



SEA screening for The Tourism Sectoral Adaptation Plan 2025-2030

Section 1: Details of the P/P

Name of P/P Maker: **Department of Enterprise, Tourism and Employment**
Title of P/P: **Tourism Sectoral Adaptation Plan 2025-2030**
Type of plan: **High-level national policy plan**
Date: **18 September 2025**

Section 2: Key Information about the Plan / Programme

Background and Context of the Plan / Programme:

National Adaptation Framework (NAF) outlines a whole of government and society approach to climate adaptation in Ireland. Ministers with responsibility for the relevant sectors are required under the Climate Action and Low Carbon Development (Amendment) Act 2021 to submit Sectoral Adaptation Plans (SAPs) to the Government. SAPs were previously prepared for the following areas:

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- Biodiversity,
- Water Quality,
- Communication Networks,
- Electricity and Gas Networks,
- Flood Risk Management,
- Transport Infrastructure,
- Water Services Infrastructure,
- Built and Archaeological Heritage,
- Health,
- Agriculture,
- Forestry,
- Seafood.

Under the NAF 2024, 13 priority sectors are required to prepare SAP's or update their existing ones. Tourism is identified as one of these priority sectors. Accordingly, the attached draft SAP aims to identify challenges and opportunities of a changing climate for the tourism sector in order to maintain the attractiveness of Ireland for holidaymakers and continue to support resilient communities via provision of employment and economic opportunities.

Purpose of the Plan / Programme:

Implementation of Ireland's first Adaptation Plan for the Tourism Sector should prioritise reducing the consequences for the sector of the climate related hazards identified by the NCCRA.

Geographical Area Covered by the Plan / Programme:

The Tourism Sectoral Adaptation Plan 2025-2030 is covering all parts of Ireland. It also aligns with shared-island initiatives and cross-border tourism objectives.

Content of the Plan / Programme:

The draft Plan for the Tourism Sector sets out three goals for the next five years:

Goal 1: Increase the tourism sector's understanding of the relationship between climatic variables and the tourism sector in Ireland, to improve the ability to address the impacts of climate change on the sector

Goal 2: Build a shared awareness of climate change and its impacts, and necessary steps to develop resilience, across the tourism sector in Ireland, particularly amongst tourism dependent communities

Goal 3: Build resilience to reduce the consequences of the most significant climate risks faced by the tourism sector.

The Plan contains a number of actions to achieve the goals which will be overseen by the Department or the tourism agencies.

The attached draft was prepared following detailed consultation with inter alia, the tourism agencies, the EPA and representatives from the local authority sector. The Climate Change Advisory Council also provided detailed observations on earlier drafts, and these have been incorporated into the text.

Section 3: Potential for Significant Environment Effects

The characteristics of the plan having regard, in particular, to: the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size, operating conditions or by allocating resources.

The Environmental Protection Agency provides an interpretation that a framework for development consent arises “when the plan/programme would lead to, or give guidance for, the consent of development projects. This may be observed as the demarcation of areas zoned for specific types of development, measures which identify circumstances under which development will be encouraged or allowed, criteria which may be applied to decisions on development consent or forward programmes which identify certain types of development to be pursued in a particular sector.”¹

The *Tourism Sectoral Adaptation Plan 2025-2030* is an overarching policy which aims to identify challenges and opportunities of a changing climate for the tourism sector in order to maintain the attractiveness of Ireland for holidaymakers and continue to support resilient communities via provision of employment and economic opportunities. It is acknowledged that the tourism sector itself overlaps many environmental, economic and social realms. Accordingly, many measures in other SAP's will be of relevance to tourism and proposed mitigation measures will also benefit the

¹ <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/synthesis-report-on-developing-a-strategic-environmental-assessment-sea-methodologies-for-plans-and-programmes-in-ireland.php>

tourism sector. Implementation of this Plan should prioritise reducing the consequences for the sector of the climate related hazards identified by the NCCRA.

The characteristics of the plan having regard, in particular, to: the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.

The National Adaptation Framework (NAF) outlines a whole of government and society approach to climate adaptation in Ireland. Ministers with responsibility for the relevant sectors are required under the Climate Action and Low Carbon Development (Amendment) Act 2021 to submit Sectoral Adaptation Plans (SAPs) to the Government.

Under the NAF 2024, 13 priority sectors are required to prepare SAP's or update their existing ones. Tourism is identified as one of these priority sectors. Accordingly, this SAP aims to identify challenges and opportunities of a changing climate for the tourism sector in order to maintain the attractiveness of Ireland for holidaymakers and continue to support resilient communities via provision of employment and economic opportunities. It is acknowledged that the tourism sector itself overlaps many environmental, economic and social realms. Accordingly, many measures in other SAP's will be of relevance to tourism and proposed mitigation measures will also benefit the tourism sector.

The development of this dedicated Climate Adaptation Plan for the tourism sector, recognises tourism's vulnerability to climate-related risks such as coastal erosion, flooding, and seasonal variability. This plan will guide resilience-building across the sector and ensure alignment with Ireland's broader climate adaptation goals.

Implementation of adaptation actions will mostly be led by the Department of Enterprise, Tourism and Employment and its tourism agencies. The sector will benefit from co-operation established with other sectors and government bodies during development of the Plan.

Implementation will be overseen by a Tourism Sectoral Adaptation Plan (SAP) Implementation Team. The SAP Implementation Team will meet at least annually, facilitating identification of challenges in implementing the 2025-2030 SAP, and supporting the development of the next SAP. A Report on implementation of the SAP by Q3 2030 will also include internal reporting by adaptation action leads, reporting within the lead Department, and reporting to external bodies such as the Climate Action Delivery Board, the National Adaptation Steering Committee (NASC), and the Climate Change Advisory Council (CCAC).

The characteristics of the plan having regard, in particular, to: Environmental problems relevant to the plan.

Tourism, while a vital economic sector, can contribute to anthropogenic pressure on the environment—particularly when visitor numbers exceed the carrying capacity of destinations. However, with appropriate planning, infrastructure, and management, these impacts can be mitigated and maintained at sustainable levels.

It is acknowledged that the tourism sector itself overlaps many environmental, economic and social realms. Accordingly, many measures in other SAP's will be of relevance to tourism and proposed mitigation measures will also benefit the tourism sector.

This Tourism SAP sets out three goals for the next five years:

Goal 1: Increase the tourism sector's understanding of the relationship between climatic variables and the tourism sector in Ireland, to improve our ability to address the impacts of climate change on the sector

Goal 2: Build a shared awareness of climate change and its impacts, and necessary steps to develop resilience, across the tourism sector in Ireland, particularly amongst tourism-dependent communities

Goal 3: Build resilience to reduce the consequences of the most significant climate risks faced by the tourism sector.

A series of actions will ensure that these goals are met.

The characteristics of the plan having regard, in particular, to: the relevance of the plan for the implementation of European Union legislation on the environment

The Tourism Sectoral Adaptation Plan is not expected to directly affect the implementation of European Union legislation on the environment.

Tourism has the potential to contribute, directly or indirectly, to all of the UN Sustainable Development Goals (SDGs). It is specifically included within targets in Goals 8, 12, and 14, on inclusive and sustainable economic growth, sustainable consumption and production, and the sustainable use of oceans and marine resources, respectively.

The priority area 'Resistance and inclusion' in the European Agenda for Tourism 2030 includes improving the resilience of tourism services and destinations to service diverse audiences in all seasons and various locations. Tourism businesses and destinations are encouraged to take part in climate adaptation actions as part of the green transition of EU tourism.

b) characteristics of the effects and of the area likely to be affected:

The probability, duration, frequency and reversibility of the effects

The probability that The Tourism Sectoral Adaptation Plan 2025-2030 will result in significant environmental effects is low. It does not set a framework for development, nor does it propose the location, nature, size or operating conditions of tourist developments, visitor attractions or support infrastructure.

The Tourism Sectoral Adaptation Plan 2025-2030 is not a development plan; rather, it provides strategic direction and policy objectives to guide future decision-making and programme design.

It is acknowledged that the tourism sector itself overlaps many environmental, economic and social realms. Accordingly, many measures in other SAP's will be of relevance to tourism and proposed mitigation measures will also benefit the tourism sector.

The cumulative nature of the effects

It is not expected that an overall significant environmental impact will arise from this plan - either through a cumulative effect from implementation of the policy proposals or through interaction with other plans and programmes.

The transboundary nature of the effects.

The Tourism Sectoral Adaptation Plan 2025-2030 references the shared-island context for tourism. As it is not expected that an overall significant environmental effect will arise from this plan, it is further expected that there will not be any significant transboundary effects.

The risks to human health or the environment

As it is not expected that any overall significant environmental effects will arise from this plan, it is not expected that there will not be any significant risks to human health or the environment.

The magnitude and spatial extent of the effects

Environmental effects are not expected to be significant in terms of magnitude or spatial extent.

The value and vulnerability of the area likely to be affected due to a) special natural characteristics or cultural heritage, and b) exceeded environmental quality standards or limit values,

The Tourism Sectoral Adaptation Plan 2025-2030 recognises the value of cultural heritage and high environmental quality to the tourism sector. It is not expected that there will be any significant effects in this regard.

Intensive land-use,

No significant effects are expected from this plan with regard to intensive land-use.

The effects on areas or landscapes which have a recognised national, European Union or international protection status.

The Tourism Sectoral Adaptation Plan 2025-2030 recognises the value of landscapes as an intrinsic part of Ireland's tourism product. As no overall significant environmental effects are expected to arise from this plan, it is also not expected that there will be significant effects on areas or landscapes, including those which have a recognised national, European Union or international protection status.

Section 4: Summary and Conclusion

This SEA Screening Report has examined The Tourism Sectoral Adaptation Plan 2025-2030 with a view to determining whether it is likely to have significant effects on the environment. The criteria set out on Schedule 1 of SI No. 435 of 2004 were used to structure this exercise.

The determination is based on the following:

- The Tourism Sectoral Adaptation Plan 2025-2030 will not set a framework of consented projects for future development
- The plan is consistent with the National Planning Framework, National Development Plan and key national environmental policies.
- The plan is cognisant of environmental issues and supportive of environmental protection measures underway across the country.
- The plan is not expected to directly affect the implementation of European Union legislation on the environment.
- The probability that the plan will result in significant environmental effects is low.

Having regard to the screening exercise set out above, it is determined The Tourism Sectoral Adaptation Plan 2025-2030 *does* not give rise to a requirement to carry out an environmental assessment under S.I. 435 of 2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 as amended by S.I. No. 200 of 2011.

Section 5: Statutory Consultation

This SEA Screening Report was sent to the designated environmental authorities for their consideration, along with a copy of the draft Tourism Sectoral Adaptation Plan 2025-2030. The observations received through this consultation are presented in Appendix 1, along with the subsequent response by DETE.

Appendix I: Observations raised by statutory consultees

Received from: Environmental Protection Agency (EPA)

Comment	Overall, the Tourism Climate Change Sectoral Adaptation Plan 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.
Response	Comment noted. No change to policy text proposed in response.

Comment	In the context of increasing climate risks, it is important that adaptation be embedded across all levels of tourism policy, capital investment frameworks, and procurement processes.
Response	Comment noted. No change to policy text proposed in response.

Comment	We recommend that climate resilience be a core criterion in project appraisal and funding decisions, particularly for long-lived infrastructure and attractions.
Response	Comment noted. New text added in the Plan.

Comment	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.
Response	Comment noted. New text added in the Plan.

Comment	We welcome that indicators for the evaluation phase have been included in the Plan and commend the costings and resourcing included in the Plan.
Response	Comment noted. New text added in the Plan.

Comment	More comprehensively addressing the three National Adaptation Framework principles of Just Resilience, Nature-based Solutions, and Maladaptation.
Response	Comment noted. New Text added in the Plan: <i>"It is recognised however, that some of the feedback will require further consideration by the SAP Implementation Team over the course of the implementation period (See Chapter 5) and additional measures are likely to be developed as part of this work. In particular, further actions relating to Just Resilience and Maladaptation may be needed to ensure consistency across all sectors, while the possibility of nature -based solutions to address potential threats to the sector will also need further exploration."</i>

Comment	Additional climate resilience actions should be identified.
Response	Comment noted. No change to policy text proposed in response.

Comment	More specific outcome indicators and targets should be put in place to track the implementation of actions and resilience outcomes.
Response	Comment noted. New Text added in the Plan: <i>"It is recognised that additional data and monitoring infrastructure may be required to effectively implement the objectives of this SAP and the implementation Team will be asked to consider any gaps in this regard."</i>

Comment	We note your initial conclusion that SEA is not required for the Plan.
Response	Comment noted. No change to policy text proposed in response.

Comment	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.
Response	Comment noted. These steps will be implemented.

Comment	The EPA notes that key research gaps have been identified in the draft plan. The EPA would welcome engagement with the Department on the potential to address some of the identified research gaps through the EPA's Fast Track to Policy research funding scheme, which provides for rapid turn-around evidence reviews to address urgent policy questions.
Response	Comment noted. No change to policy text proposed in response.

Received from: The Environment, Climate and Circular Economy (ECCE) Committee of the County and City Management Association (CCMA)

Comment	We note that the draft Statutory Climate Change Sectoral Adaptation Plan (SAP) for Tourism as prescribed under the National Adaptation Framework 2024, is the first such plan for the sector
Response	Comment noted. No change to Plan text proposed in response.

Comment	Insofar as supporting the Department and tourism entities in the delivery of action 3.2: Incorporate climate adaptation into strategies, as appropriate, developed under all National Tourism Policy Statements, we advise that the next iteration of LACAPs will commence development in 2027. The opportunity exists to engage with the CAROs prior to this timeframe to ensure that tourism adaptation actions that are designed to respond to the prioritised risks identified in the NCCRA, are mainstreamed as appropriate through the next iteration of LACAPs. The timeframe on this should be noted as it does not correlate with the timeframe specified in the draft SAP (Q3 2030). This timeframe is more akin to the alignment opportunity between the tourism SAP, Fáilte Ireland's Regional Tourism Strategies (2023-2027), as outlined in action 3.3 for delivery in Q2 2027.
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Response	Comment noted. New text added in the Plan: <i>“Delivery: Local Authority Climate Action Plans to be developed Q4 2027”</i>
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Comment	As noted above, the draft Tourism SAP is further evolved than LACAPs currently by way of up-to-date analysis, consideration of the most recent climate projections, prioritisation of risks (to the tourism sector) and alignment in general with the new NCCRA. For actions with local authorities as stakeholders, there may be a reliance on DETE and tourism agencies to assist local authorities in their supporting role for the delivery of actions.
Response	Comment noted. No change to Plan text proposed in response.

Received from: Climate Change Advisory Council (CCAC)

Comment	The impact screening and the analysis of climate impact chains are welcomed. The establishment of an Implementation Team, as well as the inclusion of milestones, indicators, and the explanation of costing and resourcing within the action plan are also positive developments. However, outputs for each action should be more clearly defined (for example, specifying how many case studies will be developed, the number of training programmes planned).
Response	Comment noted. New text added in the Plan: <i>“In terms of implementation, the Implementation Team (see Section 5.1) will need to be satisfied that clear outputs are understood for each of the Actions listed and that the associated KPIs are adequate. Many of these Actions will continue beyond 2030 and will be updated/modified in future Tourism SAPs.”</i>

Comment	Milestones have been included, but there are still some long-term generic actions (e.g. 3.6) that would benefit from sub-actions. While indicators have been assigned to each action, it would be more effective to include additional indicators that not only identify progress, but also evaluate, and ensure improvement throughout the implementation process. The impact indicators included under section 5.2 are welcomed. It is encouraged for these indicators to be collated nationally on an annual basis as soon as possible as these will inform progress towards the achievement of the vision and Goal 3 and future SAPs.
Response	Comment noted. No change to Plan text proposed in response.

Comment	It is welcome that all future Failte Ireland finance schemes will include adaptation. This should be tracked annually, and an appropriate finance-related indicator should be included in the implementation indicators. It is noted that funding needs have been identified for each action and that existing funding will suffice for the majority of actions. However, the actions do not provide enough evidence to quantify these requirements. Even though existing funding may be in place, the Department should be conscious of the additional workload required and ensure that appropriate staff are assigned to ensure effective implementation.
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	It is encouraged to explore additional funding mechanisms, including the possibility of co-financing priority heritage sites through schemes.
Response	Comment noted. New text added in the Plan: <i>“While some of the proposed actions below do not have significant resource implications, it is acknowledged that others can only be implemented if additional resources are allocated to the relevant lead agencies. Accordingly, climate adaptation measures will need to be fully considered as part of all future budget discussions.”</i>

Comment	More detailed information stating that “existing resources should be sufficient” has been provided since the first draft, although more information on the specific human resources needed to implement, monitor, and evaluate the different actions of the plan should be provided. Skills needed for the implementation and monitoring of the plan should be outlined.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Action G1 under 5.1 is welcome but it is encouraged for the team to meet more than annually to ensure coordinated implementation and to tackle any challenges to implementation, including funding. It would be helpful to clarify who will be in charge of tracking the implementation indicators; responsibilities for monitoring and carrying out the plan should be clearly assigned. It is important for the SAP to have strong coordination mechanisms given the breadth of stakeholders in the tourism sector and with it being the sector’s first SAP.
Response	Comment noted. New text added in the Plan: <i>“The SAP Implementation Team will be led by DETE and will meet at least twice annually, facilitating identification of challenges in implementing the 2025-2030 SAP, and supporting the development of the next SAP.”</i>

Comment	Only 3 priority impacts have been considered in the action plan. The action plan should include actions that address identified adaptive measures in section 3.5 on impacts and risks.
Response	Comment noted. No change to Plan text proposed in response.

Comment	An explanation of how cross-sectoral issues and actions will be addressed, particularly regarding cross-sectoral engagement, should be included. Nature-based solutions (NBS) and just resilience concepts are referenced in the adaptive measures (section 3.5); however, they are not directly addressed through specific actions in the plan. Under action 1.2 it is encouraged to include NBS / biodiversity as well as adaptation in the skills gap analysis and tailored training programme. It is noted that nature-based and eco-tourism is still to mature in Ireland (pg 126). The SAP should be an opportunity to support the further development of this type of tourism. Diversification of the tourism industry and products is an important consideration to make the sector more resilient and should be promoted as it fits with the latter part of the vision as well as other policy documents especially the DEDPs, RTDSs and funding mechanisms. Many of the actions focus on the physical
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	climate risks rather than capitalising on opportunities for greater broader resilience of the sector. The tourism potential of SACs, SPAs, national parks and nature reserves is undeveloped. Actions should be included to work with NPWS to support and promote its operation and visitor experiences in protected areas. Transboundary risks are mentioned under section 4.3.2. However, actions to manage transboundary risks would be expected and could be further prioritised through action 2.3 (e.g. conducting a risk assessment to identify most relevant transboundary risks for the sector).
Response	Comment noted. New text added in the Plan: <i>“Action 1.2: Undertake a skills gap analysis re adaptation (and possibly NBS/biodiversity) across the tourism sector and tailor training programme accordingly”.</i>

Comment	It is noted that goal 1 includes commissioning research to define and improve understanding of current and projected future relationship between climate and tourism in Ireland. It is recommended to include a research gap analysis to the plan (as an extra action or milestone) to identify priority areas.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Additional details regarding stakeholder engagement during the SAPs development should be provided. It is worth clarifying whether any industry stakeholder workshops took place during the creation of the action plan.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Under goal 3 the aim should be to integrate adaptation into existing policies that lead to local impacts, and deliver tangible outcomes. Some actions should include milestones to support continuity (for example, Action 2.1 proposes establishing a website by 2028 to raise awareness; it would be helpful to clarify what subsequent actions are planned following the website launch.)
Response	Comment noted. No change to Plan text proposed in response.

Comment	Some mitigation co-benefits are explored, for example through action 3.7 “Improve water use efficiency in the accommodation sector”. Other co-benefits could be identified for the sector, for example, tourism companies can also play a role in offsetting some of their negative impacts by investing in species protection and habitat restoration initiatives.
Response	Comment noted. No change to Plan text proposed in response.

Comment	There are no actions that extend beyond 2030; there should be continuity of the actions that address priority risks identified as critical or substantial by 2050 and 2100. For example, training will be developed for flood risk under goal 3.1, but how ongoing support, evaluation, or adaptation measures will be maintained over the coming decades should be outlined.
Response	Comment noted. New text added in the Plan: <i>“Many of these Actions will continue beyond 2030 and will be updated/modified in future Tourism SAPs.”</i>

Comment	Noted that under goal 3 there are different actions that aim to incorporate climate adaptation and climate risks into different programmes, policies and national strategies. It will be important to ensure that issues of adaptation, resilience and biodiversity are strongly mainstreamed into the DEDPs and RTDs to ensure local level impact. It is also welcomed action 3.5, to include adaptation aspects into all future Fáilte Ireland schemes providing financial assistance. However, more information should be provided on which specific policies and schemes will incorporate climate resilience. Local Authority Tourism Plans / Strategies are referenced on pg. 25 and 47 but nowhere else in the document. There is no clarity given on when these Plans / Strategies are expected to be developed. The mainstreaming of adaptation into these Plans / Strategies would also be an important action if they are being developed during the lifespan of this SAP. It is noted and welcomed that Fáilte Ireland included relevant questions about climate risk awareness in the Tourism Barometer survey at the end of 2024 to gauge industry understanding and that this will continue in future barometer surveys through action 1.3.
Response	Comment noted. New text added in the Plan: <i>“CARO and Local Authorities will ensure: • Tourism issues are incorporated into all LACAPs in their next iteration (2030-2035); • Climate adaptation measures are incorporated into Local Authority Tourism Plans & • The development of #ProtectOurDunes or similar initiatives to protect sand dunes, maintaining habitats and amenity resources”</i>

Comment	Section 2.1.4. -Paragraph on public consultation remains incomplete (sentences not finished).
Response	Comment noted and text was updated.

Comment	Section 2.1 -The section should expand on DETE goals/aims regarding tour
Response	Comment noted. No change to Plan text proposed in response.

Comment	Section 5.1 -Q4 of 2026 is likely to be the first timeline for reporting in terms of the CCAC scorecard -Under the implementation indicator for action 3.2, it would be good to include something on financial support to climate-resilience related projects. Mainstreaming into strategies and investment plans should ultimately lead to mobilisation of resources. -The implementation indicator for action 3.6, similar to 3.2, should focus on the amount of financial support mobilised rather than the plan for climate adaptation measures. -Action 3.7 is welcome, but it would be good to extend it beyond the accommodation sector to other large water users such as golf courses.
Response	Comment noted. No change to Plan text proposed in response.

Comment	The Tourism SAP uses the TRANSLATE climate projections to assess future climate conditions throughout. However, the plan does not quantitatively account for the wide range of potential futures within the climate projections.
Response	Comment noted. New text added in the Plan: <i>“It must be acknowledged however, that there are a broad range of possible outcomes and there remains uncertainty in both the direction and magnitude of projected change. It should be highlighted that many of these adaptive measures will be undertaken as part of the broader response to climate change, but the aim is to support evidence-based policy development and strategic planning to enhance the resilience and sustainability of tourism in the face of a changing climate).”</i>

Comment	Suggested edit to the definition and description of the TRANSLATE project.
Response	Comment noted. Text is updated in the Plan.

Comment	Assessment of Risk The plan takes a very detailed assessment of the state of play for the tourism sector when it comes to climate change. It employs a huge amount of information specific to the sector on the potential impacts of climate change. However, there is no clear assessment of risk throughout the plan.
Response	Comment noted. To be addressed in implementation phase.

Received from: daa

Comment	daa is a Commercial Semi-State Organisation that owns and operates Dublin and Cork airports, with subsidiaries ARI and daa International engaged in retail and airport management. daa’s Irish airports are critical international gateways, connecting Ireland to global markets. This connectivity is essential for sustaining tourism growth, promoting regional dispersal, and supporting economic resilience. Given the tourism sector’s reliance on aviation, it is imperative that the Tourism Climate Change Sectoral Adaptation Plan explicitly addresses the climate adaptation needs of Irish airports. Airports face increasing risks from extreme weather events and gradual climate shifts, which can disrupt travel and infrastructure. Integrating airport-specific adaptation measures will ensure the tourism sector remains robust and future-proofed.
Response	Comment noted. No change to Plan text proposed in response.

Comment	daa supports the goals of the Tourism Climate Change Sectoral Adaptation Plan to build shared awareness of climate change and its impacts, as well as to strengthen resilience against the most significant risks. Our submission focuses on key climate risks to airport infrastructure—such as flooding, storms, and heatwaves—and outlines daa’s adaptation actions alongside the policy and planning support required.
Response	Comment noted. No change to Plan text proposed in response.

Comment	The Tourism Climate Change Sectoral Adaptation Plan (SAP) highlights the challenge of reducing the carbon footprint of the tourism sector. Aviation faces significant decarbonisation challenges but is addressing these head-on through strong commitments and actions to reduce emissions. daa has committed to emissions reductions across our own operations and Scope 3 emissions, validated through our participation in Airports Council International's (ACI) Airport Carbon Accreditation (ACA) programme for over 15 years.
Response	Comment noted. No change to Plan text proposed in response.

Comment	As noted in the SAP, the tourism industry is particularly subject to cross-sectoral interdependencies. The SAP references risks to airport infrastructure and disruption due to unsafe flying conditions, which can affect passenger travel to and from Ireland. daa recognises the risk of climate impacts on its operations and the need to develop climate adaptation solutions.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Concern 1: Flooding can cause temporary airport closures or curtailments, disrupting flight schedules. Airport infrastructure must adapt to heavier downpours and more frequent flooding. Recommendation: Changes in precipitation patterns and pluvial flooding was determined to be a high risk for airport infrastructure. At Dublin Airport a major drainage upgrade project has been designed to improve surface water drainage, ensure the airport is more responsive to extreme rainfall events and provide capacity and flexibility to meet the future demands of the airport. Planning permission was sought for the project in Q4 2023 and approved in Q3 2024 and is currently awaiting a determination on an appeal to An Coimisiún Pleanála. Increased efficiencies in planning timelines would be beneficial for the implementation of infrastructure to address climate adaptation challenges.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Concern 2: Travel to/from the airport can also be compromised by flooding, which will in turn impact airport connectivity and operations. Recommendation: The T-SAP II identified projected changes to precipitation and all types of flooding as the most significant climate risks to roads in Ireland. Adaptation actions outlined in the plan include continuation of the existing climate adaptation strategy for motorways, local and regional roads which incorporates a build back better approach and development of new funding schemes to study and undertake infrastructure works to improve climate resilience for roads.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Concern 3: ACI recommends that airports conduct flood risk assessments and bolster draining and stormwater management to cope with heavier rain. There is also the need to integrate climate projections into infrastructure planning e.g. through engineered flood plains, pumping stations or storm surge protection.
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	Recommendation: Availability of up-to-date climate data and projections are required in order to effectively conduct flood risk assessments and develop sufficient capacity in drainage and stormwater systems to accommodate upliftment in rainfall depths due to climate change.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Concern 4: Ireland's airports are also vulnerable to powerful wind gusts and lightning as the result of extreme Atlantic storms, which can cause physical damage to airport infrastructure (e.g. via debris or power outages) and unsafe flying conditions (e.g. high winds and wind shear). Recommendation: The most significant climate risk to Irish aviation is associated with storms and strong winds. The T-SAP II flags that the risk of occurrence is high, there is a lack of available options to reduce this risk and the potential for transboundary implications.
Response	Comment noted. No change to Plan text proposed in response.

Comment	Concern 5: Heatwaves and high temperatures can affect airport infrastructure and operations – e.g. softening asphalt on runways and taxiways or causing air conditioning demand to surge and strain electrical systems. Recommendation: The T-SAP determined that heatwaves and associated potential impacts on asphalt softening are not likely to significantly affect airports in Ireland even in the most extreme scenarios. Airport stakeholders flagged that the increase in maximum summer temperatures may impact the thermal comfort of passengers and additional mitigations may be required such as sufficient cooling in terminal buildings.
Response	Comment noted. No change to Plan text proposed in response.

Comment	The Department of Transport has committed to work with stakeholders to undertake criticality mapping of vulnerable points in utility networks that may affect aviation during extreme weather events.
Response	Comment noted. No change to Plan text proposed in response.