

MINISTRY OF CLIMATE AND ENERGY

The European Commission

Ministry for Climate and Energy

The Danish government's consultation response to the EU-Commission's "Green Paper on Adapting to climate change in Europe - options for EU action" (COM(2007) 354 final)

The Danish government finds that observed and projected climate changes - as assessed by the Intergovernmental Panel on Climate Change and others – should remain the unequivocal basis for the European Commission Green Paper. The four “pillars” of the Green Paper contains a balanced view of the challenges lying ahead. They address key vulnerabilities to impacts and they provide a good foundation for future necessary adaptation measures from a policy perspective. The Green Paper addresses priority issues within and outside EU in a comprehensive manner.

The Danish government is of the opinion that because many adaptation measures can be or are being planned locally, nationally, or at European level, it is important to determine the role the EU has in this field, taking into account the subsidiarity principle.

The Danish government has published its own national adaptation strategy in parallel with the consultation process on the Green Paper. Although there are many similarities between these two, the Danish government would like to emphasize that national adaptation plans should not be restricted or delayed because of future EU regulation with respect to adaptation. On the contrary, future EU-legislation should support and reinforce national measures as much as possible. An important role for the EU could be to facilitate and coordinate planning and implementation of actions to reduce vulnerability and to secure societies against trans-national impacts. This support could consist of offering common sources of relevant information and by integrating climate change adaptation and mitigation measures into relevant sectoral legislation and Community Funds. The dimensioning of adaptation measures should be based upon a balanced assessment of the expected consequences of climate changes, the likelihood that they take place as well as the costs of prevention. In this respect it should be taken into consideration that an autonomous adaptation takes place in society.

The Danish government supports the Commission's proposal to establish a permanent entity under the European Climate Change Programme, which will provide the focus point of future EU-work on adaptation.

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With respect to the four pillars of the Green Paper, The Danish government has the following general comments:

Pillar 1

Where current knowledge is sufficient, adaptation strategies should be developed in order to identify optimal resource allocation and efficient resource use which will guide actions at EU level, through EU sectoral and other policies and the available Community Funds.

The Danish government agrees that early action on adaptation in Europe is needed and feasible. Key trans-national impacts – such as droughts and major river floods – should foster rapid action to include effective climate change adaptation measures into existing and future legislation and funding programmes – rather than developing separate European adaptation policies.

The Danish government would like to see a comprehensive listing of all legal instruments of importance to adaptation, including any plans or agreements to revise or evaluate these.

Pillar 2

The EU needs to recognise the external dimension of impacts and adaptation and to build a new alliance with its partners all around the world and particularly in developing countries. Adaptation action should be coordinated with its neighbours and cooperation with international organisations should be further strengthened.

Because poor people in developing countries are the most vulnerable to climate change impacts, the integration of climate change adaptation in European development collaboration activities is imperative. It is primarily the responsibility of the member states to meet their commitments in this area.

The Danish government welcomes the recent EU-initiatives as highlighted in the Green Paper. This includes the establishment of the *Global Climate Change Alliance*, which is a good instrument to strengthen the dialogue and collaboration between the EU and developing countries. The Danish government further welcomes the Commission's decision to allocate 50 million EUR over the period 2007-10 to these activities, which will strengthen targeted adaptation and mitigation efforts in developing countries.

The Danish government supports the Commission's view that the *European Neighbourhood Policy* (ENP) is a suitable instrument for supporting adaptation measures in neighbouring countries including Russia.

Future adaptation initiatives should be aligned with and build on the UNFCCC Nairobi Work Programme on impacts, vulnerability and adaptation to climate change.

Pillar 3

Where there are still important knowledge gaps, Community research, exchange of information and preparatory actions should further reduce uncertainty and expand the knowledge base. Integration of research results into policy and practice should be reinforced.

The Danish government supports the Commission's proposal to develop a European-level information system to facilitate exchange of data, methods, and information on good practice in response to both autonomous adaptation and policy actions. The Danish government would like to propose that coordination of this work as well as the elaboration of an updated synthesis reports on impacts, vulnerability and adaptation to climate change should be undertaken by the *Partnership for European Environmental Research (PEER)* involving 7 of the largest research institutions in Europe including the Joint Research Centre and the National Environmental Research Institute (NERI) in Denmark. The Danish government agrees with the research strategy as indicated in the Green Paper and further agrees that there is an urgent need to develop an up-to-date European-wide overview of available socio-economic assessment methods and tools, which could be used to assess or estimate adaptation costs and benefits.

The Green Paper mentions a number of areas – including the North Atlantic – where understanding of future impacts could be improved. The Danish government would like to emphasise the need to focus on the Baltic as well. It is necessary strengthen the European research effort to address the impacts of climate change in this vulnerable region, as the runoff area from 8 European countries will contribute to increasing nutrient loads to the Baltic in a warmer and wetter climate. This strengthening should take place within the context of the *Common Agricultural Policy*, the *Water Framework Directive* and the *Marine Strategy*. A number of EU financial instruments should be applied to tackle increasing problems with eutrophication of the Baltic i.e. through establishment of wetlands, which act as buffer areas to reduce excessive nutrient loads entering the Baltic Sea.

Pillar 4

Coordinated strategies and actions should inter alia be further analysed and discussed, in a European Advisory Group on Adaptation to Climate Change under the European Climate Change Programme.

The Danish government welcomes the Commission's initiative for a broad stakeholder involvement. Since the impacts of climate change will display a varied geographical pattern – e.g. droughts and forest fires will affect mainly southern Europe and leaching of nutrients in a warmer and wetter climate will affect mainly northern Europe – there may be scope for a stronger sub-regional organisation of this new entity. The main purpose of establishing such an entity should be to set priority on those areas in which specific European action would be most needed and effective. There is a strong need for a cross-sectoral approach. Dealing with each sector or each governance level separately may not be enough. Building bridges between different levels of governance should be in the core of the consultation process leading to a future White Paper on Pan-European adaptation measures. Regarding the process, the Danish government very much welcomes the Commission's proposal to involve stakeholders in society, business and the public sector in the process towards the White Paper. In this context, the Danish government supports the establishment of a new permanent structure under the *European Climate Change Programme* with focus on adaptation. The Danish government has not addressed in detail how this new entity could be mandated. However, the Danish government would prefer to be consulted prior to nomination of one or more Danish members of this new entity.

The Danish government's position on a number of specific issues raised in the Green Paper is outlined in the following (numbers refer to Section number and Question number in the Green Paper):

3.3 Further important impacts

Should further important impacts be added? If yes, which ones?

The Danish government considers the following issues as not yet well reflected in the Green Paper

- Resilience against extreme events will require sustainable development and strategic disaster risk reduction measures on a global scale.
- Disaster risk reduction on a global scale will require technology innovation and export of adaptation methods and tools.
- Impacts of climate change on urban areas and the possibilities to adapt need more focus since 80 % of the population lives in cities.

4.5 A coherent adaptation framework

What should be the different roles of EU, national, regional, local authorities and the private sector?

The Danish government would like to see EU develop its role primarily addressing trans-national challenges related to climate change. To this end it is important to focus on the social consequences of climate policies. Prevention of mass migrations due to environmental degradation in concordance with climate change is a key EU responsibility. A pro-active effort, which includes both mitigation and adaptation, should remain one of the highest priorities in the years to come.

5.25 Research communication and outreach activities

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

The Danish government shares its view with the Commission that an integrated and holistic research effort is needed to tackle adaptation in the future. Communication of research results related to adaptation will primarily be a national challenge due to linguistic constraints. One of the key components of the Danish Adaptation Strategy is the establishment of a dedicated web portal for this purpose. The Danish government thus find that a new EU-wide communication hub should be carefully planned, restricted in scope to matters related to trans-national adaptation measures, and be fully integrated in existing research networks, such as the PEER initiative (see <http://peer-initiative.org>).

5.28 Regional aspects

Would the establishment of a European Advisory Group on Adaptation be helpful in further exploring an EU response to the effects of climate change? If yes, which areas should such an Advisory Group concentrate its work on?

The Danish government foresees that a new entity under the *European Climate Change Programme* would need to have a number of sub-regional focus areas in order to operate efficiently. As stated already, two main adaptation challenges will require trans-national collabo-

ration. Tackling drought problems in southern Europe is one key component. The other key component would be concentrated around the Baltic region. Securing the long term stability of the Baltic Sea in a warmer and wetter climate will require close collaboration between the bordering countries. Main emphasis should be on the multiple threats to the marine environment. Leaching of nutrients from agricultural soils is expected to lead to more harmful algal blooms and an-oxic conditions near the bottom. Adding to the complexity will be higher water temperatures, higher runoff and changing wind conditions in the future. Adapting to these circumstances will require trans-national expert knowledge of the highest calibre.

Conclusion

The Danish government is generally positive towards the Green Paper and supports the Commission's view – in line with the Danish Adaptation Strategy – that existing and new EU-legislation should be streamlined to include adaptation to climate change. A strengthened effort to focus research on adaptation issues is also very much in line with the Danish view. It is of primary importance to engage citizens, authorities and industry in the process, since they will have the main responsibility for autonomous adaptation in practise.

The Danish government would like to emphasize the following:

- The work to turn the Green Paper into a White Paper should be pushed forward as soon as possible in a way that the EU-legislation on adaptation supports and complements ongoing work with national adaptation strategies and plans.
- The work related to coordination of research on adaptation to climate change should take place within the remits of the *Partnership for European Environmental Research (PEER)* and that a special research focus is needed to address adaptation in the Baltic region.
- A new permanent entity should be established under the European Climate Change Programme (ECCP), which will concentrate its efforts on strengthening the European adaptive capacity.