

Climate Change Adaptation Plan for Wales
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Sir or Madam,

Draft climate change adaptation plan for Wales

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 comment on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

General comments on the draft climate change adaptation plan

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 Wales 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 Climate Change Risk Assessment (CCRA) and Evidence Report Summary for Wales.

We welcome the inclusion of a vision for what a resilient and well-adapted Wales would look like, which is essential in order to prioritise actions to achieve this. The actions have timescales and stakeholders and action owners, and delivery bodies. This means that those responsible can be held accountable.

The targets in the plan are ambitious, with detailed actions underneath each one, and we welcome the inclusion of prioritised actions for the next five years. The targets are meaningful and measurable. The Plan pulls together ongoing work across sectors but is more than a sum of its parts.

We welcome the plan highlighting the importance of cross-sector working and knowledge sharing throughout the plan. The plan identifies gaps in existing work to identify areas for improvement, and effectively identifies key areas for cross-sector work. It successfully embeds climate change adaptation into Welsh policy-making.

We note that the document commits to reviewing making reporting mandatory under ARP, and we would support this. Many organisations should be used to the requirements to report on adaptation by now. We welcome the commitment to report separately on adaptation from progress on decarbonisation, highlighting the importance of adaptation in spite of any progress on mitigation as result of the impacts of greenhouse gas emissions to date.

However, we do have some concerns with the monitoring framework of the plan. We note that all of the baselines and indicators are still 'to be confirmed'. It is important that effort is devoted to developing baselines and indicators as soon as practicable as without them the value of the plan will be lessened, and meaningful assessment of progress will not be possible. Ensuring that the full range of baselines and indicators are in place as early as possible in the five-year cycle will aid effectiveness of the plan. We note also that for some of the targets, delivery bodies are still to be confirmed. We suggest that these are determined as a priority in order for work to start on these can start.

The 2017 National Infrastructure Commission report "*The impact of the environment and climate change on future infrastructure supply and demand*" highlighted the interdependencies of infrastructure as a key aspect of adaptation. These are highlighted in the draft plan as further research needed which we would advocate as a priority.

The draft plan is a strategic plan which should drive forward progress. We look forward to seeing the finalised climate change adaptation plan for Wales in due course.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Terry Fuller', written in a cursive style.

Terry Fuller
Chief Executive