



REPLIES OF THE EUROPEAN COMMISSION

TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

Climate adaptation in the EU-
Action not keeping up with ambition

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This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 259 of the [Financial Regulation](#) and to be published together with the Special Report.

I. THE COMMISSION REPLIES IN BRIEF

The Commission welcomes the attention the European Court of Auditors (ECA) brings to adaptation to climate change in its Special Report. The EU and the world are facing increasing risks due to climate change. The need to manage these risks and to build resilience to projected and emerging climatic conditions has become urgent.

Member States' data reporting on climate adaptation must be improved so as to add more value in terms of tracking progress and supporting future policy decisions. In its recent Communication on Managing Climate Risks¹, the Commission recognises the need to review existing governance processes and explore how the implementation of EU level requirements can be further facilitated, streamlined and strengthened. This includes identifying potential synergies in implementing climate resilience relevant reporting obligations across various pieces of EU legislation.

The Commission has put in place tools, such as the Climate-ADAPT portal, Copernicus or the EU Covenant of Mayors to support a variety of risk owners. The Commission is working on improvements to broaden the use of such tools and increase their impact².

The Commission is committed to working with Member States to ensure that EU adaptation policy and action gets ahead of climate change impacts, by continuing to improve the EU adaptation tools, and engaging with all stakeholders so that all involved adequately plan, implement and evaluate their adaptation measures. As such, the Commission can accept recommendation 1 and 2, while reserving its right of legislative initiative as established in the Treaties, and without prejudging future legislative proposals in content, scope or timing.

Finally, the Commission will integrate climate adaptation considerations in the implementation of EU programmes and activities as part of the 'do no significant harm' principle laid down in the Financial Regulation for the post 2027 multiannual financial framework, where feasible and appropriate. This will ensure that all relevant EU programmes contribute to climate resilience. However, reserving its right of legislative initiative as established in the Treaties, the Commission cannot prejudge future legislative proposals in content, scope or timing. Thus, the Commission accepts recommendation 3a, and partially accepts recommendations 3b and 3c.

II. COMMISSION REPLIES TO MAIN OBSERVATIONS OF THE ECA

1. EU adaptation framework

The EU-level adaptation framework comprises the European Climate Law, EU Adaptation Strategy, Governance Regulation and its implementing acts, the Communication on Managing Climate Risks, as well as numerous sector policies and legislation. Most of the responsibility for implementing measures that affect climate resilience remains at Member State (and local) level. The Commission is ready to support, in line with the available resources, Member States in fulfilling their responsibilities, and to discuss the distribution of competences between EU and national level.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2024%3A91%3AFIN&qid=1710403105471>
(see section 3.1 and 3.2)

² See ECA observations 36-43, 81 and recommendation 2.

The Commission takes note of the ECA's finding that some priorities of the regional/sectorial plans conflict with those of the EU/national strategies or plans, particularly regarding agriculture and forestry³. The Commission intends to exchange on this point with Member States.

The Commission also acknowledges the need to improve reporting on climate adaptation through common indicators to measure progress⁴. Member States' reporting on adaptation is largely descriptive, and with little quantifiable data, which makes an evaluation of progress on climate adaptation in the Member States more challenging. Nevertheless, Member State reporting is supplemented by other sources of information when evaluating adaptation progress, such as indicators maintained by the Joint Research Centre. Moreover, the Commission has made the adaptation indicators, in particular those which would help measure impacts and results of adaptation actions, the central topic of the annual gathering of the Working Group on Adaptation (WGA) in Brussels in May 2024. The WGA members agreed to strengthen the efforts related to indicators. The work on indicators is embedded in the United Arab Emirates Framework for Global Climate Resilience⁵, adopted at the Conference of Parties of the UN Framework Convention on Climate Change in Dubai in December 2023. The upcoming review of the Governance regulation offers an opportunity to revisit and rationalise reporting requirements. In advancing work to improve reporting and to develop common indicators, the Commission will pay special attention to proportionality and minimising administrative burden.

Finally, the Commission has put in place tools, such as the Climate-ADAPT, Copernicus or the EU Covenant of Mayors to support risk owners on adaptation⁶. The Activity Report⁷ of the EU Mission on Adaptation to Climate Change presents success stories, data, insights and innovative projects that aim to support regional and local authorities to prepare for the impacts of climate change. The Commission is working on improvements to broaden the use of climate preparedness tools, increase their impact, and promote knowledge sharing on climate adaptation in the EU.

2. EU climate adaptation funding

The Commission recognises that EU funding is pulled together from several EU programmes, which makes it difficult to identify all the relevant adaptation projects. The EU Mission on adaptation to climate change has worked to map the relevant adaptation projects from Horizon 2020⁸, Horizon Europe, LIFE and Interreg programmes and will soon publish a list of relevant adaptation projects from those programmes.

The objective of the Mission on adaptation on climate change is to enhance climate resilience within a subset of regions and local authorities, notably the 311 signatories of its charter, and not to raise the general awareness among all EU regions⁹. Since the ECA has surveyed a sample of 400 municipalities across Europe, and not specifically targeted the 311 participants of Mission Adaptation, and since the questions were focussing on the portal (which at the moment of the survey had few mature tools and outputs due to the Mission's early implementation stage) the results may not reflect

³ See ECA observations 79

⁴ See ECA observations 33 and 77

⁵ <https://unfoundation.org/what-we-do/issues/climate-and-energy/uae-framework-for-global-climate-resilience/>

⁶ See ECA observation 41 and Figure 10

⁷ EU Mission on Adaptation to Climate Change: [Activity Report. May 2024](#)

⁸ For instance, the REGILIENCE project ([resilience strategies for region](#)) is a forerunner project funded by Horizon 2020 and running until end of 2025.

⁹ See ECA observation 52

the actual impact of the Mission. In addition, while the portal may be the most visible aspect of the Mission, it is not necessarily the most impactful one, as the most consequential actions are taking place in the projects/demonstration sites. Nevertheless, the Commission agrees that the Mission would benefit from greater awareness of the initiative and its portal.

One of the aims of the EU Cohesion Policy between 2021-2027 is to promote climate change adaptation and disaster risk prevention and resilience, taking into account eco-system-based approaches. For the 2021-2027 programming period, a total investment of more than EUR 18.8 billion is planned in climate adaptation and risk management under Cohesion Policy, of which over EUR 13.9 billion is in EU funding. More than EUR 12 billion contributes to the specific objective of climate change adaptation¹⁰. The Commission keeps track of this and makes this information publicly available on the Cohesion Data Platform¹¹. The general delays in disbursement of relevant funds related to lack of administrative capacities at Member State level has also impacted the level of adaptation funding made available to date. The application of the principle of 'do no significant harm' (following the definitions in the Taxonomy Regulation), including to adaptation, is checked at the level of the type of actions to be programmed. Investments in infrastructure with an expected lifespan of at least 5 years need to be "climate proofed"¹² in the form of measures to ensure resilience to climate change. Specific guidance on climate proofing of infrastructure has been provided by the Commission to Member States. Finally, a specific support is provided through dedicated technical assistance to enhance capacity.

The EU Common Agricultural Policy (CAP) provides significant support for agricultural practices (beyond mandatory requirements) to improve soil health and carbon sequestration on agricultural land, with positive effects on water storage capacity, water infiltration and climate resilience. This is achieved through area-based interventions, i.e. eco-schemes and agro-environment-climate commitments, including support for organic farming. Almost half of EU farmland (47% compared to 15% in 2021) is planned to be covered with commitments beneficial for soil management to improve soil quality and biota. The CAP also supports practices beneficial for climate change adaptation such as agroforestry, and the establishment and maintenance of landscape features. Support is also provided for the restoration and management of wetlands, peatlands and floodplains. Investments in irrigation include support for the use of reclaimed water and rainwater harvesting. Investments which lead to a net increase of the irrigated area are only eligible if water bodies are not under pressure and where such investments do not lead to a significant negative environmental impact (no deterioration of water bodies affected by the investments). Member States have latitude under the current CAP to choose to what degree they reflect practices that are beneficial for climate resilience in their national Strategic Plans.

The Commission takes note of the projects identified by ECA as having little or no impact on increasing adaptive capacity, and those which according to ECA may lead to maladaptation¹³, and will discuss those with relevant stakeholders.

The Commission is committed to ensuring that all EU-funded projects are adapted to the current and future climate conditions, promoting long-term solutions for climate adaptation and that their climate

¹⁰ REGIO Specific Objective RSO 2.4. However, other Specific Objectives contribute to the total planned investment, including 2.5 Sustainable Water, 2.7 Nature protection and biodiversity, and 2.2 Renewable energy.

¹¹ <https://cohesiondata.ec.europa.eu/stories/s/21-27-Adaptation-and-risk-management/j4px-zny5>

¹² Climate proofing is defined in Article 2(42) of Regulation (EU) 2021/1060 as 'a process to prevent infrastructure from being vulnerable to potential long-term climate impacts whilst ensuring that the 'energy efficiency first' principle is respected and that the level of greenhouse gas emissions arising from the project is consistent with the climate neutrality objective in 2050.'

¹³ See ECA observation 53

risk exposure is a consideration informing the financing decision. The ECA seems to suggest there is an inherent conflict between spendings for adaptation and for other purposes¹⁴. Yet, adaptation must be integrated into all other policies, as required under the Climate Law ('mainstreaming'). Moreover, Commission will integrate climate adaptation considerations in the implementation of EU programmes and activities as part of the 'do no significant harm' principle laid down in the Financial Regulation for the post 2027 multiannual financial framework, where feasible and appropriate. This will ensure that all relevant EU programmes contribute to climate resilience.

III. COMMISSION REPLIES TO THE RECOMMENDATIONS OF THE ECA

1. Recommendation 1: Improve reporting on climate adaptation

The Commission should:

(a) strengthen the requirement for reporting on adaptation to include common indicators and criteria for measuring progress.

Target implementation date: March 2027

The Commission **partially accepts** this recommendation.

The Commission agrees that there is a lack of quantifiable common indicators¹⁵ notably when it comes to indicators for measuring the effectiveness of adaptation actions - and reference bases, which makes it difficult to assess progress made by Member States. The Commission Communication on managing climate risks of 12 March 2024 puts forward that "it [the Commission] will seek better indicators on progress on resilience, including in conjunction with other interlinked and relevant indicators to ensure a system approach."

There is progress also at the international level. Adopted at the COP28 climate summit in Dubai in December 2023, the UAE Framework for Global Climate Resilience uniquely positions climate adaptation, identifies global adaptation targets and launches the two-year UAE-Belém work programme, to establish indicators for measuring progress towards them. These targets and future indicators will contribute to drive further developments in European climate adaptation policy and action.

Without prejudging the design of future legislative proposals and instruments, the Commission is committed to reviewing existing governance processes and exploring how the implementation of EU level requirements can be further facilitated, streamlined and strengthened. This includes identifying potential synergies in implementing climate resilience relevant reporting obligations across various pieces of EU legislation.

(b) work with the Member States to address weaknesses identified in their reporting on climate adaptation.

Target implementation date: March 2027

¹⁴ See ECA observation 47

¹⁵ See ECA observations 33, 34 and 80

The Commission **accepts** this recommendation.

The Commission will further assess how the weaknesses identified in Member States' national adaptation reporting (Article 19 of Governance Regulation) and in their national progress reports (Article 17 of Governance Regulation) can be addressed, including in the context of the forthcoming Article 45 report on the evaluation of the Governance Regulation. The Commission will also continue to assess Member States' progress and measures on adaptation, including associated recommendations under the European Climate Law, and within the biennial assessment of progress under Article 29 of the Governance Regulation.

2. Recommendation 2: Making better use of the EU tools

With the goal of reaching local communities better, the Commission should:

(a) propose practical and simple tools targeting local communities (e.g. local risk assessment, funding options, best practices for adaptation) and make them available in all the official EU languages on the CLIMATE-ADAPT platform;

Target implementation date: December 2026

(b) work with Member States to better incorporate and promote the EU tools and initiatives (CLIMATE-ADAPT platform, EU Covenant of Mayors) on national and regional climate adaptation platforms.

Target implementation date: December 2026

The Commission **accepts** recommendation **2a and 2b** and will further work with European Environment Agency on improving the Climate-ADAPT.

Practical and simple tools targeted to local communities will continue to be made available by the EU Mission on Adaptation to Climate Change through its Portal on the CLIMATE-ADAPT Platform. Concerning the availability in all the official EU languages, the Commission will work with the European Environment Agency to deploy automated translation solutions to improve the accessibility and reach of the CLIMATE-ADAPT platform. For the full dissemination and deployment still, Member States have an important role to play. Moreover, the Mission will foster the role of the national adaptation hubs to support Member States in these efforts and will promote actionable solutions (in multilingual form) to the relevant regions.

3. Recommendation 3: Future-proofing EU funding for climate adaptation

The Commission should:

(a) provide guidance on actions relevant to climate adaptation and provide Member States with examples of projects leading to maladaptation;

Target implementation date: December 2026

The Commission **accepts** this recommendation.

Without prejudging the design of future legislative proposals and instruments, the Commission will continue to provide additional guidance to the Member States based on dialogue and demand, as much as possible with the available resources. The Commission is committed to work with the Member States and draw up guidance on the development of resilient landscapes that can buffer the impacts of climate change to support the best use of existing planning documents and in synergy with the Member States' spatial planning and nature restoration plans.

(b) strengthen the promotion of long-term solutions for climate-adaptation for all relevant EU-funded projects and assess the need for eligibility conditions that take account of future climate conditions;

Target implementation date: December 2026

The Commission **partially accepts** this recommendation.

The Commission agrees to strengthen the promotion of long-term solutions for climate adaptation across EU funds, and to assess the need for new eligibility conditions that take account of future climate conditions. In considering these eligibility conditions the Commission will pay particular attention to proportionality and to minimising administrative burden.

In its March 2024 Communication on Managing Climate Risks, the Commission already committed to integrating climate adaptation considerations in the implementation of EU programmes and activities as part of the 'do no significant harm' principle laid down in the Financial Regulation for the post 2027 multiannual financial framework, where feasible and appropriate.

Nevertheless, the Commission cannot prejudge the design of future legislative proposals and instruments which will need to be tailored to the specific situation and as such cannot be subject to an ex-ante framing.

(c) propose climate-proofing guidelines for agriculture investments and assess the need for new eligibility conditions for forestry measures to avoid funding single-species forests.

Target implementation date: December 2026

The Commission **partially accepts** this recommendation.

The Commission does not agree with proposing a specific climate-proofing guidance on agriculture investments at this stage, insofar that the requirements for agriculture investments are currently already established in the relevant legal acts.

The Commission commits itself to ensure that all relevant funding programmes continue to contribute to climate resilience. Furthermore, the Commission confirms that the climate adaptation considerations will continue to be integrated in all relevant programmes, where feasible and appropriate and in accordance with the relevant sector-specific legislation, within the framework of implementing the do-no-significant-harm principle following the Financial Regulation for the period post 2027.

Concerning the need for new eligibility conditions to avoid funding monoculture forests, the Commission agrees to assess the need to propose new eligibility conditions considering the principle of avoiding monoculture forests where appropriate. Nevertheless, reserving its right of legislative initiative as established in the Treaties, the Commission cannot prejudge the content, scope or timing of future legislative proposals.