

Independent Assessment of the Third National Adaptation Programme (NAP3)

March 2024

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Executive summary

This briefing provides an initial assessment of the Third National Adaptation Programme (NAP3).

It also provides the Committee's views on how the programme needs to be further strengthened.

This briefing provides the Climate Change Committee's initial assessment of the Third National Adaptation Programme (NAP3), the government's programme to ensure the country is resilient to the impacts of climate change, which was published in July 2023. At the time of this briefing's publication, global average temperatures, averaged over the past 12 months, had exceeded 1.5°C above pre-industrial levels. This is a stark reminder that we are already living with climate change, and that urgent action is needed from government to adapt to the changing climate.

This briefing also summarises the Committee's view on priorities for strengthening NAP3 in the years ahead. Our first full progress report on the UK's preparation for climate change under NAP3 will be in 2025 and will include a comprehensive assessment of progress under the programme.

Our key messages are:

- **NAP3 falls far short of what is needed.** NAP3 lacks the pace and ambition to address growing climate risks, which we are already experiencing in the UK. It fails to set out a compelling vision for what the government's 'well adapted UK' entails, and only around 40% of the short-term actions to address urgent risks identified in the last Climate Change Risk Assessment are progressed. The lack of a measurable vision will prevent effective delivery of adaptation by public agencies, local authorities, and the private sector, as well as inhibiting a clear assessment of progress.
- **Slow progress across three NAPs shows that the current approach is not working, and that change is needed.** NAP3 is an improvement on its predecessor. It is the most developed and comprehensive of the three NAPs that have been published under the Climate Change Act (2008). It goes beyond the previous programmes in several key aspects. However, the programme still falls far short of what is needed. Issues of governance, investment and monitoring are currently fundamentally limiting the ability for an adequate response to climate risks in the UK.
- **An urgent refresh of NAP3 and adaptation governance should be undertaken in the new Parliament.** NAP3 must be strengthened to avoid locking in additional climate impacts and key reforms must be implemented over the next years to support improved delivery of adaptation. NAP3 contains a commitment to an evolving programme over its lifetime. Delivering this commitment is essential. Government adaptation policy must be reorganised so that it becomes a fundamental aspect of policy making across all departments, links with government spending reviews, and is integrated into other key priorities such as nature restoration, infrastructure development, Net Zero, and health.
- **The UK has lost its place as a leader in climate adaptation.** The UK should look to international examples of good practice as valuable templates of what should be achieved as part of the refresh of the NAP.
- **We cannot assess progress without monitoring and evaluation.** The monitoring and evaluation system pledged in NAP3 needs to be delivered urgently.

1. An initial assessment of NAP3

1.1 Context and background to NAP3

NAP3 is the UK's plan to prepare for climate change. It covers the 2023 to 2028 period.

The Third National Adaptation Programme (NAP3) was published in July 2023. NAP3 sets out the UK Government's plan to ensure that the country is prepared for the effects of climate change. It covers adaptation policy for England (as adaptation is largely a devolved policy area with separate programmes in place in Scotland, Wales and Northern Ireland) and for policy areas for the whole UK reserved to the UK Government. It spans the 2023 to 2028 period and will be replaced by NAP4 in 2028.¹

A new NAP is required every five years under the Climate Change Act (2008). It must respond to the latest evidence on UK climate risk and opportunity.

The production of a NAP every five years is required under the Climate Change Act (2008). Progress in implementing the NAP and preparing for climate change more broadly, is assessed by the Climate Change Committee every two years.

- The Act mandates the government to produce a plan to respond to the risks from climate change highlighted in the most recent Climate Change Risk Assessment – the third iteration (CCRA3) was published in 2021.²
- CCRA3 highlighted 61 risks and opportunities from climate change to the UK, around half of which were assessed as 'urgent: needing more action' in the next five years.
- In March 2023, the Committee published its most recent biennial progress report of adaptation in the UK. It concluded that the UK remains insufficiently prepared for climate risks that are already having an impact on lives and livelihoods, despite some improvement in the consideration of adaptation in planning.³

The Committee set out six requirements for a high ambition NAP3 in its 2023 Progress Report.

Our 2023 Progress Report was clear that a step-change was needed in NAP3 to address the large adaptation gaps highlighted. We identified six requirements that a high-ambition NAP would need to address to deliver this step-change.

- **Vision:** clear and specific outcomes are needed to make adaptation tangible both inside and outside of government. A clear vision of what being well-adapted means is needed from central government. Making the vision operational requires clear outcomes supported by a delivery programme with measurable goals, and a demonstration of how the outcomes link to the activities in the programme.
- **Ambition:** adaptation is an urgent issue that must be tackled now. Compilations of existing policy and initiatives are insufficient; additional high-ambition commitments are needed to reduce the UK's vulnerability to climate change. Increased public funding for adaptation should be a cornerstone of an effective adaptation response – as well as helping to remove barriers to private investment. Without sufficient ambition in the current NAP cycle, there is a risk another five years will be lost to inaction.

- **Delivery:** an effective programme must have a clear focus on delivery. This includes delivering improved resilience directly through the public sector, as well as putting in place the enabling conditions needed for others to deliver adaptation. Effective cross-government governance structures are needed to ensure that all relevant departments are engaged and collectively own and deliver on interlinked adaptation challenges across multiple sectors.
- **Scope:** a comprehensive response is needed across all the risks identified in the most recent CCRA. Risks from climate change outside of the UK are one of the most significant ways in which climate change can impact our economy and must be included in the programme.
- **Monitoring:** a functioning monitoring and evaluation system is vital to drive delivery. This framework must be built around a measurable vision for the NAP to enable appropriate key performance indicators to be identified and improved over time. A strong plan for the next round of the Adaptation Reporting Power (ARP) must be provided. ARP is a key mechanism available to the government under the Climate Change Act (2008) to require the production of climate risk assessments from key bodies such as infrastructure operators. The next round of ARP should extend the requirement to report on climate risk and adaptation to additional organisations with key societal functions.
- **Development:** the next NAP must continue to be implemented and improved across the five-year period, with a mechanism to strengthen areas and close gaps as they are identified. A long term and stable resource within government is required to support this.

In this briefing we provide initial assessments of NAP3 at both programme and action levels.

The following two sub-sections undertake an initial assessment of how NAP3 addresses the challenge of preparing the UK for climate change, at the level of the programme as a whole and in addressing specific actions highlighted within CCRA3 that could be taken over the next five years to close the nation's adaptation gaps.

1.2 A programme-level evaluation of NAP3

NAP3 largely falls short of our six key requirements.

We have conducted an initial evaluation of the published NAP3 programme against the Committee's six requirements from our 2023 Progress Report (Table 1). Most of our requirements for the programme have not been delivered at sufficient scale and ambition. The programme, as with its predecessors, remains focused on bringing together existing initiatives across government and offers little in terms of significant new commitments to support the large-scale delivery of adaptation actions.

NAP3 does improve on previous NAPs in several ways.

Despite this, NAP3 improves upon previous NAPs in several important areas:

- **Acknowledging all risks:** unlike in NAP2, NAP3 acknowledges all the risks identified in CCRA3, with a specific annex for each. This includes the risks from climate change overseas which were not addressed in NAP2.
- **Adaptation reporting power:** the proposals for the fourth round of the ARP have taken on many of the Committee's recommendations from its assessment of the third reporting round – published in 2022. This is welcome and will enable a richer picture of climate risk to be produced by the next ARP, on timescales which will allow this information to feed into the next Climate Change Risk Assessment.⁴

- **Cross-government governance structures:** NAP3 commits to the creation of a new cross-government Climate Resilience Board (CRB) of senior officials. The challenge of adequate integration of adaptation into government activities has long been acknowledged, so this initiative to help tackle that challenge is welcome. However, success will be determined by how it works. It is vital it is not simply another forum unable to drive ambition and delivery. The Committee will assess the effectiveness of the CRB in future progress reports.

Table 1

Programme-level evaluation of NAP3 against the high-level requirements from the Climate Change Committee's 2023 Progress Report

Requirement for high-ambition NAP3	Evaluation of the extent to which this has been met in NAP3
Vision: coherent, specific, and measurable goals and outcomes under a unifying vision for being well-adapted.	Not met. NAP3 only contains a very high-level vision statement that is not operational, with no measurable goals or specific outcomes for any sector.
Ambition: new commitments not just restating of existing policy. Significant new funding commitments.	Not met. NAP3 is largely based on existing policy commitments or mechanisms.
Delivery: effective cross-government governance structures to engage all departments. Integration with other top-level policy objectives.	Partially met. A new cross-government Climate Resilience Board (CRB) of senior officials is planned to oversee strategic, cross-cutting adaptation and resilience issues. Integration of adaptation with other government objectives is recognised in several places in the NAP.
Scope: comprehensive response covering all of the risks identified in the Climate Change Risk Assessment (CCRA).	Met. NAP3 acknowledges all 61 climate risks and opportunities from CCRA3, including international risks.
Monitoring: monitoring and evaluation framework built around a high-level vision, with appropriate key performance indicators.	Partially met. NAP3 contains a commitment to a forthcoming monitoring and evaluation framework to inform the Committee's next progress report in 2025. A strengthened proposal for the next Adaptation Reporting Power (ARP) round is included in NAP3, aligned to many of the Committee's recommendations from its evaluation of round three reporting, including resetting the timing relative to CCRA, NAP and progress reports.
Development: continue to be implemented and improved across programme lifetime.	Partially met. NAP3 has a stated commitment to be a continually evolving programme but provides no detail of what this entails.

The commitment to continually evolve NAP3 over its lifetime is essential if a needed step-change in UK adaptation is to be delivered.

It is clear that many areas of NAP3 still need key improvements for the required step-change in the government's planning for climate change. The commitment in NAP3 for the programme to be continually evolving over its lifetime is therefore essential. It is vital that adaptation policy is sufficiently resourced by government over the lifetime of NAP3 to make this a meaningful commitment and ensure that the country does not have to wait another five years for an improved plan.

1.3 An action-based evaluation of NAP3

A rapid assessment finds significant commitments for only around one-third of actions highlighted as valuable in the last Climate Change Risk Assessment (CCRA).

CCRA3 highlighted many actions that could be taken over the next five years to close the nation's adaptation gaps. However, an initial rapid evaluation finds that only around one-third of these actions have significant commitments associated with them in NAP3 (Box 1). This rises only slightly to around 40%, when considering actions to address only the most urgent risks (as assessed by CCRA3). Underpinning this is a variable picture of the extent to which identified actions are committed to across risk areas (Figure 1).^{*} This analysis suggests that the current NAP is only making limited progress in undertaking actions identified as important to help mitigate climate risk.

Box 1

An initial assessment of the extent to which NAP3 addressed suggested adaptation actions in CCRA3

We commissioned ADAS to undertake a rapid initial assessment of the published NAP3 documents. This assessment aimed to provide an initial evaluation of the extent to which NAP3 commits to actions highlighted in the CCRA3 assessment that could close identified adaptation gaps across the 61 named risks and opportunities.

The tasks for this commission were:

- Identifying specific actions highlighted as part of the CCRA3 technical report assessment of 'Benefits of further adaptation action in the next five years' for each named risk and opportunity.
- Assessing, using only the published NAP3 documents, the extent to which each CCRA3 action has relevant commitments in the NAP, using a multi-point scale.

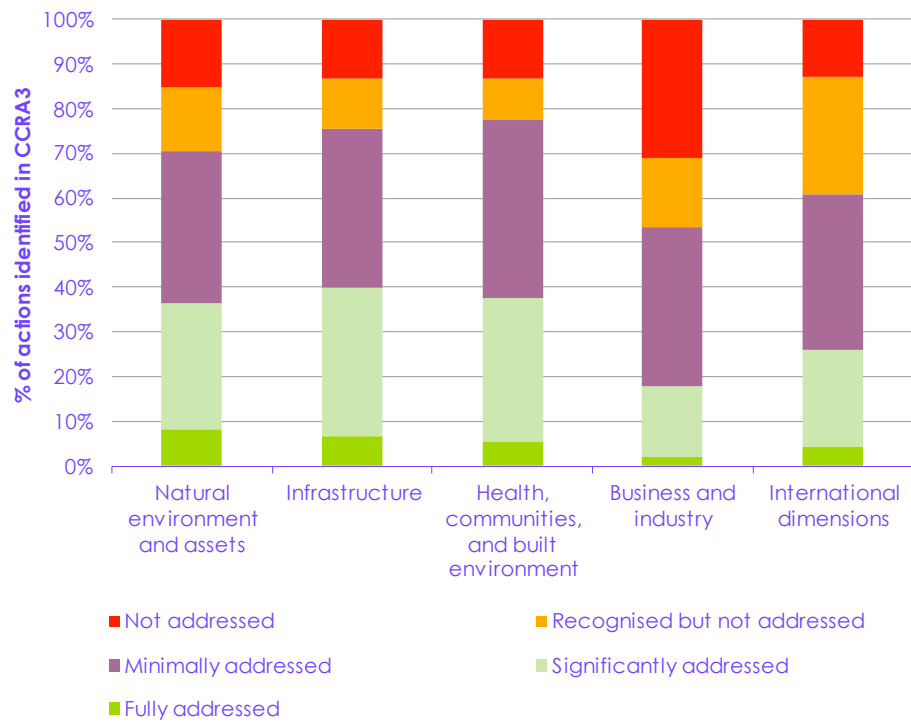
A significant level of judgement is required to interpret to what extent any action highlighted in the CCRA is addressed by the NAP commitments. Commitments to actions in the NAP also do not necessarily mean that they will be delivered or delivered effectively. This exercise should therefore be treated as an overview of how well the NAP brings forward actions proposed in the CCRA as a whole.

The findings of this assessment are published as an independent report alongside this briefing.

Source: ADAS (2024) *Rapid evaluation of the extent to which NAP3 addressed suggested adaptation actions in CCRA3*.

^{*} A smaller proportion of the necessary actions in the business and industry, and international sectors are found to be substantially addressed by NAP3 when compared to risk to the natural environment, infrastructure and built environment, communities, and health. Risks that scored in the highest urgency category in CCRA3 ('more action needed') generally see a higher proportion of the CCRA actions significantly addressed by NAP3 than for risk and opportunities with lower urgency scores. CCRA3 used a typology to classify adaptation actions. No/low regrets actions and actions corresponding to climate-smart design made up the large majority of identified actions, but no significant difference in how actions are addressed by NAP is seen across the action typology in this evaluation.

Figure 1 Evaluation of NAP3 against actions identified in CCRA3 to address adaptation gaps



Source: ADAS (2024) *Rapid evaluation of the extent to which NAP3 addressed suggested adaptation actions in CCRA3.*

Notes: Each bar summarises the proportions of identified CCRA3 actions (by chapter) allocated to each category based on the published NAP3 documents. In general, multiple actions are identified for each CCRA3 risk and opportunity. Actions identified from all CCRA3 named risks and opportunities are included. The response categories are described as follows. Fully addressed: 'NAP3 fully addresses the sub-action in CCRA3.'; Significantly addressed: 'NAP3 has some gaps but includes actions that would go a large proportion of the way to delivering the full scope of the CCRA ask.'; Minimally addressed: 'NAP3 includes some small relevant actions, but there are large gaps missing in order to deliver the full scope of the CCRA ask.'; Recognised but not addressed: 'NAP3 includes some recognition of the sub-action in CCRA3 but does not address it. For example, the action is recognised in NAP3 but for implementation in NAP4 or beyond.'; Not addressed: 'There is insufficient information in the NAP3 documents reviewed to suggest that the sub-action in CCRA3 has been addressed.'

2. Strengthening the UK's adaptation plan in the next Parliament

The initial assessment of NAP3 in the previous section highlights that the NAP does not go far enough to ensure that the UK is adequately prepared for climate change. This is true for the climate change already being experienced in the UK today, the climate changes expected over the programme's lifetime (out to the late 2020s), and the range of further changes possible over decades ahead.

The period of NAP3 is vital to properly prepare for the climate change impacts seen today and predicted in the future.

The NAP3 period is critical to building climate resilience in the UK and avoiding lock-in. Reasons for this include:

- By the late 2020s, the global temperature (averaged over many years) will be close to reaching 1.5°C above preindustrial levels, the lower end of the long-term temperature goal of the Paris Agreement. This means that climate-related impacts of a severity and frequency beyond those already experienced will increasingly be felt in the UK by the end of the NAP3 period.⁵
- Failure to act effectively over the lifetime of this NAP increases the risk of locking-in poorly adapted infrastructure. Significant increases in the investment needed to deliver Net Zero in the UK is required before 2030 (~£50 billion per year additional investment by 2030), and several major regulated infrastructure sectors including energy, water and rail will start new price control periods before the end of the decade. Without effective resilience mandates, the investment made in these price control periods could be misaligned with that needed to accommodate future climate extremes for these long-lived assets.^{6,7}
- By the end of the NAP3 period, the new Environmental Land Management (ELM) scheme for public subsidies in land management and agriculture will have been rolled-out and target dates under the Environment Act (2021) and Environmental Improvement Plan will be approaching. Improving the health of ecosystems across landscapes, through protection, restoration and sustainable management, over this critical period will help to build ecosystem and hence societal resilience to ongoing climate change.⁸

If NAP3 is not significantly strengthened in its lifetime, we risk another lost five years, with limited adaptation progress.

Without a strong commitment to a developed and strengthened NAP3 we risk another lost five years of adaptation action which the UK's people, ecosystems, economy, and infrastructure cannot afford. This promised development and strengthening must now be an urgent priority in the new Parliament following the general election.

In the following two sub-sections we provide advice on two aspects of this strengthening:

- Drawing from international best practice.
- Reforming the UK's approach to adaptation policy.

2.1 Drawing from international best practice

Other nations are increasingly showing the way on elements of an effective adaptation strategy. The UK should learn from them.

At the time of the last CCRA, the UK was still regarded as a leader in its approach to climate adaptation. However, progress elsewhere is accelerating whilst our last progress report found some persistent gaps in adaptation planning and a lack of evidence of progress on delivery and implementation across the board in the UK.

International plans and programmes contain examples of best-practice covering all elements of our requirements for a high ambition NAP (Table 2). Whilst the UK has been world-leading on the architecture of how climate risks are assessed and prioritised, the existence of examples for each requirement provides valuable templates for where others have been going beyond what the UK has achieved and show what could and should be achieved in the UK. The government should aim to learn from these, and other international plans, to apply in a UK context as part of strengthening NAP3.

Table 2

Examples of elements of high-ambition NAPs from international best-practice

Requirement for high-ambition NAP3	Examples
Vision: coherent, specific and measurable goals and outcomes under a unifying vision for being well-adapted.	<p>Binding targets for Germany in development. The German Government has committed to a new Adaptation Strategy, with measurable targets for federal ministries required by a new national climate change adaptation law. The German Government is expected to draw up goals for water, infrastructure, land and land use, industry, health, urban development, spatial planning, and civil protection by 2025. Progress against these goals will then be measured.</p> <p>Measurable targets in the Canadian Adaptation Strategy. The Canadian Adaptation Strategy published in 2023 describes goals for 2050 across five interconnected systems of society: disaster resilience; health and well-being; nature and biodiversity; infrastructure; economy and workers. Each goal is then defined further through a series of objectives and quantitative and time-bound targets (for example eliminating deaths due to extreme heatwaves by 2040).</p>
Ambition: new commitments not just restating of existing policy. Significant new funding.	<p>New federal policy commitments in the USA. Following the publication of new evidence on climate risk and frameworks on climate resilience, the Federal Government announced \$6 billion of investment in making communities more resilient to the impacts of climate change. This includes funding to support resilience of the electricity grid, reducing flood risk, supporting conservation and community-level capacity-building grants to support local action. The Federal Government has also recently produced plans to scale-up nature-based solutions for adaptation, significantly advancing this agenda.</p>
Delivery: effective cross-government governance structures to engage all departments. Integration with other top-level policy objectives.	<p>Successful and long-lasting Netherlands Delta Programme and associated Delta Fund. The Delta Programme in the Netherlands brings together national government, provincial and municipal authorities, water authorities and a range of stakeholder organisations to protect the country against flooding, now and under future climate change. The current programme has a 2050 aim of protecting all to a base level of up to a 1-in-100,000 year event. The programme has successfully delivered strategic plans on flood risk management, fresh water supplies and spatial planning adaptation and is implemented with a budget of €27 billion, the 'Delta Fund'.</p>

<p>Monitoring: monitoring and evaluation framework built around a high-level vision, with appropriate key performance indicators.</p>	<p>Comprehensive official monitoring of an agreed set of adaptation indicators in Germany. As required by the German Strategy for Adaptation to Climate Change, the Federal Government monitors progress on adaptation using a wide-ranging suite of indicators across fifteen action areas. Data for these indicators are collected and reported publicly.</p> <p>Loss and damage data collection in Bangladesh. The Bangladesh Bureau of Statistics has conducted a series of extensive surveys of the population to understand how people are already being affected by climate change each year, and to what extent this is increasing. This extensive data collection project provides a rich picture of climate change impacts and how they are changing, with comparative data available for 2015 and 2021.</p>
<p>Development: continue to be implemented and improved across programme lifetime.</p>	<p>New Zealand's National Adaptation Plan commits to strong governance and accountability, with an interdepartmental executive board established to oversee the plan and report on progress each year. These annual reports will also identify any new actions to be included in the plan, resulting in further development of the plan as new evidence becomes available and regular opportunities to adjust the plan over its lifetime.</p>
<p>Source: German Government (2021) <i>German Strategy for Adaptation to Climate Change</i>; Canadian Government (2023) <i>Canada's National Adaptation Strategy: Building Resilient Communities and a Strong Economy</i>; US Government (2023) <i>FACT SHEET: Biden-Harris Administration Releases Fifth National Climate Assessment and Announces More Than \$6 Billion to Strengthen Climate Resilience Across the Country</i>; US Government (2023) <i>Biden-Harris Administration Expands Use of Nature-Based Solutions to Better Protect Communities from the Impacts of Climate Change</i>; Delta Programme (2023) <i>What is the National Delta Programme?</i>; Interministerial Working Group on Adaptation to Climate Change (2019) <i>2019 Monitoring Report on the German Strategy for Adaptation to Climate Change</i>; Bangladesh Bureau of Statistics (2022) <i>Report on Bangladesh Disaster-related Statistics 2021: Climate Change and Natural Disaster Perspectives</i>; New Zealand Government (2022) <i>National Adaptation Plan</i>.</p>	

At COP28, the annual conference of parties to the United Nations Framework Convention on Climate Change (UNFCCC), agreement on the framework for the Paris Agreement's Global Goal on Adaptation was reached (Box 2). Alongside the seven thematic goals – all of which are key aspects of a well-adapted UK, there are four process goals that parties must comply with in the production and delivery of national adaptation strategies.

A strengthened NAP3 should also seek to align to the standards of international best practice under the Global Goal on Adaptation.

Despite the UK being an important player in pushing towards a successfully agreed outcome on the Global Goal on Adaptation Framework at COP28, NAP3 is currently falling short of several of these asks – for example there is no ongoing role for a participatory process in NAP3 and a monitoring and evaluation process is not yet in place. Ensuring that NAP3 achieves these, well-ahead of the required 2030 date, should also be incorporated into a strengthening of NAP3. We will also endeavour to ensure that the evidence feeding into the next CCRA (due in 2026/27) will cover all aspects of the Global Goal on Adaptation Framework.

Box 2

Global Goal on Adaptation Framework

COP28 saw agreement on a framework for the Global Goal on Adaptation (GGA). The new framework includes seven global thematic targets to be achieved by 2030 (and beyond):

- **Water:** significantly reducing climate-induced water scarcity and enhancing climate resilience towards a climate-resilient water supply and sanitation; and access to safe and affordable potable water for all.
- **Food and agriculture:** attaining climate-resilient food and agricultural production and supply and distribution of food.
- **Health:** attaining resilience against climate change-related health impacts, promoting climate-resilient health services, and significantly reducing climate-related morbidity and mortality.
- **Nature and biodiversity:** reducing impacts on ecosystems and biodiversity and accelerating the use of ecosystem-based adaptation and nature-based solutions.
- **Infrastructure and settlements:** increasing the resilience of infrastructure and human settlements to climate change impacts to ensure basic and continuous essential services for all.
- **Livelihoods:** substantially reducing the adverse effects of climate change on poverty eradication and livelihoods.
- **Cultural heritage:** protecting cultural heritage from the climate-related risks.

It also includes four global process targets for adaptation:

- **Impact, vulnerability and risk assessment:** by 2030, all Parties to conduct assessments of climate hazards, climate change impacts and exposure to risks and vulnerabilities and have used the outcomes of these assessments to inform their national adaptation plans, policy instruments and planning processes. By 2027, all Parties to establish multi-hazard early warning systems and climate information services for risk reduction.
- **Planning:** by 2030, all Parties to have in place gender-responsive, participatory, and fully transparent national adaptation plans, policy instruments, and planning processes covering ecosystems, sectors, people and vulnerable communities, and to have mainstreamed adaptation in relevant strategies and plans.
- **Implementation:** by 2030, all Parties to progress in implementing their national adaptation plans, policies and strategies.
- **Monitoring, evaluation and learning:** by 2030, all Parties to design, establish and operationalise a system for monitoring, evaluation and learning for their national adaptation efforts and build institutional capacity to implement the system.

Source: UNFCCC (2023) *CMA.5 Glasgow–Sharm el-Sheikh work programme on the global goal on adaptation referred to in decision 7/CMA.3.*

A strengthened NAP should also seek to further push forward integration with other key policy agendas, as is increasingly recognised internationally.

The international climate change negotiations have increasingly recognised the interlinkage between the challenge of addressing climate change and the global challenges of addressing biodiversity loss. For example, the agreed outcome from COP28 recognised the critical role of natural systems in tackling climate change through linking to the 2022 Kunming-Montreal Global Biodiversity Framework and referencing nature-based solutions in the Global Goal on Adaptation outcome. Further developments of NAP3 should seek to integrate with refreshed biodiversity strategies, going beyond the integration between the two agendas present in the current NAP, for example by aligning the UK's submissions under the UNFCCC and Convention on Biological Diversity, as well as other cross-cutting government agendas such as Net Zero, health and improving infrastructure.⁹

2.2 Reforming the UK's approach to adaptation policy

It is clear that the UK's current approach to adaptation policy is not working and fundamental changes are needed.

There have now been three NAPs produced under the UK's Climate Change Act (2008). Similar challenges have been experienced in the first and second cycle (documented in previous Climate Change Committee progress reports) to those encountered in the current version of the NAP. This suggests that achieving the necessary progress on adaptation will require a fundamental repositioning of how adaptation is approached and how it integrates with the wider machinery of government.

Issues with the approach to governance, investment and monitoring are all fundamental contributors to this.

Key underlying issues include:

- **The current approach to coordinating adaptation is not working.** Adaptation policy is currently coordinated across government by the Department for Environment, Food and Rural Affairs (Defra). However, many of the risks that need to be addressed sit with other government departments and local authorities. Despite the best efforts of officials, the machinery of government has been ill-suited to ensure that adaptation reaches the top of other departments' priority lists and is sufficiently well-understood and resourced in local government. This has been an important factor in the limited success of the NAPs conducted to date and without change it is difficult to imagine future NAPs breaking the cycle of underwhelming policy responses by fostering true ownership of risks across all departments.
- **Adaptation in the UK is inadequately funded, and private sector adaptation is poorly understood.** The development of the current NAP3 was hampered by poor alignment with the most recent spending review cycle (autumn 2021 – which fixed department budgets out to the end of financial year 2024/25). This limited the ability for ambitious new policy commitments in NAP3 that were not already planned for at the time of the spending review, as well as limiting the potential for large-scale cross-cutting funding of transformative adaptation (such as the Netherland's Delta Fund). Existing spending commitments on climate resilience are also being eroded by higher levels of inflation, as reported on for flood defences by the National Audit Office. In general, current spending on adaptation from both the public and private sector remains poorly understood in NAP3, and many barriers to private sector adaptation remain that are not effectively tackled by the programme.¹⁰
- **The frameworks needed to track adaptation and climate risk effectively in the UK have not been put in place.** Climate resilience is rising on the agendas of a wide range of organisations. Business, regulators and local government are looking to the NAP to provide clear targets, clear departmental ownership, and standards and metrics for measuring adaptation to help them drive delivery effectively. However, this overarching framework has not been put in place by government, leaving these organisations unclear on their role and how they integrate with others, holding back action. This lack of data collection on relevant adaptation indicators is a regular barrier highlighted by the Climate Change Committee's adaptation progress reports.

The time is right to tackle these fundamental issues, including cross-government governance of adaptation in the next Parliament.

The Committee believes that a refresh and strengthening of NAP3 in the new Parliament is the right time to finally tackle these issues. We identify three key priorities that would help address the major issues and ensure that NAP3 can drive action across government, and beyond, more effectively.

- **Reforming governance to put adaptation at the centre of government:** the Committee believes that improving the governance of adaptation across government is the main enabler for a strengthened NAP3. Adaptation policy must be reflected in every decision and command the cross-government priority status that it is currently missing. As highlighted by a recent Institute for Government report (Box 3), there are several low-regrets ways to make progress on this, including: a cross-cutting adaptation minister, a joint unit to support adaptation, and further embedding adaptation and resilience into core financial control mechanisms. All of these should be seriously explored for implementation in this NAP programme, alongside considering where responsibility for adaptation might be best placed in government. Improving adaptation governance must no longer be pushed to one side and needs to be addressed now.¹¹
- **Aligning further developments of NAP3 with the next spending review:** a refresh of NAP3 should be conducted alongside the development of the next multi-year spending review in the new Parliament (likely concluding before end of 2025). This is to ensure that the next spending review can be fully informed on the benefits of adaptation today. Initial work to implement and strengthen NAP3 should focus on better estimation of the amount being spent from public and private sources on climate resilience and how that has changed over time, to support the case for appropriate allocations in the next and future spending reviews.
- **Creating accountability with targets and monitoring:** a refresh of the NAP should seek to support its high-level vision statement with clear targets and metrics, so that it is meaningful to organisations seeking to understand what role they need to play as part of a wider national effort. The programme to develop indicators to track progress pledged in NAP3 must be accelerated so that it is operational for use in the 2025 Progress Report by the Climate Change Committee. The government should aim to align this framework, where possible, to the monitoring frameworks developed by the Climate Change Committee in its 2023 Progress Report. As part of this effort, the UK Government should seek improved collaboration with the devolved administrations (who are all in the process of developing new national adaptation programmes) on the development and collection of monitoring data to ensure that this is done in a way which maximises benefit across the UK.

These urgent actions to put adaptation at the centre of government priorities are essential to avoid leaving the UK exposed to more damaging climate impacts.

These three areas should be top level priorities to help ensure that NAP3 delivers on its commitment to address gaps and raise ambition over the programme lifetime. If the current programme is not developed and strengthened, the UK will be exposed to higher levels of damaging risks from climate change that have the potential to fundamentally compromise aspects of our society if not addressed with urgency. To avoid this, adaptation must now finally be put front and centre of government priorities in the new Parliament.

Box 3**Institute for Government: Adapting to climate change: how the UK can improve its approach**

The Institute for Government will publish a report on Adapting to Climate Change: How the UK can improve its approach in March 2024.

This report looks at the importance of government-led adaptation and the limitations of the current approach to tackling adaptation within central government. It provides a set of recommendations on how the approach can be strengthened.

Key recommendations include:

- There may be a case for a cross-cutting adaptation minister.
- There could be a joint unit to support adaptation.
- The government should seek to embed adaptation and resilience in core financial control mechanisms.
- Adaptation should be a cross-cutting theme in the post-election spending review.
- Adaptation needs also to be considered when devising regulations.
- Auditable metrics of risk reduction need to be part of any future adaptation plan.
- Parliament should scrutinise departmental activity on adaptation properly.

Source: Institute for Government (2024) *Adapting to climate change: how the UK can improve its approach*.

Endnotes

- ¹ Department for Environment, Food and Rural Affairs (Defra) (2023) *The Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting*, <https://www.gov.uk/government/publications/third-national-adaptation-programme-nap3>.
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