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Climate Change Committee
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Dear Cabinet Secretary,

This letter sets out the Climate Change Committee's response to the draft third Scottish National Adaptation Plan (SNAP3), as requested by the Scottish Government as part of their consultation concluding on 24 April. This builds on our [Scottish Adaptation Progress Report](#), published in 2023, that summarised evidence of progress on adaptation at the end of the Second Scottish Climate Change Adaptation Programme.

In our progress report, we identified four key programme-level recommendations for SNAP3. Based on the draft plan, there remain important gaps in the structure of the programme. We recommend that these should be rectified in the final programme.

- **Quantified targets for climate resilience:** Specific and quantified targets for levels of resilience across Scottish society under each outcome of SNAP would allow the Scottish Government to set appropriate budgets, measure progress against targets and increase accountability for their delivery. Each outcome sub-objective sets out a qualitative 'vision' statement, but there are no new quantified targets for climate resilience identified throughout the draft plan. This limits the ability for the plan to drive measurable change. We encourage the Scottish Government to strengthen the draft plan with measurable targets tied to specific dates, wherever possible.
- **Clear linkages between SNAP activities and outcomes:** A clear framework is needed to link SNAP activities to outcomes. The draft SNAP3 does not currently provide a compelling theory of change within each outcome area to help understand how and why the proposed policy actions will deliver a more climate-resilient Scotland. Without this the SNAP risks being a seemingly arbitrary set of policies with their ability to deliver on the stated objectives unclear.
- **Clear ownership for outcome delivery:** Ownership of each outcome should be clearly assigned to a specific directorate, government agency

or part of government to ensure accountability. The draft SNAP does not transparently identify clear outcome and objective ownership, limiting accountability across government. Named ownership at the objective level is required from across government to ensure that all relevant areas of the Scottish Government feel the responsibility to deliver the needed actions in their areas.

- **Strengthened monitoring and evaluation:** Implementing an effective monitoring and evaluation framework is critical to ensuring that adaptation activity is leading to real reductions in the vulnerability to climate risks. The draft SNAP includes a welcome plan for monitoring a set of indicators. We strongly encourage the Scottish Government to identify the initial set of target indicators prior to publication of the final plan and plan to improve them over time, including developing a set of specific targets to be met by the end of the programme. Well-chosen indicators can avoid the risks of perverse outcomes identified in the draft SNAP.

At a sector-level the draft plan contains proposed policies and actions, that, if delivered effectively could help move forward Scotland's preparedness for climate change. We encourage the Scottish Government to provide more detail on many of the policies that are currently in development and to bring forward new ambitious policy actions that will help move Scotland towards being well-adapted to climate change.

Priorities for each outcome area include:

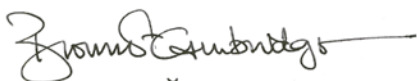
- **Nature connects:** The focus on the connectivity of nature and the linkages of climate change with the wider nature restoration, land-use and planning policy landscape with the plan is welcome. So is action to improve surveillance of vector-borne diseases and tracking invasive non-native species. We encourage the Scottish Government to provide more detail on how adaptation will be integrated and delivered by key policies and strategies (including the Land Reform Bill, Agriculture Bill and Natural Environment Bill) and support them with explicit time-bound commitments in the final version of the programme.
- **Communities:** We welcome the consideration of community-level action as well as strategic action within the Flood Resilience Strategy, and the launch of an updated Flood and Incident Messaging Service. However, commitments around household and community schemes (e.g. support to the Scottish Flood Forum and the Property Flood Resilience Development Group) are weak and lack detail, with no clear actions or links to targets and delivery. A key gap in the programme is the lack of specific consideration of managing heat risks in the built environment, despite this being a risk to health that will continue to grow in Scotland over the coming decades. While there are some promising policies for new developments, there are no plans to support adapting the existing building stock to manage heat risk.
- **Public services and infrastructure:** We welcome clarification on the timelines for some actions, such as the Trunk Roads Adaptation Plan, and on the commitment to conduct more analysis of Public Bodies Climate Change Duties returns to share best practice and drive accountability. However, we would encourage the Scottish Government to bring forward more policy actions in this space to close policy gaps identified by our most recent progress report. This should include explicitly considering the adaptation needs of local roads in SNAP3.

- **Economy, business and industry:** A focus on improving business awareness of climate risks, in particular for SMEs, is an important inclusion. SMEs are often poorly served by existing initiatives. Further developments from the draft plan under this outcome should focus on closing key data gaps for adaptation and risk monitoring in business and finance – a persistent gap across areas identified in our most recent progress report.
- **International action:** We commend the Scottish Government for continuing to include an international focused outcome within the draft SNAP despite many international policy levers being reserved to the UK Government. This reflects the importance of seeing adaptation in Scotland as part of a connected global international challenge, and the contribution that devolved administrations can make, such as through Scotland's contribution to the UNFCCC Loss and Damage Fund.
- **Enabling factors:** A dedicated focus on wider enabling factors for adaptation within the programme is a valuable addition. This section should provide more substantive commitments to enable adaptation to be effectively integrated with the delivery of other priorities such as Net Zero, biodiversity and health. The final SNAP should also provide more detail around the kind of adaptation behaviours that are targeted and policy levers that will be explored to achieve this and provide assurances that key delivery agencies will be appropriately resourced to help remove barriers to private investment in adaptation.

As part of the consultation the Scottish Government is seeking views on what climate change futures to prepare for. Effective planning for climate change must involve considering a range of climate futures, including the most damaging ones. Whilst Scotland, and the rest of the UK has ambitious decarbonisation targets on the path to Net Zero, the climate risks experienced by the UK in future will depend on global and not national emissions reduction ambition. Estimates of current global emissions reduction are expected to lead to global warming of between 2 – 3°C above preindustrial levels by the end of the century with warming significantly above 3°C remaining possible. We believe that it therefore remains prudent to be planning for the effects of at least 2°C of global warming (above preindustrial levels) by mid-century at a minimum and additionally considering how adaptation can be delivered in a way robust to the possibility of much higher levels of warming beyond mid-century for SNAP3.

We would welcome opportunities to discuss our assessment of the draft SNAP3 further.

Yours sincerely,



Baroness Brown
Chair of the Adaptation Committee, Climate Change Committee