

23 July 2024
Job No: 1093118.0000

Dr Karen Lavin
Climate Change Commission
Level 21
1 Willis Street
Wellington 6011

Dear Karen,

Expert review of the approach to the National Adaptation Plan Progress Assessment (NAPPA)

In response to contextual material provided by the Commission and discussions with you and your team, Dr Timo Leiter and I have provided feedback on the proposed approach to the first National Adaptation Plan Progress Assessment (NAPPA).

Reflecting our expertise in Monitoring, Evaluation and Learning of adaptation to climate change including for National Adaptation Planning processes, this letter highlights the main findings of our reviews with regard to:

- The Commission's methodology and approach to their National Adaptation Plan Progress Assessment (NAPPA).
- Recommendations for future improvements to the Commission's approach.

Dr Leiter and I undertook independent reviews of the Draft NAPPA methodology document provided by the Commission in April 2024. We then discussed our reviews and collated our conclusions. *We have concluded that the proposed methodology provides a sound basis for the first NAPPA.* There are no points on which the reviewers disagree. It is noted that some of the review comments have already been reflected in the Commission's final methodology which will be used to develop the NAPPA.

The Commission's methodology and approach to their National Adaptation Plan Progress Assessment (NAPPA).

As the first NAPPA, it is important that the methodology is robust whilst sufficiently pragmatic to deliver decision-relevant findings at this point in the NAP cycle. Our review concluded that the Commission's proposed approach should enable the NAPPA to provide valuable insights into 1) the quality of the plan, 2) implementation of the plan, 3) observed progress towards the desired outcomes, as proposed in the Draft NAPPA methodology document. It should also provide a sound foundation for future assessments.

The following suggestions have been made during the review process which we believe could further strengthen the NAPPA methodology:

- **Stronger emphasis on adequacy:** The assessment approach could place stronger emphasis on adequacy of the plan compared to the level of risks presented within the National Climate Change Risk Assessment. Hence, we would recommend that the assessment goes beyond assessing whether action was taken to also assess whether the intended and undertaken action was sufficient in light of the identified climate risks. Methods such as expert elicitation workshops could be useful in this regard.
- **Scope:** The assessment methodology should be clear on whether focus of the NAPPA is primarily on the NAP document and actions stated therein or also considers actions taken that were not foreseen in the NAP, but which directly address its objectives and desired outcomes. Likewise, policy gaps are best assessed against the current state of policies rather than only against the baseline from the year the NAP was drafted. In general, we suggest basing the assessment on the situation at the time of the review. This better reflects the dynamic nature of the policy environment and may help to highlight where policies are supporting or hindering the implementation of the NAP.
- **Assessing assumptions of the change process:** We recommend that the methodology considers the assumptions that underpin the expected change process that are implied by NAP actions and scrutinises whether these assumptions turned out to be accurate. Examples of assumptions could include the policy context, the availability of finance or public acceptability of adaptation options. Including this aspect in the assessment can provide the basis for taking corrective action.
- **Scorecards:** Scorecards can be a useful tool to structure the analysis, but care must be taken to clearly and sufficiently describe the conditions/criteria that need to be fulfilled to meet a stage in the scorecard. The format of the scorecard should also not lead to oversimplification of the assessment. For example, with regard to implementation, it may be important to understand *which* actions have or have not been implemented rather than *how many* are implemented. Scorecards can provide an overview, but the assessment should go deeper to understand the significance and reasons for particular scores. The scorecard criteria need to be conceptually consistent (e.g. if the scorecard seeks to assess adequacy, then all scoring categories should relate to adequacy). Scorecards should avoid terms which are highly subjective or are open to interpretation (e.g. “credible”).
- **Choice of terminology:** Care should be taken when using closely related terms for example explaining ‘outcomes’ and how these relate to ‘outcome areas’ specified in the NAP. Similarly, if terms such as ‘how likely’ are used, there needs to be a clear method to explain how likelihood will be determined.
- **Transparency and Learning and Improvement:** *Transparency and Learning and Improvement* have been identified as two core purposes for the NAPPAs. The assessment should articulate a) the role of the NAPPAs process in addressing these purposes and b) how it will assess the extent to which *transparency and learning and improvement* have been enhanced in the context of the NAP.
- **Reviewing the Monitoring and Evaluation system:** While the mandate of the Commission in monitoring adaptation was well articulated in the information provided, it was less clear if, and how, the adequacy of monitoring and evaluation processes for the NAP will be assessed. As has been noted in other countries, a functioning monitoring and evaluation system is vital to drive delivery of a NAP. Over time, the methodology for subsequent NAPPAs can be further developed.
- **Communicating findings:** While not specifically part of the NAPPAs methodology, thought should be given as to how the findings will be communicated to the range of stakeholders involved in the implementation of the NAP, including, but not limited to, public sector, private sector, civil society, mana whenua and the general public. The report should include a clear,

concise executive summary (or similar) with unambiguous key messages. Targeted communication formats including on social media can help reach diverse audiences.

Recommendations for future improvements to the Commission's approach

Future NAPPA processes should consider the following:

- It is noted that the Commission aims to build up a set of key national indicators for measuring outputs and outcomes related to adaptation in the Aotearoa New Zealand context in future progress assessments due in 2026 and 2028. We support the development of such indicators and agree with the Commission that quantitative indicators can be effectively combined with qualitative insights on the enablers and barriers of adaptation. This approach is consistent with international good practice and can provide a richer, more nuanced understanding of adaptation progress. In contrast, an overemphasis on quantification can limit an assessment to an understanding of *what* has been achieved but not *why and how*. It can also lead to an assessment which is focused on what is easy to quantify rather than what matters most for reaching the NAP's objectives.
- As previously mentioned, future assessments should go beyond assessing whether action was taken and should assess whether the intended and undertaken action was sufficient in the context of an evolving understanding of climate risks. This recognises the actions in the NAP need to be proportional to the changing national climate risk profile.
- Similarly, each report could assess the extent to which the current national and international policy environment is enabling or hampering the effective delivery of the NAP. This ensures the assessment is decision-relevant at the point of publication.
- There needs to be a review of the extent to which both the NAP and the NAPPA processes are transparent and have facilitated learning and improvement. This might include assessing the extent to which NAPPA recommendations are addressed through adjustments to NAP implementation or in future iterations of the NAP.

In summary, both reviewers agree that the proposed methodology provides a sound basis for the first NAPPA. We note that the methodology will need to be enhanced in future years in order to provide as full a picture of NAP progress as possible as the NAP process matures. Dr Leiter and I are happy to discuss any aspect of the review provided above.

Yours sincerely,



Paddy Pringle, Principal Consultant



James Hughes, Project Director

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