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29/08/2025

EPAC Reference No-2325

Re: Public Consultation on the draft Sectoral Adaptation Plan for Agriculture, Forestry & Seafood 2025

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Sectoral Adaptation Plan for Agriculture, Forestry and Seafood 2025.

The development and implementation of robust sectoral climate adaptation plans is critical to building 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 increasing, as highlighted in Ireland's first National Climate Change Risk Assessment (NCCRA) recently published by the EPA.

We welcome that the NCCRA and the associated Technical Guidance for Sectoral Risk Assessments have been used in the preparation of the risk assessments. The Plan demonstrates good alignment with the National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation 2024. It employs a systems-based approach to risk assessment and includes comprehensive stakeholder engagement, to which the EPA contributed during the planning phase. In the context of increasing climate risks, it is essential that adaptation be embedded across all levels of agricultural, forestry, and seafood policy, including funding mechanisms, land use planning, and rural development strategies. We welcome the work put in so far on this and recommend that climate resilience be a core criterion in programme design and investment decisions where it is not present already, particularly for infrastructure and systems that support long-term sectoral sustainability. We welcome the inclusion of indicators for monitoring and evaluation and the structured approach to annual reporting and governance outlined in the Plan.

Key EPA Recommendations

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

1. A more detailed risk assessment should be undertaken and communicated in the Plan;
2. The NAF principles of just resilience, Nature-based Solutions, and maladaptation should be more comprehensively addressed within the Plan;
3. Cascading impacts into and out of the agriculture, forestry, and seafood sectors should be elaborated in line with the NCCRA, and integrated into risk prioritisation and actions.
4. Additional climate resilience actions should be identified;
5. More specific outcome indicators and targets should be established to track the implementation of actions and resilience outcomes.

These points are further developed below.

1. Risk Assessment

The NCCRA Technical Guidance for Sectoral Risk Assessments, published by the EPA in 2024, was designed to support sectors in developing more detailed, sector-specific risk assessments following the NCCRA. The Plan demonstrates good alignment with this guidance, employing a systems-based framework and incorporating both RCP4.5 and RCP8.5 scenarios. The EPA recommends that RCP4.5 be used as the minimum reference trajectory for resilience planning in this and future sectoral plans.

While the Plan includes a comprehensive screening and prioritisation of risks, there is scope to further enhance the granularity of the assessment. This could include clearer categorisation of risk types, identification of vulnerable populations (e.g., smallholder farmers, coastal communities), and deeper exploration of cascading and systemic risks—particularly those affecting food systems, biodiversity, and rural infrastructure. The EPA recognises the uncertainty inherent in long-term climate projections, but encourages consideration of planning horizons beyond 2050, especially for land use, forest ecosystems, and aquaculture infrastructure with long lifespans.

Consistent and spatially resolved risk data—particularly regarding regional vulnerabilities and system-level exposure—would strengthen the prioritisation process and support more targeted adaptation actions. For example, while extreme wind is identified as a high-priority risk for forestry and horticulture, the Plan notes uncertainty in future projections but could go further in exploring contingency planning and resilience measures for worst-case scenarios.

2. Further consideration of National Adaptation Framework principles

The EPA recommends a more in-depth and systematic consideration of the key National Adaptation Framework principles of Just Resilience, Nature-based Solutions, and Maladaptation within the Plan.

Just Resilience

Vulnerability and equity should ideally be considered as part of the risk assessment process. In implementing the Plan, actions relating to just resilience should be progressed in an integrated way with other sectors to ensure consistency and avoid gaps. For example, rural and coastal communities, smallholder farmers, and seasonal workers may be disproportionately affected by climate impacts such as flooding, drought, or marine heatwaves. The EPA recommends that DAFM engages with relevant sectors and stakeholders to incorporate these considerations into adaptation planning and implementation.

Nature-based Solutions

The Plan includes several actions that reference nature-based solutions, particularly in forestry and agriculture, which is welcome. However, the EPA recommends that the final Plan include a clearer narrative on the role and potential of nature-based solutions across all three sectors. Approaches such as agroforestry, wetland restoration, and sustainable aquaculture can deliver co-benefits for climate resilience, biodiversity, and water quality.

Maladaptation

The EPA recommends that further consideration be given to the potential for maladaptation arising from sectoral adaptation actions. For example, certain land-use changes or infrastructure developments may inadvertently impact biodiversity, water quality, or community land use priorities. The Plan should assess the broader environmental and socio-economic trade-offs associated with adaptation measures and ensure that actions do not undermine long-term sustainability or resilience.

3. Cascading Impacts

The Plan identifies several cascading impacts across agriculture, forestry, and seafood systems, using the NCCRA systems-based framework. The EPA welcomes this inclusion but recommends that cascading impacts be more clearly integrated into the risk prioritisation and action planning process. For example, the agriculture sector's impact on water quality through nutrient runoff, the role of forestry in affecting energy and communication infrastructure during storm events, and the seafood sector's vulnerability to biodiversity loss and marine ecosystem shifts are all highlighted in the NCCRA and should be addressed more systematically in the final Plan.

The EPA also recommends that cascading impacts into the agriculture, forestry and seafood sectors—such as flooding from other land uses, or climate-induced changes in transport infrastructure affecting seafood logistics—be considered in greater detail. Appendix E of the NCCRA and its supplementary materials provide a useful reference for identifying these interdependencies.

4. Climate Resilience Actions

The actions outlined in the Plan are necessary and welcome steps toward building resilience across the agriculture, forestry, and seafood sectors. However, the EPA recommends that additional resilience-focused actions be identified, particularly those addressing chronic risks such as soil degradation, biodiversity loss, and marine ecosystem shifts. Planning should extend beyond 2050 where relevant, especially for long-lived systems such as forest ecosystems, aquaculture infrastructure, and land use strategies.

We note that, of the 99 actions listed in the Plan, many have a completion date of 2030. The EPA recommends that more specific, time-bound milestones be developed to ensure progress is measurable and ambitious. Where risks have been classified in the NCCRA as requiring "further investigation," the Plan should include corresponding actions to address these gaps. For example, the potential for saltwater intrusion into coastal agricultural soils and aquaculture sites due to sea level rise and storm surges is a significant risk that warrants targeted investigation and mitigation planning.

5. Indicators

The EPA welcomes the inclusion of a structured monitoring and evaluation framework in the Plan. However, the current approach relies primarily on process indicators. To strengthen the Plan's effectiveness, the EPA recommends the development of **outcome indicators** that track improvements in resilience across the agriculture, forestry, and seafood systems.

Actions should be clearly linked to measurable resilience outcomes, such as improved soil health, reduced nutrient runoff, increased forest cover, or enhanced aquaculture sustainability. Indicators should reflect updated climate and demographic projections and account for systemic interdependencies, including cascading impacts. Strengthening data infrastructure and ensuring transparent, consistent criteria for evaluating progress will support adaptive management and long-term resilience.

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 has been 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.

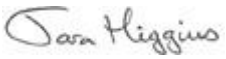
Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for the potential for likely significant effects in accordance with the criteria set out in Schedule 1 (S.I. No. 435 of 2004, as amended) of the SEA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

Further Research

The Plan identifies several climate-related risks, including phenological changes, pest and disease spread, marine heatwaves, and soil health impacts, as requiring further investigation; however it does not outline how these knowledge gaps will be addressed or the findings integrated into future planning. To strengthen the evidence base and support proactive adaptation, the EPA recommends that the final Plan includes clear commitments to research, data development, and collaboration with climate science bodies. Priority gaps should be identified early and addressed systematically. The EPA would welcome engagement with DAFM to support urgent and policy-relevant research needs through the EPA's Fast Track to Policy research funding programme.

The EPA looks forward to continuing to work with your Department as part of the Sectoral Adaptation Planning process and is available to discuss any aspect of this submission.

Yours sincerely,



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