



**COUNCIL OF EUROPEAN MUNICIPALITIES AND REGIONS
CONSEIL DES COMMUNES ET REGIONS D'EUROPE**

30-11-07

**Green Paper
Adapting to climate change in
Europe – options for EU action**

COM (2007) 354

CEMR RESPONSE

Brussels, November 2007

Conseil des Communes et Régions d'Europe • Council of European Municipalities and Regions
15 Rue de Richelieu F-75 001 Paris
tel : + 33 1 44 50 59 59

cemr@ccre.org - www.ccre.org

1 Square de Meeûs B-1000 Bruxelles
Tel : + 32 2 511 74 77

**CEMR's response to the
GREEN PAPER on Adapting to climate change in Europe –
options for EU action
COM (2007) 354**

KEY POINTS

CEMR:

- ⇒ Welcomes the Green Paper on Adapting to climate change;
- ⇒ Points out that adaptation issues are intimately linked to the local level;
- ⇒ Underlines that a multi-level governmental approach and a coordination of policies at all levels is indispensable;
- ⇒ Stresses the need to integrate mitigation and adaptation policies together;
- ⇒ Identifies issues and challenges at the local and regional level;
- ⇒ Emphasizes that local and regional authorities are willing to take their responsibilities but they also need the right support, notably financial;
- ⇒ Proposes actions to be taken at local, regional, national and EU level.

GENERAL REMARKS

1. The Council of European Municipalities and Regions (CEMR) is the European umbrella organisation of 49 national associations of local and regional authorities in 36 European countries. CEMR is very involved with sustainable development and particularly active on issues related to climate change such as environment, energy and transport policy. In a publication published in March 2006 "Save energy, save the climate, save money. Guide for local and regional government"¹ CEMR proposes guidance to local and regional authorities on how to contribute to the mitigation of climate change.
2. Climate change is now firmly set on the political agenda at the national, European and international levels. However, the success of such policies relies to a great extent on their implementation at local and regional level. Local and regional governments can contribute to mitigation policies against global warming (and are already doing so) and they are in the frontline when it comes to measures to adapt to climate change.
3. CEMR generally welcomes the approach of the Green Paper. The document rightly recognises the prominent role of regional and local authorities. It underlines that there is no "one fits all" solution: CEMR indeed believes the principle of subsidiarity is here particularly relevant, as adaptation measures will be intimately connected to the local conditions and needs. We therefore support the multi-government-level approach proposed by the European Commission.
4. In our response to the Commission's Green Paper we would like to explore what are the issues regarding the adaptation to climate change at the local level and what approach and potential actions should be taken. Nevertheless, CEMR would like to insist that an integrated approach to mitigation and adaptation is indispensable. Many measures can contribute to both objectives, and the mitigation agenda should remain among the top priorities.
5. The Green Paper rightly exposes the importance of integrating adaptation criteria into all public policies. CEMR would like to stress the need to improve the coherence of EU policy in terms of mitigation. For instance, some policies aim to promote sustainable transport and energy savings, while others encourage the construction of motorways and the consumption of energy. Climate change is a challenge that requires EU and national authorities to truly integrate mitigation and adaptation requirements together into their public policies.
6. CEMR welcomes the establishment of a European Advisory Group on Adaptation to Climate Change and calls on the European Commission to officially invite representative organisations of local and regional authorities. CEMR and its member associations would like to express their willingness to contribute to the further activities and initiatives aiming to achieve the objectives.

¹ available at: http://www.ccre.org/bases/T_599_34_3524.pdf

IDENTIFYING ISSUES

7. The Green Paper offers a satisfactory concise assessment of the situation in Europe and of the challenges that we are facing. It rightly stresses that plain areas will be affected too, and not just, as some believe peripheral areas such as coasts, mountains and the far North.
8. In addition to the problems exposed in the Green Paper, CEMR members have identified the following issues more directly related to the local and regional levels:
9. Some disturbances caused by extreme weather conditions can be highly problematic for daily municipal services and jeopardize citizens' welfare and health as the negative aspects can concentrate on those who have the less means to adapt individually (the most vulnerable; the poor, elderly, isolated etc.). In sudden situations of emergency people will likely ask for the help of local authorities, which are closest to citizens. The adaptation and mitigation issues might therefore become a significant social question to be solved locally.
10. These extreme weather events, when they affect public property, can represent potential important costs to local and regional authorities. Municipal and regional property consists of infrastructure such as buildings, parks, buses, roads, electricity or IT networks, water, wastewater and district heating pipelines and utilities.
11. Many European cities are in river basins or estuaries, or prone to storm surges which makes them vulnerable to flooding. As an example, it is estimated that France has about two million households in flood risk areas. CEMR members from many countries report that too many construction permits are still given in zones at risk. There is a need for local and regional authorities in these areas to work together with national governments to ensure plans are in place to provide flood risk management to protect both the cities and surrounding low lying areas.²
12. Some of the threatened regions (e.g. in the Netherlands) fear the negative consequences of possible declining faith and loyalty on the part of industry and civilians.
13. Urban areas are likely to particularly suffer from warmer summers since they experience even higher temperatures and have lower air quality³; but rural areas will be disrupted too. Heat waves and other disasters can also highlight problems of solidarity, healthcare services and social organisation.
14. Water issues: vegetation is stressed by what seems to be increasing variations in rain patterns and by heat waves. Many European countries so far spared from water scarcity problems have had to face this

² For instance, London authorities have teamed up with the Environment Agency to scope the challenge, and plans for adaptation are well underway

³ For instance, in France, the 2003 heat wave brought about, according to the INSERM Institute, an over mortality of + 60% for the whole of the country (15 000 more deaths for this period than usual), but the over mortality was 130% in the very urban Ile-de-France region

problem in recent years. Local authorities cooperate with other services (water agencies, national government, police etc.) to introduce and monitor water use restrictions.

15. Climate change can have adverse effects on the building stock (mould growth in dwellings, subsidence and heave, slope instability, damage to the building fabric, particularly cladding, wind-related damage, effects on roof drainage etc.). This directly affects local and regional authorities, for their own public buildings and for the well-being and property of their citizens.
16. Climate change is likely to increase the migration pressure from affected areas to less affected areas. Local and regional authorities will have to manage this potential new influx of migrants.
17. Changes in touristy patterns can have a huge impact for many local and regional authorities, which rely on tourism as their main source of income and jobs; on the other hand, a warmer weather can develop tourism in other parts.

IDENTIFYING BARRIERS

18. Adaptation to climate change is a new policy issue. There are currently several obstacles for local and regional government to act that need to be overcome:
19. Uncertainty: although the occurrence of climate change is now scientifically proven, and recognised politically almost across the board and at all levels, there are still important uncertainties as regards the scale, timing and consequences of the change to come. As a result, it is difficult for public authorities to develop measures in this context.
20. The lack of information, knowledge and expertise at local and regional level and the lack of guidance to the local and regional authorities is, in part, a consequence of the previous point and also hinders policy-making. In this area the EU and national governments can play a crucial role, by developing methodologies for assessing the impact and designing cost effective adaptation policies as well as acting as a “clearing house” for information and the exchange of best practices.
21. Political will: given the uncertainty, the novelty and the long-term perspective of the challenge, tackling climate change requires strong political will. This will is growing but still lacking in many places.
22. Lack of support: the local and regional level is very often singled out as the level where a lot needs to be done – but hardly ever gets extra funding to do so.
23. Another barrier to the implementation of climate change policies at the local level is the barrage of often conflicting programmes, strategies and policies that municipalities and regions face from the EU and national levels.

GENERAL APPROACH TO ADAPT TO CLIMATE CHANGE

24. CEMR members report that, although many local and regional authorities are eager to tackle climate change, they do not always know what to do or where to start. In terms of mitigation policies, local and regional authorities can encourage (and develop for themselves) policies for using less fossil fuels and for using energy more efficiently. They are already doing so in many places⁴.
25. Nevertheless, adaptation policies require a different approach. The problem is that future climate is the driver and it is uncertain in its timing, magnitude, frequency and location. Because of the uncertainty a case for action cannot be fully developed and adaptation remains so far largely an academic discipline.
26. To get out of this dead end we tend to expect governments to legislate/regulate because that is what the mitigation agenda tells us is the right thing to do. But governments operate at national level and are not likely to provide the right solutions for the local and regional level. Local and regional authorities need something to operate at the local level where the impacts are felt and local solutions negotiated with local communities are appropriate. The Green Paper rightly points out the important role local authorities have to play in terms of knowledge on the local natural and human conditions.

Therefore CEMR would like to propose the following:

27. An integrated approach to mitigation and adaptation is indispensable. Many measures can contribute to both objectives, and the mitigation agenda should remain one of the priorities, at all levels of government. Local and regional authorities are responsible for delivering many public services and for maintaining infrastructure such as roads, energy, water, waste etc. Land use planning done by local and regional authorities can greatly influence the preparation to potential extreme weather events. Those same planning elements and policies can lead to energy saving and reduction of greenhouse gases emissions from traffic, housing and buildings for decades ahead.
28. The other start point should be to work on vulnerability. We need to know where we are before we can identify where we want to be. An idea would be to develop the concept of a local “vulnerability map” which identifies not only those areas sensitive to current climate conditions (the present climate driver) but the present adaptive capacity of communities, settlements, etc. (the socio-economic driver) and of habitats, ecosystems etc. (the environment driver). The map would be based on climate change and risk criteria (increased risks of flood, drought, storm, wind, heat, fire...notably based on existing occurrences and observations).

⁴ the CEMR Guidebook “Save energy, save the climate, save money. Guide for local and regional government, mentioned in paragraph 4, contains many examples of good practice

29. The map could draw from existing sectoral assessments (eg; water situation) but would present the vulnerability picture in an integrated way. The map would create a catalogue/map of locations, communities, ecosystems etc. that are vulnerable to present climate conditions and allow assessing what is being done to protect against current vulnerabilities. Then actions can be taken to climate proof the vulnerable items against both today's climate and what we might expect in the future. Indeed, once a vulnerability map is drawn then local and regional authorities know where to prioritise their actions. The aim should be to eliminate vulnerability to current climate and then consider the impact studies to make sure the measures climate-proof the solutions for future climates.
30. The local vulnerability map would constitute a bottom up rather than top down approach. The map should be developed on a voluntary basis. It would provide evidence to the local and regional authorities to apply for support from the national and EU authorities for the development of adaptation policies.
31. National adaptation plans have proven (e.g. in the Netherlands) to be a useful tool for a systematic approach towards adaptation to climate change. These may include measures in the fields of water management, risk management and heat protection in the cities. Furthermore, the experience of some of our members has shown that systems for emergency response to extreme weather can be valuable preemptive measures.

CEMR proposes more specific actions in its responses to the questions of the Green Paper, in the annex.

FINANCING

In light of the climate change challenge, and as demonstrated in the Green Paper, it is very likely that local and regional authorities, in the near future, will have to develop costly adaptation measures. In this context, specific financial support will be needed, like:

32. Emergency funds to respond to natural disasters: the European Union Solidarity Fund, set up after the disastrous floods in Central Europe in 2002, has already proved its usefulness in recent disasters such as the floods in Bulgaria and forest fires in Portugal. Even though it is quite well funded (1 billion euros a year), in light of the increase in the frequency of extreme weather events, it will likely have to be increased.
33. Investments to gradually adapt infrastructures and services to changing climate conditions: here cohesion and structural funds can play an important role; as such CEMR is satisfied by the recognition in the Green Paper that these funds must integrate adaptation needs (mitigation requirements must be integrated too). National governments also have, naturally, an essential role in helping to update public infrastructures.

34. A specific funding line for preventive measures would increase the visibility of the subject and reduce possible reluctance on the part of responsible authorities.

CONCLUSION

35. Adaptation to climate change constitutes a new challenge, and, as such, requires new approaches, strategies and policies. Currently the making of these strategies is hampered by the uncertainty on the scale, timing and consequences of the change to come.
36. This is why CEMR proposes an approach by which we draw vulnerability maps and adopt an integrated approach of mitigation and adaptation policies. Thanks to this work public authorities will be then able to identify and prioritise their actions and create the best synergies. At first, such initiatives should be voluntary for local and regional authorities. If national governments, or the EU, decide to take broad actions on adaptation, and to ask the local and regional level to assess the problems and needs throughout the territory, and to take actions, adequate funding should be provided to the local and regional authorities for doing so.
37. As for other broad challenges, a strategic vision is needed that must be underpinned, in its implementation, by good coordination and cooperation between the different levels of government. The impact of climate change is both global and local. Climate change requires broad policies but also actions at the local and regional level. The impact is global, but a multitude of various local impacts are expected, requiring different solutions. Flexibility at the local level is therefore a prerequisite.
38. By developing a coherent approach to mitigation and adaptation, and actions, local and regional authorities can also benefit in terms of saving energy and money, improving overall environmental performance, enhancing the living conditions of local residents and protecting local people from the threats posed by our changing climate.

* * * * *

Part II: Responses to questions in the Green Paper

Please find below our answers to the questions that we found the most relevant for local and regional authorities.

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?

see also § 7

Local and regional authorities and their citizens throughout the EU face an increased frequency of extreme weather events (floods, heat waves, storms, droughts) with potential dire social, economic and environmental consequences (deaths, diseases, water scarcity, damage to private housing and infrastructure, crop losses, damage to vegetation and biodiversity etc.).

Local and regional authorities will have to face the potential social impacts of climate change as the negative aspects can concentrate on those who have the less means to adapt individually (the most vulnerable; the poor, elderly, isolated etc.).

4) Does the green paper place the right urgency and emphasis on the matter of adaptation in Europe?

Yes. It is timely and open. It puts the right level of urgency.

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? 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?

see also § 10 to 13

Whilst EU and national authorities may set strategic targets, local and regional authorities are best placed vehicle for making assessments of which areas and communities are most vulnerable to the impacts of climate change. Measures are needed to require local and regional authorities to include assessments of vulnerability in their strategic land use plans so that resources are diverted towards the communities where they may be needed.

Local and regional authorities should:

- Develop or introduce stringent construction regulation for flood risk areas⁵. In some countries or regions, even knowing which areas are likely to flood has not stopped local spatial planners from making development

⁵ e.g. in Scotland flood risk maps and flood protection programmes must be drawn, and, as part of the regulation on land planning, a flood risk assessment must be done before any new construction is undertaken.

plans for major parts of the flood-prone areas. Spatial planning is very important, but in many cases locally performed without the full strategic overview of the situation at hand, more focusing on short term economic gains. There is a necessity to increase the level of awareness and responsibility of politicians and practitioners about land use planning; too many construction permits are still given in zones at risk. The local and regional level climate risk management should be integrated with other municipal or regional existing risk management activities (e.g. flood risk management plans, civil emergency plans, health crisis plans, water management etc.). Indeed it does not matter if the risk is caused by climate change or other reasons: the impact is the same, and the plans should be integrated.

- Behavioural changes are necessary (e.g. shut the windows during heat waves, use less water, grow plants that require less watering, drink more water during heat waves etc.). Local and regional authorities can contribute to push citizens to change behaviour. They can run, with the support of national governments or the EU, public information campaigns. Education should play an important role here too.
- New buildings can be made to take into account climate change, and, where possible and if necessary, old buildings should be retrofitted to adapt (and mitigate). Buildings should retain coolness in summer, be well insulated to retain warmth in the winter, and, generally, reduce the use of energy. National programmes can provide incentives to citizens and local and regional authorities to adapt their buildings.
- Cooperation with the private sector: in some countries (e.g. Sweden) insurance companies are helping with the planning process in the sense that they will not insure houses / buildings that are built in areas at risk for flooding. Insurance companies can in this case be a positive factor in securing “climate proof” local spatial planning.
- Increase shade in urban areas. More trees, more parks, more green roofs and other forms of shadow in the public areas can contribute to cool the air and improve the climate in the summer.

National governments and the EU should:

- Continue and strengthen active mitigation policies (national, EU and international emission policies); CEMR encourages the European Commission to monitor the implementation of a strong EU emission trading system (with ambitious national allocation plans that will allow Member States to achieve their Kyoto targets) and to continue to lead the international negotiations on climate protection, notably by making sure the Kyoto Protocol is correctly implemented and by pushing for strong post-2012 measures.
- CEMR also calls on the Commission to develop strong EU emission policies (vehicle emission standards, and, generally, tackling emissions from the transport, energy and industrial sectors); these offer the advantage of also contributing to the objectives of EU legislation on air quality. CEMR also recommends that EU institutions continue to take actions for developing further renewable energies, including biofuels and biomass.

- National governments and the EU should develop action plans and strategies on adaptation to climate change, preferably in a concerted way, and in cooperation with local and regional authorities.
- Governments and the EU should run public information campaigns on climate change and on adaptation, and should support local and regional authorities to also do so.
- The EU should “climate proof” its legislation and policies. The fight against climate change, as well as adaptation, need to be mainstreamed into existing policy frameworks, including trade, external and development policies.
- The EU should act as a facilitator for better sharing and diffusing knowledge and information within the EU about adaptation. A system of exchanges of information, experience and good practice should be set up. The Commission could play a great role in building adaptive capacity through such actions and through awareness rising and could help to prevent duplication of effort.
- Research on adaptation should be stepped up, notably on the identification of vulnerability. The dissemination and the application of the results need to ensure a high benefit at the relevant level.
- National governments should make sure that major national infrastructure is climate proofed for the long term (e.g. flood and sea defences, but also transport and energy infrastructures). Generally, they should mainstream climate change into infrastructure planning and development.
- Governments should reinforce civil defense and protection, and disaster relief mechanisms. The EU should strengthen the European Solidarity Fund for disaster relief.
- National governments should regulate the distributional consequences of climate change – making sure that the poor, disadvantaged, uneducated, old, young and infirm do not suffer disproportionately (e.g. the Afro American experience after Katrina).

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?

see § 7-8

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?

- Climate change is likely to increase migration pressure; this should be addressed in the Green Paper and in EU policies.

11) How should the EU express its solidarity with regions suffering most heavily from the consequences of climate change?

- The EU could create a “adaptation fund” within the European Solidarity Fund in order to help the most vulnerable areas protect against the effects of climate change. Structural funds should be made available for

actions aiming to adapt to climate change where justified. The European Solidarity Fund should also help areas and public authorities struck by direct effects of climate change.

14) What will be the consequences of climate change for Member States' potential energy mix and for European energy policy?

- EU and national energy policies must clearly reflect the mitigation agenda and priorities. The European Council sent the right signal in March 2007 by adopting, for the first time, binding EU targets on renewable energies, and a general (indicative) target on energy savings. CEMR welcomes the flexible approach proposed by the European Commission and validated by the Council (nationally differentiated targets according to potential and starting point).
- The EU must renew its effort on energy efficiency. The EU action plan on energy efficiency must deliver its announcements and lead to the adoption of strong energy efficiency standards on energy using products. Similarly, energy-efficiency labels must be strengthened and extended to more products. It must also deliver a strong strategy for the promotion of passive houses.
- The Commission should also strongly encourage local revolving funds for energy efficiency schemes, as set out in the plan, and introduce measures to promote the connection of decentralised energy production to the general grids.
- The directive on energy end use efficiency and energy services must be strongly implemented; national governments must adopt meaningful national action plans on energy efficiency, and as far as possible, in the spirit of the directive have their public sector lead by example.
- Prices must reflect the cost of energy use to the environment and the climate, and push the consumers to save. Today, promising lower energy prices is an anachronism and makes the EU policies incoherent. The liberalisation of markets can have some positive effects (notably on the development of energy services and of renewable energies) but it should not be used as a tool to promote lower energy prices. Some social mechanisms can help the lower income groups to cope with higher energy prices. Social housing should be among the priority buildings to be retrofitted in order to use less energy.

16) What are the possible synergies between adaptation and mitigation measures? How can these synergies be strengthened?

- All adaptation measures should be “mitigation-proofed” (or carbon-proofed), at all government levels.

23) Do the listed research areas address the most important knowledge gaps?

- Yes

25) How should research results be communicated and made available to decision makers and a broader public at local, national, EU-level and internationally?

- Research results which are practical (i.e. recommendations and guidance to local decision-makers and citizens on how to adapt) should be made available in all EU languages diffused as broadly as possible

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?

See § 6

If yes, which areas should such an Advisory Group concentrate its work on?

- how to integrate mitigation and adaptation policies
- how to assess vulnerabilities and prioritise adaptation measures
- who does what? Identify the roles of the different levels of government and study how to ensure a good coordination between the different levels and create the best synergies

* * * * *