



Submission by CAN-International on National Adaptation Plans

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Climate Action Network – International is a coalition of 700 environmental and development non-governmental organizations worldwide committed to limiting human-induced climate change to ecologically sustainable levels.

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Key aspects

- Overall, it is important that decisions in Durban set out and elaborate on an international process that will enable LDCs to formulate and implement national adaptation plans, clearly articulating the role, responsibility and functions that the UNFCCC will offer, support and facilitate;
- Elements in the run-up to Durban, such as the NAP expert meeting and the LEG paper on mid- and long-term adaptation planning, provide an important opportunity to prepare such a decision and should be used in a focused manner;
- Given past experience, the specific form and format of national adaptation plans and strategies should be decided by each country, whether to create a stand alone plan as a complement or to incorporate the ‘elements of national adaptation planning’ into existing strategic plans;
- The Cancún Adaptation Framework (paragraph 12, 1/CP.16) manifests important guiding principles which have to be further concretised in order to be applied in national planning processes.

1. Background and context

The SBI invited Parties and relevant organisations at the conclusion of its 34th session, building on 1/CP.16, to submit to the secretariat, by 15th August 2011, as an input to the possible expert meeting, views on matters related to the process on national adaptation plans mentioned in the conclusions:

(a) Identify and discuss elements and deliverables of the process to enable least developed country Parties to formulate and implement national adaptation plans, building upon their experience in preparing and implementing NAPAs;

(b) Elaborate draft modalities and guidelines for least developed country Parties and other developing country Parties to employ the modalities formulated to support national adaptation plans (NAPs).

CAN welcomes the invitation to submit views and to thereby feed experience from its broad and diverse member organisations into this extremely relevant process. For clarity, we would like to set out *in what way* we are responding to the specific questions a) and b).

For a) we are interpreting the 'process' as the global one (UNFCCC focused) addressing issues such as workshops, reporting, etc. Specific suggestions are provided in section 2 of this submission.

For b) we are interpreting 'modalities' as technical support, funding etc at the global level (section 3.1), and 'guidelines' as wider principles and elements required from national adaptation planning and which should form substantial elements of national adaptation plans (section 3.2).

Furthermore, the term National Adaptation Plans (NAPs)¹ will be used in this submission only for reasons of brevity, without assuming that a specific plan called a "National Adaptation Plan" will be an automatic outcome of the process, for reasons which are addressed further below.

1.1 General context

Climate change impacts are already devastating for many of the poorest communities in Least Developed Countries (LDCs). There is still a big need for short-term finance for urgent and immediate needs in LDCs as identified in their National Adaptation Programmes of Action (NAPA). However, due to the long term and dynamic nature of climate change and likely increase in intensity and frequency of climate change impacts, it is necessary to support adaptation planning that also take into account future risks and uncertainty. The focus of National Adaptation Plans (NAPs) on the mid- and long-term is, therefore, welcomed.

We strongly support lessons being learned from the NAPA process and highlight here some important generic lessons. Of particular note, to date 45 of the 48 LDCs have produced NAPAs, however much potential value of the NAPA process has been undermined due to the very limited availability of funding for projects identified under the NAPA. Almost all NAPAs have also been created to exist separately from, and in addition to, other planning documents such as Poverty Reduction Strategy Papers or nationally-owned development or disaster management plans. They were also developed in response to internationally agreed guidelines and limitations, rather than following a country's own choice of procedure for planning for climate change resilience. To enhance country ownership and to more actively address challenges such as integration across sectors or mid- and long-term adaptation needs, some LDCs have developed advanced strategies which offer particularly valuable lessons.²

We want to highlight that welcome attention on addressing medium and longer term needs through NAPAs must in no way mean that implementation of NAPAs and their priority projects are neglected. Support for NAPAs and their implementation has to continue and financial support be scaled up.

1.2 On the way to COP17: expert meeting and LEG paper

CAN would like to use this opportunity to stress that in order to move NAPAs forward with a view to adopting a decision at COP17, as agreed in Cancún, it is of utmost importance that the expert meeting to be held from 15 to 17 September will be designed in a way that it results in an outcome which provides greater clarity on elements and deliverables that LDCs and other developing countries require from this process. Up front in our response, we would like to suggest the following aspects be considered by this meeting to provide important impetus into the negotiating process and thereby to contribute to a successful agreement in Durban:

- presentations of views and experience by Parties (both developing countries and developed countries) who have already developed National Adaptation Plans or national climate change strategies, on how

¹ It should also be recognised that the acronym NAP is already used in the UNCCD process for National Action Plans, which may create confusion.

² The 'Bangladesh Climate Change Strategy and Action Plan' (BCCSAP) is a much broader substitute for a NAPA – and the Bangladesh government's latest 'Five-year [development] plan' incorporates all elements of the BCCSAP. In Nepal, an 'expanded' NAPA was produced, which included strong participatory elements and achieved country-ownership across diverse stakeholders as well as gave consideration to the mid-term adaptation needs of Nepal (further detail provided in Wiggins S (2011) *Adaptation United Building blocks from developing countries on integrated adaptation*, Tearfund UK available at www.tearfund.org/tilz).

they have approached the adaptation challenge in these strategies, and what their conclusions are with regard to this process;

- presentations of views and experience from civil society and research organisations on national adaptation plans and strategies, including participatory and consultative aspects of design and formulation processes in selected developing countries, the role of gender analysis in prioritizing action and identifying needed policy change, the availability of vulnerability assessment and integration tools, and how to develop an integrated approach to national adaptation planning; and
- experience on assessing and estimating costs of larger-scale programmatic approaches, such as sectoral and cross-sectoral adaptation programmes.

As of immediate relevance, we would also like to highlight that the LEG is in the process of preparing a **technical paper**³ expected to be released at its 20th meeting. This is due to be held right before the expert meeting on NAPs. The paper will elaborate on “how medium- and long-term adaptation activities can be implemented in LDCs, taking into account processes of integrating adaptation into national development planning, including sector-wide and programmatic approaches.” This provides an important input which the expert meeting should use as a key basis for the discussions. The technical paper should in particular consider aspects mentioned in section 3.

2. Elements and deliverables of the process (a)

Overall, it is important that decisions in Durban set out and elaborate on an international process that will enable LDCs to formulate and implement national adaptation plans, clearly articulating the role, responsibility and functions that the UNFCCC will offer, support and facilitate, for example through a clear framework that includes means for continual review and improvement of the process itself.

The UNFCCC process for NAPs at the global level should prioritise LDCs, taking into account the special attention they require, through *inter alia* delivering a process or processes that provide:

- Opportunities for shared learning, including South-South learning, technical assistance, including future opportunities through bodies such as the Least Developed Countries Expert Group, Nairobi Work Programme and Adaptation Committee.;
- General assistance on frameworks and guidance regarding national processes to promote consistency with regard to scope, coordination of climate strategies with other national plans, adherence to principles included in the Cancun Agreements (incl. paragraph 12 of 1/CP.16);
- Modalities for updating plans to enable an iterative process that is responsive to long-term climate change and variability and related threats and opportunities;
- Opportunities to build national, local, and civil society capacity;
- Avenues for financial support for aspects related to the design and implementation of such mid- and long-term strategies.

Process needs could be addressed and met through a variety of means such as timely negotiated outcomes, inclusive and participatory workshops, technical reports, expert meetings, peer to peer learning platforms, etc. A broad base of expertise can and should be drawn upon to facilitate the process objectives required, including:

- LDCs' experience with preparation and implementation of NAPAs
- Expertise of the LEG (including the results in the LEG's work programme on identifying medium and long-term needs, such as the technical paper to be prepared addressed below)
- Experience from other national level planning processes, including, among others, low carbon and climate resilient development strategies⁴

See ³ FCCC /SBI/2011/4

⁴ This could also include experience from the preparation of national adaptation plans in developed countries, e.g. as contained in a Europe-focused comparison, see e.g. Swart et al., 2010: Europe Adapts to Climate Change. Comparing National Adaptation Strategies. http://www.peer.eu/fileadmin/user_upload/publications/PEER_Report1.pdf

- Experience from funding entities which have provided support to relevant approaches, such as the Global Environment Facility, the Pilot Programme for Climate Resilience or bilateral entities
- Experience from other processes assessing the costs of adaptation actions, including the UNFCCC NEEDS process
- Paragraphs 12 and 14 of 1/CP16
- Expertise and contributions of civil society, research, intergovernmental and other relevant institutions
- The Adaptation planning and practices Work Area of Nairobi Work Programme
- The UNFCCC National Communications process (including the expertise of the Consultative Group of Experts on NCs).

3. Draft modalities and guidelines (b)

3.1 Modalities

Modalities (technical and financial support, etc) should also draw upon broad expertise as for example from the bodies, institutions and sources listed above in 3 i) –ix) and be delivered through a variety of process means. The resource base and means of delivery could and should be broader recognising that modalities need to support developing countries Parties more generally, and not focus on LDCs alone. We would, however, stress the pressing needs of LDCs and the need to prioritise the most vulnerable.

Financial modalities for NAPs are critical, and important lessons need to be learnt from the NAPA experience. For example, when countries develop such planning documents, they must be able to expect that they will be supported by the international community in the design (particularly to enable inclusive planning and consultations in accordance with para 12 1/CP.16) and implementation of such strategies, in particular through programmatic and budget support, rather than just limited to the funding of specific small projects or technical support. The NAP process through the UNFCCC needs to facilitate this clearly and fairly.

While the NAP process must be country-driven, vulnerable countries should benefit from clarity regarding funding modalities and requirements in order to avoid having to rewrite/resubmit strategies and proposals that were previously developed through participatory processes when they approach funding institutions such as the Least Developed Country Fund or the Green Climate Fund, with a view to minimising barriers for funding of NAPs. This should be applied not only to LDCs, but also to other developing countries that are likely to make use of the modalities and guidelines developed through this process.

Linked to this, there is a need for wider recognition of the need to achieve the transformational change that adaptation to climate change will require, that can only occur over a longer time period, through an iterative process of development. Longer planned project implementation periods of 5-10 years are necessary to support this. Flexibility needs to be built into project and programme design and implementation systems to encourage a cyclic process of learning at the national and district and local levels; these must include built in mechanisms for regular participatory decision making and implementation of multiple stakeholders including the most vulnerable groups and communities

Monitoring and evaluation of the planning process (including M&E of the participation of local communities & civil society) and of implementation efforts, including in accordance paragraph 12 of 1/CP16 is also significant to address. The plumb line for measuring success should be shared resilience indicators that cut across sectors and address a multitude of stressors (rather than trying to achieve ‘adaptation’ as an end game). It is important to recognise the strong overlap between adaptation and disaster risk reduction, water, agriculture and other sectors.

3.2 Guidelines

Experience from other processes, as well as the nature of adaptation itself, suggest that the approach to the NAPs process should take into account *inter alia* the following aspects:

- Each country starts in a unique place and will likely take a unique path;
- The process should NOT require that plans be delivered in a specific format;
- Countries should NOT be required to undertake a specific planning process, since no single step-by-step planning sequence is likely to apply equally well in a large number of different countries;
- Assumptions should NOT be made about the institutional arrangements countries will use for adaptation planning and implementation;
- Engineering a broad-based consensus on adaptation requires a partnership approach based on local ownership;
- Any planning process should put people and the actions they can take at the centre of adaptation strategies.⁵

Therefore the specific form and format of national adaptation plans and strategies should be decided by each country, whether to create a stand alone plan that complements other strategic plans (notably development and disaster management plans), or to incorporate the 'elements of national adaptation planning' into existing strategic plans (including plans for low-carbon development for all relevant sectors).

CAN would like to recommend a number of elements which are important to consider in order to develop a longer-term approach to adaptation at a national level which delivers on essential needs.

These include, in particular, all the principles contained in the paragraph below in italics.

The process should follow an inclusive and integrated country-driven, gender-sensitive, participatory and fully transparent approach that considers vulnerable groups, communities and ecosystems, and acts to integrate adaptation into relevant social, economic and environmental policies. Priority should be placed on full and effective participation by local communities and the most vulnerable groups and communities to ensure country ownership and integration of local needs and priorities (as per paragraph 12 of 1/CP16).

Furthermore, national adaptation planning should deliver:

(i) To vulnerable groups and ecosystems

- Outcomes that benefit the most vulnerable groups, communities and ecosystems. NAPs are expected to address all aspects of needed adaptation, including transboundary concerns. To avoid maladaptation, to encourage integration and enable shared learning, they should prioritize the most vulnerable groups, communities and ecosystems (per paragraph 12 of Cancun Agreements). This is in line with, and can serve to further, human rights principles which almost all governments in the world have promised to adhere to as well as principles of sustainable development.
- Incorporation of gender and the specific needs of children. Recognizing that climate change impacts women and men, girls and boys differently, medium- and long-term planning processes should include gender- and children- differentiated analysis of impacts, risks and vulnerability as well as prioritize gender- and children-sensitive implementation approaches
- Incorporation of ecosystems and the role and vulnerability of natural systems and processes. Climate change will impact biodiversity and ecosystems both directly and indirectly through human responses to it. Medium- and long-term planning processes should include analysis of ecological impacts, risks and vulnerability and prioritise no / low regret implementation approaches that do not erode the resilience of natural systems and support human needs into the future.
- Better project and programme design, resulting in design that is accountable to the poorest and most vulnerable, incorporates rigorous analysis, modelling, and comprehensive vulnerability assessments and uses the results to identify needs, gaps in capacity and prioritisation of activities; this will generally mean

⁵ Adapted from McGray, 2009: Adaptation Planning Under a Copenhagen Agreement: Laying a Foundation for Projects, Policies, and Capacities that Countries Need, World Resources Institute, http://pdf.wri.org/working_papers/adaptation_planning_under_a_copenhagen_agreement.pdf.

spending more time on the design phase, but this should be balanced with pragmatism for needing to get on with the task and learning through an iterative processes

- Project and programme design as described above should therefore include comprehensive vulnerability assessments that include social, economic, environmental and political factors recognising different and relevant scales (geographic, ecological and temporal); this can inform the identification and prioritization of the most vulnerable sectors, populations, and ecosystems as well as give consideration to the underlying causes of vulnerability.

(ii) Capacity building and participation at design, implementation and review (all) stages

- Actions that achieve resilience and build adaptive capacity⁶ that have been prioritised through participatory decision making processes by multiple stakeholders, including the most vulnerable groups and communities, particularly women and children.
- Modelling and projections of risks and impacts can inform assessments of needs, gaps in capacity, and prioritization of activities. Comprehensive vulnerability assessments that include social, economic and political factors as well as geographic location and the health of ecosystems can inform the identification and prioritization of most vulnerable sectors, populations, and ecosystems as well as the underlying causes of vulnerability.
- Identification of gaps in institutional and civil society capacity to contribute to participatory decision making and implementation processes and mechanisms to address these gaps.
- A process that builds in effective review and learning to enable periodic updates and for transformational changes to evolve over time, and that is participatory and allows for ongoing capacity building to enable vulnerable groups and communities to participate.

(iii) Contributing to mid and long-term resilience to all stressors in and across all sectors

- Contribute to a better mid and long-term resilience to climate change, in particular through measures that increase the adaptive capacity, while making sure that resilience to other stressors is also being built.
- Resilience-building and increasing adaptive capacity in the following sectoral areas should be considered and prioritised according to the needs of the most vulnerable, and poorest people: Agriculture, Disasters, Education, Energy (for both adaptation and mitigation purposes), Environment, Fisheries, Forests, Health including nutrition, Local government, Meteorology, Natural resources and biodiversity including coastal resources, Rural development, Urban settlement, Water, Women and children. This should be done in an integrated cross sectoral way where ever possible to avoid solutions for one sector negatively impacting another and could be facilitated e.g. by appropriate local resilience frameworks .
- Shared goals for transformational development, disaster risk reduction and adaptation which support wellbeing, resilience, economic development and environmental sustainability in a changing climate.
- Outputs that focus on building resilience at different levels (local, sub-national, national recognising the different scales at which different human and natural systems function and work) in a way that may reduce the impact of the many stressors which limit adaptive capacity of people (eg through defining rights and entitlements, supporting equitable resource access, devolving decision making processes, providing access to justice, increasing partnerships and access to information, strengthening ecosystems, building social capital, providing conflict resolution mechanisms and disaster preparedness strategies⁷).
- Promotion of synergy with other international commitments and agreements (eg Hyogo, UNCBD, UNCCD).

(iv) Better recognition of the importance of qualitative and softer results over a longer time period, allowing for iterative development

- Increased softer, qualitative results and planned project implementation periods of 5-10 years.
- Flexibility built into project and programme design and implementation systems to encourage iterative learning at the national and district and local levels, to enable transformational changes that evolve and

⁶ Adaptive capacity is defined as the potential of individuals, communities, and societies to be actively involved in the processes of change, in order to minimise negative impacts and maximise any benefits from changes in the climate.

are added to over time. These must include built in mechanisms for regular participatory decision making and implementation of multiple stakeholders including the most vulnerable groups and communities.

- Monitoring and evaluation of the planning process (including M&E of the participation of local communities & civil society) and of implementation efforts, including in accordance paragraph 12 of 1/CP16 – the plumb line for measuring success should be shared resilience indicators that cut across sectors and address a multitude of stressors (rather than trying to achieve ‘adaptation’, recognising the strong overlap between adaptation and disaster risk reduction, water, agriculture and other sectors).

The International (UNFCCC) process and agreed guidelines and modalities must not be prescriptive but should recognise important elements, such as those outlined above, to help enable flexible, country-led planning, as well as cross-border cooperation and country to country learning, that delivers for the most vulnerable groups, communities and ecosystems into the future. The provision of reliable and predictable international climate finance will be crucial to address the mid- and long-term needs, but other streams of funding that can contribute towards building resilience in a broad way (not just resilience to climate change but resilience to a multitude of stressors) may play an important role as well.