



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Chaile Sheáin
Contae Loch Garman, Éire
T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

By email: Adaptation2025@npws.gov.ie

National Parks and Wildlife Service,
90 King Street North,
Smithfield,
Dublin 7,
D07 N7CV.

16/09/2025

EPAC Reference No-2525

Re: Public Consultation on the draft Biodiversity Climate Change Sectoral Adaptation Plan 2025

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Biodiversity 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 National Climate Change Risk Assessment (NCCRA) recently published by the EPA.

Overall, the draft SAP demonstrates good alignment with the National Adaptation Framework (NAF) and the Sectoral Planning Guidelines for Climate Change Adaptation 2024, involving a thorough process and strong stakeholder input that the EPA was involved in at the planning team stage. In the context of increasing climate risks, it is important that adaptation be embedded across all levels of biodiversity policy, capital investment frameworks, and procurement processes, while considering the

key NAF principles of just resilience, Nature-based Solutions, and avoiding maladaptation. We recommend that climate resilience be a core criterion in project appraisal and funding decisions, and we recognise the Plan's ambition in this regard. We welcome that indicators for the evaluation phase have been included in the Plan and that a structured approach is proposed with biannual reporting and an interim review.

The EPA has emphasised the need for Nature-based Solutions (NbS) to be considered in other Sectoral Adaptation Plans and have recommended that relevant sectors should engage with the NPWS and your Department to ensure that NbS are designed to deliver positive benefits for biodiversity and the Biodiversity sector. This is particularly relevant in the case of the Agriculture, Forestry & Seafood SAP, the Water Quality & Water Services Infrastructure SAP, and the Flood Risk Management SAP. This aligns with the recommendation in the EPA's State of the Environment Report 2024 for biodiversity and nature to be fully integrated into sectoral plans and policies. The State of the Environment Report also emphasised the need for rigorous implementation of existing environmental plans and programmes, including the National Biodiversity Action Plan, to achieve the benefits that they were developed to deliver. Achieving tangible and measurable improvements in nature and biodiversity requires actions to be adequately resourced and for their performance to be monitored and reported on.

Key EPA recommendations

The EPA recognises many positive aspects of the Plan, however, we have identified two areas that we recommend should be strengthened in finalising the Plan. These are:

1. The National Adaptation Framework principle of just resilience should be more comprehensively addressed;
2. Clear indicators and targets should be put in place to track the implementation of actions and resilience outcomes.

These points are further developed below.

1. Further consideration of National Adaptation Framework principle of just resilience

The EPA recommends a more in-depth and systematic consideration in the plan of the key National Adaptation Framework principle of Just Resilience. Just resilience and vulnerability are discussed throughout the plan but should ideally have been taken into account as part of the risk assessment process. In implementing the plan, actions relating to just resilience should be devised and progressed

in an integrated way with other sectors, to ensure just resilience is being considered consistently across sectors with no gaps. For example, different areas and communities have varying levels of access to biodiverse environments and this access could shift in the future due to climate pressures. The EPA recommends that the Department engages with the relevant sectors on incorporating these considerations into biodiversity sector adaptation planning.

2. Outcome indicators

The EPA recognises the inclusion of a proposed biannual and interim review structure to track and revisit the Plan. We also recognise that planning in a cohesive, integrated way is a key part of the adaptation planning process for Biodiversity and that the actions are formulated using SMART principles with process indicators included in the monitoring and evaluation structure. However, in finalising the Plan, the EPA recommends that outcome indicators should be developed for the actions proposed in the Plan to enable tracking of improved resilience to climate change.

Actions should be clearly linked to measurable resilience outcomes, including the level of protection they provide. They should integrate climate-proofing, reflect updated climate and demographic projections, and address systemic interdependencies such as cascading impacts. Monitoring and data infrastructure must be strengthened to support adaptive management, and all actions should be underpinned by transparent, consistent criteria for evaluating progress.

SEA

It would be useful to prepare a SEA Screening report taking into account Schedule 1 of the SEA Regulations (S.I. No. 435 of 2004, as amended). We recommend that the [Good Practice Guidance on SEA Screening](#) (EPA, 2021) and the EPA's State of the Environment Report 2024 are also taken into account. 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.

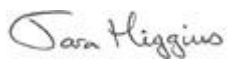
Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 1 (S.I. No. 435 of 2004, as amended) of the SEA Regulations,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

Further Research

We note that a number of key research gaps have been identified in the Plan. The EPA would welcome engagement with your Department/NPWS 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. In addition, the EPA Research Programme also funds biodiversity-related research under our "Protecting and Restoring our Natural Environment" research hub via our annual Research Calls, and we look forward to continuing to collaborate with NPWS on this.

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

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Tara Higgins', with a stylized, cursive script.

Dr Tara Higgins
Programme Manager