NATIONAL ADAPTATION FRAMEWORK
Response to Consultation
National Adaptation Framework- Response

Background
Codema is Dublin’s Energy Agency and was founded in 1997 as a not-for-profit limited company. We act as energy adviser to the Local Authorities in Dublin and on their behalf sit as energy experts on a range of Steering Committees. Codema is well networked in Europe and has been very successful in bringing European projects to Dublin with a local implementation for the Local Authorities. We work on projects covering all aspects of sustainable energy including sustainable renovation, renewable energy, energy performance contracting, green electromobility, low energy buildings and end-user programmes, as well as smart metering through ICT.

Context
Codema welcomes the opportunity to make a submission to this consultation process. Codema’s interest in the Draft National Adaptation Framework stems from our ongoing work with the Dublin local authorities (DLAs) reducing their CO₂ emissions and increasing their energy efficiencies to 33% and most recently developing their Climate Change Action Plans. We have 20 years’ experience in the climate change and energy sector, specifically in how EU and national legislation will affect their activities and how the DLAs can future proof their areas of governance to both mitigate and adapt to the effects of climate change.

Response

General Comment
Acknowledging that globally cities and local governments are viewed as the level of government suited to addressing the impacts of climate change, we welcome the Draft National Adaptation Framework’s recognition of the important role that local authorities have in addressing climate change. As the agency through which the four Dublin Region Local Authorities are developing their Climate Change Action Plans, Codema is working closely with local authority staff to integrate climate change into their operations and service delivery through the development of their Climate Change Action Plans. This is undoubtedly a challenging process that has yielded many lessons which has informed our responses to this consultation. Most important is the breadth of knowledge and expertise that exists in each of the four local authorities and the keen desire of the DLAs to transition the Dublin Region to a low carbon future.

Role of Local Authorities

Consultation Questions
▪ Do you have any comments on adaptation at local authority level to date?
▪ How best can local authorities contribute to reducing the vulnerability of the State to the negative effects of climate change and avail of any benefits that may occur?
▪ Is a regional approach the best way forward for local authorities in addressing climate adaptation?
▪ How can local government best input into the development of sectoral adaptation plans?
▪ Are additional legislative provisions required to allow local authorities maximise their impact in driving the climate adaptation agenda at local or regional level?

At present, the four Dublin Local Authorities (DLAs) are developing and implementing adaptation actions within their remit and contributing to the State’s resilience to climate change. The primary responsibilities of local authorities that have guided the development of the actions are:

▪ Land-use planning and development and public realm
- Parks and recreation services
- Roads and traffic management including the promotion of sustainable transport
- Waste management in the public realm
- Housing services
- Local economic and community development
- Water supply and waste water services as an agent of Irish Water

The process followed by the DLAs is similar to the Climate Ireland Sectoral Adaptation Tool. The DLAs are developing their action plans using the ICLEI Five Milestone Process, which is iterative and follows an adaptive planning approach. This process has enabled the DLAs to work collaboratively to identify problems and solutions. Most importantly it has allowed for the identification of challenges and barriers to implementation of their action plans.

The DLAs have taken a regional approach to developing their action plans (at present Codema is developing separate action plans for each DLA). There is acknowledgement from the DLAs that key action areas do align with a regional approach, namely emergency response, flood risk management, and natural capital. As such there is support for a regional approach with consideration to the unique identities of each local authority within a region.

Given the recognition that “local authorities are well positioned to play a key role in mobilising the public as a result of their interaction with citizens and communities through the discharge of their various statutory functions”, one way that local authorities can contribute to sectoral adaptation plans is to provide information to the public on the plans and how the plans will affect their livelihoods. As well as provide constructive feedback on the implementation of sectoral adaptation plans that can strengthen future iterations of plans. From developing the DLA action plans it is evident that there is a wealth of knowledge held by staff on what makes successful policy. This knowledge is valuable to guaranteeing that action on climate change is comprehensive and integrated in nature.

Emerging from the process has been the importance of legislation that supports or inhibits the capacity of DLAs to implement actions that work to adapt the region to present and future impacts of climate change. Of concern is the breadth of existing legislation which shapes the capacity of the DLAs to implement programmes and projects in a timely manner. In the process of developing the climate change action plans, we have been actively identifying legislation that actions work to. This process is ongoing and there is evidence of conflicting or absent legislation that is needed to support the DLAs in implementing their plans. As such we would view an ongoing process of identifying the need for legislative provisions to guarantee the capacity of local authorities to drive their climate action plans as necessary.

**Climate Information and Data**

**Consultation Questions**

- What information is required to support sectors, local authorities and individuals to make better adaptation decisions?
- How should the costs of climate change adaptation be considered in economic decision making and how should options be prioritised?
- Is additional guidance required to assist in the development of climate change adaptation responses?

In the process of developing the Climate Change Action Plans for the DLAs, staff members were asked to identify challenges to addressing climate change. Resources in terms of time, staff, and funding emerged as key concerns for all four local authorities that would shape their capacity to implement and monitor their progress on the actions in their plan. Information and data were also raised as concerns.
The DLAs are cognisant of the impacts of climate change and its potential effects on the Dublin Region. However, of importance to the DLAs in delivering and monitoring their actions is access to accurate and localised data that they can use to set targets and measure progress. Presently, the Climate Change Action Plans have used the data that is publicly available through Climate Ireland, the OPW and Met Eireann, while valuable more detail is needed to better assess the impacts of actions, economically, socially and environmentally.

Codema recognises that the economic costs of climate change action or inaction are important in assessing a plan’s feasibility; as such the methodological approach chosen to assess the economic value of a project is important. Cost benefit analysis, (which is a method currently in use to assess flood alleviation projects,) is challenging to conduct and can be swayed to a preferred outcome depending on the criteria selected for inclusion in the model and the discount rate and timescales used to calculate the present value of a project. Therefore, cost effectiveness may be a preferred method to assess the economic value of policy or programme in decision making. However, decisions should not be solely based on economics, which has been nominally acknowledged by the OPW. A multi criteria analysis is recommended to be undertaken for project proposals submitted to the OPW, but the outcomes do not factor significantly in project approval.

Policy analysis tools need to be qualitative in as much quantitative. Whilst the proposed behavior economics unit is welcomed, there are challenges with this approach. One is that it will focus on changing behaviour without regard to the reason certain behaviours exist or persist. Economic incentives to encourage people to change behaviour are not necessarily effective when there are no alternatives to a choice. For example, achieving modal shift in transportation from cars to public transit and cycling may not be achieved with subsidies alone. Rather, undertaking a survey to understand why people do not take the bus or cycle may inform the decision-making process and identify alternative policies that will ensure encourage modal shift, such as introducing new routes and increasing the frequency of public transport services. As such Codema recommends that greater consideration be given to the impacts of projects in terms of long term benefits, social impacts and environmental impacts, not just economic costs, when deciding on actions.

Considering the implications of climate policy beyond economic costs to include environmental, social, and human health impacts would align with a ‘whole of government’ approach to climate change.

**Collaboration Across Sectors, Levels of Government and Civil Society**

**Consultation Questions**

- How best can climate change adaptation be successfully integrated and mainstreamed into key national, regional and local policies?
- How do we encourage efficient cross sectoral cooperation between relevant stakeholders on climate change adaptation?
- How can Government further promote dialogue and understanding of the need to adapt to a changing climate?

During the development of the Climate Change Action Plans for the DLAs, research of plans implemented by other cities was undertaken by Codema. Beyond reviewing the policies adopted by these cities, where possible, their processes for developing climate change action plans were investigated. It was found that support from central government plays a role in the capacity of cities to deliver policy; as well as having a mandate for action and being able to take the lead on action.

It is also important that a clear message that acting on climate change is a priority by all levels of government committing to action and setting ambitious targets. This should naturally encourage cooperation between stakeholders, especially within an adaptive governance structure that allows for leadership and ownership to be taken by stakeholders who may have a comparative advantage in a sector to respond. What was also found by
some cities is that in sending this message citizens responded positively and actively sought out opportunities to work with their local governments to take action.

From working with the four DLAs, Codema has found that it is essential to bring key stakeholders together in a workshop setting to: Firstly, engage with each other, and secondly, identify opportunities for collaboration and co-creation of solutions. Cross sectoral workshops are also important opportunities to engage with different aspects of climate change policy and foster thinking beyond one’s specific work area to how one’s work influences and impacts another’s work area.

Themes and Global Practice

Consultation Questions

- Do you have any comments on the thematic areas for sectoral plans (Natural Capital; Critical Infrastructure; River and Coastal Flood Risk Management; Public Health) identified in Chapter 4 of this document?
- Are there successful examples of adaptation in the public or private sectors that you are aware of and lessons you consider that can be learned from them?

The thematic areas are appropriate however, the division of labour and responsibility for the areas suggests a continuation of work being done in silos. The themes are cross cutting, and the sectors are co-dependent. It is recommended that consideration be given to how bridges can be built between departments. This may be achieved through integrating engagement with counter parts in other departments as a key performance indicator, or as part of yearly reporting.

The boxes below highlight climate action plans and processes that demonstrate best practice. Key lessons from both are the emphasis on responding to climate change as a service; engagement with stakeholders in civil society, academia, and private sector to co-create solutions; and finally, open and transparent reporting on progress.

Singapore’s Climate Action Plan

A small island city-state, Singapore is keenly aware of the impacts of climate change on its economy, society and environment. Responding to the risks posed by sea level rise, increasing temperatures, and intense rainfall events, underlies the 16 actions found in the plan developed by the National Climate Change Secretariat (NCCS). The NCCS is an agency that coordinates Singapore’s domestic and international policies on climate change and has adopted a whole of government approach. The actions in the plan are focused on ‘protecting Singapore from the impacts of climate change’ and ‘reducing greenhouse gas emissions and using energy more efficiently’ and provides information on how Singaporeans can contribute to today for a sustainable future.

Highlights:

- In 2009 pledged to reduce emissions by 16% by 2020; in 2015 increased this target to 36%
- In 2009 Singapore had 2MWp (megawatt peak) of solar PV in 2015 there is 60MWp of solar PV providing electricity
- Development of a Public Sector Sustainability Plan
Conclusion

Broadly, Codema supports the draft National Adaptation Framework. However, as has been highlighted significant work is needed to truly achieve a “whole of Government” approach to climate change. There are examples globally of national, regional and local governments taking the opportunity to respond to climate change to revitalise the way in which they operate and deliver services.

It is a challenging road ahead, however, in our experience to date with the Dublin Local Authorities, there is no shortage of will, knowledge and ideas to address climate change and transition to a low carbon society. What is needed is support from central government in terms of resources, funding and legislative capacity.

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