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Aarhus, Climate Adaptation, Citizen Engagement and Local Government Division Department of the Environment, Climate and Communications 29-31 Adelaide Road Dublin 2 D02 X285

19 February 2024

RE: National Adaptation Framework Public Consultation

To whom it concerns,

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals five of which have been identified by the Chambers Ireland network.

The recently published Environmental Protection Agency's report on Ireland's Climate Change Assessment¹ painted a stark picture of current and expected impacts of climate change in Ireland. Ireland's climate is changing now, and disruption is expected to continually worsen. However, adaptation rarely receives the same attention as mitigation does regarding policy, decision-making, resourcing and implementation.

Last year we witnessed unprecedented heatwaves, intense storms, and widespread flooding, all indicative of the profound shifts underway. As temperatures rise and weather patterns become increasingly erratic, Ireland faces significant challenges across every sector. An enhanced focus on implementing adaptation measures is urgently needed to mitigate the impacts of these changes and build resilience within communities. Proactive steps must be taken to safeguard Ireland's future in the face of a rapidly changing climate.

The government has made many positive steps forward to address the vast challenges in the face of the interlinked climate and biodiversity crises. However, gaps still exist across human and financial resources, sectoral plans, transboundary climate risks, data availability, and overall awareness among communities that have limited the implementation of adaptation measures. As such, the revised National Adaptation Framework (NAF) comes at a critical time and upon review seeks to close these gaps and progress implementation at all levels.

An up-to-date list of names of every Company Director, in accordance with Section 151 of the Companies Act 2014 is available on application from the Company's Registered Office. Cork Chamber is a registered brand of Cork Chamber of Commerce, a Company Limited by Guarantee. Registered in Ireland No. 13918 VAT No: 0005247M



¹ Ireland's Climate Change Assessment Synthesis Report

As this consultation process closes, Cork Chamber welcomes the opportunity to contribute and offer a series of advice and observations which we ask are considered in the final publication of the NAF. We remain at your disposal for further consultation and additional insights from our member businesses.

Yours sincerely,

CH.

Conor Healy

CEO

Cork Chamber's Response

Awareness building and mainstreaming adaptation

Effective implementation of this framework and sectoral adaptation plans is key to success and must be progressed with urgency. Previous to this NAF, various gaps existed which limited implementation capacity. It is very positive to that this NAF has clearly sought to close these gaps.

Previous NAFs focused more on top-down approaches in planning and implementation, which limited awareness within civic society. As such, the mixture of top-down and bottomup approaches within this revised version will contribute to involving communities, nongovernmental organisations and the private sector, which is greatly needed to ensure successful planning and implementation. Community outreach will be key to driving awareness at all levels.

It is very positive to see a greater level of alignment, policy coherence and integration of sectoral adaptation plans and local authority climate action plans within the NAF. Undoubtedly, this will mainstream adaptation into policy and decision-making. Further to this the inclusion of the built environment and tourism sectors to develop sectoral plans along with the development of national adaptation indicators and timelines will allow for better revision and implementation of adaptation measures and sectoral plans.

Effective implementation of this framework and the various sectoral plans is key to success. This must be progressed with urgency. It is very positive that a review of the sectoral adaptation plans is being undertaken. This is especially critical for the sectors which have seen limited progress, in particular biodiversity which no progress has been made regarding risk, prioritisation, and adaptive capacity.

Financial and Human Resources

A deficiency in financial and human resources has limited the impact of adaptation in Ireland to date as reported by local authorities and included sectors. We are pleased that the Climate Change Advisory Council's recommendations have been taken in the development of this revised NAF, specifically the development of a 2030 budget for adaptation and the assessment for 2050 and onwards. We urge that investment requirements and detailed budget information is provided in the short term to address this. This information should specify the funding that will be required for all relevant departments, regulators and local authorities.

Coastal Management Strategy

The government needs to allocate funds towards enhancing our resilience to withstand the impacts of climate change. With sea levels on the rise, it is imperative to promptly implement a Coastal Management Strategy aimed at effectively addressing the evolving nature of our coastlines.