



**EUROPEAN COMMISSION**  
Impact Assessment Board

Brussels,  
D(2012)

**Opinion**

**Title**                    **DG CLIMA - Impact Assessment on EU Strategy for adaptation to climate change**  
**(draft version of 10 October 2012)\***

**(A) Context**

The EU, its Member States and regions have put significant efforts in mitigation and adaptation to climate change over the last two decades. The 2009 White Paper on adaptation to climate change included 33 actions to be implemented by the end of 2012 and called for a comprehensive EU Adaptation Strategy to be adopted by 2013. Most actions announced in the White Paper have been, or are in the process of being implemented. Despite the efforts undertaken by governments and the private sector to increase adaptive capacities, uptake of adaptation in the EU is still facing important barriers. This report aims to identify such remaining barriers. The forthcoming Strategy will also consider how the EU can best promote adaptation action at sub-EU level and by the private sector.

**(B) Overall assessment**

**The report does not adequately inform decision making, in particular, on the need for a legislative proposal requiring national adaptation strategies by a certain date. It should be significantly improved in several important respects. Firstly, the report should clearly demonstrate that all the identified problems need to be addressed at the EU level, in particular regarding knowledge generation and private sector engagement. It should explain the main reasons and obstacles preventing some Member States from taking the necessary measures. Secondly, it should strengthen the baseline scenario by explaining in greater detail how evolving problems would differently affect Member States, regional and local actors, sectors and business capacities to adapt to climate change. Thirdly, the report should better formulate the objectives so that is possible to evaluate, based on specific progress indicators, the extent to which the actions foreseen in the EU Adaptation Strategy have generated the intended effects. Fourthly, the report should better present the options and explain how they will be implemented in practice. It should clearly differentiate new actions from those that are already implemented or planned. Finally, the report should provide a comprehensive and substantiated analysis of social, environmental and economic impacts, in particular, present a more consistent analysis of costs of each option. It should summarise the preferred option package for the EU Adaptation Strategy and indicate its combined impacts and related costs.**

**Given the nature of these recommendations, the Board asks DG CLIMA to submit a revised version of the report, on which it will issue a new opinion.**

\* Note that this opinion concerns a draft impact assessment report which may differ from the one adopted

### **(C) Main recommendations for improvements**

**(1) Improve the problem definition.** The report should be more specific on the differences among Member States, as well as regions and sectors, in terms of impacts of and vulnerability to climate change. These should be quantified where possible (adding references to the supporting studies). It should also clarify the main reasons for, and problems stemming from the fact that only a few Member States have developed adaptation strategies or plans. For instance by transparently explaining the underlying obstacles and barriers. The report should outline the main characteristics of these strategies/plans highlighting good practices or common shortcomings. It should also clarify if for any of the sectors (e.g. agriculture, tourism, energy) adaptation is more important than for others. The report should describe the problems and define their exact nature in a way that does not prejudice the possible solutions. Throughout the problem definition, the report should clearly demonstrate that all the identified problems need to be addressed at the EU level, in particular, with regards to knowledge generation and private sector engagement.

**(2) Strengthen the baseline scenario and the case for further EU action.** The report should be more specific on how the situation would evolve in the absence of further EU action on adaptation. For example, it should describe the significant gaps in knowledge generation and dissemination and explain how it would affect different Member States, regional or local actors, sectors or business capacities to adapt to climate change. The report should also provide concrete examples and evidence on how adaptation actions, that do not take place across all Member States at a similar pace, affect the EU internal market. It should describe more clearly the problems related to the infrastructure resilience and how they would evolve in the absence of further EU action. The baseline scenario should be complemented by factual evidence expressed in quantitative terms where possible. For example, it should give a better indication how serious the six identified problems are by providing figures on, for instance, the labour market in the most affected sectors and the extent and location of the areas affected (for example, outermost areas with extreme weather conditions). Where possible the report should highlight the costs of inaction on adaptation in the baseline scenario, comparing costs of action now with cost of inaction in the future.

**(3) Better formulate the objectives and clarify the corresponding monitoring and evaluation arrangements.** The report should define better the specific and operational objectives so that it would be possible to evaluate – based on realistic progress indicators – the extent to which policy intervention has generated the intended effects. It should elaborate how the data would be collected for the necessary monitoring indicators. The report should link the specific objectives more closely to the identified problem drivers, options and corresponding monitoring indicators. For example, it should explain why the problem of making infrastructure more resilient is addressed through the specific objective of capturing the potential of the market, while this seems to be driven by a lack of common guidelines to assess the climate resilience of infrastructure. The report should provide more information on the foreseen evaluation, particularly on its timing, scope and content.

**(4) Better present the policy options.** The report should better explain the rationale behind the construction of options (and option packages) and describe how the proposed changes would be implemented in practice. It should consistently show how the options differ from the status quo by clarifying which actions are already being implemented or planned, and which are complementary actions. The report should include options that address the identified problems concerning employment and broader social issues in adaptation, or clarify which of the options has the potential to do so, and explain how they can address these issues. The report should briefly describe options discarded at early stage and provide reasons for doing so. It should explain why international issues are not addressed.

**(5) Strengthen assessment of impacts and comparison of options.** The report should comprehensively assess economic, social and environmental impacts, based on a clear set of methodologies and assumptions. It should present a more consistent analysis of costs and (long-term) benefits of the different options by clearly identifying at what levels these costs and benefits would occur and for whom (EU, Member States, regional or local authorities, and private sector) and by differentiating between different types of costs. The report should discuss if any of the options have significant impacts on SMEs, competitiveness and labour market (employment rate and skills upgrading). It should discuss if the actions to be covered by the EU Adaptation Strategy should not be prioritised towards regions or sectors that are more vulnerable to climate change impacts. It should analyse if the various guidelines and standards proposed will be adapted to the needs of the various sectors. The report should clearly identify the components of the preferred option package, and indicate its combined impacts and related costs and implementation timeframe. The comparison of options should demonstrate the proportionality and value added of the envisaged EU action, in particular, as regards the need for a legislative proposal requiring national adaptation strategies by a certain date.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report*

**(D) Procedure and presentation**

The report should explain in the policy context section which actions from the 2009 White Paper on Adaptation still require further EU intervention and clarify in which cases actions undertaken did not fully reach the objectives (explanation is currently only provided in the annex). The presentation of the section on impacts should be improved, for instance, by clarifying the costs and benefits of each option in the overview tables and by including an overview of their main economic, social and environmental impacts. The report should present stakeholder views throughout the report, in particular, where they do not support the proposed options. For instance, it could better present views of Member States from various geographical areas that are affected differently by climate change. Annexes should be revisited to ensure legibility of graphs.

**(E) IAB scrutiny process**

Reference number	2013/CLIMA/002
External expertise used	No
Date of IAB meeting	7 November 2012