CONSULTATION

Response Document

National Adaptation Framework

Planning for a Climate Resilient Ireland

19th February 2024

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- UN Decade on Ecosystem Restoration 2021-2030 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

This response was coordinated by Members of our Ireland Policy Group.

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at JasonReeves@cieem.net with any queries.

The National Adaptation Steering Committee's Governance Group (NASC) definition of climate resilience in the NAF (2018):

> Climate resilience is the capacity of a system, whether physical, social, or ecological, to absorb and respond to climate change and, by implementing effective adaptation planning and sustainable development (including governance and institutional design), to reduce the negative climate impacts while also taking advantage of any positive outcomes. This will allow the system to either return to its previous state or to adapt to a new state as quickly as possible. (NAF 2024, Box 2, p12)

In order to have effective adaptation planning and sustainable development, the following need to be addressed.

Transformational, rather than incremental change.

We need a system that can deliver climate resilience with the capacity to absorb change from tipping points, e.g. further slowdown and possible shutdown of the Atlantic Meridional Overturning Circulation (AMOC), which brings Ireland the warming North Atlantic Drift.

The NAF 2024 describes the transformative approach as, "fundamental changes that reshape systems, policies, and practices to effectively address underlying vulnerabilities." It states that, "[Transformational strategies] are crucial for enhancing long-term resilience and ensuring sustainable adaptation to climate change, particularly when addressing systemic risks and striving for comprehensive and lasting solutions." (p16).

There is an urgent need for transformational change if adaptation planning is to be implemented effectively and at the scale required for long-term climate resilience, particularly with regard to existing, outdated legislation, which conflicts with climate adaptation objectives and blocks progress.

Review existing legislation for conflict with climate adaptation objectives

Out-of-date legislation not only frustrates progress on adaptation, but can have adverse outcomes, for example:

- planting trees on peat which results in carbon release rather than sequestration;
- drainage which modifies natural habitats and undermines climate resilience; and
- intensification of agriculture and resultant pollution and soil exhaustion which undermines the integrity of natural systems.

We need a root-and-branch review of where these legislative impediments are, and how they should be removed. This should be the foremost Future Research Priority for the NAF 2024.

Initial examples in an Irish context include the Arterial Drainage Act 1956 and 1995, where continued requirement for drainage of areas works against a need to take an ameliorative approach that increases the capacity of the wider landscape to hold water at times of high rainfall, and feed it back through watercourses slowly. The forestry re-planting obligation under the Forestry Act 2014 has the potential to make it more difficult to remove forestry from bog habitats that require restoration. The exempted development status of forestry replanting under the Planning and Development Act, which also has the potential to make it more difficult to remove forestry from bog habitats that require restoration.

Make responsibility for delivery of Sector Adaptation Plans multi-departmental

A cross-sectoral/governmental approach is necessary for effective implementation of Nature-based Solutions, a 'guiding principle' of the NAF: "Sectors should work together to coordinate and collaborate on the integration of effective nature-based solutions that support adaptation and deliver co-benefits for mitigation and biodiversity." (p102).

In commenting on the limited progress of climate adaptation in the Biodiversity sector in 2022, the Climate Change Advisory Council (CCAC) said that, “Given the cross-sectoral nature of biodiversity, responsibility for its protection, management and restoration sits across multiple government departments, local authorities, and non-state actors.” (p155)

Yet, each Sector Adaptation Plan, and its implementation, is the responsibility of a single department, including the Biodiversity Sector Adaptation Plan; responsibility for which lies with the Department of Housing, Local Government and Heritage. It is not clear where mutual responsibility for delivering climate resilience is going to be enforced.

Review the role and priorities of semi-state actors

The NAF 2024 states that, “The Commercial Semi-State Sector has a role to play in supporting the delivery of an enabling environment for adaptation and resilience through, for example, safeguarding its own operations and services as well as supporting the wider implementation of adaptation actions.” (p86).

The New Economy and Recovery Authority (NewERA) Framework for the Commercial Semi-State Sector to address climate action objectives, cited in the NAF 2024, recommends that

climate action objectives be approved and embedded in the corporate plan by the company Board.

We agree that climate adaptation should be at the core of semi-state sector governance, since an out-dated focus on economics and growth can have perverse outcomes for the environment and climate adaptation. It is important, however, that the introduction of climate action objectives be systematic and well-thought through, not piecemeal and without consideration of how they may conflict with other objectives to produce unintended consequences (see Coillte's reforestation of peatland).

Actions for climate adaptation should be transformative and well-informed

Actions for climate adaptation should be truly transformative, not just responsive, and informed by relevant, up to date research and analytical input. This includes understanding that many different habitats can contribute to climate change objectives.

In our position statement on carbon and habitats[1], we observe that there is currently a strong emphasis on tree planting and peatland restoration as NbS to capture carbon and help mitigate against climate change, along with major reductions in greenhouse gas emissions. We agree that peatland restoration is a critical aspect of climate mitigation plans. Tree planting, however, is not a panacea for carbon capture as the carbon lost on establishment, felling, and combustion as fuel, can outweigh that being stored for many decades while the trees mature.

Recent reviews by Anderson (2021), the British Ecological Society (Stafford et al. 2021), and the Natural England report by Gregg et al. (2021) all come to similar conclusions: that there is a wide range of habitats that provide opportunities for substantial greenhouse gas absorption and storage. These habitats include marine and coastal ecosystems such as seagrasses, salt marshes and mudflats; rivers and wetlands such as floodplains, ponds and lakes; and open habitats including heathland, species-rich grasslands, blanket bogs, raised bogs and fens.

Given the capacity of peatlands to sequester carbon, we strongly advise that there should be no planting or replanting on organic soils, including ‘shallow’ peats (<30cm), since a thin

[1] CIEEM (2021) Position Statement on Habitat Creation and Restoration for Tackling the Climate Emergency. Available at: https://cieem.net/resource/carbon-and-ecosystems-restoration-and-creation-to-capture-carbon/

peat layer of 30cm has a carbon store equivalent to tropical rainforests (hectare for hectare)[2].

The potential of different habitats to contribute to climate adaptation should be taken into account in ecological assessments

Given the potential to contribute to climate adaptation objectives of a wide range of habitats, we believe that taking this into consideration should be part of ecological assessments, including the Ecological Impact Assessments (EcIA) and Appropriate Assessments.

Evaluation of the potential of existing habitats for meeting climate adaptation objectives should be made before modification of that habitat, even where that modification is for the purposes of climate adaptation or NbS.

Evaluation should include a full assessment of the carbon losses and gains over time, alongside assessments of ecological impacts[1]. This would be in the manner of whole life carbon assessments, but for habitats as opposed to the built environment. For example, new woodlands may take 30 years or more to become a significant carbon sink, depending on the soil type and level of disturbance during establishment, what habitat they are replacing and the tree species used. Assessments of losses and gains of both the proposed and the existing habitat would determine whether woodlands are the best option and whether they should be planted or could be generated through natural colonisation, which can deliver a more immediate carbon sink.

Understanding the role of Nature-based Solutions in climate adaptation

In our position statement on Nature-based Solutions[3], we acknowledged that nature-based solutions must play a key role in mitigating against, and adapting to, climate change, and reversing ongoing declines in biodiversity.

However, implementing NbS is not a substitute for addressing the adverse outcomes of outdated legislature or governance, including those listed above. Here we wish to highlight the IUCN and Commission on Ecosystem Management eight core principles to help with the implementation of NbS:

1. embrace nature conservation norms (and principles);

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[2] IUCN (2020) Position Statement: Peatland and Trees. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2020-04/IUCN%20UK%20PP%20Peatlands%20and%20trees%20position%20statement%202020.pdf

[3] CIEEM (2020) Using Nature-Based Solutions to Tackle the Climate Emergency and Biodiversity Crisis. Available at: https://cieem.net/resource/using-nature-based-solutions-to-tackle-the-climate-emergency-and-biodiversity-crisis/

2. can be implemented alone or in an integrated manner with other solutions to societal challenges (e.g. technological and engineering solutions);
3. are determined by site-specific natural and cultural contexts that include traditional, local and scientific knowledge;
4. produce societal benefits in a fair and equitable way in a manner that promotes transparency and broad participation;
5. maintain biological and cultural diversity and the ability of ecosystems to evolve over time; and
6. are applied at a landscape scale.

Targets and KPIs must be SMART

The NAF 2024 states that, "Embracing the SMART approach in adaptation planning can lead to more resilient and successful outcomes, preparing us to better navigate the challenges posed by a changing world." (p116).

We agree with this, however, there are no SMART targets in evidence in the NAF 2024, not even in Table 6, Key actions proposed (p117-120). The key performance indicators (KPIs) given refer to "Number of..", various plans and reports with no indication of their scale, scope or substance. The expected outcomes include the word "strengthened" with no explanation of what this means in practice.

SMART targets should feature in detailed climate adaptation and action plans *and* the overarching NAF 2024.

Summary and suggested actions

First and foremost, a systematic review legislative blockages to climate adaptation, and how these should be removed, should be conducted as a Future Research Priority.

This is fundamental to effective action on climate adaptation in Ireland and to the adoption of sustainable practices with well-established benefits for biodiversity and climate resilience, such as:

- biodiversity enhancement though development — see our briefing note on Biodiversity Enhancement for New Developments in Ireland[4];
- wetland restoration for biodiversity and water management;
- continuous cover forestry as an approach to sustainable forest management; and

[4] CIEEM (2024) Briefing Paper: Biodiversity Enhancement for New Developments in Ireland. Available at: https://cieem.net/resource/cieem-briefing-paper-biodiversity-enhancement-for-new-developments-in-ireland/

- support for farmers to engage in nature-positive farming practices, for example extensive grazing, and the removal of perverse incentives which encourage polluting or otherwise environmentally harmful activities.