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Third River Basin Management Plans
Second Flood Hazard and Risk Maps and Second Flood Risk Management Plans
Member State: Ireland

Accompanying the document

REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT

on the implementation of the Water Framework Directive (2000/60/EC) and the Floods Directive (2007/60/EC)

Third River Basin Management Plans
Second Flood Risk Management Plans

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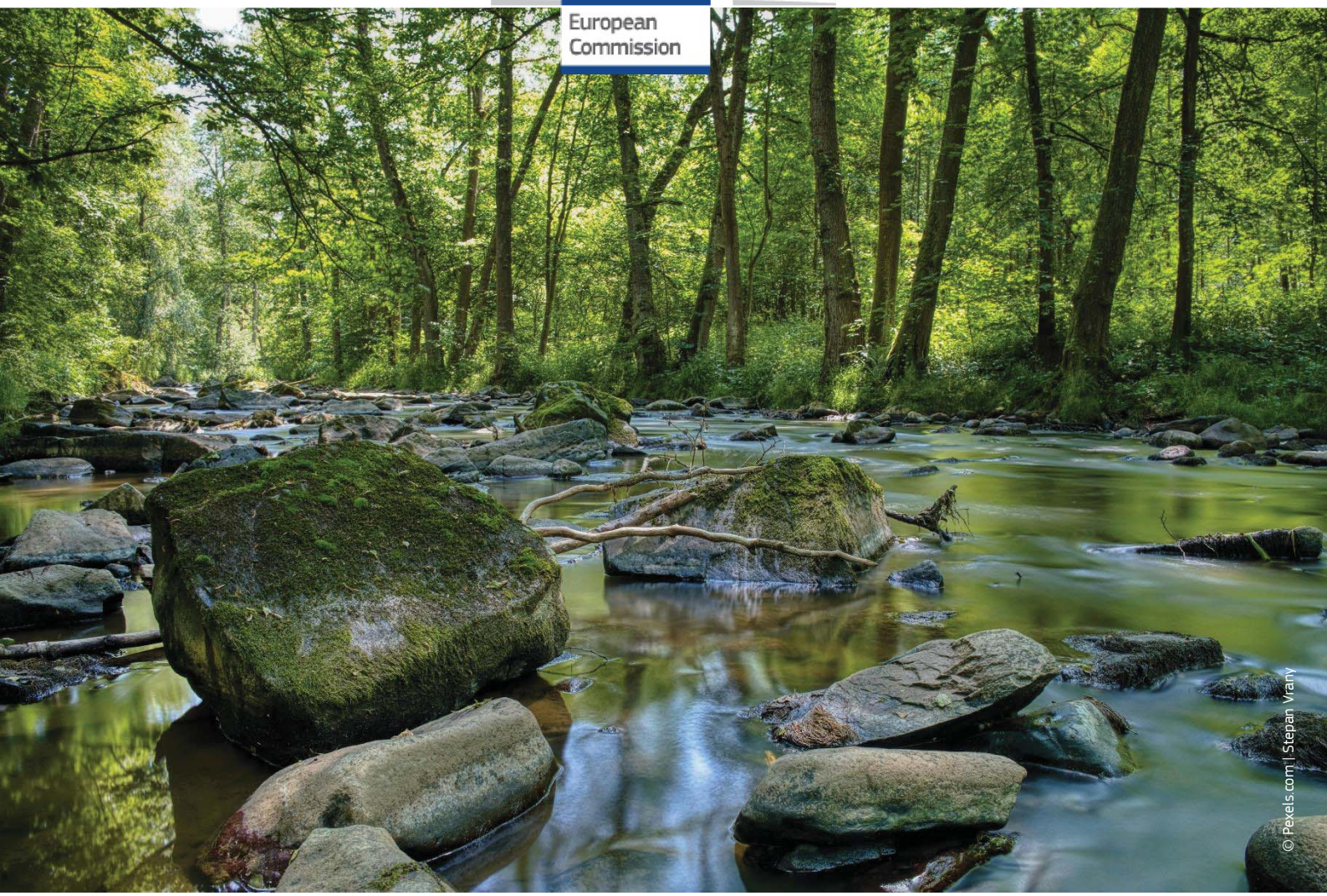
European Commission



Country specific staff working document

Ireland

ENVIRONMENT
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Content

SECTION A:

WATER FRAMEWORK DIRECTIVE

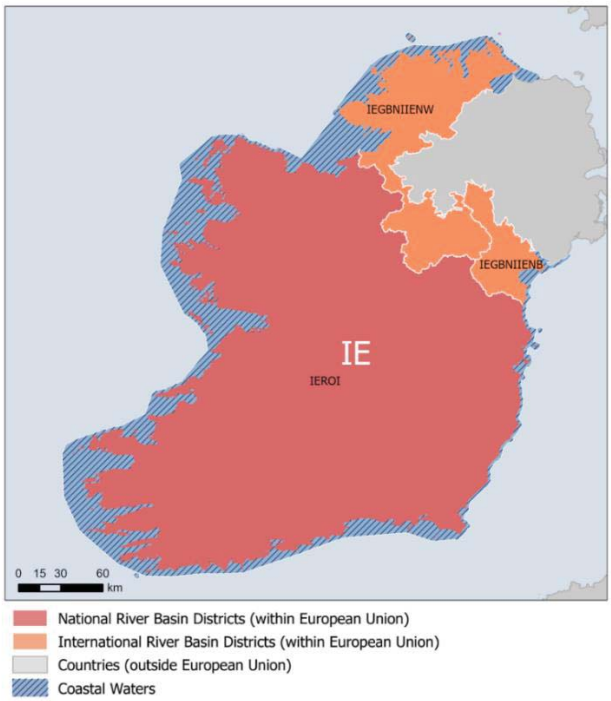
Ireland has failed to comply with its legal obligation and has not reported the 3rd RBMPs in time. The Commission has thus been bound to launch legal proceedings.

SECTION B:
FLOODS DIRECTIVE

1. Flood risk management under floods directive (FD)

The Directive requires each Member State (MS) to scan its territory for flood risks, assess the potential adverse consequences of future floods for human health, the environment, cultural heritage and economic activity, identify the significant risks, map the flood extent and the potential adverse consequences, and take measures to reduce the flood risk. These activities are reflected in (a) the preliminary flood risk assessments, or PFRAs (including the identification of areas of potential significant flood risk, or APSFRs), (b) the preparation of flood hazard and risk maps, or FHRMs, and (c) the establishment of flood risk management plans, or FRMPs. The preliminary assessments, mapping and planning for flood risk are repeated in six-yearly cycles.

There are three Units of Management (UoMs) in Ireland, which are the same as the Water Framework Directive's River Basin Districts (RBD). Fluvial, pluvial, groundwater, sea water, and Artificial Water Bearing Infrastructure types of floods are considered as potentially significant sources of flooding in Ireland. Ireland has designated 199 Areas of Potential Significant Flood Risk (APSFRs). The impacts of climate change on flood risk have been considered in Ireland at the time of the second preliminary flood risk assessment. Climate change has been assessed for the 300 previously designated APSFRs though the Irish Coastal Protection Strategy Study (ICPSS) and the National Catchment Flood Risk Assessment and Management (CFRAM) programme. The ICPSS was completed in 2013 and provides strategic current and future scenario (up to 2100) coastal flood hazard maps and coastal erosion maps for the national coastline. These two studies have determined that the impact of climate change can significantly increase flood risk in Ireland, particularly in coastal areas. They also highlight that in addition to the flood relief schemes proposed under the FRMPs, the need for further, additional flood risk management measures may arise over the coming decades for other communities, where the current level of risk is low, due to the projected increases in flood risk. The Office of Public Works published the Draft Climate Change Sectoral Adaptation Plan for Flood Risk Management in 2019 which includes a set of adaptation objectives and a series of actions aimed towards the achievement of these objectives.



1.1 Flood hazard and risk maps

Ireland is using an open-access online map portal[1] for their FHRMs. FHRMs were prepared at the national level and show the whole country. Maps for floods with low probability (1/1 000 years), with medium probability (fluvial and pluvial: 1/100 years and coastal: 1/200years) and with high probability (1/10 years) are provided. Flood extent is shown on the maps. Water depth is shown on the maps. Number of inhabitants is shown. Likewise, type of economic activity is shown on the maps. IED installations are shown. Potentially affected protected areas identified in Annex IV(1)(i), (iii) and (v) to Directive 2000/60/EC are shown in the FHRMs.

In the first FHRMs, Ireland reported 300 APSFRs. As an output of the work for the second PFRA and for the second FHRMs, 199 APSFRs are reported. However, the online viewer and the CFRAM PDF maps are not exclusive to these 199 APSFRs, but also cover the wider set of areas identified as Areas for Further Assessment (AFAs) for 300 communities.

In terms of changes of contextual information (i.e. the way in which information about the maps is conveyed to the public) since the first FHRMs, the extent of information available on flood hazard and risks on the main website[2] has increased since the first FHRMs. For example: different sources/studies have been used to create the flood maps, and there are different layers that show hazards from different flood sources and flood probability scenarios. In addition to the online GIS-based maps, downloadable PDF maps for 300 "significantly at risk" communities are available[3], and these PDF maps show information on both risk hazard (flood extent, flood depth, water level, and total water flow) and flood risk (e.g. inhabitants potentially affected, economic activities at risk). Similarly, the available features in the main website have also increased. For example, a weakness identified in the first FHRMs was that it is not possible to search for areas of interest. The main website now has this function. In the first FHRMs, it was deemed that labelling on climate scenarios was unclear. This has improved in the second FHRMs; climate scenarios are now clearly labelled as mid-range or high-end[4]. Additionally, on the online version of the maps, layers showing past flooding events are available, and other online maps related to flooding (e.g. drainage, flood plans, and coastal hazard maps) are also available.

In terms of changes in methodologies used to prepare flood hazard maps since the first FHRMs, for the first FHRMs, Ireland assessed hazard from pluvial floods but did not publish associated maps. For the second FHRMs maps for pluvial hazard for the Dublin City and the Raphoe APSFRs have been published as they have been identified as having significant risk from pluvial floods.

In terms of changes in methodologies used to prepare flood risk maps since the first FHRMs, additional potential adverse consequences were included in Ireland's second FHRMs that were previously not included in the first FHRMs. These are types of economic activities, location of IED installations and WFD protected areas.

[1] https://www.floodinfo.ie/
[2] www.floodinfo.ie
[3] Ireland subsequently clarified that for the second FHRMs, they are only reporting 199 APSFRs. The PDF maps cover a larger number of areas than the reported APSFRs for the second FHRMs, as these maps are generated for national use and are not limited to fulfilling reporting requirements of the Floods Directive.
[4] The "current" climate scenario used in the first cycle seems to have been replaced by a "present day" scenario which is assumed to be the baseline scenario shown in all maps (except for those showing the mid-range and high-end climate scenarios).

Climate change in the second FHRMs

The European Commission's assessment of Irelands first FHRMs[5] stated that flood maps have been produced under climate change scenarios; however, it does not state which flood sources have had maps produced. For the second FHRMs, the climate change scenarios were applied to fluvial flooding (under the CFRAM programme and the National Indicative Fluvial Mapping) and to coastal flooding (under the National Coastal Flood Hazard Maps and the CFRAM programme). Similar to the first FHRMs, the source(s) of information used to (qualitatively) define the flood parameters under the climate change scenarios were not explicitly mentioned.

1.2 Flood risk management plans

Objectives and measures

Ireland did not develop new or updated second FRMPs, instead publishing a review of the FRMPs in December 2021 ('2021 Review'). The 2021 Review[6] is not a new plan in itself. The 2021 Review sets out an overall objective, 15 detailed objectives and 18 sub-objectives at national level. The objectives are tailored to local conditions through a weighting system applied to each measure. These objectives have not changed since Ireland's first FRMPs. The common overall objective calls for a reduction of the potential consequences of flooding. The overall objective refers to managing and reducing consequences of flooding for human health; to managing and reducing consequences of flooding for economic activity; to managing and reducing consequences of flooding for the environment; and to managing and reducing consequences of flooding for cultural heritage. Beyond the overall objective, one objective refers to minimising risk to human health and life. One objective refers to minimising economic risk (and others to minimising risk to transport infrastructure, utility infrastructure and agriculture). More detailed objectives concern potential adverse consequences to specific environmental components, such as damage to flora and fauna. One more detailed objective refers to avoiding damage to cultural heritage. Ireland reported 601 measures. These measures cover three of the four aspects of flood risk management: protection, prevention, and preparedness. Recovery and review measures fall under preparedness measures in the Irish reporting to EIONET, and the 2021 Review refers to a preparedness pillar that includes recovery and review. Ireland's reporting to EIONET categorises all measures as either very high or high priority The 2021 Review does not set out the methods used to prioritise measures and only briefly mentions prioritising structural measures. The 2021 Review includes an assessment of progress. The description of progress on national measures in the 2021 Review does not draw a conclusion on the status of progress – it is not clear whether these measures are completed or not. On the other hand, the community-level measures have clear progress status.

The 2021 Review does not detail the assessment of economic costs and benefits. Costs are provided for some schemes (groups of measures) but not for all measures. The Review refers to CBA for some potential measures and its use for flood relief measures under a different document, the Climate Change Sectoral Adaptation Plan for Flood Risk Management (CCSAP). One of the 15 specific objectives refers to the WFD's objectives. Ireland's reporting and the 2021 Review indicate the actions taken to address WFD objectives. Water retention is addressed through national-level measures, including sustainable urban drainage. Local authorities are encouraged to use natural water retention measures in local urban planning. A multi-agency working group promotes the use of nature-based

[5] https://circabc.europa.eu/ui/group/9ab5926d-bed4-4322-9aa7-9964bbe8312d/library/59099982-97cc-4a02-afec-46e4def92dfa/details

[6] https://www.gov.ie/en/publication/bab83-review-of-the-flood-risk-management-plans-frmps-2021/

solutions for flood risk management. Flood-related objectives include supporting the objectives of the Habitats Directive and avoiding damage to (and, where possible, enhancing) flora and fauna. Sub-objectives include avoiding damage and enhancing Natura 2000 areas and maintaining/improving conditions that allow upstream migration for fish species.

Ireland reports 190 prevention measures (out of 601 measures); 269 protection measures (the 2021 Review lists structural flood protection measures, primarily community/local measures); and 113 preparedness measures. The 2021 Review sets out non-structural flood risk prevention and preparedness measures, including measures for flood forecasting and warning systems. Measures for spatial planning and land use are detailed in the 2021 Review: these call on local authorities to address flood risks in their spatial planning. The 2021 Review presents the same objectives as those set out in the first FRMPs. The objectives do not include quantitative targets. The 2021 Review sets out the contribution of measures to the objectives of the FRMPs[7]. Neither the 2021 Review nor the first FRMPs tie specific measures to objectives, and thus it cannot be considered that the 2021 Review sets out the progress towards the objectives. Ireland reported the same measures in its 2022 reporting to EIONET as in 2018. Several minor changes appear to be administrative rather than changes to the measures themselves – the 2021 Review makes it clear that no new measures are necessary. The 2021 Review also does not provide further information on the methods used to prioritise measures (although it is clear in both the FRMP and the 2022 reporting to EIONET that measures have undergone some prioritisation). The 2021 Review provides a brief description of activities undertaken since the 2018 reporting to EIONET for the measures set out in the first FRMPs, though it does not explain what needs to be done before each measure can be considered complete. It also appears that the community-level measures have (for the most part) progress status. Several measures are being subject to SVRs[8], however, it appears that 58 schemes recommended by the first FRMPs have not yet commenced, and it is not clear when they will start (although they are planned to be underway before 2030, capacity shortages are hinted at in the 2021 Review)[9]. In its 2022 reporting in EIONET, Ireland listed the priority of each measure, using only two of the five categories defined at EU level: all measures were reported as having a 'very high' or 'high' priority (i.e. no measures were reported as critical, moderate, or low priority). The majority of measures, 436 of the 601 (73 %) were reported as high priority and the remaining 165 (27 %) were reported as very high priority. The distribution across UoMs was fairly similar, with 63 % of measures in the Northwestern UoM (IEGBNIIENW) reported as high priority (22 measures), compared to 68 % of measures in the Neagh Bann UoM (IEGBNIIENB) (15 measures) and 73 % in the Republic of Ireland UoM (IEROI) (399 measures). Protection measures had the largest share of very high priority measures, at 39 % (106 measures), compared to 17 % of prevention measures (33 measures), 22 % of preparedness measures (25 measures), and 4 % of 'other' measures (1 measure).

Governance

The Review states that it was not considered appropriate to undertake public consultations (beyond stakeholder consultations) for the 2021 review of the FRMPs, given that extensive public consultations took place for the first FRMPs and the more recent Climate Change Sectoral Adaptation Plan. It notes that no additional measures or changes to the first FRMPs have been proposed in light of the 2021 Review, and the Review is limited to reporting on implementation progress rather than

[7] 2021 Review, section 5.7.
[8] Scheme viability reviews (SVRs), which aim to determine whether or not a potential flood scheme should be taken to project stage.
[9] 2021 Review, p. 33.

setting out any new proposals[10]. The 2021 Review of the FRMP refers to ongoing coordination with Northern Ireland.

Consideration of climate change

Since the first FRMPs (2018), Ireland has published its CCSAP for flood risk management, which represents progress in considering the impacts of climate change on flooding. The 2021 Review indicates that the CCSAP includes further actions to support non-structural measures, such as enhancing knowledge and training of local authorities, with spatial planning and NWRMs clearly set out in the objectives of the CCSAP. One objective of the FRMP refers to future flood risk and the potential impacts of climate change. The 2021 Review refers to links with plans for climate adaption, such as the CCSAP, and briefly describes the expected impacts of climate change. It indicates that, as part of the 2021 Review, the measures were assessed in terms of climate impacts and coherence with new adaptation policy documents at local and national level. The 2021 Review indicates that existing flood measures were assessed for coherence with Ireland's CCSAP. Additionally, it appears that some national measures (non-infrastructure measures applicable to all areas) have a significant climate change component. While the main sources of flooding were not expected to change, climate change is likely to have a considerable impact on flood risk in Ireland through rising mean sea levels, increased wave action, and potential increases in winter rainfall and intense rainfall events. Land use change, such as new housing and other developments, could also increase potential future flood risk.

Progress identified in the second FRMPs

The 2021 Review now includes a clear description of how the first PFRAs were used in the development of the FHRMs and FRMPs. Also, it describes how the results of the second PFRA were used in the second FHRMs and the 2021 Review. It also appears that the community-level measures have (for the most part) been confirmed and developed. The 2021 Review refers to a review of the approach to project appraisal undertaken in 2021, which recommended expanding the range of potential benefits to better capture indirect and/or intangible environmental, cultural heritage and societal benefits, addressing the recommendation made concerning the first FRMPs. The 2021 Review indicates that existing flood measures were assessed for coherence with Ireland's Climate Change Sectoral Adaptation Plan for Flood Risk Management (CCSAP). Since the first FRMPs (2018), Ireland has published its CCSAP for flood risk management, which represents significant progress in considering the impacts of climate change on flooding and flood risk. The 2021 Review indicates that the CCSAP includes further actions to support non-structural measures, such as enhancing knowledge and training of local authorities, with spatial planning and NWRM clearly set out in the objectives of the CCSAP.

[10] 2021 Review, p. ii.

2. FD recommendations

Based on the reported information and the FHRMs and FRMPs assessed and in addition to the progress already achieved, Ireland should:

- discuss APSFRs with more clarity throughout the products of the flood risk management cycle;
- add also maps to the online map viewer since information on flood risk that is only available in the CFRAM PDF;
- make available Information on cultural heritage in the online map viewer;
- provide details in the FRMP on how the FHRM was used in the choice of objectives and measures;
- make the objectives of the FRMPs measurable and where possible linked to quantitative indicators and be timebound. An assessment of the progress made towards the achievement of the objectives should be included in the FRMP;
- provide information in the FRMP on the overall cost of measures;
- provide in the FRMP information on the methods used to prioritise measures;
- link in the FRMP the structural and non-structural measures to the objectives;
- set out a clear overview of the use of Cost Benefits Analysis the methodology behind it in the plan;
- when reviewing the FRMP, if a decision to not revise the FRMP appears likely, the draft findings and conclusions of the review should be the subject of a public consultation and the result of it incorporated in the review.