

By email: commssap25@ccs.gov.ie

Communication Networks Sectoral Adaptation Plan,
Strategy Development and Business Management Unit,
Department of Culture, Communications and Sport,
Tom Johnson House,
Haddington Road,
Dublin
D04 K7X4

EPAC Reference No-2425

29/08/2025

Re: Public Consultation on the draft Communications Networks Sectoral Adaptation Plan, 2025

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to this consultation on the draft Communications Networks Sectoral Adaptation Plan, 2025 (CNSAP).

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 CNSAP 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 communications 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 communications infrastructure. 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 a structured approach is taken within the sector, with the inclusion of indicators as metrics within annual and biannual reporting.

Key EPA Recommendations

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

1. A more detailed risk assessment should be undertaken and communicated in the Plan;
2. More comprehensively addressing the three National Adaptation Framework principles of just resilience, nature-based solutions, and maladaptation within the Plan;
3. A more detailed risk assessment should be undertaken and communicated in the Plan to prevent a misalignment between the scale of future comms infrastructure development and the evolving climate hazard profile;
4. More specific outcome indicators and targets should be put in place to track the implementation of actions and resilience outcomes; and
5. Research gaps should be identified and addressed within the Plan.

These points are further developed below.

1. Risk assessment

The NCCRA Technical Guidance for Sectoral Risk Assessments was published by the EPA in 2024 in order to support sectors in developing more detailed, sector specific risk assessments to follow on from the NCCRA. We recommend there is scope for the CNSAP to include a more granular evaluation of impacts. We note for example the additional semi-quantitative technical report on cabinet overheating provided and recommend that further semi-quantitative risk assessments are undertaken and expanded. We also recommend that these risk assessments identify vulnerable populations and align with future climate and population projections to more cohesively address vulnerability.

While windstorms are identified as a high-priority risk with critical consequences both now and in the future, the Plan acknowledges that confidence in future projections of windstorm frequency and intensity is very low. Despite this, the assessment does not adequately explore the implications of this uncertainty or propose robust contingency planning for worst-case scenarios. The projected increase in exposure due to network expansion is not quantified or integrated into the risk scoring framework. This results in a misalignment between the scale of future communications infrastructure development and the evolving climate hazard profile. To address these gaps, the EPA recommends that the Plan should incorporate contingency planning for low-confidence but high-impact risks, improve granularity of risk data, and integrate projected infrastructure expansion into the risk assessment framework.

2. 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 devised 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 communications

networks disruption to disproportionately impact on the health sector and the social sector. The EPA recommends that the Department engages with the relevant sectors on incorporating these considerations into communications networks sectoral adaptation planning.

Nature-based Solutions

The CN sector's exposure to climate hazards – particularly extreme winds, flooding, and extreme heat – necessitates a proactive approach to climate-proofing critical infrastructure. Nature-based Solutions are mentioned as a possibility for some assets in the Plan, which is welcome; however, Nature-based Solutions have not been included in the actions. This should be addressed in finalising the plan.

Maladaptation

There is no significant consideration of maladaptation in the draft Plan. The EPA recommends that further consideration should be given to the potential for CN adaptation actions to cause maladaptation more broadly; for example, the potential for vegetation clearance and forestry corridor expansion (designed to reduce storm-related outages) to inadvertently impact biodiversity, carbon sequestration potential, or community land use priorities. Maladaptation and the wider environmental impact of the Plan actions should be appropriately assessed.

3. 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 European Union (Resilience of Critical Entities) Regulations 2024 (S.I. No. 559 of 2024), which transposes the Critical Entities Resilience Directive, includes the digital infrastructure sector and communications subsectors as critical entities, requiring them to implement proportionate technical, security, and organisational measures to enhance resilience—particularly in preventing incidents and addressing disaster risk reduction and climate adaptation.

Additional resilience actions should be identified under Goal 3, in particular looking forward to address acute and chronic risks to at least 2050, preferably 2100 for long-lived critical infrastructure. Actions should cover more technical measures and should have more specific outcomes. Of the 17 actions laid out in the Plan, we note that 13 are “ongoing” actions, with the other four actions due by the end of 2027. The EPA recommends that these actions should be further considered and more realistic but ambitious timebound targets should be set. Considering that the capacity of the sector will likely have increased over the course of the Plan period, there may be scope for further actions to be progressed in 2028–2030. The EPA recommends that the Department should consider including within the Plan an interim review in 2028 to examine further actions that could be progressed in 2028–2030.

4. Indicators

The EPA notes the inclusion of a proposed biannual review structure to revisit the Plan. While cohesive and integrated planning is an important aspect of adaptation for the CN sector, the current plan has few outcome indicators and does not fully link identified risks through to actions and then to outcome indicators. The EPA recommends that outcome indicators should be developed for the Plan actions to enable tracking of improved resilience.

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.

5. Research gaps

The Plan references several climate-related risks as requiring further investigation, including near coastal infrastructure investment, effects of flooding to ground-based infrastructure, and landslides affecting access. However, it does not clearly define these research gaps or outline how these will be investigated. Where relevant risks in the NCCRA have been classified as requiring “further investigation”, then the required further investigation should be covered in the Plan actions and completed within the timeframe of the Plan.

The EPA would welcome engagement with the Department on the potential to address urgent and policy-relevant research needs through the EPA’s [Fast Track to Policy](#) research funding programme, which supports rapid evidence reviews.

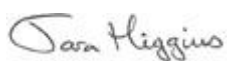
SEA Screening

We note your initial conclusion that SEA is not required for the Plan. 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.

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". The signature is fluid and cursive, with the first name "Tara" being more prominent.

Dr Tara Higgins

Programme Manager