

22 August 2012



# Towards a Climate Ready UK

## CIEH's comments on Defra's National Adaptation Programme Progress Check

### Preliminary

The CIEH, having been involved to date in the "co creation" process favoured by the Government for producing the first National Adaptation Programme, welcomes the publication of [Defra's progress check](#).

This is a good way to keep the "co creators" involved and to maintain the co creation process.

### Overview

Contrary to the nomenclature "Progress Check", the document does not actually say much about progress in the sense of having a temporal dimension to it. Rather, it reads as an agenda for the eventual National Adaptation Programme, though the detail is such as to make this a useful document at this stage. It is surprising that it contains no meaningful mention of air quality and food (the latter not really being captured in the "agriculture" section).

Over the time that the National Adaptation Programme has been in development, the proposed five themes have become accepted as a convenient drawing together of the eleven sector reports under which the preceding assessment of risks was carried out. The CIEH endorses the adoption of these within the first National Adaptation Programme provided that there is recognition that these themes may change over time and future programmes may look very different.

Accepting that the suggested proposals should be grouped around these five core themes, the CIEH nevertheless believes that the current document is not anchored very well and would benefit from an expression of the programme's overarching objectives. The cross-cutting areas described in Annex A are useful but these cross-cutting issues will need to be referenced within the body of the programme, in those places where they apply. For example, the issue "Green Infrastructure" has an application in several places.

The outcome of the deliberations to which we "co creators" should aspire is a programme with a clear purpose capable of inspiring all citizens to participate.

### Objectives

Section 58 of the Climate Change Act 2008 requires the Secretary of State to produce programmes setting out the Government's:

- Objectives in respect of adaptation
- Proposals and policies for meeting those objectives
- Timescales for introducing those proposals and policies

Section 58 also requires the objectives, proposals and policies to contribute to sustainable development.

The National Adaptation Programme therefore really needs to start with a clear statement of the objectives and demonstrate how the objectives and also the proposals and policies will contribute to sustainable development.

The CIEH contributes the following suggestions for inclusion in the programme as possible **objectives**.

The UK's actions on adaptation will support:

1. sustainable development
2. A green economy in the UK and sustainable and balanced growth of the global economy

In support of these objectives, the programme should set out the following **pre-requisites**:

- A. Adaptation measures should not themselves contribute to climate change and will where possible support mitigation measures
- B. There is a need for capacity building at all levels to enable adaptation programmes to be implemented effectively
- C. Ongoing research, information and guidance is required to meet the needs of adaptation programmes and their implementation

The rationale for these objectives and pre-requisites is clear from what the Climate Change Act 2008 requires, the advice received from the Committee on Climate Change and the practical requirements for implementing this proposed programme.

The CIEH would however comment further on the proposed pre-requisite relating to mitigation of climate change.

Action to mitigate future climate change and adapt to unavoidable climate change is required by the Climate Change Act. It is fitting that both adaptation and mitigation are contained within the same legislative measure because the two are inter-related.

There are therefore a number of strong reasons why a National Adaptation Programme should nevertheless reference mitigation actions. These reasons include:

- (1) Adaptation and mitigation can complement each other and together can significantly reduce the risks of climate change<sup>1</sup>
- (2) Opportunity costs and benefits of securing adaptation measures should be considered when planning mitigation works and vice versa
- (3) A more resource efficient economic model, respecting environmental limits and supporting mitigation, will increase resilience (as well as reduce costs)

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<sup>1</sup> IPCC 2012:Summary for Policymakers

- (4) A combined approach assists and supports the application of a full life cycle costing model by businesses and organisations
- (5) It retains a necessary focus on the international aspects of tackling climate change.

The other two proposed pre-requisites – capacity-building and research – are common to all the five core themes. They are also relevant to:

- Localism and the implementation of the proposals and policies at all levels
- The development of future adaptation programmes

When the National Adaptation Programme is eventually published, the CIEH would welcome strong **statements** to the effect that:

- (a) Investment in mitigating future climate change and adapting to unavoidable climate change contributes to a healthy economy through the creation of green goods and services
- (b) Successful implementation of the programme's proposals and policies requires strong partnerships

## The five core themed areas

Some great work has been done in getting us to the position where we can draw up this first adaptation programme in terms of assessment of the risks and gathering of evidence. The UK Climate Change Risk Assessment 2012 and the accompanying Evidence Report are among the 'best in class' for this purpose.

The Evidence Report acknowledges that there are still significant knowledge gaps and for this reason carrying out further research remains a priority.

On the whole, the proposals and policies grouped in the five themed areas are appropriate, based as they are on the evidence that has been gathered and assessed.

However, the 2012 Assessment and Evidence Report make clear that some adaptation measures are required sooner than others yet the proposals and policies listed under each theme give no sense of priority setting.

Priority may be determined by the severity of the likely impacts overall or on specific sectors or vulnerable groups. Likelihood of occurrence should be a factor too (severity x likelihood = risk). In addition, advantage needs to be taken of opportunities, even modest ones, routinely as they arise. Thus, for example, if repairs are needed to a riverbank, they should take account of projected higher flow rates.

By their content, the five themed areas have clearly been influenced by the discussion in those documents on priorities, for example the *Health and wellbeing* requirement of a Heatwave Plan addresses the identification of this as a risk that requires early action (see Box ES3, Evidence Report).

The CIEH recommends that more attention is given to identifying under each theme the early actions that the available evidence justifies. This might usefully be presented in the form of individual action plans for each themed area.

The CIEH is surprised that none of the themed areas contains any mention of air pollution. The 2012 Assessment states that health problems caused by air pollution may increase and projects a rise in hospital admissions and an increase in respiratory-related deaths. Action on air quality is justified under several of the themes or at the very least ought to be identified as a cross-cutting area to be addressed.

Additionally, the subject of food requires inclusion. Clearly the themed area of agriculture and forestry is relevant, and food production is presumably intended to benefit from, for example, water availability and protection from pests and disease. However, the relationship between adaptation to climate change and food goes much wider. It extends to considerations of security, supply, composition, storage, transportation, public health and inequality. The Evidence Report captures these issues in a number of separate places though they are not there drawn together as a "food" subject. The CIEH recommends that the programme ought to perform this drawing together – either within the agriculture and forestry theme or as an additional cross-cutting subject.

## Cross-cutting areas

The CIEH takes no issue with any of the issues that have been collected together under the description of "cross-cutting". We nevertheless raise the question of whether "air quality" and "food" should be additional cross-cutting areas.

However, we are not clear what is going to happen to these issues in the "co creation" of the National Adaptation Programme. We would welcome further involvement in developing the purpose for and utility of identifying these cross-cutting themes and making best use of them in the programme.

## About the CIEH

As a **Chartered professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners. As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research. As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners. As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy. We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.