

Position Paper

Response to EU strategy on adaptation to climate change

Our reference:	GEN-SUS-20-068	Date:	24 August 2020
Referring to:			
Related documents:			
Contact person:	Thomas Gelin	E-mail:	Gelin@insuranceeurope.eu
Pages:	14	Transparency Register ID no.:	33213703459-54

Questions about climate change, the 2013 EU Adaptation Strategy, and recent policy developments

This section seeks to gather information on your awareness of climate change impacts, general knowledge of the <u>2013 EU Adaptation Strategy</u> and recent policy developments.

I. Climate change impacts

Climate change manifests itself in various types of weather that disrupts whole countries, regions, and the lives of citizens in many different ways socially, environmentally and economically. Therefore, it is important to reflect throughout this survey on your experiences with, and knowledge of, climate change impacts and be as illustrative as possible.

Q1: In your place of residence, have you experienced unusually frequent or severe events that could be attributed to climate change?

	Yes	No	Don't know
Abnormally warm overall temperatures/droughts during one or more seasons	Х		
Heat waves causing health problems and death among the vulnerable (elderly, sick)	Х		
Restrictions on water availability due to prolonged drought	Х		
Disappearance of glaciers or long-lasting snowfields	Х		
Forest disturbance (e.g. forest fires, pest outbreaks)	Х		
River and coastal floods	Х		
Flash floods or landslides from extremely heavy rain	Х		
Seaside storm surges	Х		
Coastal erosion	Х		

© Reproduction in whole or in part of the content of this document and the communication thereof are made with the consent of Insurance Europe, must be clearly attributed to Insurance Europe and must include the date of the Insurance Europe document.



Intrusion of seawater in freshwater aquifers	X	
Extreme wind (100 km/h or more)	Х	
Appearance/gradual shift of species (insects, plants, fish etc.) associated with	v	
changing climates	^	
Severe crop losses caused by extreme weather conditions (drought, heavy rains,	v	
storms, etc.)	^	
Emergence of tropical diseases that are otherwise not present in your area	X	
Other (please specify):	Х	

Subsidence issues for buildings constructed on specific types of clay soils: this hazard creates damaging effects such as leaks and cracks in building structures. This phenomenon affects many buildings and is due to significant moisture changes in the soil because of extreme seasonal effects.

Q2: In your place of living, are you aware of any of the following actions which have been implemented recently with the intention to prepare for the likely effects of climate change?

	Yes	No	Don't
			know
Reinforcement of infrastructure (transport, energy, communication networks) to better withstand natural disasters like floods, heatwaves etc.	x		
<i>Preparation for floods (e.g. dykes, designated flood plains, restrictions in flood risk areas etc.)</i>	x		
Adaptation of agriculture to the changing climate (e.g. water efficient irrigation, drought-resistant crops)	x		
Heat wave action plans (e.g. early warning systems, late opening of parks, water dispensers in public area)	x		
Increase of green areas in towns to cope with heatwaves / floods	X		
Encouragement of water saving and reuse	X		
<i>Efforts to prevent forest damage from heatwaves, drought, pests, fires, or storms (e.g. awareness raising campaigns, forest management, preventive infrastructure)</i>	x		
Reinforcement and protection of the seacoast (e.g. seawalls, sand replenishment)	X		
Early warning systems for natural disasters	X		
Communication to the public about the need to adapt to climate change	X		
Awareness raising on the availability of insurance options against climate change damage	x		
Other (please specify):	X		

Nature Based Solutions", based on interaction with the ecosystems for more resilient and sustainable buildings. (2) "Build Back Better" solutions, which can be adapted to existing buildings affected by subsidence.



II. The 2013 EU Adaptation Strategy and recent policy developments EU policies

The current EU Adaptation Strategy was adopted in 2013 and was evaluated in 2018 to assess its effectiveness, efficiency, relevance, EU added value and coherence.

Q3: To what extent are you familiar with the following? *0:* Not familiar at all / 5: Very familiar

	0	1	2	3	4	5	Don't know
The 2013 EU Adaptation Strategy						Х	
The results of the <u>evaluation</u> of the Strategy,						v	
completed in 2018						^	

Q4: Please rate the following as how important is it for the new EU Adaptation Strategy to be aligned with the following EU and international policies? 0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Paris Agreement						X	
Sendai Framework for Disaster Risk Reduction						Х	
UN Sustainable Development Goals						X	
UN Convention on Biological Diversity						Х	
European Green Deal						X	
EU Civil Protection Mechanism						X	

Specific questions on potential actions of the new Strategy

Climate change is evident across and beyond European regions, and in many sectors important to our society. It is also increasingly complex and affecting all citizens' quality of life in far-reaching ways, including the recovery from the Covid-19 crisis, which is an opportunity to "build back better". Therefore, the European Commission seeks to gather insight into the challenges, objectives, and priorities for the new Strategy. The following section gathers feedback on these elements.

I. Challenges

The following questions will support the problem definition of the EU Adaptation strategy and its relevance for the design of initiatives with EU added value for society.

Q5: To what extent do you agree that the following drivers are important for a new EU adaptation strategy? *0:* Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Growing speed of climate change impacts						X	
<i>Unclear distribution of responsibilities between levels of governance</i>			x				



<i>Insufficient public awareness of the need to adapt to climate change</i>		X			
<i>Lack of cost-effective solutions and skills to adapt to climate change</i>			x		
Slow adoption of local adaptation strategies	X				
<i>Insufficient private sector investment and action on adaptation</i>		x			
<i>Insufficient public finance for adaptation to climate change</i>		X			
<i>Lack of interest in climate impacts in some Member</i> <i>States or regions</i>			x		
Insufficient science/knowledge on climate risk assessment for adaptation		X			
Other (please specify):				X	

Insurers have long campaigned for policymakers to not only mitigate the effects of climate change, but also to invest in adapting to its consequences (notably in the private sector, including construction), some of which are already becoming apparent.

Q6: To what extent do you agree that the following problems are important in preventing adaptation action in the EU?

0: Not at all / 5: Completely agree

	0	1	2	3	4	5	Don't know
The 2013 EU Adaptation Strategy is predominantly focused on the EU.			x				
The alignment between the EU Adaptation Strategy and international policy developments is unclear.			х				
<i>The implications of climate impacts in third countries on the EU are not taken into consideration.</i>					x		
Agreement on principles, measurable targets, and requirements for adaptation is limited and affected by uncertainty at decision-making levels.			x				
<i>Implementation of adaptation strategies and plans is weak.</i>						х	
Mechanisms and indicators to monitor and report on the implementation of adaptation strategies and action should be strengthened.					x		
Knowledge of climate impacts and potential responses is not sufficiently adjusted to a local scale (nor sufficiently known or available).				x			
Appropriate methodologies, indicators and other links integrating disaster risk reduction and adaptation are lacking.					x		
<i>Financial support for adaptation to climate change is insufficient.</i>					x		
Businesses and the financial sector (in particular, but not limited to, the insurance sector) are not appropriately involved in adaptation efforts.		x					
Other							



Insurers are fully involved in many of the EU MS's Adaptation Strategies. However, insurance is not a substitute for other adaptation measures or an instrument for their funding. Public bodies and the private sector must do more on adaptation measures: eg putting in place the right incentives and legal obligations.

II. Objectives, actions and potential impacts for the new EU Adaptation Strategy

The questions below address the objectives setting which will link the analysis of the adverse effects from climate change to the options for the policy response. The objectives will set the level of policy ambition, fix the yardsticks for comparing policy options and determine the criteria for monitoring and evaluating the implementation of the new EU Adaptation Strategy.

Q7: To what extent do you agree with the proposed new objectives of an EU Adaptation Strategy, as stated below? 0: Not at all / 5: Completely

	0	1	2	3	4	5	Don't know
<i>To help make the EU a climate-resilient society, adapted to the unavoidable impacts of climate change, with reinforced adaptive capacity and minimal vulnerability.</i>						x	
<i>Increase focus on Solutions (in addition to understanding)</i>						x	
<i>Increase focus on Innovation (in addition to research)</i>					x		
Increase focus on Implementation (in addition to planning)					x		
Increase focus on Prevention (in addition to expost action)						x	
Other (please specify):						Х	

Better data collection, sharing and monitoring is needed for ALL objectives and must be promoted at every risk governance level. Prevention is most crucial (there is still an overreliance on ex-post response and recovery).

Q8: To what extent do you agree with the following statements? *0:* Not at all / 5: Completely

	0	1	2	3	4	5	Don't know
The EU should support Member State level action						х	
on adaptation						^	
The EU should support regional level action on						х	
adaptation						^	
The EU should support local level action on						х	
adaptation.						~	



The EU should support private sector action on adaptation.		x	
The EU should support citizen action on adaptation.		x	
The EU should support international action on adaptation.		x	
The EU should support non-state actors' action on adaptation.		x	

Q9: To what extent do you agree that the actions of the 2013 EU Adaptation Strategy, as stated below, should be expanded?

	Agree, action	Agree, action	Disagree,	
	should be	should be	action should	Don't
	retained in	retained and	be	know
	current form	reinforced	discontinued	
Action 1: Encourage all Member States to adopt		x		
comprehensive adaptation strategies		^		
Action 2: Provide LIFE funding to support capacity		x		
building and step up adaptation action in Europe.		^		
Action 3: Introduce adaptation in the <u>Covenant of</u>				
Mayors framework and support climate resilience		X		
of cities				
Action 4: Bridge climate change adaptation		x		
knowledge gaps		~		
Action 5: Further develop <u>Climate-ADAPT</u> as the				
'one-stop shop' for adaptation information in	X			
Europe				
Action 6: Facilitate the climate-proofing of the				
Common Agricultural Policy (CAP), the Cohesion		X		
Policy and the Common Fisheries Policy (CFP)				
Action 7: Ensuring more resilient infrastructure		X		
Action 8: Promote insurance and other financial				
products for resilient investment and business		x		
decisions				

Q10: To what extent do you agree that further action for sustainable adaptation to climate change is needed within the new Strategy to address the following sectors? 0: Not at all / 5: Completely agree

	0	1	2	3	4	5	Don't know
Agriculture						X	
<i>Ecosystems (e.g. forests, marine and coastal ecosystems, wetlands)</i>						x	
Health (human and plant health)						X	
Inclusion and cohesion					Х		
Energy					Х		
Water						Х	
Insurance and finance						X	



Construction				X	
Transport			Х		
Other (please specify):			Х		

Sectors considered so far as non-exposed (eg tourism) must also be considered. The COVID crisis might provide useful insights to prepare them for CCA.

Q11: How would you rate the following potential actions for a new EU Adaptation Strategy? *0:* Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Supporting resilience investments and natural disaster insurance penetration through EU and Member State policies						x	
Helping to identify health and/or social risks linked to climate change at an early stage by developing an observatory of social/health vulnerability.					x		
Increasing infrastructure resilience through an extended use of EU climate proofing guidance based on the latest IPCC reports and scientific findings.						x	
Supporting a more open access to climate loss and disaster risk data from private and public sources, to allow all actors to take an active role in adaptation action and to help integrate climate risks in decision- making.						x	
A greater focus on innovative adaptation solutions, including through the <u>Horizon Europe mission</u> on Adaptation to Climate Change, including Societal Transformation.					x		
Supporting the resilience of agriculture and forest ecosystems e.g. through monitoring of ecosystem vegetation changes, plant health and emerging pests and diseases, and better exploitation of existing EU plant and forest genetic resources.					x		
<i>Providing tailored adaptation guidance and peer- to- peer knowledge exchange to public authorities and non- state actors.</i>					x		
<i>Strengthening the climate risk and vulnerability</i> <i>assessment at EU level, including on the EU</i> <i>outermost regions.</i>					x		
<i>Increase private investment in adaptation via increased public-private investment opportunities or incentives through e.g. the EU Taxonomy or the EU Green Bond Standard.</i>						x	
Other (please specify):						X	

The following actions are essential: data collection, sharing and monitoring, at the various governance levels; capacity building of stakeholders through participative governance; supporting adequate design of climate risk management authorities.



Q12: How important is it for a new EU Adaptation Strategy to achieve the following impacts? 0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Increased financial and economic resilience						Х	
<i>Closing the climate protection gap (e.g. increasing insurance coverage)</i>						х	
A just adaptation and just transition (access to essential services)					x		
Climate and risk proofing of infrastructure and investments						x	
Incorporating climate risk management into fiscal frameworks						х	
Preventing climate risks						Х	
Improved health, social cohesion and resilience						Х	
Avert, minimise and address population displacement						х	
<i>Enhancing the resilience of the agri-food system to climate change</i>					x		
<i>Healthier ecosystems with improved resilience to climate impacts</i>						х	
Enabling climate-informed decisions by citizens						Х	
Other (please specify):							X

All these impacts are crucial to achieve, meaning it is very difficult to differentiate their respective degrees of importance. They are all interlinked as part of a climate risk management system.

In-depth thematic questions

In order to complement overarching views on climate adaptation in the EU, we are also seeking targeted insights in relation to a set of thematic areas. Respondents are asked to select their area(s) of interest first and will then be presented with specific questions.

Q13: Please select sectors or topics of interest from the list below. For each option selected you will be taken to a short set of questions on issues specific to this topic.

Χ	Finance and insurance (climate protection gap)
Χ	Agriculture and forests
Х	Freshwater
Х	Ocean ecosystems, coastal areas and the blue economy
Х	Policy support for local authorities and other non-state actors
Χ	None



I. Finance and insurance (climate protection gap)

Q14: Please select the relevant statements related to access to resilience and financial risk information:

v	I know where to find information about the climate-related risks that I or my property, my business
^	activities, are exposed to;
×	I know how to request advice on how to increase my resilience, that of my property or my business
^	activity to the adverse effects of climate change;
Х	I know where to get financial support to invest in resilience;
v	I know which climate-related risks I, my property, or business activity are insured against, and to what
^	extent;
	<i>I rely on my government should a climate-related disaster affect me, my property or my business activity.</i>

Q15: Please select the relevant statements related to access to adequate climate-related insurance products:

×	I found access to adequate and affordable insurance products for relevant climate risks for myself, my
^	property or business activity
	Available insurance products I found only cover a narrow range of climate- related risks
	The insurance products I found on the market have too high deductibles or too low payout ceilings
	The relevant insurance products on the market are not affordable
	I could not find relevant insurance product on the market

Q16: In your opinion, which of the following groups should have easier access to **asset- specific** *information about the physical and economic damage from past climate related disasters:*

X	Citizens at large
Χ	Social partner organisations
Х	Local public authorities
Χ	Prospective Private and Public buyers
Χ	Prospective Commercial owners
Χ	Financial sector (banks, insurance)
Х	Other (please specify):

Creating appropriate local governances in charge of the design and implementation, at relevant risk basin level, of the appropriate risk management policies, projects and capacity building actions is a requisite to put participative governance in action between all stakeholders.

Q17: In your opinion, which of the following groups should have easier access to **custom ised information about forward-looking climate physical risks to people, nature and assets**:

Citizens at large
Social partner organisations
Local public authorities
Prospective Private buyers
Prospective Commercial owners
Financial sector (banks, insurance)



Other

II. Agriculture and forests

Q18: In your opinion, how important are the following elements for climate resilient agriculture / forests? 0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
<i>Agro-Biodiversity (diversity of cultivated crops, plant varieties, tree species)</i>						x	
<i>Diversified systems (e.g. mixed farming, agro- forestry, different forest systems and management, age structure)</i>						x	
Natural resource efficiency (e.g. water)						X	
Management practices					X		
Economic diversification (e.g. processing, rural tourism)					x		
Precision technologies and decision-support systems						x	
Investments and infrastructure						X	
Nature-based solutions						Х	
Other (please specify):						X	

Multi-risk climatic crop insurance policy enables farmers to cope with climatic hazards and adapts to their needs by offering several levels of cover.

Q19: In your opinion, how important are the following actions to support resilience- building in agriculture / forests?

0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Research and innovation					Х		
Awareness raising / information about climate							
impacts on future vegetation change (changes in						Х	
ecological zones)							
Information / guidance about adaptation options						Х	
Information / guidance about management							
practices and nature-based solutions that enhance						Х	
climate resilience							
Information / guidance to better use existing							
plant/forest genetic diversity (varieties, species) to					Х		
build resilience							
Support in managing financial risks related to						х	
climate impacts (e.g. insurance)						^	
Payments for ecosystem services					Х		
Climate resilient land use planning						Х	
Exchange of good practices and experience						Х	
Monitoring of climate impacts on agriculture and						Х	



forests					
<i>Embedding climate adaptation in product labelling and certification schemes</i>				х	
Partnerships with upstream or downstream industry			х		
Other (please specify):					Х

Upstream and downstream partnerships should not be limited to the industry but should be set up with all the stakeholders in of a territory. Prevention of/protection from natural hazards should also be promoted in addition to the certification and labelling of products.

III. Freshwater

Q20: In your opinion, how important are the following climate-related needs in the freshwater and sectors? 0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
<i>Consumption reduction in agriculture (water reuse, reducing irrigation, preventing leakage and illegal extractions)</i>						x	
Consumption reduction in water supply (preventing leakage and illegal abstraction)						х	
Consumption reduction in industry and energy production						x	
<i>Consumption reduction in households (appliances, rain harvesting etc.)</i>						х	
<i>Consumption reduction in services (e.g. healthcare, HORECA etc.)</i>						х	
Sustainable freshwater management with 3rd countries (cross-border rivers and aquifers)						х	
<i>Preparing for individual events of too little water (droughts)</i>						х	
<i>Preparing for individual events of too much water (floods)</i>						Х	
Counteracting climate-change-induced worsening of ecological status						Х	
Other (please specify):						X	

Drought can also have an impact on the foundations of buildings (shrinkage or swelling of the clay) which has an impact on the entire construction sector. It is a cumulative cyclical phenomenon.

Q21: Please select the policy tools that could be best used to address climate-related water issues:

Х	Research and innovation
Х	Data collection and management
Х	Water allocations and permits
Х	Water accounting (environmental-economic accounting)
Χ	Water saving requirements / benchmarks



r	
Х	Water reuse requirements / benchmarks
Х	Water quality / pollution reduction requirements / benchmarks
Х	Labelling (of products or services) reflecting water footprint
Х	Financial or fiscal incentives/disincentives
Х	Standardisation
Х	Enforcement at EU level, improved access to justice at national level
Х	Guidance and coordination
Х	Water diplomacy (including river or international water conventions)
Х	Trade agreement provisions
Х	Awareness raising and communication
Х	Other (please specify):

In the context of CCA, water policies should be designed and carried out with careful consideration for flooding and drought risk management. Water supply should be secured in case of extreme weather but negative side effects on citizens' livelihoods should be avoided.

IV. Ocean ecosystems, coastal areas and the blue economy

Q22: In your opinion, how important are the following elements for a climate resilient ocean? 0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Nature and ecosystem-based adaptation (e.g. coral conservation and restoration, wetland conservation and restoration)						x	
Ecosystem management tools (e.g. assisted species relocation and coral gardening)						х	
<i>Infrastructure-based approaches (e.g. sea defences, sand nourishment)</i>						x	
Management practices and policies (e.g. fisheries governance)						x	
<i>Cross-sectoral approaches (e.g. Marine Protected Areas, Maritime Spatial Planning, Integrated Coastal Zone Management)</i>						x	
<i>Economic diversification, innovation (e.g. new practices that increase resilience to climate change) and relocation (e.g. relocation of economic activities and urban areas threatened by coastal flooding)</i>						x	
Community-based adaptation						X	
Other (please specify):						X	

The future EU strategy should consider carefully the costs (private and societal) of coastal assets relocation: a rule of equal treatment for EU citizens and economic actors should be defined and a compensation fund put in place where relevant.



V. Policy support for local authorities and other non-state actors

Q23: In your opinion, how important is it for local authorities to promote the engagement in adaptation action of citizens and stakeholders in the following ways?

0: Not important at all / 5: Very important

	0	1	2	3	4	5	Don't know
Ensuring clear and realistic timescales to the							
development and delivery of adaptation plans and					Х		
programmes							
Ensuring resources (including capacity-building)							
are available for the development and delivery of						Х	
adaptation projects.							
Identifying adaptation projects with multiple							
benefits .e.g. health, mitigation, social inclusion,						Х	
disaster risk reduction etc.							
Ensuring political dividends from any adaptation				x			
action				^			
Building in proper monitoring and evaluation for				x			
transparency				^			
Mapping and engaging stakeholders as soon as						х	
possible						X	
Informing about local climate risks and impacts						Х	
Other (please specify):						X	

Under the Aarhus convention, participative governance involves creating, enabling and monitoring the appropriate local bodies in charge of the design and implementation of the risk management policies, projects and capacity building actions at the relevant risk basin level.

Closing questions

Finally, you have the opportunity to provide additional information.

Q24: Please provide any further information that you believe would be useful for preparing the EU's new Adaptation Strategy.

Should the funding for some actions be prioritised, the decision should take into account the total economic losses generated by each peril in the long run and the recent past, and weighed at EU level as well as at member state level.

Regarding the specific issue of agriculture and forest, promoting climate resilient agriculture is indeed crucial and all the actions identified are important. However, adaptation, prevention and protection measures are not sufficient to guarantee agricultural sustainability given the increased frequency and severity of natural disasters. Agriculture insurance enables farmers to cope with climatic hazards and adapts to their needs by offering several levels of cover. However, farmers need the necessary support (subsidies) to be able to afford crop insurance schemes.



Q25: If appropriate, please upload concise position papers or policy briefs that express the position or views of yourself or your organisation. Please include a short summary of the document.

- Climate change adaptation is a key priority for insurers, and the industry therefore remains committed in supporting the Commission in its efforts to tackle this problem. Insurance Europe calls on the Commission to consider the following points:
 - Climate change adaptation needs to be mainstreamed in EU policies through (1) dissemination of coherent, high quality data on adaptation measures and (2) public-private partnerships (eg to help investments in otherwise costly adaptation measures).
 - Effective adaptation requires responsibility sharing between governments (eg flood defences, building codes, emergency sewage plans); the private sector (eg investment in adaptation measures); and the public (eg awareness of adaptation and avoidance of high-risk zones).
 - The EU must continue supporting ex ante financing for natural hazards and for reducing risks arising from them.

Insurance Europe is the European insurance and reinsurance federation. Through its 37 member bodies — the national insurance associations — Insurance Europe represents all types of insurance and reinsurance undertakings, eg pan-European companies, monoliners, mutuals and SMEs. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers pay out almost $\in 1$ 100bn annually — or $\in 2.9$ bn a day — in claims, directly employ over 900 000 people and invest nearly $\in 10$ 200bn in the economy.