

EUROPEAN NETWORK OF THE HEADS OF ENVIRONMENT PROTECTION AGENCIES

European Commission
DG CLIMA
Commissioner M. Petriccione
1049 Brussels
Belgium

EPA Network secretariat
Kongens Nytorv 6
DK-1050
Copenhagen

11/09/2020

Dear commissioner Petriccione,

Many Environment Protection Agencies (EPAs) across Europe are engaged in providing advice on climate change adaptation through close involvement in the development of the adaptation strategies within EU Member States (MS). EPAs are involved in the implementation and evaluation of adaptation policies and measures, and in collecting data and information that are relevant for adaptation efforts. They are also involved in communicating issues and challenges at local, regional and national levels, as well as in knowledge sharing, capacity-building and support for adaptation at sub-national levels. In this position, the European Network of the Heads of EPAs (EPA Network) has in the past supported the European adaptation policy development process. The network has been actively involved in, for example, supporting the development of the first EU strategy on adaptation to climate change in 2013 and its evaluation in 2018. We look forward to continuing our supporting role in the future.

The EPA Network welcomes the European Commission's intention to develop a new EU adaptation strategy, recognising the success of the first strategy, and, for example, the fact that all EU Member States now have a National Adaptation Strategy and/or an Adaptation Action Plan. We would like to offer a number of suggestions regarding the new strategy.

The EU Adaptation strategy of 2013 aimed to make Europe more climate-resilient, focusing on three key objectives, namely promoting action by Member States, climate-proofing efforts at EU level, and supporting better-informed decision-making. The 2018 evaluation showed that the strategy had delivered on its objectives, with progress recorded with respect to each of its eight individual actions. The evaluation, nevertheless, also outlined that Europe is still vulnerable to climate impacts, strengthening the case for a reinforced European adaptation strategy. The evaluation ended with a number of specific recommendations for this new strategy that we support. In addition, and consistent with these recommendations, we would like to highlight specific issues, which we believe need special attention.

Firstly, an EU strategy on adaptation should include clearly defined adaptation targets for the EU. The delivery and success of the strategy can then be monitored and evaluated against these targets at the EU level. In addition, national work on adaptation should be monitored and evaluated at the national level. The EU strategy on adaptation should support the development of methods for monitoring and evaluation that provide a systematic and consistent basis for monitoring vulnerability to climate change over time. Such methods should also include proxies to assess whether Europe is becoming more climate-resilient, and look at the effectiveness of policies and measures. It is our view that research is required to develop targets for adaptation and sound methods for measuring progress and effectiveness and that an EU strategy on adaptation should include this as a priority area of work.

Secondly, in our opinion, mainstreaming adaptation in **sectoral policies** is crucial. Yet, we see that, to a significant extent, adaptation is still compartmentalised and addressed within the 'environment' components of the EU bodies, Member State ministries and agencies. To overcome this barrier, it is important that climate risks become a key component of wider decision-making, at all scales, across Europe, and that sectoral policies are well coordinated, both vertically (from EU-level to Member States) and horizontally (in relation to other sectoral policies). This includes the need to integrate

adaptation into other **policy objectives**. It is our experience, in various European Member States, that linking adaptation to sustainable development goals (SDGs), climate mitigation and disaster risk reduction (DRR) may promote the integration and implementation of adaptation efforts and measures, especially when considering win-win options. Mainstreaming should also include **climate proofing of the financial instruments** of the EU, with the aim to establish instruments suitable for supporting regional and local actors to invest in adaptation measures, such as climate resilient infrastructures.

Thirdly, given the overlap in terms of impacts and response synergies between climate change and ecosystem decline, the EPA network supports the call for using **nature-based solutions** for climate adaptation. These solutions often provide multiple co-benefits, including climate change mitigation, improved air and soil quality, flood prevention and enhanced societal well-being, supporting ecological and social resilience. These co-benefits are important to many EPAs. Therefore, to our opinion nature-based solutions should be included in the next EU strategy on adaptation also as a priority.

Fourthly, the EPA network calls for a greater focus on the transboundary **and international perspective**. The first European adaptation strategy rightly had a strong internal EU focus. As recognised in the 2018 evaluation, more attention should be awarded to transboundary cooperation, such as flood prevention, ecosystem resilience or climate resilient infrastructures that require a response on macroregional scale such as mountainous regions, coastal regions or river catchments. Moreover, climate change impacts elsewhere in the world can have considerable implications for the EU, for example through global supply chains. In our opinion, the EU is often regarded a positive example on the international level. As such, the EU strategy on adaptation should clearly state the global responsibility and the willingness of the EU to support other countries improving their resilience and reducing their vulnerability.

Finally, the “build-back-better” approach connected to the European Green Deal and the current COVID 19 recovery plans for the EU should, to our opinion, be an important corner stone for the EU Adaptation strategy. Thus, actions of the recovery plan should be adequately climate proof. It should be stated in the strategy that adaptation is not about keeping the status quo but to move forward in the direction of resilience and sustainability by connecting innovation and adaptation to support the transformative change of the EU.

All these elements may help to ensure that the new EU adaptation strategy adds value to existing activities by and within Member States, and that it reflects the thinking and experience of those already involved in delivering adaptation efforts across Europe. The EPA Network welcomes dialogue on these issues and looks forward to further engaging with DG Climate Action, in this respect.

We look forward to your response.

Yours sincerely,

On behalf of the Interest Group on Climate Change Adaptation of the EPA Network

Professor Hans Mommaas
Director
PBL Netherlands Environmental Assessment Agency

This letter is supported by the following EPA Network members: Environment Agency Austria, Flanders Environment Agency, Finnish Environment Institute, German Environment Agency, Geological and Geophysical Institute of Hungary, Istituto Superiore per la Protezione e la Ricerca Ambientale, Natural Resources Wales, Netherlands Environmental Assessment Agency,

