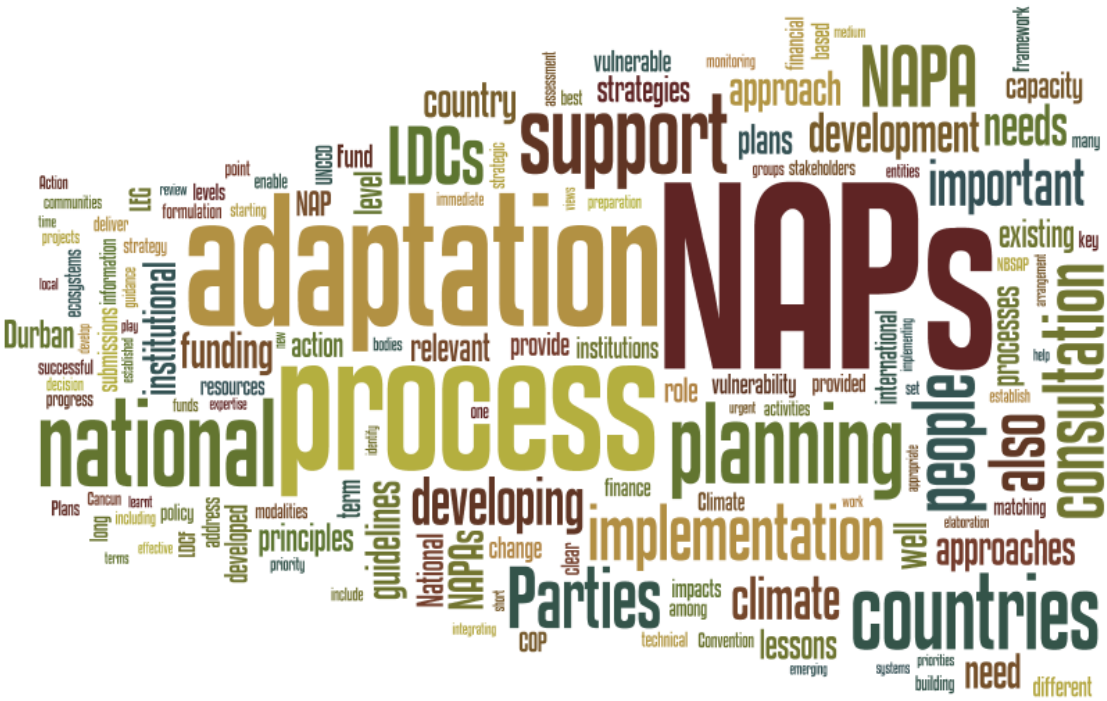
NATIONAL ADAPTATION PLANS



TOWARDS EFFECTIVE GUIDELINES AND MODALITIES

DISCUSSION PAPER

GERMANWATCH

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Brief Summary

At the UN climate summit in Cancún in 2010 it was agreed to initiate a process for the development of guidelines and modalities for the preparation of National Adaptation Plans (NAPs), in particular, but not exclusively for the Least Developed Countries. It is envisaged that the upcoming COP17 in Durban will take the first concrete decisions on this process and the next steps.

This discussion paper jointly prepared by Germanwatch and WWF International highlights some of the key aspects of this important element of the Cancún Adaptation Framework. It concludes with recommendations for the decisions to be taken, building on the emergence of the concept of NAPs, an analysis of the experience with the National Adaptation Programmes of Action (NAPAs) and similar processes in other environmental Conventions, and a summary of the most relevant views expressed by Parties to the UNFCCC in their submissions.

Imprint

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Key conclusions

National Adaptation Plans have the potential to endow developing countries with a strong climate smart strategic planning process and policy dialogue, embracing and integrating sector-wide and programmatic approaches as part of a coherent institutional, policy and regulatory framework.

Based on the analyses in this paper, the authors provide the following recommendations for an ambitious approach in Durban, which are further elaborated in chapter 5.

Guidelines

1. **Adopt an approach that is facilitative and non prescriptive in nature** to help enable flexible, country-led planning that delivers for the most vulnerable groups, communities and ecosystems.

2. **Accept that NAPs includes both a process and an implementation focus,** with appropriate institutions for medium-to long term planning while implementing priority investments to tackle climate impacts or reduce vulnerabilities.

3. **Define principles for NAPs development and implementation,** based on the Cancún Adaptation Framework and other relevant agreed procedures.

4. **Deliver for the most vulnerable,** through making use of information tools such as vulnerability assessment to identify most vulnerable groups, communities and ecosystems and prioritize them accordingly. Importantly, include consultation processes in NAPs building that meaningfully capture the needs and concerns of most vulnerable communities.

5. **Acknowledge ecosystems and their services,** prioritizing win-win or low / no-regret approaches that support human needs and enhance resilience of natural systems.

6. **Emphasize national level institutional arrangement without international prescription,** building on existing approaches and national circumstances.

7. **Facilitate synergies with other multilateral frameworks,** such as CBD, UNCCD and the Hyogo Framework for Action.

Modalities (technical, financial and capacity support)

8. **Enhance synergies and linkages among the different bodies involved in the NAPs process,** in particular the Least Developed Countries Expert Group, the Adaptation Committee and the Nairobi Work Programme.

9. **Progress financial support for both formulation and implementation,** in order to avoid any delay that will increase the cost of adaptation.

10. **Enable the LDCF and the Adaptation Fund to play an interim role in funding** with the view of enabling the elaboration of the NAPs to support formulation of the NAPs.

11. **Need to enhance coherence, strengthen synergy among the stakeholders and institutions at the national-level and sub-national levels?,** from planning to implementation and beyond

12. **Establish monitoring and evaluation systems and biennial update reports for**

matching of adaptation finance.

Overall, Durban provides an important opportunity to progress NAPs, an important element of the Cancún Adaptation Framework. Parties should therefore seek an agreement, which facilitates and enables meaningful national processes for developing medium and long termer adaptation planning and implementation, building on, integrating with and scaling up existing strategies, plans and actions.

1 National Adaptation Plans: an emerging concept

Facing the consequences of uncurbed emission growth and already committed global warming, it is high time for Parties to develop new adaptation approaches and strategies. This is especially true in LDCs, where response capacity is the lowest, but impacts are most felt. With the adoption of the Cancun Adaptation Framework, Parties decided to drive a national, systematic, medium and long-term approach to adaptation in LDCs and other developing countries. It is at this year's climate change summit in Durban that Parties have to inject life into this concept. National Adaptation Plans can endow developing countries with a strong climate smart strategic planning process and policy dialogue, embracing and integrating sector-wide and programmatic approaches as part of a coherent institutional, policy and regulatory framework.

This report, directed to delegates and interested stakeholders at the COP, aims to provide insight and recommendations to help progress and facilitate a meaningful discussion on NAPs, their modalities and guidelines at COP17.

The report approaches this by looking at national adaptation planning in a number of countries and distilling important parameters for success. The urgent and short-term focussed NAPA process (National Adaptation Programmes of Actions) and planning approaches from other Rio Conventions, has already broken ground and generated important lessons for a successful NAPs approach. An analysis of Party submissions to the UNFCCC on NAPs is used as an entry point to develop insight and recommendations for meaningful and decisive decisions in Durban.

1.1 Background – what's gone before and informs progress on NAPs

The first operational decisions on adaptation were taken at COP 7 in Marrakesh, which yielded the NAPA process. Simultaneously, the GEF was instructed to launch two dedicated new funds, one of them the Least Developed Country Fund that sponsors LDCs in the formulations and implementation of NAPAs. Parties also created the LEG, the Least Developed Country Expert Group that provides technical support to LDCs on NAPAs and other matters. The NAPA process can be seen as an instructing approach aimed at identifying and addressing "urgent and immediate" climate change challenges in LDCs. The NAPA process is forerunner for debate on NAPs in LDCs so is reviewed in some detail in Section 2 of this paper, where we distil out experiences and relevant lessons learnt.

At subsequent COPs, a further milestone has been the establishment of the Nairobi Work Programme on Impacts, Adaptation and Vulnerability (NWP), supporting capacity building of Parties on adaptation issues. Under the NWP, both in work phase 1 (up to 2008) and phase 2 (up to 2010) Parties received considerable input on national adaptation planning, and they collected lessons from the NAPA process and from bodies under the convention, e.g. the LEG as well as the Consultative Group for Experts (the body that helps developing countries with their National Communications).[1]

[1] Work Area 6 of the NWP: Adaptation planning and practices. To see an overview of the content access http://unfccc.int/adaptation/nairobi_work_programme/programme_activities_and_work_areas/items/5137.php

The formation of the Cancun Adaptation Framework (CAF), the key-stone moment for international cooperation on adaptation, saw the launch of a formal process on NAPs to address medium and long term adaptation needs. This offers the chance to overcome general barriers and divergent outlooks that exist between planning for long-term impacts of climate change and planning and policymaking for the short to medium term. It is hoped that this new phase of cooperation and discussion will move this important agenda forward to support short, medium and long term needs in least developed countries, building on lessons and experience from action and leadership at all levels.

The Cancun Adaptation Framework already offers fundamental criteria that should apply to the NAPs process to make it more effective. Through the CAF, Governments in Cancun affirmed that their action should follow certain principles such as follow a country-driven, gender-sensitive, participatory and fully transparent approach, taking into consideration vulnerable groups, communities and ecosystems; should be based on and guided by the best available science and, as appropriate, traditional and indigenous knowledge; and be done with a view to integrating adaptation into relevant social, economic and environmental policies and actions, where appropriate.[2] These principles or criteria give some initial guidance for how to organize a NAP process at the national level. However, further work and thinking is needed on how these criteria can actually be applied in practice. It will be important and useful to share good practice on this as it emerges.

1.2 National Action & Leadership – lessons from pioneers in adaptation planning

Many countries, among them several LDCs facing some of the direst climate change impacts, have already demonstrated remarkable leadership and developed national strategies and responses to adaptation planning in the absence of international guidelines.

Developing country examples include Bangladesh, Ghana, Honduras, Kenya and India.[3] Adaptation is also starting to become a political necessity for developed countries too and France, Germany, the United Kingdom and Spain, as well as and many other developed countries, have already developed first national strategic responses to tackle climate impacts.[4]

Bilateral and plurilateral adaptation initiatives are increasingly promoting national adaptation strategies and planning processes, including the Pilot Programme for Climate Resilience (PPCR) managed by the World Bank and the African Adaptation Partnership by UNDP and the Government of Japan. Many of these activities also address Least Developed Countries. Donors also have become increasingly aware of the issue, summarizing their views in an OECD-DAC flagship publication in 2009.[5] Some developing countries, such as Bengladesh, Maldives, NIgeria[6], etc.. have even created National Funding Entities to finance their respective strategies. This allows them to blend international assistance with their own resources.[7]

[2] Decision 1/CP.16, paragraph 12
[3] See Bangladesh (2009), India (2008) or Kenya (2009)
[4] See http://www.eea.europa.eu/themes/climate/national-adaptation-strategies, for an assessment of their quality view Swart et al. (2009).
[5] See OECD/DAC (2009): Policy Guidance on Integrating Climate Change into Development Cooperation.
[6] See Gomez-Echeverri (2010) http://www.eurocapacity.org/downloads/NFEsPolicyReport.pdf
[7] See Müller (2011).

These pioneers enable us to draw lessons and learning, and suggest good practice across developing and developed countries. One of these key lessons from initial national action is that a flexible approach needs to be pursued, one that is not prescriptive and that can build on and work with existing national approaches, policies and institutional arrangements. This recognises that national circumstances, needs and starting points are fundamentally different, even within LDCs.

Important principles for national adaptation planning are emerging from practice, these include[8]:

- Plans should not be required in a specific format;
- Countries should not be required to undertake a specific planning process;
- Assumptions should not be made about the institutional arrangements countries will use for adaptation planning and implementation;
- A social consensus on adaptation should be developed which requires a partnership approach based on local ownership;
- Put people and their action in the focus;
- Recognise and address the role and needs of ecosystems.

Given the many interlinkages between adaptation and mitigation, it is not surprising that more recently an increasing number of countries have developed integrated climate change strategies, and not just stand-alone adaptation and/or mitigation strategies. Whilst there are obvious benefits in supporting joined up climate smart low carbon development pathways, this should not be framed as condition, as adaptation is an utmost priority for some countries, and developing mitigation aspects maybe less urgent. However, Bangladesh and Kenya are both examples of developing countries with very low emissions in a global context, which see a benefit from such integrated strategies, especially where linked to the issue of improving energy access.

There is the concern that adaptation or climate change strategies distinct from national development plans or strategies may result in parallel processes. Existing examples of national strategies, especially from developed countries, prove that separate plans can serve as drivers for integration. Understanding the specific challenges of responding to climate change prior to wider mainstreaming and integration might yield more adaptation in the longer run. However, preparing individual plans or strategies, should not imply a silo-approach. On the contrary, key ministries, such as the finance or economic ministries and prime minister's offices, cabinet or parliament have to play a key role in the preparation of the strategy and support cross departmental working.

Other lessons relate to the process of establishing national adaptation strategies. Engineering social consensus on adaptation is a prerequisite for successful adaptation planning, and reaching out to all stakeholders especially those that suffer disproportionally. Successful national adaptation planning approaches have to have meaningful engagement and consultation approaches at their centre.

The NAPA process was the primer for adaptation in many LDCs. The short-term focussed NAPA process has often been the foundation for countries to move into more comprehensive planning approaches. Several NAPAs have gone beyond the NAPA remit of urgent and short

[8] See also Harmeling, 2011, expanded from Mc Gray. 2009

term needs to address longer term impacts and planning. It is the aim of the next section to shed light on the lessons and experiences from the NAPA process relevant for NAPs.

Box 1: Lessons from other Rio-convention

UN Convention to Combat Desertification (UNCCD)

The UNCCD itself asks Parties to establish and implement National Action Plans to combat desertification and drought effects. This should happen based on existing plans and programmes and take the form of a participatory approach.

Unfortunately, a lesson of the UNCCD NAPs was that many were prepared hurriedly during a period of optimism and apparent window of opportunity to secure new and additional funding for the course of the UNCCD. Additional support did not happen, however, also because the resulting NAPs were often characterized as shopping wish list, seldom tackling real policy issues.[9]

Convention on Biological Diversity (CBD)

Some lessons can be gained from the planning approach of the Convention on Biological Diversity, the National Biodiversity Strategy and Action Plan (NBSAP). Compared to the NAPA process, implementation started early with guidelines for implementation already endorsed as early as 1995. In this NBSAP took a hybrid approach, including an overall national strategy to achieve the goals of the CBD as well as specific plans for action. The end result is thus not meant to be only a document of suggested project ideas, but a process that defines the principles, priorities, policies, instruments and programmes that need to be considered in amending legislation, changing administrative procedures and policy goal formulation.

However, results on the ground have been limited. A big assessment of NBSAP concluded that first generation NBSAP largely lost their momentum. They were also formulated to largely target international donor, and were not directed towards in country processes and resources. However, in some instances NBSAP have been revised, also to include the global biodiversity policy goal 2010 formulated in 2002. The authors conclude, that "second generation" NBSAP were largely more focussed towards policy processes, rather than listing potential project activities as was the case with many first generation NBSAP. One issue the authors identified is that of political endorsement. Many first generation NBSAP were formulated by biodiversity specialists and approved at the level of the minister responsible for the national CBD focal point or lower. Many of the second generation NBSAPs were, however, endorsed at head of state or cabinet level, or directly adopted by the parliament.[10] Another problem relates to monitoring of activities. The absence of guidance on clear targets and indicators, made it difficult to assess success of the strategy. This is also relevant for the NAPs discussions, since adaptation is also difficult to measure.

Another concern to learn from is that, although explicitly stated as a goal and objective, the integration of UNCCD and UNCBD priorities into other national processes was mixed at best. More encouragingly, all UNCCD, CBD and also the NAPA process refer to each other (e.g. many NAPA projects have clear origins in UNCCD NAPs or NBSAPs).

[9] See Adeel et al. (2009)
[10] See Prip et al. (2010), and Sharma (2009)

2 NAPAs: key experience for the NAPs debate

In the further discussion about possible elements and structures of national adaptation planning, it is useful to start from already existing processes and gather lessons learnt. As mentioned, support for the preparation of National Adaptation Programmes of Action, the so called NAPAs, to the 48 Least Developed Countries has been one of the key areas of activities under the UNFCCC, initiated at COP 7 in Marrakesh in 2011, to support adaptation action by national governments in developing countries. These activities were then to be funded through the LDCF. The COP provided exact guidance on the process of identifying the priority list of activities, as well as the structure of the NAPA document itself.[11] Altogether, the NAPA approach was intended to be action rather than process oriented. This chapter will look at some of the key experiences and lesson learned that are relevant for the NAPs debate.

2.1 Starting action

NAPAs were immensely successful in starting action on climate change in LDCs. Nationally planned adaptation activities were largely absent when the NAPA initiative was started in 2001. For many LDCs the NAPA process was the first domestic exposure to climate adaptation actions and the prescrpitive guidance by the COP helped to deliver results. Although, or maybe because of, NAPAs being action or project-oriented, they created the base for some countries to move to more sophisticated, longer-term strategic responses on adaptation, as was the case in Bangladesh and Ghana.[12] Other countries invested more time in the preparation of their NAPA, and directly submitted a substantial strategy under the NAPA umbrella, as was the case in Nepal.

On the downside, the NAPA approach was often regarded and also designed as a ‘one shot option’. It didn’t intend to create an iterative process, establish national planning cycles on adaptation, or integration into other strategic plans or planning processes, e.g. in national budget cycles and policies. It also rarely included systematic and targeted support of national institution building and development, therefore not always meeting institutional sustainability criteria.

Some of the lessons for the creation of the NAPs process are that the delivery of concrete adaptation investments and projects is important to galvanize adaptation action at national levels, and therefore that action and strategy must be twinned. Countries that expanded their NAPA approach to broader strategies, often chipped in their own resources or other donors offered a helping hand to establish governmental capacities for adaptation planning. If LDCs move now to more comprehensive adaptation planning approaches, it is evident that capacity development needs to be supported and play a greater role.

2.2 Funding and implementing entities

Several lessons learnt from the NAPAs relevant to the emerging NAPs process are around the issue of funding. As said, the NAPA process was plagued by several bottlenecks around implementation: a) the extent of funds available to the LDCF, b) difficulties with the funding entity –

[11] See 27/CP.7

the Global Environmental Facility, including reviews and approval cycles and priority lists in NAPAs, and c) problems with implementing entities such as UNDP or UNEP, which further delayed the start of projects after its identification. Since the urgency of adaptation issues requires immediate action, many countries were inclined to measure the success of NAPAs in terms of received funding (through the LDCF) for the respective adaptation priority, rather than its broader strategic value.

For NAPs, the picture is inherently much more complex and the funding landscape has considerably changed since 2001. It is expected that NAPs and associated activities will receive funding from newly established institutions, such as the Green Climate Fund (GCF), but also from the Kyoto Protocol Adaptation Fund and others. Since NAPs should reach out to the wider development agenda, it is also important to target bilateral and plurilateral adaptation and development funding streams.

To create general momentum, to overcome domestic hurdles and to convince sceptics within developing countries, it is important that developing countries are assured that they are not preparing for an empty or very inadequately resourced process. The predictability of funding is an important prerequisite. It would be ill advised to explicitly link the NAPs process to one particular funding stream (like the NAPA process that was linked to the LDCF), but best to facilitate a variety of funding schemes. This is particularly significant as new institutions like the Green Climate Fund need to prove they function effectively and need to have time to establish their own institutional track record.

In establishing funding options, lessons should be learnt from emerging best practices. Another lesson from the NAPA process regards access of funding. whereby projects were delayed due to problems with international implementing entities. Cutting out the complexities of these intermediaries and encouraging true country ownership is the aim of the KP Adaptation Fund, where countries have direct access modalities via their national implementing entities. The emerging Green Climate Fund will probably develop along the same lines, following this concept. Developing even further institutional innovations, some countries established special national funding entities to finance their respective national adaptation plan or strategy which set useful presidents and from which lessons may be drawn.

2.3 Matching of demand & support

A further important lesson can be drawn in terms of matching demand and support of adaptation. Although the matching process of NAPAs was hoped to be extremely simple – identified projects were to be funded through the LDCF – reality proved to be more complex. Although targeted to the LDCF, NAPAs had considerable success in identifying adaptation needs and matching these with other funding sources. Different adaptation partnerships emerged throughout the last years, e.g. the PPCR or the AAP. In many instances they worked on the basis of the NAPA documents and established projects based from the identified priorities.[13] Funded projects in the KP Adaptation Fund also often come from the NAPA list.

Though having substantive success in matching needs with funding sources, NAPAs were not ideally designed to deliver this. Deficiencies relate to the frequency of NAPA preparation and

[12] Klein (2007) concludes, that "in many LDCs the NAPA process has strengthened institutional capacity at the national level, thus improving the countries' ability to integrate adaptation into sectoral planning and decision-making."
[13] See Ayers et al., 2011.

review (an ideal matching instrument needs to be updated regularly), the stakeholders involved and the extent to which project ideas were formulated (short descriptions of project ideas in the NAPA process did not allow for evaluation by funding entities). To maximize the matching abilities of NAPs there are a few responsibilities incumbent on both the host country side, but also on side of the funding entities and donors.

It is clear that national ownership is vital, to ensure effective uptake of adaption planning or plans. NAPs should not be developed in isolation, but along side or integrated into other development guidance strategies – this should also help address possible conflicts with other national priorities. The importance of national ownership should also help funding entities and donors accept country leadership of the programmes. If they are rejected, the introduction of review cycles and continual updates will be an opportunity to improve quality of proposed activities or conduct consultations.

Unlike in the NAPAs, the NAP process should also include a sequencing of priority implementation. The reporting format should be considered and maybe differ from the NAPA reporting, e.g. including short biannual update reports.[14] Furthermore, it is important to link NAPs processes to processes of donor coordination, as encouraged through the harmonization process of the Paris Declaration for Aid effectiveness. Although the distinction between adaptation finance and development assistance should not be blurred through NAPs, it is important that NAPs help to prevent maladaptive investments by existing development assistance.

2.4 Lessons for country tailoring and capacity support

Other lessons learnt from the NAPA process relate to the actual drafting and subsequent implementation process. Although instructive and facilitative in nature, at some point nationally tailored decision support tools are needed to effectively identify and prioritize adaptation actions.[15] For NAPs, which are more complex and require more analytical work, this need is likely to be even stronger. Given this complexity and scale of need, it seems impossible that the Adaptation Committee, established by the Parties in Cancun, could provide support to LDCs to deliver NAPs, like the LEG gives support to LDCs to prepare their NAPAs. Given the Adaptation Committees other significant demands, requesting it to deliver capacity development to all LDCs and other developing countries would likely overburden it and would not be making best use of its skills and resources. Therefore, a more regionalized nationally appropraite arrangement, through Regional Centres and other relevant institutions needs to be considered to deliver this important prerequisite for successful NAP implementation.[16]

The NAPA guidelines require countries to describe key vulnerabilities to climate change and encourages them to state information that will help in identifying the most vulnerable populations. However, NAPs, which have a longer-term view, require systematically accessing and weighting longer-term trends, scenarios and their uncertainties. Given that this should be a continuous task, it seems appropriate to establish the linkage on the institutional level, and not only ramp up the vulnerability analysis of the NAPA with a bigger emphasis on long term climate. An effective working cooperation of national institutions with the recently launched “Global

[14] This was a recommendation by the “Joint external evaluation: Operation of the LDCF” in 2009 (Ministry of Foreign Affairs of Denmark, 2009)

[15] Ministry of Foreign Affairs of Denmark (2009) identified this need and recommended for this reason to dedicate a certain percentage of the LDCF to support technical assistance to LDCs

[16] Harmeling et al. (2011) developed an approach, how this could be best facilitated through an interplay of the established institutions in Cancun 1. Adaptation Committee, 2. Regional Adaptatiom Centres, and national arrangements.

Framework for Climate Services"[17] seems therefore an important component for successful NAPs deployment.

3 Institutional arrangements - The wheel to spin

National Adaptation Plans need a strong institutional set-up in order to be implemented. This applies both to the domestic level, as well as to the international level. Fig. 1 shows the adaptation continuum ranging from impact to vulnerability focus, and maps accordingly how NAPs would reach out to different relevant processes in order to establish a comprehensive national approach to adaptation planning.

Figure. 1 is only meant to illustrate one possible institutional arrangement. Certainly, realized approaches will differ from country to country depending on local context. One unifying theme, however, is to introduce a country approach of an adaptation planning cycle that ensures learning and capacity development.

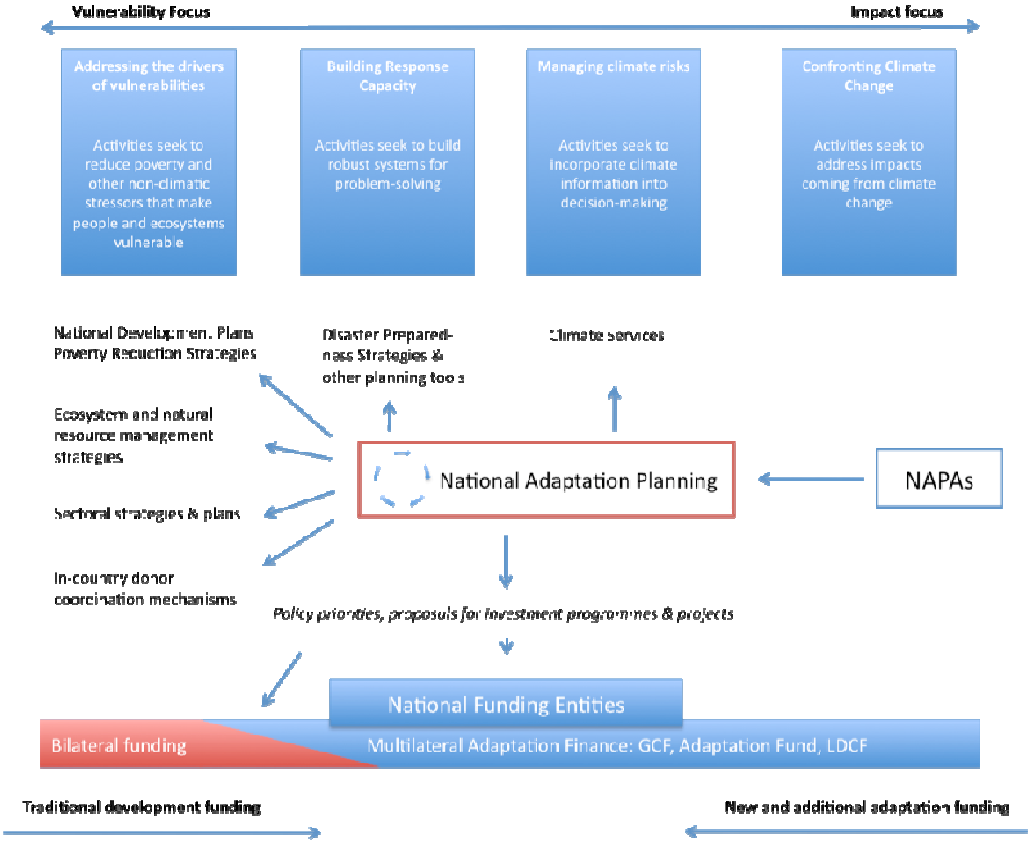

Figure 1: Institutional arrangement for national adaptation planning in the context of the adaptation continuum (own illustration based on Klein, 2008 and McGray, 2007)

The NAPA arrangement, largely impact focussed, can be the starting point. However, to facilitate a wider, more comprehensive adaptation strategy or plan, it is important to also address other relevant planning processes, starting from national development strategies (such as Poverty Reduction Strategies), further sectoral planning of adaptation relevant sectors (agriculture, water, infrastructure) and also relevant coordinating mechanism for development (such as donor

[17] The "Global Framework for Climate Services" is an initiative by the WMO to strengthen "to strengthen production, availability, delivery and application of science-based climate prediction and services" especially in developing countries. See http://adaptationonline.blogspot.com/2011/05/global-framework-for-climate-services.html

coordination mechanism). Ideally, national adaptation planning should build on or develop effective well facilitated multi sectoral or cross sectoral, multi stakeholder processes to address synergies and manage trade offs (for example competing demand for natural resources and better management of ecosystem services and the natural resource base). Importantly, the national institutional arrangement should link up with climate service providers that can provide continuous climate information flow, or updates of information to the country.

In terms of funding, it is clear that developing countries, in particular the LDCs, will need financial support to set-up their institutions and to implement their adaptation planning. Hence, the link to climate finance institutions and financial flows in general, needs to be an integral part of the institutional arrangement. In this context, one should highlight the possibility of setting up National Funding Entities that directly support the implementation of national adaptation planning approaches.

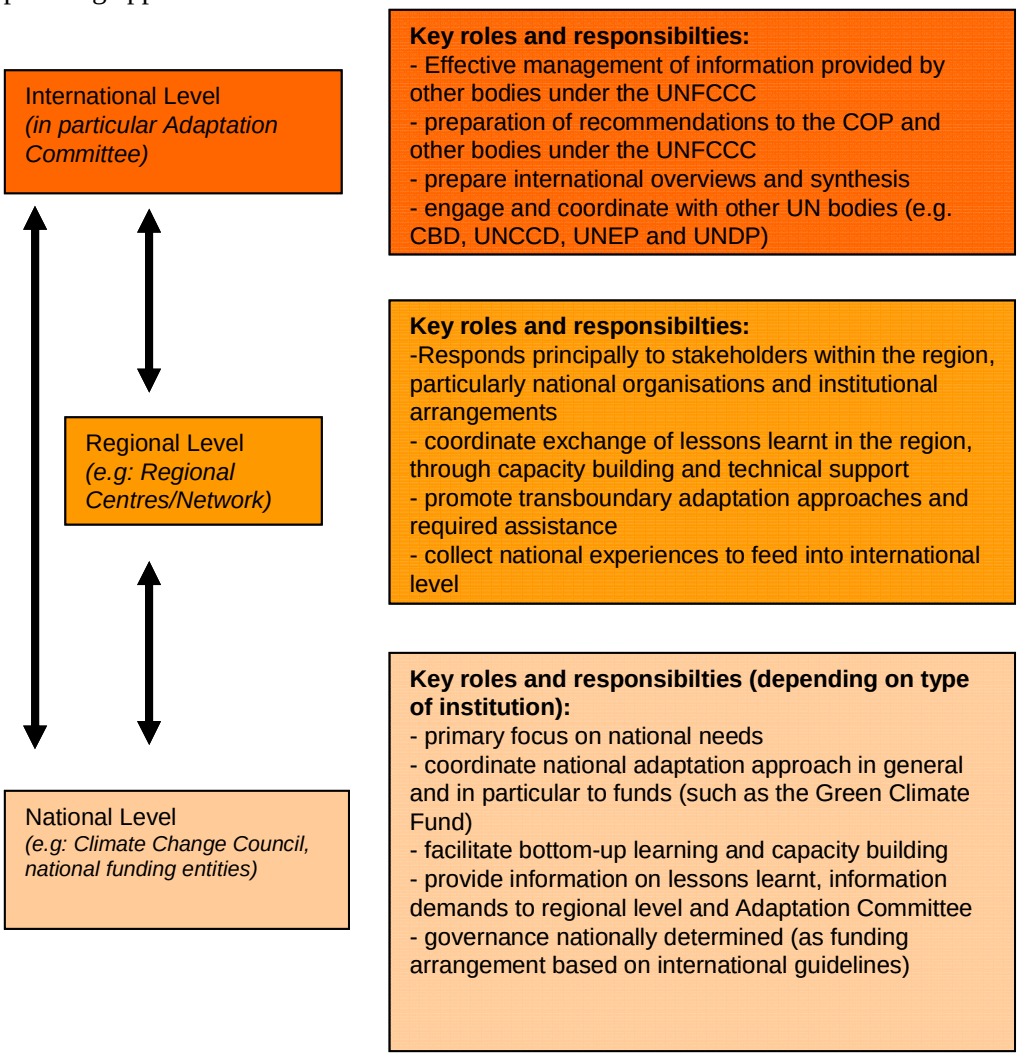

Figure 2: Roles and Responsibilities of different levels in the adaptation interplay (Harmeling et a., 2011)

Support not only in terms of finance, but also in terms of capacity development, is an explicit need of developing countries, especially LDCs. To successfully deliver capacity support to LDCs and other developing countries, an effective interplay is necessary between the different levels -international, regional, national and local. Figure 2 shows potential division of roles and responsibilities between the different levels, especially referring to the institution established by

Parties under the CAF. There is also a need to link effectively with sub-national levels of governance, such as local authorities.

4 Implications of Parties´ views

During its thirty-fourth session, the SBI[18] invited the Parties to the UNFCCC to submit their views on the elements and deliverables of the process to enable least developed country Parties to formulate and implement National Adaptation Plans, building upon their experience in preparing and implementing NAPAs.

Sixteen submissions on the NAPs process were deposited, among them eleven submissions from Parties. Four of the Party submissions originated from Annex II countries (USA, Norway, Australia, Hungary/EU), while four came from LDCs (Gambia, Democratic Republic of Congo, Malawi, Nepal) [19]., and two from other non LDC developing countries (Sri Lanka and Columbia). Five further useful submissions were made by intergovernmental and nongovernmental organisations. Due to the limited scope of this document, however, we have focused on Party submissions in this chapter.

This chapter attempts to examine and compare the submissions from Parties, in order to deduct the implications for the upcoming process. It does this in three parts, related to

- A general description of the NAPs approach;
- Elements of overarching guiding principles of the NAPs guidelines;
- Modalities required for the NAPs process.

Because of the level of detail of the Gambian submission on behalf of LDCs, it will be referred to as basically reflecting the position of the developing countries in our comparative analysis, unless a significant divergence or gap among developing countries submissions warrants a special reference. Submissions from developed countries will be considered together too, since there are often very similar views.

4.1 Synopsis of the NAPs approach

As indicated earlier, the Cancún Adaptation Framework has initiated a process on NAPs.[20] The NAPs result from the need to go beyond the focus of urgent needs and short term strategy of NAPAs, by addressing medium- and long term adaptation needs as part of development planning processes. In doing so, NAPs should endow developing countries with a strong strategic plan and policy dialogue embracing and integrating sector-wide and programmatic approaches in a coherent policy institutional and regulatory framework.

[18] FCCC/SBI/2011/ p.16-18 http://unfccc.int/resource/docs/2011/sbi/eng/07.pdf.
[19] Among developing countries's submissions the one from Gambia is the most elaborated and covers all issues related to the process, guidelines and modalities as well as contains concrete suggestions on next steps to be undertaken after COP17. It encompass the view of other Parties expressed in their submission.
[20] Decision 1/CP.16 para 5 and 16.

Accordingly, most of the Parties[21] (USA, Norway, Gambia and Democratic Republic of Congo) are of the view that the NAPs should be flexible and non prescriptive, rather facilitative.[22] Such plans should be driven by a dynamic, continuous and iterative process with deliverables and outcomes advanced through periodic reviews that would not duplicate but strengthen the existing plans and would be capable of integrating emerging science as it becomes available. This means that NAPs should be open for periodic reviews[23] and updates of adaptation interventions or enable the upgrading of existing plans to guarantee their full integration in the NAPs.[24] Besides, NAPs should be integrated into the continuous process of sectoral and cross-sectoral planning at the national and sub-national levels to assist decision-makers to address and capitalize the trade-offs and linkages that adaptation demands[25]. The process should assist LDC and other developing countries to make both early choices, taking future risks into account, as well as a step-wise "no regrets" approaches of decision making[26]. It should address the long term risks that may affect the building of enhanced adaptive capacity and resilient socio-economic and ecological systems, including through economic diversification and sustainable management of natural resources of those countries[27]. The US go further and assume that the NAPs should follow an holistic framework that enables a transformative shift or expansion of the climate resilient development[28]. The NAPs process or upgrading of existing plans should pragmatic result based effective and could be guided by a set of principles and guidelines, rather than a strict template.

4.2 Elements of overarching, guiding principles of the NAPs

Parties´ submissions reflect convergent and divergent views with regard to overarching, guiding principles to be applied for successful formulation and implementation of overarching NAPs. The guidelines are expected to encompass a set of provisions for the integration of the NAPs into existing relevant planning process.

In terms of convergence, pursuant to the Cancun decision all Parties recognised also in their submission that the NAPs are distinct and separate from NAPAs, but complement each other. They all recognised that the NAPA process was a good exercise for LDCs to understand the issues connected to vulnerability, bridge institutional barriers, identify immediate and urgent adaptation needs at different levels and serve as a starting point for further elaboration of adaptation needs and plans.[29] At the same time, it is acknowledged more or less by all Parties that the NAPA process had had limited scope and resources to cover all issues that may indispensable and relevant for the NAPs. This does by no means signify that the NAPs should substitute NAPAs, or delay their full implementation[30], nor that NAPs should divorce short-term planning from medium and long-term planning. LDCs call for a continuation of the NAPAs and where urgent and immediate project ideas may emerge from the NAP process to channel them through the NAPA for expedited support. This can be achieved through coordinated revision and update

[21] Since the other countries do not speak against these approaches in their submission, even they do not refer to. One can argue that the flexible and non- prescriptive approach is shared by the members.
[22] EU (2011).
[23] In Gambia's on behalf of the LDC view the progress on NAPs should be periodically reported at each COP, while Nepal envisions a revision of the NAPs after each decade to ensure a broad consistent with the goals articulated in the Cancun decisions.
[24] Australia (2011).
[25] Australia (2011).
[26] Australia (2011).
[27] 1/CP.16. para 14 d.
[28] USA (2011), see Draft Compilation of submissions from Parties and other relevant organizations by the secretariat (2011).
[29] Malawi (2011), Nepal (2011) and Gambia on behalf of the LDC (2011),
[30] Nepal (2011).

of the NAPA – which the LEG anyway is striving for[31]- as well as during the NAPs process by scaling up financial support[32].

Another point of convergence in all submissions is agreement that the NAPs process should be country-driven and owned, as well as transparent, strategic and scalable, fulfilling the principles contained paragraph 12 of 1/CP16 [33]. Despite the fact that country ownership should be warranted, developing country Parties expressed the need of having step-by-step provisions from the global level on when, how and for what to develop and use guidelines[34]. These guidelines should include how to define a successful implementation strategy and procurement on analysis of impact and vulnerability[35].

In this sense, assessment of needs and information is seen by the Parties as crucial. Australia mentions that national priorities are best shaped once risks have been thoroughly analyzed.[36] In doing so, clear guidelines should be provided to developing country Parties on tools related to vulnerability assessments in different sectors prioritising medium and long term adaptation actions. These guidelines should be comprehensive with user-friendly vulnerability assessment tools and downscaling of climate models. However, Norway and certain developing country Parties make clear that due to the scarcity of data in developing countries, as well as the highly local and contextual nature of climate change impacts and vulnerability, one cannot assume to capture all the impacts and vulnerabilities to climate change. They suggest the need to design the process in a way that allows adaptation processes to evolve as knowledge and experience is gained, taking into account the role of institutions.[37]

Furthermore, there is some convergence over participation and consultation. Nepal states that the guidelines should promote participation of stakeholders from different sectors, particularly vulnerable local communities, and should be socially inclusive and gender-sensitive in line with 1/CP.16.[38] Gambia on behalf of the LDCs says that the process should follow meaningful, participatory, iterative, and fully transparent approaches that considers vulnerable groups, communities and ecosystems, and acts to integrate adaptation into relevant social, economic and environmental policies[39]. The US states that only with a broad participation that tries to improve the problem identification, priority setting, decision-making, implementation, monitoring and evaluation one can be able to manage trade-offs and reduce the risk of conflict, for example within or between communities and sectors[40]. Nepal also suggests that the guidelines should encourage governments to consult and engage with local governments and non-governmental stakeholders, such as vulnerable populations, universities, and the private sector throughout the NAPs process.[41]

[31] FCCC/SBI/2011/11. Report on the twentieth meeting of the Least Developed Countries Expert Group.
[32] The LEG in its report to the SBI 35th has already initiated such a review of NAPA http://unfccc.int/resource/docs/2011/sbi/eng/11.pdf.
[33] See para 12 of the FCCC/CP/2010/7/Add.1.
[34] Gambia on behalf of the LDC (2011) und Nepal (2011).
[35] Gambia on behalf of the LDC (2011) on behalf of LDC (2011).
[36] However Gambia on behalf of the LDC pointed out that this does not mean that minor gaps should stop the commencement of planning, since the planning should be pragmatic.
[37] Gambia on behalf of the LDC (2011).
[38] Nepal (2011).
[39] Gambia on behalf of the LDC (2011).
[40] US (2011).
[41] Nepal (2011).

4.3 Modalities required for the NAPs process

The modalities, as opposed to the guidelines, should to some extent set a particular mode in which the NAPs could exist and operate. They describe how the NAP will fit in the overall UNFCCC process.

For developing countries the modalities[42] are first of all related to **financial support.** They underpin their position through principles of the Convention as contained in Art 4.4 and 4.9. This presumes that funding sources need to be clarified and appropriate arrangements need to be set in order to initiate the financing of the NAP process. Thus, the support provided by Annex II should be harmonised and equal to the support provided for mitigation[43], levels of support must accord to adaptation needs by keeping away any form of unnecessary bureaucratic procedures to access to the fund[44].

Funding should enable the preparation, identification of programmes and their implementation. In doing so existing funds such as the Adaptation Fund, the LDC Fund and the Special Climate Change Fund could play a complementary role to those to be provided by the Green Climate Fund. Columbia sees a need that the GCF provides strong incentives for adaptation and enables access to funding for adaptation projects and requirements. Along this line developing country Parties make clear that mid and long term adaptation requires larger and more consistent funding. The voluntary provision of funds to the LDCF or other funds by developed countries does not ensure the necessary predictability and adequacy. The point is also well made that any delay between approval and the delivery increases the overall costs.

Access to the funds has been highlighted as very critical. The Democratic Republic of Congo on behalf of the African Group calls for a removal of any kind of co-financing requirements. In doing so clear guidelines for monitoring of Annex II ontributions to relevant funds/technology support are demanded.[45]

On the other hand Hungary on behalf of the EU mentions previous support for NAPA plans through LCDF, multilateral and bilateral support, and the LEG, without making reference to future financial support or financing. The US mention the significant investments made by the Climate Investment Fund through the Pilot Program on Climate Resilience in 18 countries, eight of which are LDCs and encourage other Parties to support NAPs process to LDCs that have not benefited from the Pilot Program on Climate Resilience.

Parties also mentioned that key steps in the NAP process include **monitoring, evaluating and learning** from progress in order to improve and adjust plans through periodic and regular reviewing and updating. Review and monitoring of not only the implementation of the NAPs but also of the support provided is necessary.

The second layer of the modalities is related to **linkages with existing institutions** on the national and international level to enable coherence and minimise duplication of efforts.

At the **national-level**, there is a need for enhancing the coherence, communication and synergy among national institutions and assisting them in the planning process and beyond. Norway points out that the NAPs need to fit in the existing planning systems and cycles by supporting the adaptation planning, rather than being a separate plan. In doing so, there is a need for

[42] Gambia on behalf of the LDC (2011), Republic Democratic of Congo (2011), Nepal (2011) and Malawi (2011).
[43] Gambia on behalf of the LDC (2011).
[44] RDC on behalf of the African Group (2011).
[45] RDC on behalf of the African Group (2011).

strengthening of national capacities, coordination mechanisms and expertise; in particular through building and retaining capacities in-country through permanent teams of experts, as opposed to hiring external consultants.[46] Where no national institutions dedicated for the NAPs exist, they should be established if deemed necessary. In terms of coherence, Nepal is of the view that making the climate change focal point of the Parties the focal agency for coordinating and facilitating the preparation and implementation of NAPs is a useful way forward. [47] Beyond the territorial approach, several submissions remind that the NAPs must take into account trans-boundary issues. The role of Regional Centre is important to support this[48].

At the **international level** the process should also be coordinated. The technical support expertise and advise on the NAPs process should be provided by **LDC Expert Group (LEG)** [49]. The LEG should continue to provide expertise and advice to LDCs -and other developing country Parties if they request it -[50] during the formulation and implementation of their NAPs. Also at the Convention level, Gambia on behalf of the LDCs also suggests that the **Adaptation Committee** could play a key role in the process alongside the LEG. It could support the development of strategic priorities, policies and guidelines of how adaptation should be supported under the Convention by providing technical information as well as assisting with the coordination of capacity-building and sharing of experience for adaptation[51].

Regarding any contribution by the **Consultative Group of Experts**, there is broad agreement amongst more or less all Parties that its expertise gained in the field of vulnerability and adaptation assessment could be useful. However there is a divergence about whether the NAPs should be reported within the adaptation section of National Communications as suggested by the USA[52] or be communicated as a stand alone report/document to be published and made available to all stakeholders, and submitted to the Secretariat for archiving and wide dissemination as suggested by Gambia on behalf of the LDCs[53].

Also a crucial role has also been identified for the **Nairobi Work Programme (NWP)** in the NAPs process. Parties agree that resources could be valuably channelled into the NWP because of it expertise in the field of impact, vulnerability and adaptation, as well as its products and information systems and this could support the NAP process'. The USA therefore suggested that the NWP should accordingly take a sectoral approach in its next multi-year work plan, in order to identify tools and resources that would support the more effective designing by LDCs of plans that are robust under multiple climate scenarios[54]

5 Outlook and recommendations

The following section aims to provide recommendation for a substantial, yet realistic outcome in Durban. Generally, it is important to deliver on the mandate given in Cancun. That is to set modalities and guidelines for the implementation of NAPs. However, negotiation time will be extremely short in Durban. In the synthesis report, the secretariat suggested potential areas that require decision at the Durban COP, and areas that could be dealt with in the process afterwards,

[46] Gambia on behalf of the LDC (2011).
[47] Nepal (2011).
[48] Nepal (2011)
[49] This position is shared by Australia (2011) and Malawi (2011).
[50] This position is supported by Gambia on behalf of the LDC (2011).
[51] Gambia on behalf of the LDC (2011).
[52] USA (2011).
[53] Gambia on behalf of the LDC (2011).

based on the views expressed by Parties. This provides an important framework for sequencing the required actions.

Potential COP 17 decision on way forward for NAP process	**Possible next steps after COP 17**
Provisions for the immediate launching of the NAP process – and agreed timeline for this; Guiding principles; Guidelines for the preparation and implementation of NAPs, including elaboration on how to define successful implementation strategies; Arrangements for financing, technical support and capacity building, including provisions for their immediate delivery; An elaboration of the role of the LEG, the AC and other bodies, including appropriate new mandates; An elaboration of the role of the Secretariat; An elaboration of the role of Annex II Parties; Provisions for LDCs to report on progress being made at the national level and provisions for presenting their NAP and its various outputs to the COP via the Secretariat; Provisions for the periodic and regular review and monitoring of progress on the NAP process under the COP	The immediate launch of the NAP process; Training (taking into account regional aspects and language needs); Institutional capacity-building (for countries to be immediately able to start the preparation of their NAPs); An expert meeting for the LDCs and others to identify and discuss technical approaches to vulnerability and risk assessment in key sectors, within the framework of the guidelines to be adopted at COP 17, and on how to institutionalize the process of these assessments to produce periodic outputs for the NAPs over time; An invitation to the Nairobi Work Programme partners to make available information, data and other resources to contribute towards the formulation and implementation of the NAPs; Periodic submissions and views from Parties and others to inform the review of progress in the formulation and implementation of NAPs; LEG input as per its current mandate, and any additional areas of support that Parties may decide on during the adoption of the guidelines for NAPs

Table 1: Suggestions for next steps towards launching NAPs. Based on FCCC/SBI/2011/13 p.19

Overall, and as elaboration of substantial elements of the table above, we would like to provide the following recommendations[55]:

Ambition for Durban on NAPs

1. Set the track for successful NAPs implementation. Provide the required decisions to enable the immediate launching of the NAPs process by Durban as mandated by the Cancùn decision. This includes the elements identified in the synthesis paper on guidelines and modalities. Modalities and guidelines for NAPs should be set in Durban in order to progress the NAPs process.

Guidelines

2. Adopt an approach that is facilitative and non prescriptive in nature to help enable flexible, country-led planning, as well as cross-border cooperation and country to country learning, that delivers for the most vulnerable groups, communities and ecosystems into the future. Parties should not be asked to deliver a single step-by-step process, although an indicative guideline of general starting points and good practices for NAPs could be given to exert guidance where demanded by countries. It remains important not to provide a package, but rather a menu that could support specific needs.

[54] USA (2011).
[55] See also CAN International (2011).

3. Accept that NAPs includes both a process and an implementation focus: The establishment of medium-to long term planning on adaptation requires a new institutional approach, establishing continuous adaptation planning, review and learning cycles. Developing the necessary procedures and institutional capacity of existing bodies is therefore an important component for NAPs. However, Parties need to acknowledge the need for identifying, aligning, prioritizing and implementing priority investments to tackle climate impacts or reduce vulnerabilities. Therefore, NAPs constitute both process and action.

4. Define principles for NAP development and implementation. A non-prescriptive approach to NAPs should operate based on principles. These should be fleshed out and included into a Durban decision. The starting point should be the principles of the Cancun Adaptation Framework. However, a post-Durban process should further clarify and collect good practice and provide country guidance on how to implement NAPs.

5. Deliver for the most vulnerable: Outcomes of NAPs should benefit the most vulnerable groups, communities and ecosystems. They should make use of information tools to identify most vulnerable groups, communities and ecosystems and prioritize them accordingly. This can be established through human rights principles which almost all governments in the world have promised to adhere to as well as principles of sustainable development. Recognizing that climate change affects women and men, the elderly and young differently, planning processes should include gender- and children- differentiated analysis of impacts, risks and vulnerability as well as prioritize gender- and children-sensitive implementation approaches, and address the needs of other vulnerable marginalise groups. Importantly, include consultation processes in NAPs building that meaningfully capture the needs and concerns of most vulnerable communities.

6. Acknowledge ecosystems and their services. Long-term approaches for climate adaptation should include analyses of ecological impacts of proposed adaptation action, prioritizing win-win or low / no regret implementation approaches, that both support future human needs and enhance resilience of natural systems.

7. Emphasize national level institutional arrangement without international prescription. Adequate national level institutional arrangements are an important prerequisite to successfully implement NAPs. Countries will rely on different national institutions and it is important to identify a permanent body that is in charge of coordinating and perhaps overseeing the continuous process of NAPs. However, no prescription from the international level on what such institutions should exactly look like or who they should be seems advisable.

8. **Facilitate synergies with other multilateral frameworks, such as CBD, UNCCD or the Hyogo Framework for Action**: Take into account lessons learnt and establish linkages to national-level processes and arrangements in other relevant frameworks (e.g. National Action Plans under the UNCCD, National Biodiversity Strategies and Action Plans).

Modalities (technical, financial and capacity support)

9. Enhance Synergy and linkage among the different bodies involved in the NAPs process: It is important that the below mentioned bodies work closely in order to enhance mutual learning through joint and complementary work on best practises and lessons learnt. Better coordination and cooperation and agreeing specific assigned tasks will avoid duplication or overlap of efforts. The modalities to be set in Durban should provide clear allocation of role and division of labours in order to enhance the synergy and linkages among the involved stakeholders. An important area in this regard is technical and capacity development, based on the expertise of existing and emerging bodies and institutions.

Accordingly:

- **The LEG** should provide expertise, advice, capacity development, direct and practical support to the Parties on how to develop, implement and monitor their NAPs
- **The AC** should -based on the information provided by the LEG- provide broad guidance and strategic priorities on how adaptation should be supported under the convention. It should also undertake the process of adaptation analysis and review at the international level. Given this complexity and scale of need, it seems impossible that the AC could provide support to LDCs to deliver NAPs, like the LEG gives support to LDCs to prepare their NAPAs. Given the Adaptation Committees other significant demands, requesting it to deliver capacity development to all LDCs and other developing countries would likely overburden it and would not be making best use of its skills and resources
- **The NWP** should provide expertise on vulnerability, risk assessment as well as sectoral approachas, that enables a more effective designing of NAPs under multiple climate scenarios.
- **The Regional Center and Network** should provide technical input and advice in relation to the transboundary actions.

According to Table 1 on the suggestions for next steps towards launching NAPs, a clear mandate for the above-mentioned bodies is needed. In term of sequence, it will be well-advised to organise a further expert meeting after Durban that may address technical support and capacity development as well as vulnerabilities risk management such as how to institutionalise the method of these assessment through periodic outputs for the NAPs process over time

10. Clarity regarding the financial support for both formulation and implementation, in order to avoid any delay that increases the cost of adaptation: This will be the tricky and the controversial part of the COP decision. Since this is very linked to the finance parts of the negotiation, Durban should provide clear prospects that substantial support should be provided. It is of utmost importance that outcomes from Durban connect and clarify the link between the NAPs process and the financial mechanism(s) of the Convention. In addition, financial resource to be provided for the NAPs should not substitute or delay the financial commitment for implementation of the NAPAs.

11. Enable the LDCF to play an interim role in funding the NAPs, with the view of enabling the formulation of the NAPs: The NAPs process can be funded through different channels bilaterally, and multilaterally through funds under the Convention as well as others. However, it would be well-advised to use multilateral channels under the Convention by taking advantage of the most suitable channel among them. In doing so, the LDCF could play this role at the formulation phase, until the Green Climate Fund (GCF) becomes operational. The Adaptation Fund (AF) may also finance projects/ programmes emanating from the NAPs.

12. **Need to enhance coherence and strengthen synergy among the stakeholders and institutions at the national-level, from planning to implementation and beyond**. It is essential to develop capacities in-country, through establishing and assisting permanent teams of experts, as opposed to hiring external consultants. Durban should provide modalities on how to integrate NAPs into existing national development plans. While it would not be appropriate for the modalities to prescribe an "institutional constellation" within country that could be best suitable to coordinate the NAPs process, it could however call for the setup of nationally appropriate permanent mechanism tolead or accompany the NAPs process through its development and be-

yond.

13. Establish monitoring and evaluation systems and biennial update reports for matching of adaptation finance: Monitoring and evaluation is a crucial part of an adaptation learning cycle. Reporting of potential needs and activities should be an important matching function to connect adaptation finance demand with supply. Thereby, the review and monitoring system should not only be applied to the implementation of the NAPs, but also to the support provided by developed countries. With existing channels of communications, such as National Communications having a publication cycle of more than 5 years in LDCs, real-time matching of identified needs with international funds seems difficult. Therefore, Parties could consider to establish biannual update reports to report on NAP development and implementation.

Durban brings out an important opportunity to progress NAPs, an important element of the Cancún Adaptation Framework. Parties should therefore seek an agreement on elements of overarching guiding principles of the NAPs as well as on Modalities, which facilitate and enable meaningful national processes for developing medium and long termer adaptation planning and implementation, building on, integrating with and scaling up existing strategies, plans and actions.

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We welcome comments and feedback on this document and contribution to the UNFCCC discussion on NAPs – please email:

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Germanwatch

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WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by:

- conserving the world's biological diversity;
- ensuring that the use of renewable natural resources is sustainable;
- promoting the reduction of pollution and wasteful consumption.

For further information, please visit our international website: www.panda.org

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