



**VIEWS REGARDING
ADAPTATION UNDER THE LCA**

Submission of the Climate Action Network International¹

30 September, 2008

KEY DEMANDS

- A Shared Vision must result in immediate mitigation activities that limit global warming to well below 2°C above pre-industrial levels, while scaling up by at least three orders of magnitude the support, including funding, for adaptation in developing countries to the adverse impacts of climate change (I.1);
- The Copenhagen agreement must result in a coherent framework for long-term collaborative action on adaptation (I.2 and I.3);
- Key principles should guide how to define “good” adaptation within this framework (I.4);
- Negotiations on a post-2012 framework must be accompanied by immediately enhanced and expanded action to implement adaptation, through a number of different activities (II.);
- The Copenhagen agreement must contain elements that CAN views as pre-requisites of a future adaptation framework, in particular an adaptation funding regime with significantly increased resources, funded by those both most responsible for climate change as well as most (economically) capable, which supports in particular the following activities (III.):
 - Expanded cooperation and support for National Adaptation Planning and Implementation;
 - Expanded action in the field of climate risk management, including an international insurance mechanism;
 - An adaptation technology mechanism;
 - A permanent adaptation body under the UNFCCC;
 - The establishment/enhancement of regional centers/networks.

I. A shared vision for a safer and climate-resilient future

1. Strong action on mitigation and adaptation for a climate-resilient future

The negotiations on a new global climate deal have to face the fact that, at a time where billions of people are already suffering from the impacts of the development crisis such as poverty, hunger, malnutrition, energy poverty etc., climate change is increasingly undermining people’s livelihoods, food security and development prospects and the world’s ecosystems. It increases global inequity. So far, the response of the international community has been largely inadequate, both in terms of limiting global warming and with regard to adapting to its adverse impacts. Business as usual is not acceptable.

¹ CAN-International welcomes the opportunity to provide inputs to the discussions moving towards a post 2012 agreement. CAN is a coalition of more than 400 environmental and development non-governmental organizations in 85 countries worldwide, committed to limiting human-induced climate change to ecologically sustainable levels.

The **impacts of unchecked climate change** are likely to first halt, then reverse human development worldwide. Any level of global warming, which inevitably threatens the existence of entire nations such as low-lying island states or coastal areas, cannot be acceptable as a Shared Vision, just to mention one example of drastic impacts. Strong mitigation is the best approach to limit the costs of adaptation. Thus, global greenhouse gas mitigation targets adopted as part of the post-2012 deal must be guided by the consequences such targets would have on the most vulnerable communities.

CAN calls on all Parties, particularly developed country parties, to join forces to limit the global temperature rise to well below 2° C (above pre-industrial levels), taking into account feedback and non-linear effects in the earth system.

Even such a level would already constitute, for hundreds of millions of people, a severe violation of fundamental human rights, such as the right to food. Also, many ecosystems which play an important role in the livelihoods of billions of people, including their adaptive capacity, would come under increased pressure at such levels of warming. To stay below 2°C will require a rapid reversal of the current emission trend, with global emissions peaking within the next 10 years and declining thereafter.²

However, even the most stringent greenhouse gas reduction efforts will allow the world only to limit, and not to avoid climate change. It is therefore of utmost importance that the world adapts to the now unavoidable levels of climate change. The costs of adapting to it already go into the tens of billions of dollars annually in developing countries alone. Parties, in particular developed countries, have already caused these climate change impacts by their historic and continued emissions. **They have a moral obligation to minimise the harm they are causing – reduce emissions immediately - and to support those who are most affected in coping with the adverse consequences. CAN calls on all Parties to significantly enhance and expand action on adaptation now, up to and beyond 2012.**

2. Adaptation under the Bali Action Plan

The Bali Action Plan launched a comprehensive, long term, process to enable full and effective and sustainable implementation of the UNFCCC up to- and beyond 2012. It places equal weight on mitigation and adaptation, and recognizes the need to enhance focus on adaptation. It lists a number of activities understood as adaptation. In line with this, CAN believes that a comprehensive long term approach to adaptation to climate change is needed in order to address poverty in ways that both reduce climate risk and vulnerability and increase the capacity to respond and adapt to climate variability and change. Climate adaptation activities should be planned and executed within a vision of building long-term resilience and considering ecosystem feedbacks and complex system behaviour. The understanding of climate change adaptation has to include a holistic, yet local approach to what vulnerability means for the local population. People are vulnerable not only to climate change but to a range of other stressors such as socio, economic and environmental processes, health, education and political processes. These processes are interwoven and influencing each other and it is necessary to understand the local risk and vulnerability in order to build the adaptive capacity and resilience of communities.

It is therefore important that adaptation efforts are considered as much more than adapting to extreme events, and also address the long term creeping changes to climatic variations that many communities have been struggling

² See CAN's submission on the shared vision under the LCA

to adapt to for years already. Climate adaptation measures must therefore be context-specific yet comprehensive, addressing a broad range of factors and scales. **Faced with this complexity we call for a comprehensive approach to adaptation that entails a range of measures that 1) reduce the physical risk posed by climate change, ii) address and reduce the underlying factors of vulnerability and iii) strengthen adaptive capacity.**

In CAN's view there is a need to incorporate adaptation into broader development efforts, and address central development challenges facing people and communities, while considering ways that climate conditions influence these challenges. In addition, adaptation activities need to be based on sufficient understanding of local livelihood strategies and contexts, gender aspects, poor people's problems, efforts, values and aims and how these relate to local climate variability and change.

3. Towards a coherent framework for collaborative action on adaptation

The shared vision for adaptation must present a coherent framework for collaborative action that massively scales up commitment and delivery of adaptation resources and capacity. Such framework must

- ensure that adaptation financing, capacity and other urgently needed resources are scaled-up by at least three orders of magnitude, and are delivered to the most vulnerable communities, households, ecosystems and countries (in particular LDCs, SIDS and drought and flood-prone areas in Africa);
- be based on the premise that a comprehensive long term approach to adaptation to climate change is needed in order to address poverty in ways that reduce climate risk and vulnerability, considering ecosystem feedback and complex system behaviour, and at the same time to increase the capacity to respond and adapt to climate variability and change;
- strengthen the capacity of developing country governments, sectors and civil society to understand adaptation needs, identify priorities and undertake adaptation actions, in order to contribute to national and local sustainable development;
- contain clear commitments by all Parties based on the principle of common but differentiated responsibilities and respective capabilities, especially specific verifiable financial commitments by developed countries;
- entail relevant institutional arrangements.

4. Delivering good adaptation as a shared vision

Since increased action on adaptation under the UNFCCC must have the key objective of contributing to the effective implementation of adaptation for those most in need, CAN requests the following key principles as core components of the shared vision to help define 'good' adaptation:

- Focus on the most vulnerable: Adaptation planning and implementation should entail the transparent identification of the most vulnerable people³ and ecosystems and prioritize increasing their adaptive capacity. This is in line with human rights obligations and world heritage and biodiversity obligations that most developed and developing countries have committed to.
- Promote poverty reduction and long-term resilience: Adaptation activities should be planned and executed within a vision of integrating them into poverty reduction efforts and building long-term resilience. This requires addressing social and technological changes that can contribute to both poverty reduction and climate adaptation, the integration of adaptation and disaster reduction into all policies and strategies at all affected levels, but also considering ecosystem feedbacks and complex system behaviour.
- Inclusiveness: Adaptation projects and programs should actively and meaningfully involve all relevant stakeholders, particularly most vulnerable communities, in gender-balanced planning and decision-making around how adaptation funds are disbursed, used, monitored, and evaluated. Furthermore, dialogue and collaboration between various stakeholders should be encouraged.
- Access to information: Adaptation activities should be conducted in a transparent way, well documented and placed in public domain. Lessons learnt from adaptation projects and programmes also need to be documented properly and spread so that others can draw on the experience, while formulating locally appropriate approaches.
- Attention to Gender: Given the fact that poor women are particularly vulnerable to climate change,⁴ adaptation planning should prioritize adaptation needs of women and ensure that women are actively consulted and included in decisions around how adaptation funds are used, disbursed, monitored, and evaluated.
- Subsidiarity: Adaptation decisions should be made at the smallest, lowest or least centralized competent authority level relevant to the implementation of adaptation.
- Learning by doing: Recognising that the challenges of future climate change are likely to be beyond past experience, effective adaptation requires the development and implementation of flexible programs through which learning can be captured, mistakes rectified, and future activities adjusted. Lock-in to technologies that might be seen as a panacea, but are appropriate only for one particular future climate scenario must be avoided.

³ Current documents prepared under the UNFCCC, such as Initial National Communications, National Adaptation Programmes of Action (NAPAs) or Technology Needs Assessments only very rarely include sound analyses of who and where are the most vulnerable to climate change within countries.

⁴ Women, who make up 70% of the world's poor, depend more than men on natural resources that are threatened by climate change. Poor women also lack access to and control over natural resources, technologies, and credit. As a result, they are more vulnerable to seasonal and episodic weather and to natural disasters resulting from climate change.

II. Immediately enhanced action (now and up to 2012)

Climate change impacts are happening and are already observable and there is no time to waste on addressing growing adaption needs worldwide. The stalling by parties and delaying tactics must stop. We need collaboration and commitment and the time for business as usual is over. Substantially expanded action on adaptation is a key pillar required for any agreement in Copenhagen. It is the litmus test according to which those countries particularly vulnerable to climate change will decide if they can accept such an agreement or not. Parties must broadly agree on elements of future action on adaptation under the post-2012 regime by Poznan in December 2008 to enter into negotiations and finalize them by COP 15.

These negotiations on a post-2012 adaptation framework must go hand in hand with immediately enhanced implementation of adaptation under the UNFCCC, given the already apparent and unavoidable impacts of climate change. To contribute to filling the implementation gap until a new agreement may enter into force in 2013, we ask all Parties to agree in Poznan to develop a **3-year pilot phase of "Adaptation Activities Implemented Co-operatively", with a view to launching it in Copenhagen as a concrete outcome that initiates near-term action before 2013**. This pilot phase should, particularly through the support of developed countries, enhance the implementation of demonstration projects, programmes and policies in particularly vulnerable communities and countries, in particular through

- a package of financial, technical, capacity building and institutional support by developed countries to allow full and effective implementation of National Adaptation Programmes of Action (NAPAs);
- assistance to developing countries in integrating adaptation into all relevant policies and national development strategies and plans, and in formulating long-term adaptation strategies;
- promptly delivery of already pledged contributions and new additional contributions by developed countries into existing mechanisms under the UNFCCC (in particular the Adaptation Fund and the Least Developed Countries Fund);
- the full operationalisation of the Adaptation Fund;
- the strengthening of regional cooperation initiatives;
- enhancing linkages and exchange of experience with other funding streams and institutions dealing with adaptation.

Developing countries shall, recognising the key principles outlined under the shared vision (I.4), increase their efforts to exchange experience on adaptation and to integrate adaptive responses into their policies and planning.

III. The prerequisite elements for a future climate change adaptation framework

CAN regards the following elements as prerequisite elements for a future climate change adaptation framework and necessary corner stones of a Copenhagen agreement:

1. Adaptation funding regime with significantly increased resources

The Copenhagen agreement must result in a significantly strengthened and increased adaptation funding regime for post-2012 action to generate predictable, additional and adequate financial resources for adaptation measures under the umbrella of the UNFCCC process.

- Primary funding purposes should be the elements outlined in III. of this submission.
- Developing countries, especially those particularly vulnerable to climate change, will be granted support for both the longer-term integration of adaptation into national planning and implementation processes and the implementation of concrete adaptation projects and programmes.
- A key catalytic role of the UNFCCC could be, through the establishment of a strong adaptation funding regime, to leverage substantially increased financial resources and strategically spend these to expand the work of existing initiatives which have proven expertise, e.g. in climate-related disaster risk reduction (DRR) activities.
- Given the uniqueness and innovative features of the Adaptation Fund (AF) established under the Kyoto Protocol, CAN thinks that the AF should continue in the future regime as a central element of the adaptation funding regime.

1.1 Funding commitments by Parties

The funding commitments by Parties will be determined based on the following premises:

- It should generate in the order of tens of billions of US dollars annually, according to different estimates of adaptation costs in developing countries which have been repeatedly referred to in the LCA discussions, over and above existing ODA *commitments* (0.7% of developed countries GNI).
- Funding should largely come from developed countries. The burden of funding should primarily be shared by Parties based on indicators of responsibility for causing climate change and the capability to provide resources.
- Adaptation financing needs to be linked to the level and scale of emission reductions, failure to fulfil mitigation targets results in additional adaptation funding burdens, since less mitigation leads to more severe climate change impacts.
- Only those financial contributions that either occur through mechanisms of the post-2012 architecture or that follow criteria and guidelines agreed on by the COP should be counted as contributions towards Parties' determined shares.

1.2 Generation of resources

A number of proposals have been made as to how the necessary resources could be generated. **CAN thinks that the Norwegian proposal of using the revenues from international auctioning of emissions allowances**

requires the focused technical and political attention of the Parties as potentially the most promising instrument. There are good reasons for combining it with instruments that address responsibility on other levels:

- Sectoral level: e.g. through auctioning of allowances/levies in international aviation and maritime transportation, since these sectors already contribute significantly, increasingly and in an unregulated manner to climate change; and
- Individual levels: e.g. through an international aviation passenger levy, since individuals who can afford to pay international flights generally belong to those with more resources and higher carbon emissions.
- Flexible mechanisms: e.g. through the extension of the share of proceeds to Joint Implementation (in case it will remain as a mechanism after 2012)⁵ and Emission Trading.

1.3 Governance

The adaptation funding regime should entail its own fair **governance structure** that decides priorities and procedures for resource expenditure under the authority and guidance of the COP. Management and governance of the resources must be transparent and representative, with a developing country majority, special consideration of the most vulnerable countries and inclusion of non-governmental stakeholders. The governance structure of the AF may serve as a model for the future regime.

2. Expanded cooperation and support for National Adaptation Planning and Implementation:

A key purpose must be to support developing country governments in their own efforts to advance successful and effective national adaptation planning and implementation. CAN thinks that a one-size-fits-all approach would not be appropriate, given the diverse nature of possible actions to increase the adaptive capacity. Thus, it is vital that the adaptation funding regime supports developing countries in their adaptation planning in a flexible manner, based on priorities identified in transparent and inclusive processes, and contains sufficient resources for implementation of the necessities identified rather than limit support to the preparation of strategies or plans. Given the early stage of adaptation implementation, capacity building on all levels will be vital.

Developing countries may choose from different instruments which in their view, based on their national circumstances and sustainable development priorities identified in transparent and inclusive processes, may be the most suitable approaches to bring forward adaptation in national planning. Many Least Developed Countries have gained substantial experience through the NAPA process, other vulnerable countries would appreciate being supported in similar processes.

2.1 Long-term Adaptation Action Strategies: The integration of climate risks - both extreme events and slow on-set risks -, risk reduction and adaptation into governments' policies and development strategies is crucial to

⁵ See CAN's submission on "Views regarding the second review of the Kyoto Protocol under Article 9", 19 September 2008, which calls for exploring whether JI is still needed for certain countries given that they have economy-wide emissions reduction commitments.

safeguard progress in sustainable development and poverty reduction and to build climate-resilient societies. Thus, CAN suggests that developing Long-term Adaptation Action Strategies to become an integral part of the future adaptation framework and should include the following:

- The principles outlined under I.4 shall also apply to the development of these long-term adaptation strategies; This is particularly necessary to allow civil society and other stakeholders to hold governments accountable and monitor their decisions and activities;
- Preparation and implementation should build on existing experience and guiding frameworks, such as the Hyogo Framework for Action on Disaster Risk Reduction 2005,⁶ with the aim to integrate the prevention and reduction of climate-related risks into national development planning;
- Developing countries would receive financial support from the adaptation funding regime to have covered the costs of developing and implementing the Long-term Adaptation Action Strategies. The needs of developing countries most vulnerable to climate change, are prioritised;
- Developing countries may chose to develop intermediary instruments to implement their long-term adaptation strategies, such as through specific plans which outline key progress to be achieved and activities to be taken in a limited timeframe.

2.2 Concrete adaptation projects and programmes: While developing long-term adaptation strategies and promoting the integration of adaptation, the implementation of concrete adaptation projects and programmes is still urgently required, and will continue to do so for years. Developing country Parties must be supported by the adaptation funding regime in planning and implementing such projects and programmes, based on the principles outlined under I.4 and national priorities identified in a transparent and inclusive process. The operations of the Adaptation Fund under the Kyoto Protocol, including its principles and guidelines may serve as a very useful basis for this purpose after 2012.

3. Expanded action in the field of climate risk management, including an international insurance mechanism

In CAN's view, enhanced action is needed to appropriately manage climate change risks, in particular those from extreme weather events. A comprehensive strategy under the UNFCCC must include both actions to prevent and reduce climate-related risks (see above) and to help countries to cope with the costs and damages that climate-related disasters impose on them through an insurance mechanism. Such a mechanism needs a strong institutional link to the disaster risk prevention and reduction activities as part of the Long-term Adaptation Action Strategies as described above.

CAN requests Parties to establish an international insurance mechanism as an integral element of a post-2012 adaptation.⁷

⁶ Recommended by the UN/ISDR in *Disaster risk and climate change*, March 2008

The international insurance mechanism

- Shall be funded through the adaptation funding regime and thus primarily by those Parties which are most responsible for the cause of climate change and most capable to bear the costs;
- shall pool the risks over countries particularly at risk from extreme events and support responses in case of very large weather catastrophes;
- should provide technical support and other forms of assistance to help countries cope with the increasing frequency of medium-size disasters, including through expanding insurance solutions for the most vulnerable people;
- should be designed in such a way that it offers incentives to prevent climate-related disasters as part of successful National Adaptation Planning (see above), taking into account national circumstances and capabilities.

4. Adaptation Technology mechanism

The mechanism would enhance the transfer, diffusion and deployment of adaptation technologies in particular to the most vulnerable communities in developing countries. It must include provisions for removing IPR barriers. Whether the mechanism is located within a wider technology framework or is a separate mechanism under the UNFCCC, it must take into account the many ways that adaptation technologies differ to mitigation technologies, including the context-, site- and problem-specific nature of adaptation technologies. The adaptation technology mechanism can play a significant role in assisting countries with the development of long-term adaptation strategies.

5. A permanent UNFCCC adaptation body

Adaptation is currently covered under the Convention in a fragmented way. However, it needs a coherent and strategic approach across all workstreams and components of the UNFCCC to bring together adaptation as a strategic cross-cutting priority. None of the existing arrangements (e.g. the Nairobi Work Programme on Impacts, Adaptation and Vulnerability or the Least Developed Countries Expert Group) has the mandate to fulfill this task comprehensively. To facilitate this, and in particular enhanced action for implementation, a permanent UNFCCC adaptation body should be established, with the following key functions:

- Assess progress and recommend further action to the COP (in particular under SBI), based on Parties requests and reflections;
- develop guidelines and give guidance for the preparation of Long-term Adaptation Action Strategies;

⁷ see e.g. the submission from Munich Climate Insurance Initiative (MCII, 2008): “Insurance Instruments for Adapting to Climate Risks”, http://unfccc.int/essential_background/library/items/3599.php?rec=j&preref=500004788#beg

- assist the adaptation funding regime;
- develop mechanisms/instruments to verify countries' commitments related to adaptation, including financial and technological support by developed countries.

This body should take the form of a multi-stakeholder committee with government, expert, civil society and private sector participation. It should build on experience gathered through e.g. existing arrangements under the UNFCCC.

6. Establishment/enhancement of regional centres/networks

Enhanced regional cooperation on adaptation, linked to international and national adaptation action under the UNFCCC, will be an important element to initiate learning processes among Parties and their institutions:

- The adaptation funding regime should contribute to a significant expansion of the work of centres and networks of regional cooperation on adaptation, climate resilience as well as disaster risk prevention and reduction, also expanding, and building on, the work of existing institutions/facilities with proven expertise in the field.
- The key purpose is to scale-up and facilitate capacity building on national and sub-national levels, with a view to accelerate the implementation of adaptation on the best scientific basis available.
- The regional centres would work in close collaboration with the newly established permanent adaptation body, as well as with existing institutions/networks outside the UNFCCC which have proven expertise in fields that are relevant to adaptation.
- Regions may prefer to scale-up the work of existing institutions or networks rather than setting up new institutions.

However, CAN would like to stress that neither the envisaged post-2012 adaptation framework as a whole nor the implementation of individual elements as outlined above replace or excuse the need for hard and fast emissions reductions and financing needed to meet the costs that Parties have already caused by their historic and continued emissions.

Action on mitigation and adaptation are two sides of the same coin.

Failure to deliver either one or the other will have drastic consequences.