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Public Consultation
Climate Change Sectoral Adaptation Plan for Flood Risk
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EPAC Reference No- 2025

Re: Climate Change Sectoral Adaptation Plan for Flood Risk Management, 2025

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Flood Risk Management Climate Change Sectoral Adaptation Plan.

The development and implementation of robust sectoral climate adaptation plans is critical to national resilience. These plans are particularly important in the context of a changing climate, where the frequency, intensity, and unpredictability of extreme weather events are also increasing, as highlighted in Ireland's first [National Climate Change Risk Assessment](#) (NCCRA) recently published by the EPA.

Overall, the Flood Risk Management SAP demonstrates good alignment with the National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation 2024, involving a thorough and well-integrated process and strong stakeholder input that the EPA was involved in at the planning team stage. The EPA welcomes that RCP4.5 has been used in preparing this SAP, in line with the [NCCRA Technical Guidance for Sectoral Risk Assessments](#) which emphasises using RCP4.5 as a minimum reference for resilience planning.

In the context of increasing climate risks, it is important that adaptation be embedded across all levels of flood risk management policy, capital investment frameworks, and procurement processes. We recommend that climate resilience be a core criterion in project appraisal and funding decisions, particularly for long-lived infrastructure. We welcome the inclusion of indicators for the evaluation

phase within the Plan, and the structured approach adopted across the sector for reporting and integrating these indicators into biannual progress updates. We also acknowledge the clear formulation of adaptation actions, along with the strategy to implement, monitor, and continuously improve upon them.

Key EPA Recommendations

While we recognise many positive aspects of the Plan, we have identified four key areas that we recommend should be strengthened before the Plan is finalised. These are:

1. More comprehensively addressing the National Adaptation Framework principles of just resilience and maladaptation earlier within the Plan;
2. Ensuring consistency in the use of climate data and scenarios that align with national guidance;
3. Elaborating on the cascading impacts as laid out in the NCCRA;
4. Including indicators specifically focused on tracking progress in building resilience.

These points are further developed below:

1. More comprehensively addressing the National Adaptation Framework principles of just resilience and maladaptation earlier within the plan

The EPA recommends a more in-depth and systematic integration of two of the key National Adaptation Framework (NAF) principles, Just Resilience and avoiding Maladaptation, within the Flood Risk Management Plan, in line with the Sectoral Adaptation Planning Guidelines. While these principles are referenced in the Plan and associated actions, they should be addressed more comprehensively and consistently throughout the document. The EPA also suggests that, to improve clarity and accessibility, key adaptation terms such as exposure, vulnerability, risk, hazard, maladaptation, and just resilience, should be defined early in the Plan or in a glossary.

Just Resilience

The Plan would benefit from including a more precise and early definition of the term "just resilience", ideally using terminology that is in line with the NAF and IPCC definitions. The Plan should consider social vulnerability in more detail along with information on who the vulnerable groups are and how suggested solutions will mitigate their vulnerability and improve resilience. For instance, lowering vulnerability is mentioned in the outcome indicators of action 3.A. However, more information is required regarding how and for whom vulnerability will be decreased. Just resilience should ideally be

incorporated into the risk assessment procedure and represented in the planning and execution of measures alongside vulnerability. To maintain uniformity and prevent gaps, the strategy should coordinate with initiatives in other sectors when direct integration is not practical.

Maladaptation

Although the Plan makes reference to maladaptation, the EPA suggests that a more comprehensive analysis is provided of the possibility that flood adaptation measures could unintentionally lead to maladaptation. A dedicated section could help clarify maladaptation risks and mitigation strategies. Including maladaptation in the glossary and referencing IPCC and NAF definitions would also support clearer representation of maladaptation.

Maladaptation and wider environmental impacts of the Plan's actions should be appropriately assessed.

2. Consistency in the use of climate data and scenarios that align with national guidance

The EPA recommends that climate data and scenario use be more consistent throughout the Plan, in line with national guidance. References to warming levels (e.g. 1.09°C and 1.1°C) should be standardised for clarity and comparison. Scenarios and timeframes should be clearly presented in all tables to support transparency and comparability across current and future scenarios.

3. Elaborate on the cascading impacts as laid out in the NCCRA

Cascading impacts and interdependencies should be more explicitly addressed in the Plan. While some references are made, the Plan would benefit from clearer examples and a more systematic approach. The cascading impacts identified in the NCCRA, as supplied in the supplementary cascades table, should be reflected in the Plan to support cross-sectoral coherence and highlight both incoming and outgoing risks more explicitly.

4. Indicators

The EPA recognises and welcomes the inclusion of outcome indicators, KPIs, and monitoring arrangements to support delivery and reporting of the Plan. The commitment to work with Climate Ireland Adaptation Network to develop meaningful, evidence-based indicators is welcome and will help ensure alignment with national and EU-level adaptation reporting. These indicators will support continuous improvement and adaptive management. The inclusion of indicators specifically focused on tracking progress in building resilience would strengthen the Plan further and help demonstrate impact over time.

SEA Screening

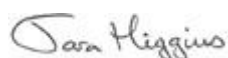
We note your initial conclusion that SEA is not required for the Plan. We also acknowledge that the EPA's SEA Screening guidance and the EPA's State of the Environment Report 2024 were considered during the screening process. As soon as practicable after making your determination as to whether SEA is required or not, you should make a copy of your decision, including, if appropriate, the reasons for not requiring an environmental assessment, available for public inspection in your offices and on your website. You should also send a copy of your determination to the relevant environmental authorities consulted.

Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 1 (S.I. No. 435 of 2004, as amended) of the SEA Regulations, as appropriate.

Further Research

The EPA notes that key research gaps have been identified in the draft Plan. The EPA would welcome engagement with the OPW on the potential to address some of the identified research gaps through the [EPA's Fast Track to Policy](#) research funding programme, which provides for rapid turn-around evidence reviews to address urgent policy questions. The EPA looks forward to continuing to work with your Office as part of the Sectoral Adaptation Planning process and is available to discuss any aspect of this submission.

Yours sincerely,



Dr Tara Higgins
Programme Manager