

## **Scottish Government**

## **Draft Climate Change Adaptation Programme Consultation**

## **Background to CIWEM**

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent commentary on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to respond to the Scottish Government's consultation on its draft Climate Change Adaptation Programme. This response has been compiled with the assistance of members from our Climate Change Network.

## Response to consultation questions

We welcome the opportunity to comment on this document. We do not have detailed comments on the questions posed, but would make the following comments:

Greenhouse gas emissions to date mean that effective climate change adaptation strategies are needed to complement efforts at mitigation. A highly co-ordinated and strategically focused adaptation plan for Scotland is vital, as planned adaptation is cheaper and more effective than reactive, unplanned action. We are supportive of the overall approach to the plan, focusing on those risks identified as urgent by the Committee on Climate Change (CCC) in their 2017 Climate Change Risk Assessment (CCRA), and building on the advice from the Adaptation Sub-Committee's first review of the Scottish Climate Change Adaptation Plan (SCCAP) in 2016.

We support the draft Programme's outcome-based approach based on the Sustainable Development Goals. An outcome-based approach will lead to actions and targets which are measurable and enable progress to be tracked against them. The inclusion of a long-term vision for adapting to climate change is essential in order to identify and prioritise the actions needed to achieve it. The identification of outcome milestones and indicators should be a priority action undertaken as soon as practicable.

The first assessment of the SCCAP by the Adaptation Sub-Committee in 2016 recommended an integrated approach to monitoring and evaluation in the next Programme, and we are pleased that the Scottish Government has taken the advice of the ASC on this. The significant gaps in the existing framework of metrics and indicators should be identified as a priority action, as well as gaps in evidence and data, or meaningful monitoring and evaluation will not be possible. A cross-cutting approach such as this will enable work across sectors and highlight interdependencies in adaptation work.

The proposed National Forum on Adaptation would keep adaptation at the forefront of policy development, and be an effective way of embedding cross-sectoral issues and interdependencies in adaptation. It should deliver increased collaboration and engagement from sectors that are not traditionally involved in adaptation planning.

Adaptation behaviour change by individuals and non-governmental organisations are vital for a well-adapted society, and it is important that wider society understands the role they can play. However, it is important that the onus is not put on the individual, as incentives and drivers for adaptation should come from government in order to make meaningful progress.

Despite the inclusion of a strategic vision and an outcomes-based approach, the draft Programme is a summary of policy actions that are already in train, and we believe it should go further than this and put in place a strategic Programme which should drive forward progress in its own right.

We would be happy to discuss any part of this consultation response with you further, and we look forward to seeing the finalised Scottish Climate Change Adaptation Programme in due course.

Yours faithfully,

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Terry Fuller Chief Executive