

Consultation on the Preparation of the EU Adaptation Strategy

Response from the Convention of Scottish Local Authorities

Introduction:

The Convention of Scottish Local Authorities (COSLA), as the representative voice of Scottish Local Government at national and international level, welcomes the opportunity to contribute to the European Commission consultation on the Preparation of the EU Adaptation Strategy.

Climate Change is a high priority matter of great importance to COSLA and its member councils. Indeed all 32 of Scotland's Local Authorities have signed up to Scotland's Climate Change Declaration, a voluntary agreement to work towards climate change mitigation and adaptation, requiring significant commitments of councils to act in this area. Local Authorities will now be progressing this work under the Climate Change Scotland Act and the new Single Outcome Agreements between the Scottish Government and councils.

COSLA expectations for the EU Adaptation Strategy:

- COSLA reiterates that Climate Change Adaptation Strategies should be developed in full partnership with local and regional authorities to make full use of their proximity and better understanding of local climate impacts and to provide them with sufficient leadership and resourcing that could enable them to implement local adaptation initiatives.
- COSLA holds that place-based integrated policies may be used as a vehicle to help address horizontal and cross-policy challenges such as those posed by climate change as part of a mixed approach. In so doing, overlaps, inconsistencies and gaps between different policies and between governance levels, including the subnational levels can be addressed.
- Any future EU strategy, to be realistically implemented on the ground, should recognise from the outset that there are limited organisational and financial resources at national and local level.
- It is crucial to develop comprehensive and integrated methodologies including indicators to measure the success of responses; improve European-wide risk, impact and cost/benefit assessment for adaptation responses, as compared with "no action"; compare integrated EU-wide responses with sectoral approaches including analysis of socio-economic costs and benefits; improved integrated assessment and the development and use of tools for demonstrating economic, environmental and social benefits of adaptation for European regions crossing national boundaries.

The Scottish case:

Through Scotland's Climate Change Declaration reports local authorities demonstrate many excellent examples of innovative and progressive adaptation work. Progress is particularly notable in several key areas:

- Several local authorities are already undertaking substantial pieces of work to better understand and evaluate the risks and opportunities that they face as a result of changes in climate.
- There is an emerging trend towards local authorities developing standalone Climate Change Adaptation Strategies in recognition of the cross cutting and detailed nature of the work that will be required to build resilience across asset bases, service areas and communities. Local authorities also reported that Strategic Environment Assessment processes are consistently being used to screen plans, policies and strategies for adaptation related issues.
- A significant number of local authorities report that climate change adaptation is being considered as part of local and strategic land use planning processes. Including adaptation as part of land use planning has been identified by the UK Adaptation Sub Committee as being 'a key determinant of vulnerability to climate change'¹ and is also an action in Scotland's Climate Change Adaptation Spatial Planning and Land Use Sector Action Plan.
- Local authorities are implementing a wide range of adaptation actions; these range from capacity building across departments and with local communities through to implementing large scale multimillion pound infrastructure projects.
- A number of local authorities are engaging local communities on climate change adaptation issues, this capacity building at the local level is key to better understanding the risks and opportunities that communities face and enabling communities to build resilience.
- Several local authorities report significant progress on the implementation of flood risk management schemes, including the construction of flood defences and, to a lesser extent, creation of areas of managed retreat.

Detailed COSLA responses to the Commission's Questionnaire:

Problem Definition

1. Which of the following adverse effects of climate change concern you most?

COLSA notes that most of the identified adverse effects are of concern due to the diverse geographical nature of the country. Having said this, the main concerns for Scottish Councils are biodiversity loss and degradation of ecosystem services, food production, sea level rise, storm surges and flooding affect our Councils the most.

2. In your opinion, which populations/groups are the most vulnerable to the adverse impacts of climate change?

Climate change affects every citizen in Scotland, whilst certain effects have a stronger direct and indirect impact on parts of the Scottish population including infants, young people, elderly, low-income households and the homeless.

7. In your opinion, in order for adaptation policies and measures to be effectively implemented, what are the three most pressing issues to be addressed by the EU?

- COSLA holds that place-based integrated policies may be used as a vehicle to help address horizontal and cross-policy challenges such as those posed by climate change as part of a mixed approach. In so doing, overlaps, inconsistencies and gaps between different policies and between governance levels, including the subnational levels can be addressed
- COSLA remains convinced that the most important area of research should aim at developing comprehensive and integrated methodologies for the assessment of impacts, vulnerabilities and cost effective adaptation. It is also necessary to develop indicators to measure the success of responses; improve European-wide risk, impact and cost/benefit assessment for adaptation responses, as compared with "no action"; compare integrated EU-wide responses with sectoral approaches including analysis of socio-economic costs and benefits; improved integrated assessment and the development and use of tools for demonstrating economic, environmental and social benefits of adaptation for European regions crossing national boundaries. Therefore good quality information on climate risk, a sound adaptation framework, examples of good practice, assessment of additional financial support to mitigate losses and to meet additional costs of adaptation are essential. Information and resources need to be prioritised to enable the early and effective identification, adaptation and protection of critical infrastructure such as power, road and rail networks which may be particularly vulnerable to climate change.
- At the local level it is appropriate for governments to take forward vulnerability mapping or scoping. It is from this stream of research that further priorities can be set. Demonstrating the benefits of adaptation will be key to ensuring that national and local governments are persuaded to commit adequate resources to this area of work. Additionally, focusing on more than just the effects on the physical environment but rather on the socio-economic benefits of adaptation will further strengthen this case.

Knowledge

3. What other actions could be considered at EU level to facilitate further knowledge dissemination and sharing?

- COSLA had supported the establishment of the European Climate Adaptation Platform and welcomes its future support. Clearly we see the need to place a particular focus of this platform the local and regional adaptation policies. On this we advocate close working and consistency with existing initiatives namely the work of the Covenant of Mayors, Smart Cities and Communities Initiative and the Reference Framework of Sustainable Cities. All provide partial responses to the wider question of the role of local and regional authorities in climate change adaptation policy but a common tread is still needed thus future work of the platform should bring together these and other national and regional initiatives.

- EU, Member States and regional and local authorities can work together with media to develop a European-wide information campaign on causes and effects of climate change and growing scarcity of resources focusing on changing everyday behaviour. Local Authorities and Regional Authorities stress the need of proper funding resourcing of such campaigns , as well as having due consideration of the need of localising messages in different Member States nations and regions.

Mainstreaming adaptation into EU policies and strengthening adaptation by the private sector

2. Have you identified other barriers preventing the economy from becoming more climate resilient?

- We believe that there is the need to ensure that existing sectoral EU legislation (Renewables, Energy Efficiency, Water Framework Directive, Floods Directive, Water Scarcity and Droughts Directive etc.) is fully consistent and is kept in line with future EU climate change adaptation proposals and goals. On that it must be stressed the need for medium term regulatory predictability, particularly regarding future administrative, capacity and financial costs for Councils.
- We are however less keen for additional horizontal EU legislation on climate change; whereas guidance to allow those Member States and regions to fully implement the existing environmental *acquis* would be useful.
- There are limits to what any specific sector of society can achieve in its own right, including the role of Local Government, so a leadership and co-ordination role for the national government will be important. However, it is essential that resources are not wasted on the duplication of activities undertaken at sub-state, Member State or EU level. Policy formulation, leadership and coordination undertaken at a sub-state level must be coordinated with Member State and EU activities rather than seek to re-formulate what has already been achieved. This includes as mentioned several times the need for climate change mitigation, as well as the need to assess the current situation with regards to adaptation, where gaps and risks are, and an early assessment of what action is needed now and in the medium and long term.
- Albeit often raised, in spite of being not just something to address at EU level it is crucial to remember that additional financial support will be essential to mitigate losses and meet additional costs of adaptation as meeting the varied challenges of climate change, however, will impose significant new financial burdens on local authorities. Some of this is attempted by the proposed ring-fencing for Low Carbon in Structural Funds (but not for climate change as such) and with the “greening” of CAP. However it remains to be seen how this can be translated into practice, and in so doing how it will be related with the new EU adaptation strategy.
- The future EU Multi-Annual Financial Framework 2014-2020 should ensure that no gaps, inconsistencies and duplicities exists between EU funding policies as regards to its effects in climate change. As adaptation measures are in many cases essentially local efforts, in order to ensure that EU support is available for them, special attention should be drawn to the fact that funding streams should be significantly simplified and made user friendly as to ensure that local and regional actors can fully benefit from them.

4. Have you identified other priority actions, at EU level, that could strengthen the adaptive capacity and climate impact preparedness and responses of the private sector?

- While we agree that the public sector should play the leading role in defining the priorities and setting the strategic framework, it is clear that this could only work if the private sector is fully onboard. Involvement from the private sector their co-operation and innovation is vital to getting adaptation measures right.
- A key element to achieve this is the existence of a clear and stable regulatory environment that allow the private sector to fully exploit its own capabilities, as climate change is not only a risk but also a business opportunity for those able to capitalise on it. Therefore, European and national governments have a role in steering the market towards the supply of appropriate products, services and processes, however the private sector needs to be brought on board early so that planning and research and development work is focused on areas that will fulfil long term demand (i.e. examples of bridges, buildings needed to be 'climate proof' mentioned in the green paper). The private sector should also be asked to input into discussions about how changes in the climate will affect different industries across Europe and what support they need to adapt and change to ensure the economy remains strong as circumstances change. The private sector shall play a role in financing new schemes ranging from being 'users' of public policies (e.g. paying fees to carbon trading schemes), 'suppliers' when it comes to public procurement activities to fund raisers via financial engineering tools.
- It should be noted that as suppliers, public procurement processes have a role to play in encouraging the private sector to be respond to adaptation through tender processes.
- We are also keen to encourage private involvement in the provision of financial mechanisms such as insurances. However it points out the need that given the structural and long term relevance of the challenges posed by climate change public sector support might be necessary and even unavoidable, especially in terms of addressing the gaps and market failures not properly addressed by the private sector.

5. Are there any other issues that should be addressed in the EU Adaptation Strategy and which are not mentioned above?

- Consistent with moves in some EU policies towards a more outcome-driven delivery it would be constructive to explore the way of engaging between local, national and EU levels on climate adaptation measures via some form of Outcome Agreements such as those being considered in Scotland, whereby each governance level commits to work towards a climate adaptation outcome and jointly take ownership and responsibility for their respective contributions.
- The role of land use planning and the need to increase attention in this area towards climate change adaptation is another critical aspect, which needs to be addressed through a consistent, overarching approach to avoid individual local and regional communities being disadvantaged.

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