan includes a commitment that potential adverse cumulative/in-combination environmental effects are accounted for when considering, selecting and implementing specific adaptation measures. This is important to ensure that environmental sensitivities under the Habitats Directive and Water Framework Directive are protected.
• Furthermore, in finalising and monitoring and evaluating the plan, it will be important to ensure that ways to recognise maladaptation early are identified, and strategies to counter this are put in place.
• The plan should clearly reference the climate data and projections/scenarios used in developing the plan. It would be beneficial to develop a common set of climate projections that can be used for adaptation, infrastructure and investment planning to 2050 and beyond. \textit{EPA Research 223: A Summary of the State of Knowledge on Climate Change Impacts for Ireland} (EPA, 2017) is useful in this regard.
• EPA funded environmental research provides essential scientific support for environmental policy development, implementation and broader decision making. The EPA’s Environmental Research Data Archive available at \url{http://erc.epa.ie/safer/} represents a significant resource that may assist you in the preparation of your plan, while the DROPLET Water Research Database at \url{http://erc.epa.ie/droplet/} may also be relevant. There are also significant resources available on the Climate Ireland platform and also through the European Environment Agency’s Climate Adapt platform.
• Any identified research gaps should be clearly identified with information on how it is intended to address these.
• You should ensure that the plan complies with the requirements of the SEA regulations and the Habitats Directive where relevant.

If you have any queries or need further information in relation to the above, please feel free to contact me.

Yours sincerely,

Jonathan Derham
Head of Programme
Office of Evidence & Assessment

Cc. John O’Neill, Department of Communications, Climate Action and Environment