

An Insecure Ireland ?

A review of National Risk Assessment practice in Ireland

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1. Introduction

1.1 We live in a country that has had to confront few of the challenges routinely faced by our neighbours, near or far. Our climate and weather is by and large benign, missing the extremes experienced by countries such as Philippines or Haiti. Our geology is relatively stable, lacking the unpredictable tremors and eruptions of countries such as Chile, Japan, or even Italy. Our coastal communities generally only face the predictability of tides and winter gales.

1.2 Nor have we been exposed to any of the man-made catastrophes arising from war and conflict, or the poorly understood risks and complexities of modern technologies and industries. We have watched and responded to such events at some remove, whether in the Middle East or Africa, or we have been blessed to learn from, rather than endure, at first hand, technological mishaps such as Flixborough (1974), Seveso (1976), Bhopal (1984), Chernobyl (1986) or Fukushima (2011).

1.3 Does that presume that we are forever protected? The Great Famine of the mid-1840's is the one disaster event that is marked on our national memory. While the period itself left its immediate mark over seven generations ago, its political, social and economic consequences endured into our lifetimes, evidenced most clearly in census data that captured a catastrophic depopulation that changed and channeled the history of our country. But there are other events not so well known. The seismic event that devastated Lisbon in 1755, generated tsunamis that damaged communities in Kinsale, Baltimore, and Galway. These were recorded, but for other communities, such events and their consequences became 'localised' - censored by poor communications, restricted by lack of roads and access, and unresolved through lack of then local Irish institutional capacity and knowledge.

1.4 This last point raises the question of whether the world seems more prone to disaster events, or are we just better and more immediately informed. All-day news coverage and electronic media in general share responsibility of dramatising and personalising our immediate engagement. The latest 'news' can focus and foment not so rational fears, on issues as diverse as air travel, child protection, medicine or migration. UN records show no clear trend of increasing

numbers of disaster events¹, but since 1980, there is a clear and increasing trend in the global value of the economic damage that occurs. Can a community really plan to insulate itself from a cascade of consequences, or does the complexity and interconnectedness of modern society mean that, in the absence of absolutes, we live with, plan for, and manage the uncertainties and risk of disaster events and their consequences? That debate captures, at least in outline, the transition from concepts of major incident or 'crisis' management to that of a 'risk society'² that manifests in such seemingly unconnected issues as workplace health and safety, environment protection, road safety, or business management. If business activity, and economic development, dislike uncertainty, it is reasonable to demonstrate that a society has in place the skills and arrangements to minimise that uncertainty and risk.

The purpose of this paper is to examine the how risk-based approaches generally, are supplanting a more traditional approach to incident management for the complexities of a modern society, and to see to what extent Ireland is keeping pace with this evolution.

2. Evolving Global Frameworks...

2.1 The international approach to disaster reduction has been led by the United Nations. Several stages of developing of a global approach arose from decisions of the UN General Assembly, and resulted in the International Decade for Natural Disaster Reduction (1990 - 1999). The initiative prioritised researching the complexities of the Southern Ocean Oscillation (El Nino) as a source of natural disasters (1997). The period also coincided with the emergence of disaster risk reduction from being a narrow technical discipline, to a more broadly based concept linked to sustainable development, and later, to climate change.

2.2 From that decade's work, the General Assembly established a permanent secretariat for the International Strategy for Disaster Reduction³ as its global coordinating platform. It sought to build on previous work, confirming a common language and terminology, around terms such as

¹ http://www.unisdr.org/files/47804_2015disastertrendsinfographic.pdf

² "...a systematic way of dealing with hazards and uncertainties (for a society) induced and introduced by modernisation itself..."
Ulrich Beck

³ (ISDR 1999) (United Nations Office for Disaster Risk Reduction)*, www.unisdr.org

'hazard', 'resilience'⁴, and 'disaster', as implying those caused by hazards of natural origin and related environmental and technological hazards and risks only. Significantly, this omitted disasters arising from human activity, or the concept of slow-onset disasters.

2.3 UNISDR is the UN organisation tasked with promoting disaster mitigation through better governance and disaster risk reduction worldwide. Its core areas of work include "...ensuring disaster risk reduction (DRR) is applied to climate change adaptation, increasing investments for DRR, building disaster-resilient cities, schools and hospitals, and strengthening the international system for DRR". One of its early major tasks, assigned by the General Assembly, was to organise and convene a first World Conference on Disaster Reduction.

2.4 **Hyogo Framework.** Building on previous global efforts, UNISDR convened the conference Kobe, Japan. Its objective was to achieve a "...substantial reduction of disaster losses, in lives and in social, economic, and environmental assets of communities and countries." The intention was to provide a comprehensive basis for action, ranging from strengthening governance, institutional and legislative frameworks, to community involvement in mitigating strategies and actions. It challenged member states and regional groupings with a set of ambitious tasks for building resilience, including baseline assessments of capabilities; establishing national coordination mechanisms; and establishing systems for cost benefit analysis, and ongoing monitoring and assessment of vulnerability and risk. These sought to address issues around building the resilience of nations and communities to resist disasters. It is worth noting that the proceedings focused on disasters of natural origin and related to environmental and technological risks and hazards. The outcome - known as the 'Hyogo Framework for Action (HFA)'⁵ - laid out a five-point strategy for the period 2005 - 2015 to make disaster reduction and building the resilience of nations a policy priority. It involved participating states submitting plans and interim progress reports on their activities over the 10 year period to implement the HFA.

⁴ Hazard: "A potentially damaging physical event, phenomenon or human activity that may cause the loss of life or injury, property damage, social and economic disruption or environmental degradation. Hazards can include latent conditions that may represent future threats and can have different origins: natural (geological, hydrometeorological and biological) or induced by human processes (environmental degradation and technological hazards).

Resilience: "The ability of a system, community or society exposed to hazards to resist, absorb, accommodate to and recover from the effects of a hazard in a timely and efficient manner, including through the preservation and restoration of its essential basic structures and functions", United Nations Office for Disaster Risk Reduction (UNISDR), "2009 UNISDR Terminology on Disaster Risk Reduction", Geneva, May 2009 (<http://www.unisdr.org/we/inform/terminology>).

⁵ http://www.unisdr.org/files/1037_hyogoframeworkforactionenglish.pdf

2.5 Ireland was not an active participant in this process. In Europe, the Commission led the process for a wider European region. Its closing report in 2015⁶ noted Ireland as one of five countries, including Belgium, Luxembourg, Estonia and Ukraine that did not actively participate in regional structures or approaches in implementing the HFA (although Dublin did participate in its 'Making Cities Resilient' campaign). That report made recommendations for building resilience at national level, including integrating disaster risk reduction into sectoral and development plans, to ensure a comprehensive approach; engaging private sector interests - for example, strategic industry sectors; collating and using risk and hazard data; developing disaster loss data-bases as a basis for assessing investment into disaster risk reduction activities, relative to social and financial returns; and more intense investment in modernising early warning systems and communications technologies, and public education campaigns. All of these are recognised as elements of an effective risk reduction/mitigation program, but appear largely absent from the evolving arrangements in Ireland.

2.6 While UNISDR's role was initially concerned with 'natural disasters', there are other crises and disasters that are man-made, or arise as a direct consequence of human activities. For example, the UN World Food Program has long highlighted that famine and other humanitarian disasters are often a direct consequence of conflict. Following the devastation of Super-Typhoon Yolanda/Haiyan in November 2013, the UN Secretary General, Mr. Ban Ki Moon, observed that "*...we must stop calling these natural disasters; many extreme events arise from global climate change, and that is man-made...*". This recognised an emerging 'all-hazard' approach, in which the focus was not on differentiating and managing a crisis incident itself, but on managing the common consequences or impacts that can arise from any category of crisis or disaster.

2.7 **Sendai Framework.**⁷ The UN final report from the Hyogo process recognised the progress made and work remaining to be done in this area. The world conference was reconvened in Sendai, Japan in 2015 and published a successor framework, building on the outcome from Hyogo. It sets ambitious targets, for example, to reduce global disaster mortality, economic losses and damage to critical infrastructure. It includes four priority actions, each with multiple subsidiary actions, related to understanding disaster risk, strengthening disaster risk governance, investing in

⁶ *Implementing the Hyogo Framework for Action in Europe: Advances and Challenges 2005-2015*

⁷ http://www.preventionweb.net/files/43291_sendaiframeworkfordrren.pdf

resilience and strengthening preparedness, recovery and reconstruction. Each of these priority actions is linked to the need for robust risk assessment tools and risk management approaches within local, national and regional institutions.

2.8 Apart from mobilising its member states, the UN system recognises the crucial role of integrated and coherent policy responses. All UN organisations, including its 'front line' agencies for humanitarian response, have agreed to mainstream the Sendai framework into their own work linked to Sustainable Development⁸. ("Towards a Risk-informed and Integrated Approach to Sustainable Development"). The plan of action hinges on three key commitments, each with its own set of multiple and time bound actions, and in many ways, reflecting the tasks set for member states;

- Strengthening UN system-wide coherence in support of the framework, through a risk-informed and integrated approach.
- Building UN system capacity to deliver coordinated, high-quality support on disaster risk reduction.
- Keeping disaster risk reduction as a strategic priority for all 28 UN organisations.

2.9 The first two commitments recognise the critical role that risk assessments play in achieving coherence across different policy themes for effective outcomes. This focus on risk assessments is extended under the second commitment that advocates for the development of national risk-based approaches to disaster mitigation and risk reduction. At the same time, the strategy seeks to 'lead by example', requiring agencies to develop risk assessments at organisational and inter-organisational levels.

2.10 In this phase of international action, Ireland has taken a more active and assertive role, and has linked disaster risk reduction with a policy priority around food security in development assistance. Its opening statement to the world conference noted the importance of a coherent and coordinated approach. *"A common international approach is more effective than separate national approaches. Disasters do not respect borders. (...) It is our responsibility as Member States to ensure mutually reinforcing and coherent outcomes to maximise synergies across the key sustainable development, financing, climate and humanitarian processes being negotiated this*

⁸ http://www.preventionweb.net/files/49076_unplanofaction.pdf

year. Ireland, as co-facilitator of the Post-2015 Development Agenda negotiations, looks forward to continued cooperation with all parties, in order to agree an ambitious, transformative and coherent outcome in New York this September.

All of these processes address underlying risks and require action at national level. With limited resources at country level, a coherent set of targets and indicators will facilitate balanced and effective decision making.⁹

The text of the address goes on to outline Irelands "whole of government, multi-hazard" national approach; it will be worth reviewing to what extent this is actually the case under national and local arrangements.

2.11 In response to the Sendai Framework, the European Commission published a staff working document in June 2016¹⁰, which prompts the development of a disaster risk-informed approach to all EU policies, both within and outside Community borders. Building on the four priorities, the working document highlights existing coordination activities under EU legislation and practice, including member state multi-hazard risk assessments under the Civil Protection Mechanism (CPM)¹¹, and specific requirements under Directives with regard to floods, major accident hazards and critical infrastructure. In particular, the activities listed for implementation includes specifically linking disaster risk management and climate change adaption with urban policies and biodiversity strategies.

3. EU approach to Disaster Risk Reduction.

3.1 Many regional organisations, including the OECD, have engaged with this issue. However, the European Union is acknowledged by government departments as the most significant and most direct influence on public policy in Ireland. Irelands foreign policy notes "*The European Union is fundamental to Ireland's future.(and) remains central to our long-term economic stability and growth*".¹² Relatively, the EU is a latecomer to the debate on disaster risk reduction. Its engagement is seen as beginning in 1985, following a meeting of Environment Ministers at which it was agreed to investigate a community role for improving the collective response to natural disasters and civil protection. Initially conceived as a forum for liaison and cooperation between

⁹ *Third World Conference on Disaster Risk Reduction, Sendai, Japan, 17th March 2015 – Statement by Ireland*

¹⁰ *SWD (2016) 205 final – Commission Staff Working Document, Action Plan on the Sendai Framework for Disaster Risk Reduction 2015-2030*

¹¹ *Decision 1313/2013/EU of the European Parliament and of the Council on a Union Civil Protection Mechanism*

¹² *The Global Island - Irelands Foreign Policy for a Changing World, 2015 - p.8*

national experts, it stressed the need to improve member states capacity in the face of natural or technological disasters. The CPM was only established in 2001, developing previous practices and links into a more formal framework for cooperation, and promoting a coordinating network among existing national civil protection authorities. That focus was on existing structures, rather than on potential events, and may offer some insight into the way in which subsequent European policy, with its focus on integration, has evolved while attempting to accommodate disparate perspectives in member states.

3.2 The Lisbon Treaty (2009) recognised the EU Civil Protection in the full formality of a treaty-based activity¹³ as a shared competence between the EU and member states, but it is argued that it subtly shifted power to the Commission. To improve synergies between internal and external actions, the policy areas of humanitarian aid and civil protection were merged under a then new 'Directorate-General for European Civil Protection and Humanitarian Aid Operations', while retaining the former acronym DG ECHO (European Community Humanitarian Aid Office). It was this directorate that led the wider European engagement with the Hyogo framework, as referred to above. In 2013, the commission published a new Civil Protection Mechanism, formalising external actions and linking to the wider task of promoting peace and civil security beyond EU borders.

3.3 At this point it is worth highlighting what appear to be key divergences that begin between the UN concepts of Disaster Risk Reduction/mitigation and a European concept of Civil Protection. It is notable that there is no formal EU definition of 'civil protection'. A European Council decision of 2013 notes that civil protection shall "*...cover primarily people, but also the environment and property, including cultural heritage, against all kinds of natural and man-made disasters, including environmental disasters, marine pollution, and acute health emergencies occurring inside or outside the Union*"¹⁴. Indeed, several EU member states and academic studies, interchange the terms 'civil protection' and 'civil security'. This gives rise to some tensions in the blurring of distinctions, while at the same time, members states may note no differentiation between events arising "*on all fronts*" (France), or an ability of a society "*to handle antagonistic and non-antagonistic threats*" (Sweden) posing a significant impact to the functioning of that society. This begins to offer a broader concept of potential 'disaster' than that envisaged originally by the

¹³ Treaty on the Functioning of the European Union, (TFEU) Art 196.

¹⁴ Council Decision 1313/2013/EU OJEU

UNISDR, but still the debate highlights and promotes a risk-based approach, and concepts of risk management, governance and resilience.

3.4 The interchangeable language of protection and security is reflected in the EU Internal Security Strategy (ISS)¹⁵, which incorporated actions to risk assess and build resilience to crises and man-made disasters with the Unions wider internal security. The ISS noted national responsibilities, and defined 'threats' to society and its five objectives in terms of disrupting international crime networks; preventing terrorism and radicalisation; reinforcing cyber security; strengthening border management and increasing Europe's resilience to crises and disasters. The proposed actions under this last point include:

- Making full use of the solidarity clause;
- Preparing an all-hazards approach to threat and risk assessment, and establishing a risk management policy and publishing guidelines for the development of common approach to national risk assessments;
- Linking and unifying 'operation centres' used by various Directorates within the Commission, and
- Developing a standing emergency response capacity.

3.5 In the intervening period, the solidarity clause of the ISS has been activated for civil protection relatively frequently, for example, as a response to wide area wildfires across southern Europe. For example, in August this year, in the face of predicted extreme temperatures and unfavourable weather patterns, Portugal requested support to fight wide area wildfires. The EU and member states deployed fire-fighting aircraft as part of its assistance, reinforcing local capacities.

4. Risk Assessments in practice.

"Risk assessments deal with uncertainties and probabilities... Risk assessments (...) are the central components of a more general system."

Christos Stylianides, EU Commissioner, Humanitarian Aid and Crisis Management

¹⁵ *Internal Security Strategy for the European Union, Towards a European Security Model, 2010*

4.1 Following from the publication of the ISS, the Commission published a 'staff working paper'¹⁶ setting out guidelines in relation to risk Assessment and Mapping Guidelines for Disaster Management. The purpose of the guidelines is "*...to improve coherence and consistency among risk assessments undertaken in Member States ...in the planning, prevention and preparedness stages...*". They are based on a multi-hazard and multi-risk approach for all natural and man-made hazards, but exclude threat assessments in relation to conflicts and terrorism. The guidelines draw on, and make reference, to an existing body of legislation and guidance at community level addressing floods, COMAH, critical infrastructure, water management and wildfires. It also sought to establish consistency with international bodies and publications of the International Standards Organisation (ISO), as well as a common terminology and a shared understanding of concepts, proposing definitions of terms in relation to hazards and threat, exposure and vulnerability, impacts and consequences, and risk and resilience. In short, they provide a solid 'blueprint' for risk assessments, and outlined much of the technical and background research.

4.2 Several international organisations, including UNISDR¹⁷, have an established practice of publishing annual reviews of global risk assessments, and they share both good information on global trends, and good practice on the detail and information that should be contained to better communicate and inform. For example, the UN University, Tokyo, with partners in Germany, have produced a 6th annual edition of their 'World Risk Report 2016'¹⁸. Their approach has been to focus on specific themes highlighted through real disaster events. The current edition examines how logistics capacity and infrastructure - key issues for humanitarian relief organisations and operations - may hinder or help disaster response, and may themselves pose a threat to vulnerable communities. Previous editions have focused on topics such as food security, urban environment, both of relevance to Ireland. The reports identify and assess issues of vulnerability and exposure, based on multiple characteristics, and develop a 'world risk index' for every country. As expected, developing countries rank among the most vulnerable. Ireland's risk index is relatively low (112, as against that of Italy, 119), because of the assessed quality of its logistics and infrastructure, but it ranks high in exposure to extreme weather events and sea level rise.

¹⁶ Commission Staff Working Paper, *Risk Assessment and Mapping Guidelines for Disaster management – SEC(2010) 1626 final*

¹⁷ GAR - *Global Assessment Reports, UNISDR*. - <http://www.preventionweb.net/english/hyogo/gar/2015/en/home/>

¹⁸ *World Risk Report 2016, Focus: Logistics and Infrastructure. UNU-EHS*

4.3 The World Economic Forum has produced an 11th edition of its 'Global Risk Report'.¹⁹ Its categorises hazards or threats under five generic categories, by likelihood and impact (risk), but goes onto propose its more detailed analysis, linking risks to emerging trends, examining the interconnectedness which can contribute to a cascade of crises, within a country or across a region. It draws on surveys of its membership of business entities and companies with global reach, and sets out a detailed methodology based on expert and very technical analysis and review.

4.4 Its 'deep dive' into five key global risks examines the issues of unemployment, energy security, the poor national governance, asset bubbles and cyber attacks is useful, and each of these hold resonance for Ireland, albeit some more pointedly than others. But it is an important 'caveat' that these are identified by business as risks to business, and do not necessarily reflect risks that may confront states or societies. For Europe, its assessment of the three key risks for 2016 to be large-scale involuntary migration, fiscal crisis and unemployment intuitively ring true. But it is powerful in its address to wider societal issues, linking disempowerment of citizens, the nexus of technology and information, and social instability. It is matched by the WEF report on 'Resilience Insights'²⁰, which addresses building resilience around three issues; resilience to water crises, large scale involuntary migration and to large scale cyber attacks.

4.5 The Global Risk Report series represents a solid starting point from which to distill key drivers and influences on a national risk assessment. It sets a useful standard, and should be comprehensive reading for those tasked with preparing a national risk assessment. But this should be reinforced by reviewing the approaches taken by a number of European member states that share common characteristics with Ireland.

5. Civil Protection and Risk Management in Ireland

5.1 Irelands response to issues of civil protection and risk management in Ireland has progressed significantly in recent years, but displays the strengths and weaknesses of a work in progress. The establishment of the National Steering Group, supported by the National Directorate for Fire and Emergency Management in the Department of Housing, Planning, Community and

¹⁹ *Global Risk Report 2016, World Economic Forum, January 2016*

²⁰ *Resilience Insights, World Economic Forum, Global Agenda Council on Risk & Resilience, January 2016*

Local Government; and the Office of Emergency Planning (OEP), within the Department of Defence, led to the development of the current Major Emergency Management Framework²¹ and a substantial body of associated documentation and procedures. Of particular note is the framework's definitions of terminology and good practice for risk assessment and management, and which stakeholders at national level appear to be largely overlooked.

5.2 Challenges remain. Almost uniquely in Europe, civil protection in Ireland lacks a fundamental in legislation, albeit there is a commitment to address this issue in the future²². Its disaggregated structures, multiple 'lead agencies', and arrangements to cope with a diverse set of 'major emergencies', leave civil protection efforts vulnerable to difficulties in coordination in the face of real challenges. One aspect has been tested, in relation to flooding events during winter 2015/2016, but hardly under circumstances which would support a description as 'well tried lead government department concept'²³. The lack of a shared understanding and priority relating to societal risks was recognised by the OEP, in its first National Risk Assessment (NRA) in 2012. The purpose of their publication was to provide an overarching national basis for risk mitigation. The OEP noted that this included identifying hazards and all types of risks, establishing priorities that will facilitate cross-sector coordination, and ensuring compliance with EU requirements.

5.3 The publication was based on the national guidance documents under the Major Emergency Management Framework and their agreed terminology, and provided an overview of the methodology used in its preparation. It grouped its identified hazards under headings of Natural, Transportation, Technological, and Civil Hazards. Understandably, it was influenced by many of the then recent events and national experiences, listing severe winter weather, flooding, animal disease and the effects of volcanic ash on air travel. Many of the other hazards identified were quite generic, and some quite typical of the challenges faced at local level.

5.4 In general, that first NRA does not appear to have taken account of, or share the terminology of the EU Guidelines, nor did it reference other assessments of global risks. However, it did provide a reasonable basis for further strengthening and development. Much of the narrative was quite general with limited efforts to quantify hazards, probabilities and consequential risks and

²¹ www.mem.ie/wp-content/uploads/2015/05/A-Framework-For-Major-Emergency-Management.pdf

²² *White Paper on Defence, August 2015, p104*

²³ *White Paper on Defence, August 2015, p41*

priorities. While it did identify lead departments for several issues, it imparted limited confidence that the issues raised were shared as a priority concern. Interestingly, it did not identify any risk related to the then current banking and financial crises in Ireland and across Europe, and that would lead to societal risks arising from banking systems being shut down in Cyprus (2013) and Greece (2015).

6. A National Risk Assessment

6.1 The latter three editions (2014 - 2016) were published under the aegis of the Department of the Taoiseach, and follow a consistent format. The 2014 edition noted that it built on the earlier work of the OEP, but that the primary driver for publication was stated as being part of Dáil Reform, and alongside a number of other documents including the Stability Program Update, was to be presented to the European Commission without specifically referencing the CPM. Civil protection requirements are referenced only as a secondary issue in the body of the text, and the text makes no reference to the European Guidelines. While referencing the five generic categories of global risk identified in the WEF Global Risk Report for that year, it did not appear to take account of other background documentation. Crucially, there does not appear to be a context of agreed terminology, as established in the Framework for Emergency Management and this gives rise to some difficulties in understanding and interpretation.

6.2 The introduction to the 2014 edition notes the need for open and challenging discussion, and is described as being "*...part of the response to failures of the past to identify and address risks beyond a short time horizon.*" It provides an analysis of the circumstances then facing Ireland, and outlines a consultative effort to engage both expertise and public comment. In its description of issues, it did not provide detail or analysis, assessments of likelihood or impact, and conveyed little sense of priority or which arm(s) of government held responsibility.

6.3 Public consultation was limited. Nevertheless, a consultative forum was organized to include invitations to academia and other expertise, and which sought contributions in relation to trends, risks, and prioritisation. An invitation for submissions received over 30 written submissions from groups and individuals²⁴. These included significant bodies such as the International

²⁴ http://www.taoiseach.gov.ie/eng/Publications/Publications_2014/

Monetary Fund, the Institute of Public Administration (IPA), the then Radiological Protection Institute of Ireland (RPII) and the Competitiveness Council; from state companies such as Dublin Airport and C.I.E.; and from representative organisations and individuals. While many of the submissions could be described as solid policy advocacy on issues of business, environment, or social justice, many identify less a threat or hazard, and more the reasonable concerns around the need for a particular national policy or strategy.

6.4 A number of submissions from private sector companies offered good insights and highlighted expertise. The IPA highlighted the importance of governance structures for cross cutting issues, pointing to vulnerabilities. The text of the IMF submission posed questions whether some of the issues identified should be considered risks, rather than being the collateral consequences of public policy decisions. It is not clear from the process and subsequent publications to what extent the full value of some of these submissions has been taken into account.

6.5 The later editions followed a similar format, and including revisions in respect of threats that became more imminent. The introduction to the report outlines a consistent approach to purpose and limitations. It notes "*The objective is to identify strategic risks that may arise due to potential changes in the economic, financial, geo-political, technological and social environments. ... (it) is not intended to replicate or displace the detailed risk management that is already conducted within Government Departments and Agencies, or the work of the Office of Emergency Planning. Rather it aims to provide a systemic overview of strategic risks facing the country.*"

6.6 At face value, this appears a reasonable statement, but may suggest a potential dilemma that undermines its purpose. If its purpose is not stated as explicitly creating an overarching and coordinating frame of national risks and priorities, then to what extent will it sufficiently influence subsidiary departments and agencies, or provide government, local or national, with a coherent basis for action, or to monitor performance and progress, or even to raise public awareness and promote informed public discussion? Departments and agencies are expected to carry out detailed risk assessments on issues within their responsibilities. But a 'whole-of-government, multi-hazard approach' that's seek to challenge and confirm the coherence of this work, has to be based on a set of overarching national priorities around risks, ownership and proposed mitigations. The NRA notes the critique that Irelands recent national economic difficulties arose from

insufficient self-questioning. That danger may re-emerge here, in an apparent 'light touch' risk assessment.

7. Coherence

7.1 The need for a "whole of government, all-hazards approach" has been acknowledged, and official statements have advised that this exists. But does the evidence support the assertion? An examination of the respective 'Statements of Strategy' for the period 2015-2017, and associated documents at department/agency level, would be expected to reflect and refer to an overarching national risk assessment, at least in framing an analysis of operating environments, and even reaching to the priority actions that may be required in response to issues raised by the NRA.

7.2 The Department of Housing, Planning, Community and Local Government has been subject to a significant reorganisation and its statement of strategy is not updated, but its engagement with 'major emergencies' and risk management is clear, and has already been outlined. However, its major foundation document, published 2006, appears to acknowledge a divergence from EU policy, for reasons that are not specified. "*The preferred European terminology in this field is "Civil Protection". However, this document uses the term "Major Emergency Management" (MEM) as being the most appropriate for Irish circumstances*"²⁵. However, the Directorates later policy document "Keeping Communities Safe" (published 2013) seems to turn back on that position, noting that the roles for the various county-based Fire Services "*...extends beyond extinguishing fires, to response to a range of rescue situations, hazardous materials incidents and road traffic accidents, as well as emergency management and civil defence. ...In order to standardise and encompass this range the title 'Fire and Civil Protection Service' should be adopted by all fire services*"²⁶. It is not clear what policy rationale underpins the 'volte-face'.

7.3 A number of other departments and their subordinate agencies take clear account of the NRA. For example, both the Department of Defence, which host the Office of Emergency Planning, and the Defence Forces, make overt reference to the process in their Statement of Strategy. The White Paper on Defence 2015 also strongly references and draws on the NRA, the

²⁵ A Framework for Major Emergency Management (2006) section 1.8

²⁶ Keeping Communities Safe, A Framework for Fire Safety in Ireland - p.40

Framework for Major Emergency Management and national structures for incident management in Ireland, in building a background for a national policy and referencing it against commitments and guidance under the EU Civil Protection Mechanism. While the 'statement of strategy' for the Department of Foreign Affairs and Trade makes no direct reference to the NRA, Irelands foreign policy²⁷ captures a number of the issues raised by the NRA, noting that interstate violence, transnational crime and terrorism threaten human security and the stability of critical infrastructure. The Department of Communications, Climate Change and Environment also references the NRA, and has published, for example, a national energy policy²⁸ and a national Cyber Security strategy²⁹ which directly address issues identified in the NRA. The awareness and commitment are evident in both cases; however, critique is offered relating to the degree of reliance on private sector resources to manage national strategic interests.

7.4 In other surprising quarters, departments and respective agencies make no overt reference to the NRA, and display no equivalent level of awareness or commitment. For example, in respective Statements of Strategy and associated documentation, neither Departments of Public Expenditure and Reform; Health and Children and the Health Service Executive, nor Justice and Equality, and the Policing Plan 2016, appear to make any overt reference to the NRA.

8. Conclusion

8.1 The three editions of the National Risk Assessment over the years 2014 -2016 follow a consistent format. While the initial edition in 2014 can be regarded as a good start, there is no evidence of significant development of the NRA with each succeeding year. Clearly, there would be benefit in benchmarking against some of expertise demonstrated by other EU member states. Indeed, there is an argument that the relevance of the NRA is being diluted, notwithstanding the adjustments and improvements that that have been made over time.

8.2 The NRA suffers from a series of weaknesses, some of which have already been identified through consultation processes. A number of issues would be worth consideration in order to strengthen the NRA and its support to government.

²⁷ *The Global Island - Irelands Foreign Policy for a Changing World, 2015*

²⁸ *White Paper on Energy – Irelands Transition to a low carbon Energy Future 2015-2030 - Department of Communications, Climate Action and Environment.*

²⁹ *National Cyber Security Strategy (2015-2017) - Department of Communications, Climate Action and Environment*

- Particular elements of risk assessment are already well established. These are linked to European Directives, such as those dealing with flooding, industrial accidents, or money laundering and terrorist financing. They receive considerable attention by responsible government departments. Risk assessments and mapping are undertaken, consistent with a Europe-wide policy approach, but without apparent national coordination, as part of the NRA.
- Civil protection and emergency planning in Ireland, is poorly supported by overarching national legislation and procedures. Responsibilities at national level are fragmented across a range of stakeholders, each with a distinct culture and separate legal basis of operation, and, except in limited circumstances, are relatively unpracticed at interoperability and coordination.
- The more recent editions of the NRA (2015/2016) explicitly state that they are not intended to replicate or displace the detailed work that is already conducted within government departments. The creation of an explicit and overarching approach would reinforce coherence and provide a tool to promote a uniform approach, and to monitor priorities and progress. An overarching approach would help, for example, to establish and embed consistent baselines in terms of terminology, definitions, methodologies and results/outcomes. It is appropriate that such an overarching framework is established under the NRA, providing priority and direction for improved coordination across departments and agencies, and to reinforce the 'whole of government, multi-hazard approach'.
- The NRA lacks a context of agreed terminology, and this contributes to a sense of incomplete understanding of requirements and processes. What should be a process to identify hazards, and assess risk (considering likelihood and impact), is vulnerable to critique as merely a descriptive narrative, listing of general concerns. The NRA needs to be developed beyond this point.
- There is no publicly available or transparent system that reports on annual progress or commitments under the NRA, by departments or agencies. This could be achieved by embedding assigned responsibilities under the NRA into Business Plans, and reflecting them in Annual Reports.
- The 'risks' as listed in the NRA lack prioritisation, clear ownership, and follow-up actions, apart from identifying a number of 'lead role' departments. A number of issues are described in vague or indefinite terms, and the text does not give confidence that sufficient challenging thought has been given to external high level hazards/threats.

- If the identified 'risks' are tested against the definitions applied in the EU Guidelines, or even in terms of national MEM guidance documents, it would suggest that many would not conform to that definition. For example, issues such as housing concerns, expenditure expectations, competitiveness or 'monetary policy uncertainties' are policy issues of huge importance in their potential impact, but it is a moot point whether they should be seen as a "*dangerous phenomenon... that may cause loss of life...*" or even a "*phenomenon with the potential to cause direct harm...*"
- While the NRA 2014 edition highlights the need for open and challenging debate, and to avoid group-think or herding, the narrative and submissions by the IMF in that year, strengthen a sense that the NRA process, to date, is captured and dominated by the concerns arising from the economic collapse, to the detriment of other issues.
- The NRA's next iteration should raise consideration of additional or alternative hazards. It may be helpful, perhaps, to discriminate between those that may be existential, and those, while not existential, are sufficiently serious, with widespread impact, that may necessitate the activation of the 'solidarity clause'. An outcome from this might be a clearer outlining of the circumstances, responsibilities and arrangements that maybe needed to receive such support.
- NRA should extend to consider issues of societal or community vulnerability, adaptive capacities (resilience), and investments required, as these will markedly influence the priority that might be assigned.
- In its current form, the NRA appears to represent, not so much a deviation from European frameworks and guidance, but more a missed opportunity to take full account of the support and expertise that is available in a rapidly evolving arena. As the institutions of EU move to assert themselves in the aftermath of 'Brexit', it may be helpful to minimise those areas where Ireland is not fully aligned.
- Consideration should be given to additional or alternative hazards and scenarios to be addressed as part of the NRA process;
 - The Department of Foreign Affairs has highlighted that the EU is crucial to Irelands wellbeing. Any threat to the continued existence of the EU, for whatever reason, or a significant divergence from or dilution of its current values, may pose such a threat to Irelands well being as to be regarded as an 'existential threat'.

- Without engaging in specific military threat assessments, there is a need to consider the civil protection 'fallout' in the case of global, or more likely, regional conflict. Such an event may not involve Ireland directly, and may not even involve traditional military actions. There are scenarios that may impact on our ability to maintain daily life, and the well being of communities.
- The island of Ireland may face the threat of isolation through the severing of air and sea transportation for whatever reason, limiting the ability to export and import foodstuffs, energy, medicines and other vital materiel. The need to be self sufficient in all respects, even for limited periods of time, poses social and technological challenges for the state.
- The NRA lists food safety as an issue. However, 'food security' is recognised by international organisations and policy fora as a more direct and overarching threat that confronts all nations and communities. The loss of productivity is one threat, but conversely, a capacity for food production has been the source of communal and inter-state conflict, and one to which Ireland may become vulnerable.
- Threats arising from extreme environmental or natural events may be unlikely, or at least unknowable. Tsunami threats are judged to exist for Atlantic coasts of Europe, and these may well pose a threat to coastal communities over wide areas in Ireland. Such an event may raise concerns for issues of early warning, evacuations, temporary accommodations, and economic cost.
- Ireland has made progress in relation to providing mitigations in respect of particular hazards. However, an argument can be made that that is overly dependent on private sector capacities. If this is considered true, the failure of the private sector, or of its capacity to deliver poses a threat to the well being of the state.
- 'Risk' governance and decision-making has been highlighted during consultation stages of several iterations of the NRA process, and its importance is well acknowledged by the UN and EU among others^{30, 31}. This is not just an issue of institutional capacity or individual leadership, but includes the societal network of organizations, laws and regulations, and collective engagement by civil society, founded on a practice of good decision-making and trust in the management of day-to-day affairs. It is not achieved

³⁰ *Governance in Disaster Risk Management, Report N0.3, IRDR/ICoE 2014*

³¹ *European Commission SWD (2016) 205 final - Action Plan on the Sendai Framework for Disaster Risk Reduction 2015 - 2030*

overnight, and there is little evidence to assume that it already exists. It needs investment, training and a supportive culture.

8.3 PPAN, as a network, is uniquely placed to provide multi-disciplinary expertise, reinforced by strong experience, on this policy issue. The annual NRA cycle for 2017 will commence in the near future. PPAN should consider seeking an invitation to such a forum, as a means to providing early and strong guidance to strengthening future iterations of the NRA, and to reinforce that contribution with a substantial written submission to the consultative process.

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