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Tourism Policy Unit,
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12/09/2025

EPAC Reference No-2625

Re: Public Consultation on the draft Tourism 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 Tourism Sectoral Adaptation Plan, 2025.

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 Tourism Climate Change Sectoral Adaptation Plan 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 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 tourism 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 and attractions. The scenarios RCP4.5 and RCP8.5 were used in the NCCRA and the EPA recommends that RCP4.5 be used as the minimum reference scenario for resilience planning in the delivery of this Plan and in the formulation of future

plans and guidance. We welcome that indicators for the evaluation phase have been included in the Plan and commend the costings and resourcing included in the Plan.

Key EPA Recommendations

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

1. More comprehensively addressing the three National Adaptation Framework principles of Just Resilience, Nature-based Solutions, and Maladaptation;
2. Additional climate resilience actions should be identified;
3. More specific outcome 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 principles

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

Just Resilience

Just resilience and vulnerability 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 developed and should be progressed in an integrated way with other sectors, to ensure just resilience is being considered consistently across sectors with no gaps. For example, there is potential for negative effects from prospective growth of tourism to the islands to both drinking water and wastewater infrastructure on the islands. The EPA recommends that the Department engages with the relevant sectors on incorporating these considerations into tourism sector adaptation planning.

Nature-based Solutions

The tourism sector's exposure to climate hazards – particularly extreme winds, flooding, and extreme heat – necessitates a proactive approach to climate-proofing businesses and assets. Nature-based Solutions are mentioned as a possible approach in multiple sections of the Plan, which is welcome; however, no narrative is given within the Plan as to the potential of Nature-based Solutions in the tourism sector. This should be addressed in finalising the Plan.

Maladaptation

There appears to be limited consideration of maladaptation in the draft Plan. The EPA recommends that further consideration should be given to the potential for tourism adaptation actions to cause maladaptation more broadly; for example, the potential for installing irrigation systems in fire risk areas to impact water availability in a negative way during droughts, or the potential for increasing

seasonal activity offerings (as per suggested adaptation measures for risk section 3.5.7) to exacerbate seasonal employment in tourism-dependent communities. The Plan references potential adaptive measures for the sector and industry partners, but does not assess the broader environmental or social trade-offs that may arise from such measures.

Maladaptation and the wider environmental impacts of the Plan actions should be appropriately assessed in finalising the Plan.

2. Climate Resilience Actions

The actions contained in the Plan can support resilience and are necessary for resilience planning, however, they are not likely to be sufficient to ensure resilience in the long term. The EPA recommends that additional resilience actions should be identified under Goal 3. More comprehensively linked resilience-focused actions are required in the Plan, such as ensuring coordinated planning between tourism forecasts and infrastructural sectors such as energy, water, and transport.

3. Indicators

The EPA recognises that planning at a sub-sectoral asset-owner and business-operator level is a key part of the adaptation planning process for the tourism sector and that actions have been formulated using SMART principles. However, we would encourage stronger mechanisms to capture information about the outcomes of the sectoral actions. 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 should be strengthened to support adaptive management, and all actions should be underpinned by transparent, consistent criteria for evaluating progress.

SEA Screening

We note your initial conclusion that SEA is not required for the Plan. Schedule 1 of the SEA Regulation (S.I. 435 of 2004, as amended) sets out all information that should be included as part of the SEA Screening Report. 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

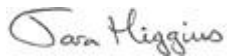
accordance with the criteria set out in Schedule 1 of the SEA Regulations (S.I. No. 435 of 2004, as amended), as appropriate.

Further Research

The EPA notes that key research gaps have been identified in the draft plan. The EPA would welcome engagement with the Department on the potential to address some of the identified research gaps through the [EPA's Fast Track to Policy](#) research funding scheme, which provides for rapid turn-around evidence reviews to address urgent policy questions.

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,

A handwritten signature in dark ink, appearing to read 'Tara Higgins', is positioned above the printed name.

Dr Tara Higgins

Programme Manager