

Marc McManus
Social Policy & Public Service Reform
Department of the Taoiseach
Government Buildings
Dublin D02 R583



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Y35 W821

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire
Y35 W821

T: +353 53 9160600
F: +353 53 9160699
E: info@epa.ie
W: www.epa.ie

LoCall: 1890 33 55 99

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Re: Consultation on Draft National Risk Register

Dear Mark,

I refer to your email of 10 June 2016 to Ms. Laura Burke, Director General of the Environmental Protection Agency inviting submissions on the draft national risk register.

Our comments are as follows:

We welcome the inclusion of an overall chapter on the environment risks and have two suggestions to make. The first is to include a new sub-heading called 'protecting the quality of our natural environment' with some recommended text provided below. The second suggestion is some proposed amendments to the sub-section on climate change and extreme weather events.

Proposed addition to section on environmental risks

Protecting the quality of our natural environment

The economic resilience and future prosperity of Ireland is intimately linked to environmental quality, and to the role of our ecosystems and natural resource services. The future direction of our food industry and its reliance on a clean green environment is a striking example of this. Insufficient protection and preservation of our environment also has an economic cost. The World Economic Forum (Global Competitiveness Report 2013-2014) commented that '... the undesirable environmental consequences of human activity are leading to a less habitable world'. The World Health Organisation estimated that the overall annual economic cost of health impacts and mortality from air pollution, including estimates for morbidity costs, stood at €1.45 trillion. Another significant economic and social cost due to environmental impact derives from climate change where recent EU research concluded that the economic cost - in the absence of climate change adaptation actions - for the EU was in the tens of billions of euro per year¹.

The overall quality of Ireland's natural environment is good in comparison to many other countries and this gives Ireland a competitive economic advantage which is of great value and needs to be protected. Ireland faces significant challenges in the years ahead to meet national, EU and global commitments across a range of areas including water, air, waste,

¹ Ciscar et al., (2014). Climate Impacts in Europe. Results from the JRC PESETA II Project. JRC Scientific and Political Reports, EUR 26586EN



biodiversity and greenhouse gasses. By meeting these commitments we will reduce the risk of environmental degradation and protect Ireland's reputation as a country with a clean and well protected environment.

Proposed amendments to section 3.1 Climate Change and Extreme Weather Events (amendments in bold)

Warming of the climate system is unequivocal **and the human influence is clear**. Mitigation actions are being taken to limit warming, with clear expectations arising from the new global commitment to taking action following the Paris Climate Agreement in December 2015. However, many impacts of climate change are 'locked-in' for decades to come and adaptation actions are aimed at managing these climate change risks.

The scale and rate of climate change in Ireland is consistent with regional and global trends and these changes are projected to increase over the coming decades. Nationally, climate change will have wide ranging impacts on the environment, society, and the economy and associated sectors, including water resources, agriculture and food security, human health, terrestrial environments, critical infrastructure, biodiversity, and coastal zones.

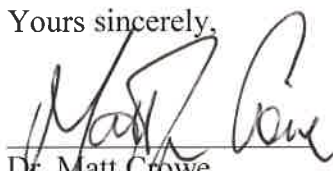
Recent years have illustrated clearly the risks posed to Irish society by extreme weather events, with instances of prolonged cold in 2010, damaging windstorms in the winter of 2013/14, and widespread flooding in late 2015 / early 2016.

Notwithstanding the new climate legislation and structures to prepare and implement 5-yearly National Climate Mitigation Plans and National Climate Adaptation Frameworks, there is a risk of failure to invest effectively or sufficiently in both mitigation and adaptation measures required to help minimise or address the impacts of this climate change. **Delayed actions increases costs, weaken strategic planning, e.g. on decarbonisation of energy systems, and risk undermining achievement of the national policy objectives of a low emissions climate resilient economy and society.**

Apart from the risks posed by climate change itself, there are also potential compliance costs associated with current emission and renewable energy targets to 2020 and the outcome of negotiations on individual EU Member State targets for 2030 under the non-Emissions Trading Scheme which are expected to conclude in 2016 or 2017. In particular, the level of Ireland's 2030 non-ETS greenhouse gas emissions reduction target could potentially pose a significant challenge to the State in meeting the costs of compliance.

Thank you for the opportunity to provide you with some suggested revisions to the draft register. Please feel free to contact me if you have any queries about our suggested revisions.

Yours sincerely,



Dr. Matt Crowe
Director
Office of Evidence and Assessment

