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AVIS DU COMITÉ DES ANALYSES D'IMPACT

**LIVRE BLANC - ADAPTATION AU CHANGEMENT CLIMATIQUE: VERS UN CADRE
D'ACTION EUROPEEN**

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Brussels, 20 JAN. 2009
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Opinion

Title **Impact Assessment on: White Paper on Adaptation to adverse effects of Climate Change**

(draft version of 12 December 2008)

Lead DG **DG ENV**

1) Impact Assessment Board Opinion

(A) Context

In June 2007 the Commission released a Green Paper "Adapting to Climate Change in Europe – Options for EU action". The paper examines climate change impacts in Europe, and suggests that the European Union should take on the challenge of adaptation in partnership with the EU Member States. The EU is a party to the United Nations Framework Convention on Climate Change (UNFCCC), requiring all parties to formulate and implement national or regional programmes containing measures to facilitate adequate adaptation to climate change (Art. 4.1b). The recent progress report on implementing the EU Sustainable Development Strategy highlights the need to focus on mainstreaming climate change concerns by concentrating essentially on the integration of climate change mitigation and adaptation in all relevant EU policies. The IA report focuses on adaptation in the EU.

On 30 August 2008 the IAB provided upstream support on the basis of an early draft of the IA report. On the 2 October 2008 the IAB issued an opinion requesting DG ENV to resubmit the IA¹. The IA report has now been refocused on a limited number of short term actions.

(B) Positive aspects

The IA report includes a comprehensive overview of the available models and climate change scenarios and outlines the knowledge gaps. National adaptation strategies have been reviewed in the annex 3.

The IA report has been improved along the lines of the earlier IAB recommendations.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. 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

¹ D(2008) 7912

assessment report.

General recommendation: A number of the previous IAB recommendations have been implemented. However, the IA report requires further work on several important aspects. The objectives should be better linked to the problems. The justification for the selection of the win-win/no regret actions is currently insufficient and should be strengthened. The report does not contain the formal assessment of impacts which would be needed for it to qualify as a proper impact assessment. Therefore, at least a qualitative assessment of the impacts of the proposed measures should be presented, and used subsequently for the selection of preferred options or sub-options. During its meeting with the Board, DG ENV agreed to make changes in line with the IAB recommendations.

(1) The problem definition section needs to be better linked to the objectives. The problem definition section should analyse in more detail the problems which underpin the operational objectives (improving the knowledge base and co-ordination of adaptation policies). The IA report should analyse underlying drivers and take this analysis into account when proposing policy options. With regards to the knowledge base, the IA report should not only assess the quality of the science currently available (e.g. in terms of coherence and degree of detail of the models), but also state more clearly which level of quality is needed (to allow for better informed policy making), and what actions would be necessary to encourage this evolution. The practical implications of differences in the science on adaptation and that on mitigation, in particular relating to the timing of necessary investments, should be made more explicit. Similarly, in relation to the co-ordination of adaptation policies among Member States and institutions, the IA report should analyse existing mechanisms and their deficiencies and provide examples of the impact and negative spill-overs that a lack of co-ordination may have on the vulnerability to climate change. Additionally, the IA needs to clarify how autonomous adaptation has been integrated into the baseline, including the adaptation by businesses and individuals, and the impact that this may have on the vulnerability assessment. Finally, the discussion on green and grey infrastructure should be moved to the section of the IA dealing with policy options.

2) The IA report should better justify choice of the short term measures proposed in section 4.2. The IA report should clarify to what extent the list is exhaustive and to what extent proposed measures might be competing with each other, e.g. for the same budgetary resources, and would therefore need to be assessed from a cost-efficiency perspective. The impacts of the proposed measures need to be assessed (see below). Additionally, the discussion on risk management should be expanded and not limited to insurance only. The three assessment criteria (knowledge base, subsidiarity, synergies/trade-offs) should be reconsidered or at least better defined, to allow a more consistent screening of the proposed measures.

(3) Impacts of the policy options need to be assessed. The IA needs to assess the expected impacts of the policy options. This should be done both for general policy options (no new EU action, an action plan, white paper) as well as for more detailed measures discussed currently in section 4.2. In line with the proportionality rule, the assessment can to a large extent be qualitative. Economic, social and environmental impacts should nevertheless be clearly presented. Identification of further impact assessment work for future actions should be provided. This assessment of impacts should be used as the basis for comparing policy options.

(D) Procedure and presentation

An annex with planned follow up work on impact assessments should be added.

2) IAB scrutiny process

Reference number	2008/ENV/007
Author DG	ENV
External expertise used	No
Date of Board Meeting	14 January 2009
Date of adoption of Opinion	20 JAN. 2009 The present opinion concerns a resubmitted draft IA report. The first opinion was issued on 02 October 2008.

