

Consultation on the European Commission's Green Paper on "Adapting to climate change in Europe – options for EU action" {SEC(2007) 849}

Comhar input to public consultation on Green Paper, 20 September 2007

Background

The European Commission has published a Green Paper on the subject of adapting to climate change. This is based on the inevitability of adverse impacts of climate change and the need to introduce adaptation measures to lessen these effects, even while attempting to reduce greenhouse gas emissions. The Commission has launched a public consultation on the Green Paper and is inviting submissions by 30 November 2007. Comhar SDC intends to submit its observations directly to the Commission and also to the Department of Environment, Heritage and Local Government, which has invited Comhar to contribute to its own response. In addition to this contribution to the Department's submission, Comhar SDC will submit its own comments to the European Commission by the deadline of 30 November 2007.

The Green Paper sets out four "pillars", or priority areas for action:

- I. Early action to develop adaptation strategies in areas where current knowledge is insufficient
- II. Integrating global adaptation needs into the EU's external relations and building a new alliance with partners around the world
- III. Filling knowledge gaps on adaptation through EU-level research and exchange of information
- IV. Setting up a European advisory group on adaptation to climate change to analyse coordinated strategies and actions

Our recommendations focus on EU adaptation policy, with specific reference to Ireland's circumstances.

Context

Even with deep cuts in global emissions, a rise in global temperatures is now inevitable. Ireland, like other EU countries, will not be spared the adverse effects of climate change, which may include water shortages, ecosystem destruction, sea-level rises and flooding, in addition to major economic and social impacts, especially in economic sectors that depend strongly on climatic conditions (e.g. agriculture, tourism). Even if Ireland escapes some of the direct adverse impacts of rising temperatures due to its northerly location, it will be vulnerable to the spill-over effects of these impacts in other countries such as reduced economic growth. The negative impacts will outweigh any positive effects of climate change.

Recommendations

Guiding principles

A common EU approach to adaptation to climate change should be based on the following global principles:

- i. Preventative or early action is preferable to ad-hoc, incremental reaction. We welcome the focus of the paper on early action (5.1). This implies that adaptation must be integrated into the conception and design of all relevant policies. The costs and benefits of early action must take into account the social and environmental costs of action as well as the counterfactual no-action scenario. Early action means that adaptation must be factored into the conceptual stage of all new policies. We also*

welcome the focus on integrating adaptation into existing policies (5.1.1.) and funding instruments (5.1.2).

- ii. *Adaptation should be based on the precautionary principle.* Where data are uncertain the EU should take a precautionary approach so that relevant policies are designed around an assumption that adaptation to climate change will be necessary.
- iii. *Strengthening natural resilience is preferable to engineering solutions.* For instance, protecting and enhancing wetlands as flood buffer zones is a better response to adaptation than building or strengthening dykes to protect against floods. The EU can advance this principle through many common policies e.g. on habitats, agriculture and in guiding structural funds.

Pillar 1: Early action in the EU

The Green Paper makes a strong case for integrating adaptation measures into other EU strategies and policies. The European Union has common policies on many areas that will have an impact on the Union's ability to adapt to climate change, including biodiversity, fisheries, agriculture, water, energy networks, as well as EU spending programmes on research, rural development, trans-European networks, cohesion, fisheries, external actions and the European Development Fund. In addition, EU institutions could play a more active role in the enforcement of adaptation-relevant policies at member-state level.

The Green Paper highlights the following areas where adaptation could be integrated into existing and upcoming legislation:

- Agriculture, taking advantage of the 2008 CAP review
- Industry and services: the European Commission's proposed Action Plan on how industrial policy can contribute to adaptation effort could include an adaptation fund for affected businesses
- Energy
 - The revised Buildings Directive should contain strengthened standards
 - Technology: EU measures to increase the flexibility of electricity grid should be pursued, e.g. facilitating embedded generation, greater interconnections
- Transport
 - Transport infrastructure: integration of adaptation in infrastructure design should be based on protecting and enhancing the natural resilience of systems e.g. wetland and habitat preservation
 - Spatial planning: EU guidance (e.g. the sharing of best practices) on spatial planning would be welcome, while stressing that spatial planning is largely the remit of the member states
- Water: there is a need for the Water Framework to address adaptation to climate change directly. The Green Paper rightly draws attention to water conservation and there should be an explicit hierarchy of responses (similar to the waste hierarchy) that prioritises conservation, pricing and soft non-structural measures (e.g. enhancing wetlands) over hard structural measures like greater water extraction or dykes. Additional guidance at the EU level on national issues such as integrating adaptation into spatial planning would be welcome.
- Marine and fisheries: Community fishing policy should be based on an assumption that the resilience of fish stocks will deteriorate with climate change, and therefore

fishing policy should take a precautionary approach when estimating sustainable levels of fishing.

- Ecosystems and biodiversity: The Green Paper places appropriate emphasis on the need to protect ecosystems to increase their chances of withstanding climate change, such as species migration due to changing weather patterns. This concern should be brought out more fully in other relevant Community policies such as agriculture or funding programmes for infrastructure, which can have a detrimental effect on important habitats. Biodiversity is vulnerable to climate change but protecting biodiversity can be complementary to adaptation to climate change. The protection of natural habitats like wetlands can safeguard the resilience of vulnerable ecosystems while providing an adaptation function through protecting against flooding.

Pillar 2: Integrating adaptation into EU external actions

The Green Paper points out that adaptation will be necessary for the achievement of the UN Millennium Development Goals after 2015, especially in sub-Saharan Africa. The Green Paper correctly points out the need to integrate adaptation to climate change into existing funding and cooperation instruments.

Pillar 3: Integrated climate research

The European Union has a special role to play in coordinating research through the 7th Framework Programme for Research, which has a strong focus on climate change. In addition to the measures listed, the European Union could help facilitate cooperation between Member-State bodies such as national research councils to encourage the transfer of research findings and best practices.

Pillar 4: Involving EU society, business and the public sector

The European Commission proposes the establishment of a European Advisory Group on Adaptation to act as a Commission's Expert Group. This would be a useful initiative. To capitalise on existing resources for research and stakeholder representation it should be connected to national advisory councils on sustainable development (e.g. Comhar SDC) both directly and through the EU-wide umbrella group, the Association of European Environment and Sustainable Development Advisory Councils (EEAC). The European Advisory group should include representatives from outside the European Union, particularly developing countries that are most vulnerable to climate change. The Advisory Group should be encouraged to offer advice to Member States not just on Community policies but also areas that are primarily the responsibility of Member States, such as spatial planning.

Key questions in the Commission's Green Paper

- 1) What will be the most severe impacts on Europe's natural environment, economy and society?
- 2) Which of the adverse effects of climate change identified in the Green Paper and its Annex concern you most?
- 3) Should further important impacts be added? If yes, which ones?
- 4) Does the green paper place the right urgency and emphasis on the matter of adaptation in Europe?
- 5) What should be the different roles of EU, national, regional, local authorities and the private sector?
- 6) Which economic, social and environmental impacts of climate change should be addressed at EU level as a matter of priority?
- 7) Apart from the main priority areas identified in the four-action approach, are there other areas that have been missed out? If yes, which?

First pillar: Early action in the European Union

- 8) Does section 5.1 correctly and comprehensively identify the needs and policy priorities for early adaptation actions that should either be taken or coordinated at the EU level?
- 9) How do policy priorities need to change for different sectors? Which policy approaches should be taken at national, regional or local level? Where is European action needed?
- 10) How can EU agriculture and fisheries policy be adapted to help these sectors adjust to the impacts of climate change? What will be the likely consequences of climate change for trade in agricultural products?
- 11) How should the EU express its solidarity with regions suffering most heavily from the consequences of climate change?
- 12) How could a collective European response help coastal Europe to tackle the effects of rising sea levels?
- 13) How should EU policy on public health take the impact of climate change into account?
- 14) What will be the consequences of climate change for Member States' potential energy mix and for European energy policy?
- 15) Please rank the listed options under each of the areas of the four-action approach for EU adaptation into the following three categories:
 - 1) Most urgent and to be implemented by the Commission as a matter of priority.
 - 2) Low priority for Commission implementation.
 - 3) Irrelevant for Commission implementation.
- 16) What are the possible synergies between adaptation and mitigation measures? How can these synergies be strengthened?
- 17) In the context of EU policy, how can companies and citizens be encouraged to participate in adaptation actions?

Second pillar: Integrating adaptation into EU external actions

- 18) How will climate change affect the policy priorities of the EU's external policies?
- 19) Which priorities should the EU set for its co-operation programmes in the different parts of the World with respect to adaptation to climate change?
- 20) Which are the main opportunities and obstacles for adaptation in different parts of the World?
- 21) What are the best options to make the EU's external action more resilient to climate change?
- 22) What could be the value added for EU action compared to other international initiatives including, for instance, the UNFCCC and multi-lateral funding instruments?

Third pillar: Reducing uncertainty by expanding the knowledge base through integrated climate research

- 23) Do the listed research areas address the most important knowledge gaps? If not, please add?
- 24) Which are the five most important research areas that need to be addressed as a matter of priority?
- 25) How should research results be communicated and made available to decision makers and a broader public at local, national, EU-level and internationally?

Fourth pillar: Involving European society, business and public sector in the preparation of coordinated and comprehensive adaptation strategies

- 26) Does the Green Paper foresee sufficient participation of the different stakeholders in identifying and implementing EU adaptation actions?
- 27) Should stakeholders from the EU's neighbours and other regions be involved?
- 28) Would the establishment of a European Advisory Group on Adaptation be helpful in further exploring an EU response to the effects of climate change? If yes, which areas should such an Advisory Group concentrate its work on?