



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
D(2012)

Opinion

Title **DG CLIMA - Impact Assessment on EU Strategy for adaptation to climate change**
(resubmitted version of 30 November 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 actions 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 has been substantially improved in line with the Board's recommendations, but needs further work in a number of respects. Firstly, the report should further strengthen the case for EU action by better demonstrating the need and value added of addressing at the EU level problems concerning adaptation action at sub-EU level and by the private sector. Secondly, it should further clarify the operational objectives and formulate progress indicators so that they are directly responding to the actions foreseen in the EU Adaptation Strategy. Thirdly, the report should improve the presentation of options by clearly distinguishing between the description of options and the assessment of economic, social and environmental impacts. Fourthly, the report should better demonstrate in terms of value added and proportionality why a legislative proposal requiring national adaptation strategies by a certain date is necessary now, and how concerns of those Member States who oppose it will be addressed.

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

(C) Main recommendations for improvements

(1) Strengthen the problem definition and the case for EU action. The report should better demonstrate the need to address at the EU level problems concerning the uptake of adaptation action at sub-EU level and by the private sector. For example, by describing the consequences of no EU-wide action in these respective areas and by explaining why this cannot be adequately addressed by Member States' action only.

(2) Further clarify objectives and corresponding performance/progress indicators. While the report presents now better developed specific and operational objectives, some operational objectives should be further clarified. For example, the report should explain on the basis of convincing evidence why only the fact of having an adaptation strategy will make the Member States, major regions and cities more climate-resilient. In addition, it should explain how 'major' regions and cities are defined. Furthermore, the report should identify core indicators that should help to determine if the EU adaptation strategy has generated the intended effects and measure progress.

(3) Improve presentation of the policy options. The report should clearly distinguish between the description of options and the assessment of their economic, social and environmental impacts (i.e. presentation should be in separate chapters). It should also describe the "no policy change" option in the main text and set it as the baseline (currently only done in the annex). Option 3B includes activity engaging with stakeholders that deal with social issues in order to better identify how Member States currently protect their vulnerable groups and how existing EU instruments can be used to increase resilience. However, the report should be more specific in describing how this option would address the identified problems (e.g. health, employment challenges). In addition, it should indicate how actions suggested for the EU Adaptation Strategy will focus on regions or sectors that are more vulnerable to climate change impacts (e.g. looking at skills upgrading in outermost regions).

(4) Further strengthen the assessment of impacts and better demonstrate the value added and proportionality of legislative action. The report should clarify the methodology and main assumptions for the assessment of costs and benefits of different options. It should better present in the main text the key findings of the options' impacts on SMEs and competitiveness. It should analyse if guidelines on national adaptation strategies and guidelines for project developers for climate proofing vulnerable investments will be detailed to account for the needs of the various sectors. The report should better demonstrate in terms of value added and proportionality why a legislative proposal requiring the development and adoption of national adaptation strategies by a certain date is necessary now, and not after providing appropriate guidelines and financing for producing the strategies. It should elaborate reasons why some Member States are opposed to this requirement and explain how these concerns will be addressed.

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

Presentation of impact analysis should be further improved by explicitly distinguishing between economic, social and environmental impacts. In addition, references to annexes should be more frequently provided in the main text, where annexes offer additional explanation, e.g. on the description of options or the analysis of impacts. The legibility of figures in the main text should be improved.

(E) IAB scrutiny process	
Reference number	2013/CLIMA/002
External expertise used	No
Date of IAB meeting	Written procedure This opinion concerns a resubmitted draft IA report. The first opinion was issued on 9 November 2012.