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LIMITE

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on the Environment

Subject:	Preparedness Union Strategy and European Climate Adaptation Plan: follow-up to the WPE meeting on 20 June 2025 - Comments from delegations
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Following the call for comments on the above set out with WK 8539/2025, delegations will find attached comments from DE, EL and CY.

GERMANY

Comments following Council Working Party on the Environment (20 June 2025): European Climate Adaptation Plan (ECAP) and the Preparedness Union Strategy (PUS)

Question 1: What does the all-hazards, all-of-society approach mean in your national context? What role can your ministries play in the implementation of the Preparedness Union Strategy?

- Germany welcomes the integrated approach of the Preparedness Union Strategy and is pleased that environmental and climate risks are acknowledged as security aspects. It is **essential to systematically consider environmental and climate risks** such as biodiversity loss, pollution and climate change together **with other short-term and long-term civil and military risks**.
- At EU level, the climate-security nexus is already well established. However, there is a need to **systematically improve risk identification, anticipation, strategic foresight and early warning systems** for extreme weather events and the impacts of environmental degradation and climate change. Also key in this context is systematic implementation of the Joint Communication “A new outlook on the climate and security nexus: Addressing the impact of climate change and environmental degradation on peace, security and defence” (June 2023).
- Our **national security strategy** adopts an integrated approach to security, which we believe is the basis for a resilient society and people’s security. In addition, our first **National Interdisciplinary Climate Risk Assessment – NiKE** – compiled by climate and security experts from the Federal Intelligence Service, among others, has shown how climate change and increasing extreme weather events are already having a major impact on our security, also in combination with other risks. NiKE is a core component for further work on the climate-security nexus in Germany and the EU.
- The initiatives in the action plan will be evaluated and implemented by the competent ministries in Germany in **close consultation with relevant stakeholders** from policymaking, the scientific community, the private sector and civil society
- We welcome, for example, the European Water Resilience Strategy. And we think it is important to recognise the **contribution that water and resource conservation** make to security, something the German government already set out in its National Water Strategy 2023.

Question 2: What are the barriers and what are potential leverage points to embedding climate resilience by design in your national efforts to boost climate resilience? How can the European Climate Adaptation Plan support your efforts to this end?

- Germany is pleased that the Commission is working on an initiative to strengthen climate adaptation.
- With its various elements, which still have to be developed together with the Member States, the **ECAP can be an important component in the Preparedness Union Strategy** and promote “resilience by design”. It is important that the ECAP is designed to minimise bureaucracy and does not create any additional reporting requirements.
- The concept “resilience by design” is already established in the precautionary approach in the 2024 German Adaptation Strategy.
- Since adaptation and preparedness affect many areas of society, in Germany they are the responsibility of the Federal Government as a whole, along with the federal states and municipalities. The German government has created a **framework for strategic and dynamic adaptation management based on targets and progress** with the new Climate Adaptation Act and the Adaptation Strategy. Public bodies now have to take climate adaptation into account in their planning and decision-making.
- For this reason, we generally welcome the proposal to develop **joint adaptation targets and indicators at EU level** so as to ensure strategic alignment of EU adaptation activities. Given the wide variety of national approaches to climate adaptation, we recognise the need for further review and discussion.
- Germany has been following the proposal to develop a **joint climate reference scenario as part of the ECAP** with interest. Using this as a point of reference for planning processes, investment decisions, norms and standards could be an interesting approach from a precautionary standpoint.
- In all further planning and considerations, it is important to use **existing data and information sources and systems** as a basis so as to minimise the additional time and effort needed and build on existing sources.
- In Germany, the various levels of government are required to address climate change nationwide and identify adaptation measures. As most of the measures are developed and implemented at subnational level, it is important for us that the **ECAP also strengthens capacities at this level**.
- In this context, **ecosystem-based adaptation approaches and aspects of economic sustainability, social justice and equitable resilience** must be taken into account as key elements in the planned ECAP package.
- We look forward to **actively participating in this discussion process** this year and next and to reviewing the individual elements.

GREECE

Comments on the Environment Working Group of 20 June on the Preparedness Union Strategy and the European Climate Adaptation Plan

1. What does the all-hazards, all-of-society approach mean in your national context? What role can your ministries play in the implementation of the Preparedness Union Strategy?

- Climate Risks assessments at national and regional levels, in Greece, examine risks and impacts of all key sectors of environment, society and economy applying an all-climate-hazards approach that considers cascading and synergistic risks as well. However, these assessments and relevant policies do not consider linkages with other non-climate related hazards, at least not in a systematic way. An all-hazard approach could help capture synergies between different policies and ensure better coordination of resources.
- In terms of climate change adaptation, a «whole-of-society» approach means bringing together all key stakeholders, including the most climate vulnerable professional and social groups. Such an approach could contribute to the development of more effective solutions and could provide a more fertile environment for ensuring equity and socially just adaptation.
- The Ministry of Environment and Energy plays a key role in the implementation of the national adaptation policies and in strengthening Greece's resilience to climate change. It is expected to contribute to the Preparedness Union Strategy through developing climate projection tools to provide reliable information on climate change-related hazards at national level. It is also expected to contribute to mainstream adaptation across sectors and thus to the resilience of vital societal functions.

2. What are the barriers and what are potential leverage points to embedding climate resilience by design in your national efforts to boost climate resilience? How can the European Climate Adaptation Plan support your efforts to this end?

- The National Climate Law 4936/2022 mandates government departments to embed adaptation into their sectoral strategies and plans, through adaptation and climate resilience measures. In addition, it requires assessing the climate resilience of projects as part of the environmental licensing procedures. These legal arrangements aim to enable climate adaptation and climate resilience into design.
 - ECAP could support Member States to implement their own national adaptation strategies and plans, including mainstreaming climate adaptation and climate resilience. It could help to overcome identified common challenges, barriers, and gaps, for example in terms of governance, knowledge and finance e.g. provision of reliable climate data and services, guidance and methodologies to use climate projections in decision making, examples of adaptation solutions, increased funds.
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CYPRUS

Comments for the WP on 20/6/2025 on the European Preparedness Union Strategy

In regards to the 2 questions in the non-paper from the commission (doc. WK8210/2025 INIT) Cyprus has the following comments:

1. What does the all-hazards, all-of-society approach mean in your national context? What role can your ministries play in the implementation of the Preparedness Union Strategy?

In our national context, the all-hazards, all-of-society approach reflects a growing recognition of the need for integrated risk governance, where all ministries and societal actors contribute to resilience. The environment and civil protection authorities play a key role in coordinating actions across sectors, while recent climate adaptation planning has highlighted the value of inter-ministerial cooperation. The Preparedness Union Strategy is welcomed as an opportunity to enhance institutional readiness and encourage long-term investment in prevention and early warning, provided it respects national priorities and administrative capacities.

2. What are the barriers and what are potential leverage points to embedding climate resilience by design in your national efforts to boost climate resilience? How can the European Climate Adaptation Plan support your efforts to this end?

A key barrier remains the fragmentation of responsibilities across sectors and levels of governance, which often hinders coordinated and proactive action. Our revised National Adaptation Strategy provides a partial response to this challenge by foreseeing the establishment of an inter-ministerial monitoring committee to enhance coherence and oversight. The European Climate Adaptation Plan can add value by offering a shared vision, practical tools, and financial support that align with national needs while encouraging greater integration of resilience into long-term planning.

In addition, Cyprus has the following general comments:

A. Στρατηγική της Ένωσης για την Ετοιμότητα και ECAP (European Climate Adaptation Plan)

- Η πρωτοβουλία για μια ευρωπαϊκή στρατηγική ετοιμότητας είναι εύστοχη και έγκαιρη, λαμβάνοντας υπόψη την αυξημένη συχνότητα και ένταση των επιπτώσεων της κλιματικής αλλαγής. Η ετοιμότητα δεν αφορά μόνο την πολιτική προστασία, αλλά και τη λειτουργική ανθεκτικότητα βασικών τομέων και υποδομών.
- Ο διαχωρισμός μεταξύ της “στρατηγικής ετοιμότητας” και του ECAP είναι χρήσιμος, αλλά απαιτεί σαφές καθορισμό ρόλων και στόχων ώστε να αποφευχθούν επικαλύψεις μεταξύ εργαλείων που ήδη υπάρχουν στο πλαίσιο της ενωσιακής στρατηγικής για την προσαρμογή.
- Χαιρετίζουμε την πρόθεση για ενίσχυση της διατομεακής ανθεκτικότητας και τη δημιουργία ενός συνεκτικού πλαισίου έγκαιρης προειδοποίησης, ωστόσο θεωρούμε ότι η στρατηγική ετοιμότητας πρέπει να λειτουργεί συμπληρωματικά προς τα εθνικά και τοπικά συστήματα και όχι ως νέο ρυθμιστικό επίπεδο.

B. ECAP και Εθνικές Στρατηγικές και Σχέδια Προσαρμογής (NAS/NAP)

- Το ECAP, όπως αναφέρεται, δεν θα αντικαταστήσει την ευρωπαϊκή στρατηγική αλλά θα λειτουργήσει ενισχυτικά στην εφαρμογή της. Θεωρούμε καθοριστικό το ECAP να μην υποκαθιστά ούτε να καθοδηγεί τα εθνικά NAS/NAP, αλλά να εστιάζει στην υποστήριξη της εφαρμογής,

προσφέροντας τεχνική βοήθεια, χρηματοδότηση, εργαλεία παρακολούθησης και βελτίωση της διακυβέρνησης.

- Η εμπειρία από την ετοιμασία και αναθεώρηση του Εθνικού Σχεδίου Προσαρμογής (2024–2025) στην Κύπρο δείχνει ότι η πρόκληση δεν είναι η χάραξη πολιτικής, αλλά η επιχειρησιακή εφαρμογή και η κατανομή αρμοδιοτήτων μεταξύ εθνικών και τοπικών φορέων. Συνεπώς, το ECAP θα μπορούσε να συμβάλει ουσιαστικά αν ενσωματώσει δράσεις που ενισχύουν την διακυβέρνηση, την αποκέντρωση, την ενίσχυση ικανοτήτων και την τοπική προσαρμογή.
- Ειδικότερα, προτείνεται το ECAP να προβλέπει:
 - α. δημιουργία υποστηρικτικού μηχανισμού εφαρμογής (implementation facility) για τις δράσεις των NAS/NAP,
 - β. καθορισμό δεικτών εφαρμογής και αποτελεσματικότητας που να συνδέονται με τους εθνικούς στόχους,
 - γ. ενίσχυση της τοπικής διακυβέρνησης και της συμμετοχής των αρχών τοπικής αυτοδιοίκησης στην υλοποίηση των Σχεδίων.
- Τέλος, είναι σημαντικό να διασφαλιστεί ότι το ECAP δεν θα επιφέρει πρόσθετο διοικητικό βάρος στα Κράτη Μέλη, αλλά θα επικεντρωθεί στη διευκόλυνση και επιτάχυνση της υλοποίησης.

Courtesy translation:

A. Union Strategy for Preparedness and ECAP (European Climate Adaptation Plan)

- The initiative for a European Preparedness Union Strategy is timely and well-conceived, considering the increasing frequency and intensity of climate change impacts. Preparedness is not limited to civil protection but also concerns the operational resilience of key sectors and infrastructures.
- The distinction between the "preparedness strategy" and ECAP is useful but requires a clear definition of roles and objectives to avoid overlaps with tools already existing within the Union's adaptation strategy framework.
- We welcome the intention to strengthen cross-sectoral resilience and to create a coherent early warning framework; however, we believe that the preparedness strategy should function in a complementary manner to national and local systems, rather than as a new regulatory layer.

B. ECAP and National Adaptation Strategies and Plans (NAS/NAP)

- As stated, the ECAP will not replace the European strategy but will support its implementation. We believe it is crucial that the ECAP neither replaces nor directs national NAS/NAPs, but focuses on supporting their implementation by offering technical assistance, funding, monitoring tools, and improved governance.
 - Experience from the preparation and revision of the National Adaptation Plan (2024–2025) in Cyprus shows that the challenge lies not in policymaking but in operational implementation and the allocation of responsibilities between national and local bodies. Therefore, ECAP could make a substantial contribution if it includes actions that strengthen governance, decentralization, capacity building, and local adaptation.
 - Specifically, it is proposed that ECAP should provide for:
 - a. the creation of an implementation support mechanism for NAS/NAP actions,
 - b. the definition of implementation and effectiveness indicators linked to national targets,
 - c. the strengthening of local governance and the participation of local authorities in the implementation of the Plans.
 - Finally, it is important to ensure that ECAP does not impose additional administrative burdens on Member States but focuses on facilitating and accelerating implementation.
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