

Climate-resilient Netherlands: The NAS as a compass for collaboration and investments





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#### Client

Ministry of Infrastructure and Water Management

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### Introduction

**Update of the National Climate Adaptation Strategy (NAS)** – Under the leadership of the Ministry of Infrastructure and Water Management, the Dutch government is working on an update of the <u>National Climate Adaptation Strategy</u> (NAS). This will consist of *fifteen key challenges* that are jointly developed by all ministries. The NAS is guided by three principles and five priorities. Some challenges are directly related to economic sectors such as housing and agriculture, while others are more indirect (e.g., flooding, water quality and heat-resilient cities). *Goals* and *adaptation pathways* are developed for each challenge up to 2100 and revised every ten years. One component within the NAS is the broadening of climate finance for adaptation.

**Interfaces between the NAS and the financial sector** – This report, commissioned by the Ministry of Infrastructure and Water Management, explores the interfaces between the NAS, its various objectives, and the financial sector. *Where* can financial institutions *contribute*, and *what do they need* from the government and others? It builds on the earlier report titled 'Accelerating Climate Adaptation – An alliance between the financial sector and government' (2023). This report was the result of collaboration among over fifty financial institutions, government representatives and knowledge organisations from the <u>Working Group on</u> <u>Climate Adaptation in the Financial Sector</u>. Now that the NAS is being updated, there is an opportunity to better integrate opportunities for strengthened collaboration with the financial sector.

**This document is an analysis and an advice** – Over the past period, we have conducted a *desk study* and *held discussions* on the interfaces with the leads of the fifteen challenges, representatives from the financial sector and the business community. We then organised a *working session* with the leads and the participants from the broader Working Group on Climate Adaptation in the financial sector, in which we tested interim results and insights gathered additional input from participants. The findings are incorporated in this report.

**Reading guide** – In chapter 2, we analyse how climate adaptation can be accelerated through more public-private collaboration. In chapter 3, we then discuss opportunities for collaboration, using a framework that we have been using to identify the interfaces between government, the financial sector and private parties. We link these to the various challenges in the NAS. In chapter 4, we draw conclusions and make recommendations.

**In-depth** – We have included a desk study, interpretation of the interfaces based on the discussions and the most important insights from the working session as appendices and further background information.



## Acceleration through public-private collaboration

Our desk study and the interviews held show that there are opportunities for accelerating climate adaptation by fostering more and better public-private collaboration. This can act as a lever, enabling financial institutions to further develop and apply their facilitating role in line with the goals set in the National Climate Adaptation Strategy, to the extent this aligns with their capabilities and interest.

By the facilitating role of financial institutions we mean:

- The ability to inform customers about risks, adaptation measures to be taken and ways to finance them;
- Supporting climate adaptation through concrete (co-)financing, insurance, by investing in adaptation projects, financial incentives and risk sharing, including the development of innovative new financial products;
- Helping assess the effects of climate risks, working on prevention, trying to limit risks and potential impacts and making residual risks insurable. For example, by insurers who share knowledge and insights and thus warn of events to limit consequential damage.

Unlocking these opportunities for collaboration requires alignment of efforts between the public and private sectors. It is essential that government policy is consistent and that climate resilience is given the priority it requires, by all parties involved.

#### Explanation

(Inter)national initiatives underline the importance of coordination and cooperation The Dutch Working Group on Climate Adaptation in the Financial Sector has been an active part of the Sustainable Finance Platform since 2022. At the end of 2023, this working group concluded: "It is crucial to take measures together. This requires commitment from citizens, companies, governments and financial institutions." The importance of collaboration and the active role of financial institutions is confirmed by the Climate Adaptation Target Setting Working Group of **the UNEP Finance Initiative**. This international group emphasises the importance of banks aligning their climate adaptation strategies with national policy frameworks such as National Adaptation Plans (NAPs).

The **report 'Landing the Economic Case for Climate Action with Decision Makers'** by Boston Consulting Group, climaTRACES Lab and Cambridge Judge Business School (2025) also indicates that *cooperation is essential to limit the economic risks of climate change while ensuring economic growth and resilience* (see In-depth 1, desk study).

Working together on an implementation agenda offers opportunities to accelerate and sustain climate adaptation. Taking advantage of these opportunities for collaboration requires

making adaptation goals more concrete in consultation with the economic sectors and including this as a point of attention in the National Adaptation Strategy. In the overview below, we further elaborate on the preconditions leveraging these opportunities for collaboration. We indicate where the Netherlands currently stands and what we believe is needed for acceleration based on all the input received. We do this on the basis of three starting positions: the soil, the germination power and the ecosystem.

#### Starting position 1. The soil

There is already a climate agreement and legislation	What is needed?	What has already been set in motion?	What else can be done?
<ul> <li>With the Paris Climate Agreement, the Dutch Climate Agreement, the existing sustainability legislation and soon the new NAS, there is a basis for taking (more) action and public-private collaboration for climate adaptation.</li> <li>This includes identifying and managing risks, as well as seizing opportunities and financing investments in adaptation.</li> <li>This also involves aligning financing with climate goals (emissions and resilience), as outlined in Article 2c of the Paris Agreement.</li> </ul>	<ul> <li>To take action, the following is needed:</li> <li>More insight into risks, including additional knowledge, access to data, and clear methods.</li> <li>Clarity about the division of roles between government and private sector, and opportunities for collaboration.</li> <li>More (public-private) financial solutions across the full breadth of financial services to businesses, individuals and governments. In line with a clear customer demand and projects that are financeable, insurable and investable.</li> </ul>	<ul> <li>Various initiatives in which the government collaborates with the financial sector and the business community:</li> <li>Accessible climate data and support in its interpretation (including the Dutch Climate Risk Portal)</li> <li>Overview of (financial) solutions (Climate Adaptation Portal and the RVO Toolbox for financing climate adaptation).</li> <li>Exploration of a 'Water indicator' for real estate.</li> <li>Progress on measurement methods and stress tests.</li> <li>New guidelines from regulators on expectations for financial institutions (European Central Bank, EIOPA, the European Banking Authority and the NGFS).</li> </ul>	<ul> <li>Due to the complexity and broad scope of the NAS, its impact on the economy, financial institutions, and citizens, more research and dialogue are needed, such as:</li> <li>Investigate the specific challenges and adaptation possibilities per economic sector.</li> <li>How can the national approaches and targets help and guide companies?</li> <li>What responsibilities and roles does everyone have, what does the government cover?</li> <li>Which problems cannot be solved through public policy or public resources, and what is required from companies and citizens?</li> <li>Organise dialogues per economic sector to discuss risks, goals, roles, measures and financing.</li> <li>Option – A task force for financing with rules (legal frameworks) for financing, insurance and other financial services.</li> <li>Further elaboration and concretisation of climate adaptation within the existing climate agreement (including opportunities for integration and policy synergies).</li> </ul>



#### The Paris Agreement

In the UN <u>Paris Climate Agreement</u> (2015), climate adaptation and the financial sector are part of the agreement:

- a. Article 2b deals with the "Increasing the *capacity to adapt to* the adverse impacts of climate change and *promoting climate resilience* and development with low greenhouse gas emissions, in a way that does not jeopardise food production".
- b. Article 2c refers to "*Reconciling financial flows with* a pathway to low greenhouse gas emissions and *climate-resilient development*." Internationally, the point of 'aligning finance flows' refers to both public and private financial flows.
- c. Article 7 promotes global *cooperation to strengthen countries' resilience* to climate change, with support for developing countries through *financing, knowledge, and technology*.
- d. Article 8 recognises climate change damage that cannot be avoided, and *encourages cooperation on risk management and assistance*, without legal liability.

#### Sectoral focus in the Dutch Climate Agreement

The <u>Dutch Climate Agreement</u> focuses on climate mitigation and has followed a process with <u>agreements involving five sectors</u> (link in Dutch): the built environment, agriculture and land use, electricity, industry and mobility. Quantitative targets have been set for each sector with regard to emissions reduction. The sectors themselves, together with stakeholders, have developed plans on how to achieve these targets and what is needed to do so. The government's climate plans and measures, including legislation, subsidies and supporting policy, will be important starting points in the coming years. The government, businesses and citizens are jointly faced with the task of meeting the climate goals. This requires an effort from each party and a clear, consistent government policy.

#### Starting position 2. The germination power

There is a shared interest	What is needed?	What has already been set in motion?	What else can be done?
Financial institutions, companies and the government have a shared interest: <i>acting</i> <i>on climate risks in a</i> <i>timely manner</i> and, where possible, seizing opportunities in the <i>transition</i> to a sustainable climate- resilient economy.	To <u>drive</u> more action we need to: • Raise awareness about the importance of climate adaptation and provide a clear path forward, for both companies and citizens.	• The interests, roles, and mutual expectations of the involved parties are discussed at various consultation tables. There is good cooperation among the different parties (see also starting point 3).	<ul> <li>From scaling up small collaborations and pilots to sector-wide collaborations and agreements in line with a clear direction and in combination with good management.</li> <li>Linking up with European and international initiatives and developments to share knowledge more broadly, scale up good examples and implement recommendations.</li> </ul>

#### 'The germination power': two European initiatives as examples

The European Commission has convened a **European Reflection Group** on Mobilising Climate Adaptation Finance. This is a temporary advisory group, with representatives from the business community, public institutions, banks, insurers and the pension sector. The group identifies best practices, obstacles and conditions for financing climate resilience. It expects to deliver a report by the end of 2025.

The **European Investment Bank** (EIB) is very active on the theme of climate resilience and climate transition. It has drawn up its own climate adaptation plan and is implementing it in order to accelerate investments in climate adaptation. The bank provides concessional financing, guarantees and, for example, shares knowledge with the market. In the coming years and decades, the role of the public banks will continue to be very important in supporting the market in the transitions.

These developments also underline the importance of the financial sector working together on climate adaptation, both from the perspective of managing risks and seizing opportunities. For more examples, see In-depth 1: desk study.



#### Starting position 3. The ecosystem

There is a (structural) network	What is needed?	What has already been set in motion?	What else can be done?
<ul> <li>Stakeholders are in discussions with each other about climate risks and solutions.</li> <li>There are several platforms for this, such as the Sustainable Finance Platform and the Netherlands AAA climate-proof.</li> <li>There are ongoing discussions between the ministries and various branche organisations and individual stakeholders.</li> </ul>	<ul> <li>Continuing the current approach, combined with financial institutions taking further action themselves—building on their own and their clients' climate transition plans. Making use of materiality analyses and signals from climate heatmaps. They could, for example, allocate more capacity to:</li> <li>conducting analyses,</li> <li>engaging in client discussions on the topic,</li> <li>developing sustainable products,</li> <li>integrating climate adaptation with other sustainability themes where possible.</li> </ul>	<ul> <li>The Climate Adaptation Working Group created, together with municipalities, the <u>Climate</u> <u>Adaptation Factsheet for</u> <u>Business Parks</u> as a tool for account managers in their conversations with customers.</li> <li>The United Nations Environment Programme Finance Initiative (UNEP FI), in collaboration with 27 leading banks, created a guide offering recommendations on how to identify climate-related risks, locate these risks within their own balance sheets, assess national adaptation policies, and formulate relevant goals and strategies.</li> </ul>	<ul> <li>Ensure the continuity of the platforms.</li> <li>Facilitate that the platform activities become even more closely integrated with the NAS objectives, and at the same time remain aligned with the approach of, for example, financial sector regulators.</li> <li>Support platform activities that contribute to the NAS goals.</li> </ul>

#### Initiatives of the Sustainable Finance Platform and NL AAA

**Since 2024, the Working Group on Climate Adaptation in the Financial Sector** has been working on the follow-up to its recommendations from the report 'Accelerating Climate Adaptation' (2023). Part of this follow-up is an approach with pilots with municipalities. Together with the municipality of Rotterdam and Lingewaard, insurers and banks explore public-private (financial) solutions for tackling foundation damage. Banks and insurers work together with the municipality of Southwest Friesland and the Adaptation Alliance Foundation on climate adaptation at a business park.

The public-private initiative **Netherlands AAA Climate-proof** is working on raising awareness with a podcast series and strengthening the network at board level.



### **Recommendations for concrete agreements**

To better align joint efforts, we conducted an analysis based on the interviews held and the working session of the potential use of policy instruments by the government and the financial sector. In doing so, we follow the structure outlined in the visual narrative <u>Making</u> <u>the Netherlands more Climate-Resilient - What Role Do Financial Institutions Play?</u> Samen Klimaatbestendig, 2021) (link in Dutch) and the report <u>Accelerating Climate Adaptation</u> (Working Group on Climate Adaptation in the Financial Sector, 2023).

This framework provides an in-depth look at the conclusions on the national starting position for collaboration in Chapter 2. We provide recommendations for each action perspective and we <u>indicate</u> these by underlining the <u>NAS key challenge(s) to which they apply</u>.



Figure: Framework for identifying opportunities for cooperation between governments and financial institutions. Source: 'Accelerating Climate Adaptation' (2023).

The other stakeholders must also be involved in further aligning the effort, such as provinces, municipalities, the business community and residents.



#### Risk analysis and stress testing

**Unlocking data** – Many (local and supra-regional) stress tests are carried out, especially by the Delta Programme for Spatial Adaptation (DPRA), and data is being made available by the central government (especially Ministry of Infrastructure and Water Management and the Department of Waterways and Public Works (RWS)). This data helps carry out risk analyses and stress tests. In order to ultimately determine what the exposure is and what measures should be taken when the exposure is too high (in frequency and/or impact). These tests do not yet fully cover all national challenges. Once the NAS is finalised, this can be further examined.

Financial institutions and large companies also conduct numerous risk analyses and investigate the impact of climate change. Hence it is crucial to share publicly collected data with the private sector and vice versa. The <u>Dutch Climate Risk Portal</u> is a good example, where existing data and information on flood and climate risks are actively shared with the (international) financial sector. Currently, there are multiple locations and portals containing data, streamlining and coordination among them is essential.

**The most vulnerable actors in sight** – Furthermore, it seems wise to introduce a nationwide prioritisation within the public-private collaboration approach based on (nationally) mapped vulnerabilities combined with opportunities to align with other (sustainability) themes. For instance, which are the most vulnerable neighbourhoods? Which industrial parks can be approached to create public-private conditions for increased investments in climate adaptation and better management of climate risks? Which areas have priority from other transitions that could be leveraged, for example residential areas that are made gas-free.

#### Recommendations

- a. **Sharing data** Investigate how climate risk analysis and stress test data from the government and financial sector can be shared even better and what can be accessed together. Platforms such as the Climate Adaptation Portal, the DCRP Portal and the Sustainable Finance Platform offer suitable options for this (for various purposes and audiences). It is important that information is tailored to the users (for example in the level of detail and in the explanation) so that they have actional perspectives. Additionally, due diligence checks must also have been carried out on the information, as this can significantly impact households and businesses economically.
- b. Mapping vulnerabilities Map out vulnerabilities per economic sector and for the most vulnerable locations and assets nationwide, while indicating the nature of these vulnerabilities. Combine this with opportunities to integrate with other challenges.

<u>Applicable to the NAS challenges</u>: High water, <u>Flooding</u>, <u>Freshwater</u>, <u>Water quality</u>, <u>Agriculture</u>, <u>Nature</u>, <u>Seveso\*</u>, <u>Heat</u>, <u>Health</u>, <u>Cultural heritage</u>, <u>New construction</u>, <u>Housing</u>, <u>Working landscapes</u>, <u>Infrastructure</u> and <u>Utilities.</u>

\*In the case of Seveso installations, it is the responsibility of the operator of the installation to identify the risks and to implement proper risk management. The central government may be able to facilitate the provision of good climate information in order to be able to carry out that analysis.



#### Communication

**Coordinate communication** – It is important that government communication regarding the NAS and its objectives is coordinated with communication by the financial sector and other stakeholders. Coordination with other policy developments in the sectors and with strategies such as the National Spatial Strategy is also essential. Acting together strengthens the message and avoids conflicting communications.

This enhances awareness and provides clarity on what is expected from citizens and businesses. However, bringing all parties together and maintaining their cooperation can also be challenging.

Examples of coordinated communication:

- The <u>Climate Adaptation Factsheet for Business Parks</u> (link in Dutch), created by the Working Group on Climate Adaptation in collaboration with municipalities and the Adaptation Alliance Foundation. This factsheet is aimed at park managers, businesses, municipalities, account managers of banks and insurers, to inform their clients.
- Information provided on the <u>climate adaptation knowledge portal</u> targeted at different stakeholder groups, demonstrating how they can get started with the process. This includes sector-specific information.
- Spotlight regenerative agriculture together, with messaging about advantages of better soil management and policies focused on combating biodiversity loss. For instance, with the <u>soil index</u> (link in Dutch) and <u>biodiversity monitor for agriculture</u> (link in Dutch).
   Farmers, supermarkets, consumers, and NGOs collaborate to transition towards soilrestorative farming. Farmers are encouraged to adopt soil-friendly techniques, supported by subsidies and purchase guarantees from supermarkets.

#### Recommendations

- c. Joint insight into communication agendas We propose to create a shared overview of the various communication agendas related to climate adaptation. This overview could include key moments and messages from both the National Climate Adaptation Strategy and the financial sector. The aim is to enhance alignment and synergy in communication efforts on climate adaptation towards stakeholders and the general public.
- d. Inclusive transition What do climate risks mean for people in vulnerable areas and situations in society that are less able to cope with these consequences? For example, for lower income groups that live in vulnerable homes and areas, or groups of SMEs that do not have the knowledge and resources to be informed in the same way as larger companies. Or which cannot take adequate measures themselves.
- e. **Research the effectiveness** Additional research can provide more insight into these aspects of communication and cooperation between the government and the financial sector, and the business community. The Adaptation Alliance Foundation also offers facilities for this. In addition, we recommend research that investigates the reinforcing effect of coordinated communication (message and timing).

<u>Applicable to the NAS challenges</u>: High water, <u>Flooding</u>, <u>Freshwater</u>, <u>Water quality</u>, <u>Agriculture</u>, <u>Nature</u>, <u>Seveso</u>, <u>Heat</u>, <u>Health</u>, <u>Cultural heritage</u>, <u>New construction</u>, <u>Housing</u>, <u>Working landscapes</u>, <u>Infrastructure</u> and <u>Utilities</u>. **Collaborative engagement** – Institutional investors can address the boards of listed companies through their role as shareholders. If they work together on this, we speak of 'collaborative engagement'. By joining forces, they increase their influence on the sustainability policy and social responsibility of these companies. For example, Achmea Investment Management is working with Deltares on collaborative engagement with a number of companies that extract a lot of water from the water system (see In-depth 1: desk study).

#### Recommendation

f. Inform institutional investors – Explore the possibility of collaborative engagement regarding adaptation themes or specific risks relevant to publicly listed companies. Inform institutional investors to ensure their knowledge level on this topic is adequate, allowing them to incorporate this into their engagement through shareholder meetings.

<u>Applicable to the NAS challenges</u>: High water, Flooding, Freshwater, <u>Water quality</u>, <u>Agriculture</u>, Nature, <u>Seveso</u>, Heat, Health, <u>Cultural heritage</u>, New construction, Housing, <u>Working landscapes</u>, Infrastructure and (privatised) Utilities.

#### **Financial incentives**

Financial incentives are crucial for promoting climate adaptation, complementing communication to strengthen the message and reward citizens and businesses for adopting climate adaptation measures. Such incentives can encourage behavioural change, accelerate investments, and make innovative solutions more appealing.

**Financial incentive instruments** – Public entities have powerful policy instruments such as taxes and subsidies. Examples include partial exemption from sewage charge for disconnecting rainwater from wastewater systems or subsidies for green roofs. Private entities can also apply financial incentives, such as discounts on products, services, or measures that promote greening/adaptation. It is important to consider groups that would benefit most from these financial advantages and might struggle to access them (inclusivity).

Although financial institutions may not have the same responsibilities or policy tools as governments, they can still play a significant role. Examples include:

- Sustainability discounts on mortgages or loans for climate-resilient homes;
- Insurance discounts for homes with water-absorbing/water-resistant measures or surcharges if such measures are not adopted.
- Investment strategies actively supporting climate adaptation projects.

When applied from various angles, these incentives create a reinforcing effect that makes adopting climate measures more attractive and commonplace. The report 'Accelerating Climate Adaptation: An alliance between the financial sector and government' elaborates on several examples. Initiatives such as the former <u>Financial Incentives Alliance</u> and its successor, the <u>Adaptation Alliance Foundation</u>, provide a solid basis for further collaboration.



#### Recommendation

g. Investigate combinations of financial incentives – Explore collaboration around the effectiveness of combinations of financial incentives for climate adaptation and how these can be integrated into the implementation of the National Climate Adaptation Strategy, keeping in mind competition rules for financial institutions. Additionally, ensure attention to vulnerable groups during the development of financial incentives.

<u>Applicable to the NAS challenges</u>: High water, <u>Flooding</u>, <u>Freshwater</u>, Water quality, <u>Agriculture</u>, <u>Nature</u>, <u>Seveso</u>, <u>Heat</u>, Health, <u>Cultural heritage</u>, <u>New construction</u>, <u>Housing</u>, <u>Working landscapes</u>, Infrastructure and Utilities.

#### Financing and investment

**Public and private financing** – Projects for climate adaptation in public spaces and national protection are mainly publicly funded through tax revenues and institutions like the public NWB Bank. For investments in private areas, private entities are also needed. Additionally, climate adaptation offers opportunities for private entities in water management, climate-adaptive construction, infrastructure, and sustainable agriculture. This includes landowners, port managers, engineers, suppliers, and others.

**Insights on climate finance** – For businesses and partly for individuals, here are key aspects of climate adaptation projects and investments (selection, with more detail in the desk study):

- The *benefits* of adaptation measures often become *tangible only later*, and costs and benefits may not align with the same entities.
- There are significant *uncertainties* regarding climate change and which entities will take action toward adaptation. Often, it is expected that governments or large companies will act, causing other entities to hesitate even if action is necessary.
- *Rewarding timely action is crucial*. Types of incentives and support can make the difference in prompting action.
- Projects and investments are location- and sector-specific.
- *Various types* of public-private instruments could be considered. Given the scarcity of public resources and the increasing importance of climate resiliency for private parties, such instruments provide the opportunity to achieve climate adaptation at sufficient speed together.
- The issue is not so much the availability of funding but rather the lack of clear revenue streams to repay it. This creates a skewed risk distribution, where the expected return does not justify the risk of default.
- An added reason for action: *climate risks are underinsured*. In Europe, only 25% of natural disaster damages are insured.
- *Easily accessible information* is crucial. An example: overviews of financial solutions for climate adaptation in the built environment can be found on klimaatadaptatieportaal.nl and in the <u>Toolbox Financing Climate Adaptation</u> (link in Dutch) of RVO.



#### Recommendation

h. Leverage and develop public-private finance solutions – More dialogue between government and business can remove barriers and create new financing opportunities, such as blended finance solutions, DBFMO financing, green bonds and guarantees, making climate adaptation more accessible and 'cheaper'. This initiative could be pursued within the Sustainable Finance Platform and NL AAA Climate Resilient, respecting competition rules.

Applicable to the NAS challenges: High water, Flooding, Freshwater, Water quality, Agriculture, Nature, Seveso, Heat, Health, Cultural heritage, New construction, Housing, Working landscapes, Infrastructure and Utilities.

#### Conditions

Access to financial products – Climate risks can be included (insured or financed) or excluded by financial institutions. Hence, understanding, assessing, and managing these risks thoroughly is critical. When damages occur repeatedly without improvements, institutions may choose to limit or even exclude coverage, potentially reducing access to basic insurance or financing, particularly for vulnerable groups or sectors.

Avoiding exclusion – In a healthy and competitive market, financial institutions focus on return and risk management. Increasing climate risks can lead to risk selection, where (in extreme cases) only low-risk clients or projects retain access to financing or insurance. This poses a threat to maintaining insurability and finance-ability, essential for a resilient society.

Financial institutions are aware of these challenges and are actively working on them. For example, in recent years most insurers have expanded flood coverage to include failures of secondary flood defences. The Dutch Association of Insurers is currently exploring whether flood risks in unembanked areas suitable for development can be insured. There are also rules that financial institutions cannot change on their own. Price incentives, such as discounts, can reinforce inclusion or exclusion. Therefore, a balanced and consistent approach is needed. Institutions can contribute by closing knowledge gaps, improving data, developing new solutions (such as parametric insurance), and exploring opportunities for prevention and risk reduction.

**Collaboration and dialogue** – These themes are actively discussed with industry organisations and within the Sustainable Financing Platform, where public and private parties collaborate on creating a future-proof financial system.

#### Recommendation

- i. **Ensure access** Governments can contribute to ensuring access through legislation and supportive policies. Think of:
  - Collaborating with the insurance sector, to investigate whether hard to insure risks can be made insurable, such as the broad weather insurance;
  - Introducing subsidies or tax benefits for businesses and individuals actively insuring against climate risks;



• Supporting innovative insurance solutions, such as through reinsurance funds or public-private partnerships.

<u>Applicable to the NAS challenges</u>: <u>High water, Flooding</u>, <u>Freshwater</u>, <u>Water quality</u>, <u>Agriculture</u>, <u>Nature</u>, <u>Seveso</u>, Heat, Health, <u>Cultural heritage</u>, <u>New construction</u>, <u>Housing</u>, <u>Working landscapes</u>, <u>Infrastructure</u> and <u>Utilities</u>.

#### Regulate

Setting standards and legislation – Establishing standards, and more broadly, legislation, is as crucial as strong price incentives. These apply to everyone and are enforceable (if made practical). Overregulation should be avoided as it can hinder innovation and lead to high costs. What the market can self-regulate should remain so. Climate adaptation standards could include, for instance, norms for new construction or water usage by industries in drought-prone areas.

**No-regret measures (mandatory)** – One potential solution is to legally mandate no-regret measures for climate adaptation, similar to the energy-saving legislation (e.g., this <u>top 7</u>). Large companies that can easily save energy are obliged to do so. The <u>MIA/Vamil list</u> (link in Dutch) provides an initial overview of potential no-regret measures for climate adaptation. A Dutch retail bank refers to this list in its Sustainability Contribution for SMEs. This principle can be explored for climate adaptation and biodiversity, with clear standards and enforcement being essential. The Ministry of Infrastructure and Water Management could discuss this idea with other ministries, knowledge institutions, and VNO-NCW.

**Tackling high risks** – Regulation and oversight should address excessive risks if they are likely to be passed on otherwise. For instance, preventing construction in high-risk areas. Additionally, during sales and property valuations, climate risks must be adequately assessed. The demand for protective arrangements will also grow as climate-related risks increase.

#### Recommendations

- j. Set standards for climate adaptation Explore opportunities and implementation of standards for the built environment and in agriculture.
- k. Identify and secure no-regret measures Provide clarity and encourage the implementation of no-regret measures.
- I. **Tackle excessive risks** Provide adequate information for vulnerable groups and places so that the risks for the residents and businesses concerned are known. Support them where necessary and possible, in collaboration with financial institutions where this is feasible, to limit the impact of climate change.

Applicable to the NAS challenges: High water, Flooding, Freshwater, Water quality, Agriculture, Nature, Seveso, Heat, Health, Cultural heritage, New construction, Housing, Working landscapes, Infrastructure and <u>Utilities</u>.



#### Lead by example

#### Government and financial institutions as employers and as examples for others - An

interesting approach is to consider the government and financial institutions as important employers, as parties with their own footprint, and as examples for others when assessing their role and contribution to climate adaptation. They own premises, procure products and services, and employ staff. In analogy with the 'scope one' approach within the climate transition to a net zero economy (own buildings and business operations), governments and financial institutions could provide a clearer picture of how they themselves want to become climate-resilient.

What could that look like?

- For all government buildings, for instance, water guidelines could be introduced;
- Employees could be encouraged and supported to implement climate adaptation measures in their own homes (similar to energy-saving measures, which is already more common);
- Staff could be trained to take climate-related risks and adaptation solutions into account during their work;
- Climate adaptation could become a standard part of procurement processes.

The same example setting role applies to financial institutions:

- Banks and insurers can set a good example for their clients by making their building(s) demonstrably more sustainable and climate-resilient;
- They could encourage their employees to take measures at home.

#### Recommendation

m. Set the example – Explore the possibilities to further set the example as employer and purchaser in regards to paying attention to resilience. If necessary, evaluate its effectiveness and, where relevant, collaborate in this area, for example through a community of facility managers and/or HR managers.



### **Conclusion: Moving forward together**

This report has formulated concrete conclusions and recommendations for each topic and instrument used (or that could be used) by governments and financial institutions. These are intended to support both the NAS challenge leads and the financial sector in accelerating investments and increasing climate resilience. To conclude, we present the following strategic priorities for the National Climate Adaptation Strategy, to guide further action in the near future:

**Use the NAS process to make climate adaptation concrete within the Dutch Climate Agreement** – The new national adaptation strategy provides direction for national goals and strategies for climate adaptation, outlines possible scenarios, and offers insights into national goals and adaptation pathways. It thereby provides concrete starting points for the private sector to base their own approaches on. A translation to the sector level also seems helpful, with goals and actions to increase the climate resilience of sectors.

Link up to the European context – In further elaboration, it is important to take into account the European climate adaptation plan and European legislation, such as the obligation for ESG reporting and the creation of transition plans by large companies. These plans can explicitly focus on climate adaptation and how national goals can be translated into concrete, achievable objectives at the company level.

**Urgency calls for acceleration** – Significant steps are needed and possible to address the impacts of climate change. The NAS provides a strong framework, which now requires a translation to a broader group of stakeholders. In addition to governments, financial institutions also play a role, as do residents, businesses, civil society organisations, and the scientific community. Together, they are needed to achieve a climate-resilient Netherlands. The Climate Agreement, European sustainability legislation, and national regulations have already laid a solid foundation for this public-private cooperation.

**Consistent policy and regulations are needed now** – To make an impact, clear standards, predictable policies, transparent and workable rules, and standards for measuring and pricing sustainability impacts and risks are necessary, as well as supporting measures like subsidies.

Accessible data for well-informed climate action – Reliable data is crucial for effective steering and offering residents actionable perspectives. Often, this data is missing, incomplete, or only available to a select group. Think, for instance, of foundational or flood data. There is also a need for transparency of underlying methods, models, and assumptions.

**Proactive engagement from all parties** – The government, businesses, and financial institutions are expected to adopt a proactive attitude to develop solutions for increasing climate resilience. Additionally, it is important for citizens to understand the risks and possibilities of what they can do themselves to enhance climate resilience. The government

plays a significant role by acting on a larger scale and with more resources than individual companies or citizens can, but it cannot do this alone.

**Ensure a fair distribution of costs and responsibilities** – Ensure a balanced distribution of the costs of climate measures. Both citizens and businesses can take more action on climate. They also share in the benefits: a better climate is good for everyone.

**Be realistic about what is and isn't possible** – Recognise that citizens and small businesses have fewer resources, knowledge, and perspectives to work on this compared to larger enterprises or governments. The expectations and requirements imposed on various parties should therefore be in line with what they can achieve.

**Finally**, over the coming months and in 2026, continue the dialogue with stakeholders to jointly and nationally concretise climate adaptation within the Climate Agreement and the NAS. With broad support and collective action, we can take the step toward a future-proof, climate-resilient Netherlands. The time to act is now!



### In-depth 1

## Desk study – Insights from studies and developments on climate adaptation and interfaces with the financial sector

This desk study provides an in-depth basis for the advisory report and provides insights from various studies and developments on climate adaptation and interfaces with the financial sector. The components that are covered are:

- 1. Definitions of climate adaptation and financial instruments
- 2. Investigating the role of the financial sector in climate adaptation
- 3. EU countries' national climate adaptation strategies and interfaces with the financial sector
- 4. The role of sustainability platforms to accelerate climate adaptation

#### 1. Definitions of climate adaptation and financial instruments

Below we provide an overview of the terms in the advisory report and their corresponding definitions and further sources of information.

**Climate adaptation** – according to the IPCC, involves taking action to prepare for and adapt to both the current and projected impacts of climate change. Climate adaptation can be autonomous or planned. 'Autonomous' adjustments are adjustments that take place spontaneously or automatically, without there being a conscious policy measure or planning. This happens, for example, when farmers adjust their crop choice to changing precipitation patterns based on experience or necessity. In contrast, planned adaptation is the result of targeted policy measures, such as the construction of dikes or the adaptation of building regulations. Vulnerability to the effects of climate change depends on the effects of the changing climate and the extent to which society is able to respond to those effects, or climate resilience. Climate resilience depends, among other things, on climate awareness, existing institutions and the available financial resources.

Adaptation pathways – are structured plans and measures that can be taken, taking into account lead time, sequence, effectiveness and feasibility. They are assessed from an economic, administrative, technical, political and sociological perspective, to support informed decision-making and allow for adjustments as developments unfold. These pathways indicate the point at which measures can effectively reduce risk and describe actions that are site-specific or applicable to a broader action (source: KIN).

Adaptation goals and strategic measures for climate change – include the goals and initiatives that countries and companies take to adapt to the impact of climate change. This



can range from physical adaptations, such as improvements to infrastructure, to policy measures, including regulations and investments that increase the resilience of communities and ecosystems. Examples include investing in water management and dike reinforcement to prevent flooding, promoting urban greening to reduce the effects of heatwaves, and the application of climate-smart farming techniques that protect crops from extreme weather events. In addition, innovations such as climate-resilient building materials and green roofs, for example, play a role in creating sustainable urban environments, while new irrigation systems contribute to more efficient water use in agricultural areas.

**Climate adaptation and financial instruments** – Effective climate adaptation measures require robust financial instruments to support implementation and scaling. A significant part is financed by governments. At the same time, there is active work on mobilising more private funding to increase the impact and sustainability of adaptation projects. Information plays a crucial role in this. For example, the Netherlands Enterprise Agency (RVO) has compiled the <u>Financial Instruments Toolbox</u> (link in Dutch) for private parties in the built environment, divided into five categories: funds, subsidies, loans, tax benefits and financial constructions.

In addition, the Climate Adaptation Working Group of the Platform for Sustainable Finance made an overview of climate-adaptation-oriented financial and other instruments in its report 'Accelerating Climate Adaptation'. This is shown in In-depth 4 with concrete examples, including solutions that banks can offer and additional options for insurers and investors. These solutions have also been incorporated into RVO's Toolbox.

**Blended finance** – is a financial instrument that combines public and private resources to stimulate investment in sustainable development. The aim is to attract private investors by reducing risks and thus increasing the financial feasibility of investments. Public funds are used to encourage private investment. Governments and development banks offer guarantees or concessional financing (sources: <u>EU Blending facilities</u>, EIB, 2025 and <u>How</u> <u>Blended Finance Works</u>, IFC, 2025).

**Insurance and climate change** – Climate change is causing an increasing frequency and intensity of extreme weather events such as storms, heat stress, floods, and droughts. Climate adaptation focuses on reducing the risk of damage and, if damage occurs, limiting the impact. Insurance plays an important role in this process, with preventive measures and risk management at its core. Increased climate-related risks are typically reflected in higher insurance premiums and, if the risks are not sufficiently mitigable, may lead to additional conditions or limitations in coverage. On the one hand, insurers ensure that both companies and individuals can insure themselves against weather-related risks, and on the other hand, that they are encouraged to take measures themselves to reduce risks – within their action perspective. In addition, solidarity plays an essential role within the insurance sector. By bearing risks collectively, it becomes possible to protect individuals and companies from climate hazards that would otherwise be too great to control on their own. Climate adaptation also stimulates innovation within the insurance sector, with new products such as parametric insurance, which provide compensation based on objective climate-related indicators such as extreme weather events.



#### 2. Investigating the role of the financial sector in climate adaptation

In this section, we highlight a number of reports that have been published in recent years on climate adaptation, financing and action perspectives for the financial sector.

#### Analysis and action perspective for financial institutions

At the end of 2023, the Working Group on Climate Adaptation in the Financial Sector presented its report '<u>Accelerating Climate Adaptation – An alliance between the financial sector and government</u>' to the then Minister Harbers of Infrastructure and Water Management. The report was written by representatives from the financial sector, in consultation with governments and knowledge organisations. The report contains conclusions on climate risks and opportunities for sectors and recommendations on how to strengthen climate resilience. The Working Group has been working on following up on the recommendations since 2024, with various pilots and in five clusters. See also the <u>Progress</u> <u>Report 2024</u>.

In mid-2025, the Climate Adaptation Working Group launched the <u>Climate Adaptation</u> <u>Factsheet for Business Parks</u> (link in Dutch), together with the <u>Adaptatie Atelier</u> foundation, a partnership of local authorities. The aim of the factsheet is to communicate more unambiguously with entrepreneurs, and to involve the account managers of banks and insurers in this. This form of a factsheet can also be used with other themes and stakeholder groups. The Working Group is considering this. In addition, the Working Group published a <u>template</u> (link in Dutch) for concluding Green Deals with partners around a business park.

#### Guide for banks on setting climate adaptation targets

UNEP FI released the '<u>Climate Adaptation Target Setting guide</u>', drawn up by a Working Group within the UNEP cooperation of banks under the Principles for Responsible Banking. The guide offers practical suggestions for financial institutions to set climate adaptation targets, integrate them into their strategies and implement them. It follows a five-step approach.

- **Step 1** looks at *alignment with the objectives* for climate resilience and consistency with national/international adaptation frameworks.
- **Step 2** focuses on baseline *determination*, with approaches to physical climate risk assessments, data collection and use, identification of risk mitigation and adaptation measures, assessment of risk mitigation and adaptation measures, and other baseline elements.
- **Step 3** distinguishes between *goals at the level of application of instruments* ('practices' targets, in fact an effort made to influence these practices towards greater sustainability) and *result targets* ('outcome targets'). The latter is many times more difficult than the former. Before this is possible, it is necessary that the approach is sufficiently robust and, for example, that there is good data to measure the outcome. Another problem is to establish the direct relationship between a certain effort and an outcome.
- **Step 4** involves *making action plans*, choosing key indicators to measure progress and trying to understand and, where possible, strengthen connections.



• **Step 5**, *implementation*, deals with strategy/internal policies and processes, customer engagement, business opportunities and financial flows, capital mobilisation and engagement.

In our view, the guide is useful for banks to structure the climate adaptation approach and contains examples of 27 international banks that have started working together on this. A follow-up report will be published around the summer of 2025. Pilots will also be developed for agriculture and the built environment.

#### The economic business case of climate adaptation and the role of levers

The recent report 'Landing the Economic Case for Climate Action with Decision Makers' (BCG, climaTRACES Lab and Cambridge Judge Business School, 2025) makes a clear point: investing in climate action is smart from an economic point of view. Because investing in climate action could yield a return of about ten times by 2100, it is a highly cost-effective strategy that far outweighs the economic damage of inaction—which is estimated to be between 11% and 27% of cumulative global GDP by the end of this century.

However, despite the strong economic arguments, investments in climate adaptation are still slowed down in practice. This is due to limited insight, unequal cost-benefit distribution and economic inequality. In particular, projects often lack clear revenue streams ('cash flows') and relate to non-market sectors or public goods, making them less attractive to private investors and financiers. The short-term focus of private investment is also at odds with the long-term benefits of adaptation, while uncertainty and information gaps further complicate the scale-up of private investment.

The report identifies five *levers* to address these challenges: 1) reframing the debate on the costs of climate change, 2) creating transparency about the net costs of inaction for all actors, 3) strengthening national climate policies to accelerate mitigation and adaptation, 4) revitalising international cooperation, and 5) deepening the understanding of the net costs of inaction.

In the Netherlands, a research on '<u>The Costs of Doing Nothing</u>' (link in Dutch) by the Climate Initiative Netherlands aligns with this final point. It examines the financial impacts of climate change and how to make these more transparent.

#### Finance gap for climate adaptation

The gap between what is needed and what is available in terms of finance is referred to as the 'adaptation gap'. The '<u>Adaptation Gap Report 2024</u>' (UNEP, 2024) shows that although adaptation finance has increased in recent years, the current volume remains low and adaptation is largely financed by the public sector. The report highlights that financing 'no-regret', reactive and incremental adaptation is relatively easier, while anticipatory, transformational adaptation, especially in non-market sectors and for vulnerable groups, is more challenging. To meet the challenges of climate change, adaptation financing needs to shift from reactive and project-based approaches to anticipatory, strategic and transformational adaptation.

To help scale up complex, harder-to-finance projects, the involvement of both public (i.e., governments, multilateral banks) and private institutions is crucial. This includes sharing risk, reducing risk, using guarantees, and blended finance. This form of 'blended financing' and the 'stacking of financial flows' are effective forms of supporting these projects. See also the figure below.



Figure: Overview of forms of adaptation and the associated challenges for financing. Source: <u>Adaptation Gap Report</u> <u>2024: Come hell and high water</u> (UNEP, 2024; adapted to 'Typology of adaptation financing' Watkiss, 2024).

In any case, more concessional government financing is needed to increase private financing for climate adaptation. This can reduce risks. In addition, publicly backed guarantees and risk-sharing mechanisms help build the confidence that private investors need to participate in long-term adaptation projects. In this context, public financial institutions such as the European Investment Bank (EIB) play a role. They can help realise and scale up complex adaptation projects that are more difficult to finance, as we explain below.

#### **European Investment Bank Climate Adaptation Plan**

The <u>EIB Climate Adaptation Plan</u> (EIB, 2021) places a stronger focus on nature-based solutions, building on experience from the <u>Natural Capital Finance Facility (NCFF)</u>. This helps to identify measures that deliver both adaptation and mitigation benefits and thus promote climate resilience more effectively. For example, restoration of forest and agricultural ecosystems and natural flood control measures can reduce vulnerability to weather risks while providing benefits for ecosystems and biodiversity. Identifying such opportunities enables the EIB to finance mutually reinforcing projects.

By 2025, the EIB aims to increase the share of its climate finance for adaptation to at least 15%, a significant increase from the average of 4–5% between 2012 and 2019. This ambition is in line with the EU Adaptation Strategy, which calls for scaling up high-impact investments that reduce vulnerability and mainly benefit the most climate-vulnerable groups. The EIB is developing new indicators to measure the effects of adaptation investments, such as reduced exposure to floods, droughts and forest fires, and the prevention of economic damage. All funding must comply with the EU Taxonomy and must not undermine climate mitigation or other environmental objectives.

To achieve this, the EIB screens all direct loans for physical climate risks and strengthens the requirements for indirect financing through intermediaries, including transparency on climate risks according to the <u>Task Force on Climate-Related Financial Disclosures (TCFD)</u> guidelines. The Bank places a strong emphasis on nature-based solutions and investments that offer both adaptation and mitigation benefits, such as ecosystem restoration and natural water management measures. Key areas of investment include water and flood management, urban development, infrastructure protection, sustainable food systems, health, innovation, and disaster risk management. The EIB is working closely with international financial institutions to harmonise the reporting and monitoring of adaptation finance and will continue to report on this in its sustainability reports.

#### Financing options for climate adaptation

The '<u>Guide for Adaptation and Resilience Finance</u>' (United Nations Office for Disaster Risk Reduction, Standard Chartered Bank, KPMG, 2024) is a practical roadmap for financing and outlines more than 100 investment activities. The roadmap provides a standardised classification of more than 100 investable activities, such as climate-resilient crops, vertical farming, natural flood protection, and renewable energy storage solutions. This framework helps investors to better identify and assess opportunities, addressing a crucial funding gap in the area of climate adaptation, especially in emerging markets.

Key findings show that early investments in adaptation are reaping significant economic benefits: every dollar invested could generate up to \$12 in returns this decade. By providing clear definitions, co-benefit analyses and impact measurement tools, the framework aims to strengthen investor confidence and stimulate innovative financial products, such as adaptation bonds and resilience loans. In doing so, it contributes to a future that is both more resilient and more sustainable.



# 3. EU countries' national adaptation strategies and interfaces with the financial sector

In this analysis, we describe the national adaptation strategies of EU countries and identify whether they overlap with the financial sector. After the comparative analysis, we zoom in on the European adaptation plan and two large European countries: France and Germany.

eemparisen er n	APS by EO Count			
Country	Key targets, climate risks assessed	Legal binding nature	Sectoral approach*	Role of the financial sector
Austria Austrian Strategy for Adaptation to Climate Change	Emphasis on 'no- regret' measures and avoiding maladaptation	Not legally binding; Strategic framework	Yes; 120 specific recommendations in 14 sectors	Not specified
Finland Finland National Climate Change Adaptation Plan 2030	Three main goals for social actors: strong will, resources and adaptability; Objective 16 on climate risk management and monitoring	Legally binding; ' <u>Climate Act</u> <u>423/2022</u> ' mandates adaptation planning, targets and monitoring	Yes; 24 goals under 10 themes, plan guides adaptation efforts until 2030	Not specified
Germany German Strategy on Adaptation to Climate Change (DAS 2024)	Mandate the establishment of NAS with measurable objectives, requires federal and state governments to conduct our risk assessments and implement adaptation measures	Not legally binding; a policy document supported by the ' <u>Federal Climate</u> <u>Adaptation Act</u> ( <u>KAnG</u> )', which provides the legal framework for adaptation	Yes; specific clusters (infrastructure, land use, human health, urban development, water, economy, cross-sectoral themes)	Not specified
Ireland Ireland National Adaptation Framework (NAF)	Key guiding principles grouped into high-level themes	Framework mandated under 'Climate Action and Low Carbon Development Act 2015'; focuses on planning	Yes; 12 priority sectors with a ' <u>Sectoral</u> <u>Adaptation Plan</u> ' under development	Not specified; mentions several adaptation funds
The Netherlands <u>National Climate</u> <u>Adaptation Strategy</u> (NAS'23)	15 key challenges divided into four domains: 1) Water; 2) Agriculture, nature and the	Not legally binding; strategic framework; 'Self- binding' for central government	Yes; some challenges are directly related to economic sectors (housing,	Limited; does not address how adaptation measures are financed and does

#### Comparison of NAPs by EU country (source: UN Climate Change <u>NAP central portal</u>)



	environment; 3) People and culture; 4) Living and working		agriculture), while others are indirectly related (floods, water quality, heat- resilient cities)	not distinguish between public and private funding roles
Spain Spain National Climate Change Adaptation Plan 2021-2030 (PNACC)	The framework has 5 guiding principles and 4 strategic components for adaptation actions	Requires the adoption of a NAP with objectives and indicators under ' <u>Law 7/2021</u> <u>Climate Change</u> <u>and Energy</u> <u>Transition</u> '	Yes; 81 actions on 18 themes with sectoral objectives	Limited: Law 7/2021 introduces obligations (e.g., annual reporting, carbon reduction targets) for the financial sector
United Kingdom UK Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting	Focus on 3 themes: 1) Action through an appropriate policy framework, with government programs and private investments; 2) Information through better evidence and tools; 3) Coordination through an integrated approach	Risk assessment and NAP required under the ' <u>Climate</u> <u>Change Act 2008</u> '	Yes; 100 actions across sectors, however lacks measurable objectives	Not specified; recognises the importance of funding for adaptation
France <sup>**</sup> <u>Third National</u> <u>Climate Change</u> <u>Adaptation</u> <u>Programme</u> (PNACC-3)	Emphasis on 'no- regret' measures; Main climate risks to be addressed: heatwaves, droughts, floods, coastal erosion, forest fires, biodiversity loss	Not legally binding, but integrated into the national climate framework; planning is mandatory under the ' <u>Energy-Climate</u> <u>Act 2019</u> '	Yes; 52 concrete measures and 200 actions to tackle climate change in 11 sectoral areas	Limited; with €1 billion through water agencies, €75 million added to the Barnier Fund by 2025, creation of a system to help insurers maintain affordable coverage in high- risk areas, and development of a climate risk map for transparency
Denmark** Klimatilpasning.dk	Each municipality develops its own adaptation plan	Not legally binding; Legislation in development	Not specified; Primary local/municipal approach	Not specified

\* There is a section in the portal on sectoral NAPs, however this is only available for developing country parties. \*\* NAPs from these selected countries are not available in the NAP central portal.

# Insights from comparative analysis with other European climate adaptation strategies

- Legally binding In most EU countries, the NAS is not legally binding, but indicative in nature and supported with broader legal frameworks. As far as we have been able to determine, Finland has a legally binding NAS under '<u>Climate Act 423/2022</u>' that mandates adaptation planning with targets and oversight. While Ireland and the United Kingdom have binding planning, however lack enforceable targets.
- Sectoral and thematic approach Most countries use a sectoral and thematic approach, it varies greatly how they do this and how much detail is applied. Some countries have developed specific actions and themes, such as the fifteen challenges in the Netherlands. For example, Spain is looking at targeted measures for water availability, agriculture, forestry, biodiversity, health, tourism, energy, infrastructure and transport and coastal areas.
- Role of the financial sector Most NASs do not indicate how adaptation measures will be financed or what the role of insurance is. While some countries (such as Ireland, United Kingdom, France) recognise its importance for climate adaptation and reinforce it by making additional contributions to specific funds, there is generally a lack of a clear description of possible action perspectives for financial institutions.
- Emphasis on 'no-regret' measures Some countries (such as Austria and France) have explicitly emphasised the importance of 'no-regret' measures, i.e., actions that deliver benefits regardless of the severity of the potential impact of future climate change.
- Measurable goals Countries such as Ireland and Spain have plans with measurable objectives and a wider range of actions, which can help ensure more effective implementation. However, most climate adaptation strategies still lack measurable goals.
- **Centralised or decentralised?** The NAS strategies include actions at both centralised and decentralised levels. By further exploring differences and similarities in the chosen approaches, insight is gained into what works best under which circumstances. For example, the French strategy seems to be quite centralised compared to others, while Denmark takes a local or municipal approach.

Based on this global analysis, in-depth follow-up research can show whether this picture can be supplemented.

#### In-depth analysis of the adaptation strategies of Europe, Germany and France

#### **European Union Adaptation Strategy**

In 2021, a <u>new adaptation strategy</u> was adopted in the European Union. It is built around four main objectives: to make adaptation smarter, faster and more systematic, while strengthening international action on climate change adaptation:

- 1. Smarter adaptation means using robust data and risk assessment tools that are accessible to everyone.
- 2. Faster adaptation focuses on developing adaptation solutions to reduce climate risks, increase protection and secure freshwater.



- 3. More systemic adaptation integrates climate resilience into all policy areas and supports strategies with priorities such as macro-fiscal policies, nature-based solutions and local adaptation actions.
- 4. Strengthening international action means supporting climate adaptation worldwide through cooperation, knowledge sharing and financial support to vulnerable countries.

In this context, the <u>European Climate Change Adaptation Platform provides</u> useful examples from countries, as well as accessible, programme- and policy-specific data to support adaptation planning.

A European approach to sharing sustainability data is also important. Improving data exchange in Europe and within countries, for example through a '<u>European Single</u> <u>Access Point</u>' (ESAP) for sustainability information.

#### Case study France

France, one of the first countries to introduce a National Adaptation Plan in 2006, has developed its third <u>National Climate Change Adaptation Programme</u> (PNACC-3) (link in French) following a public consultation and inter-ministerial consultation. The strategy includes 52 concrete measures and more than 200 actions aimed at climate adaptation in 11 sectoral areas, with a focus on area-based approaches and the financing of measures.

The PNACC-3 outlines the main financial initiatives, including the mobilisation of one billion euros through water agencies, 40% of which will be allocated to nature-based solutions. It also includes the strengthening of the Barnier Fund with an additional 75 million euros in 2025. The Barnier Fund is a special financial resource within the PNACC-3 that supports local climate adaptation projects, aimed at strengthening the resilience of communities with practical, location-based solutions. A system will be set up to encourage insurers to maintain affordable insurance coverage in high-risk areas, as well as a climate risk map for greater transparency.

The French adaptation strategy places a strong emphasis on area-based coordination and centralised planning, while the Dutch approach relies more on a decentralised, bottom-up governance model in which regional and local authorities are given the space to define and implement context-specific measures.

Several institutions have responded to PNACC-3. Agéa, the national federation of insurance agents, welcomed the plan in their <u>press release</u> (link in French), highlighting the measures to prevent natural risks, the increase of the Barnier Fund to 300 million euros and the continued role of the Caisse Centrale de Reassurance (CCR) in the identification of risks. The Institute for Climate Economics (I4CE) acknowledged in their <u>press release</u> (link in French) that there is more clarity on public funding for adaptation, but also expressed concern that it is still insufficient, stressing that



adaptation cannot rely solely on government subsidies. The institute highlighted the key role of private financial actors, in particular banks and insurers, and welcomed the move to launch a mission focused on bank financing and to continue the dialogue with insurers. This provides opportunities for cooperation in involving financial institutions in the government's new mission to further mobilise private stakeholders, in particular banks, in risk prevention, which will start in the first half of 2026.

In summary, the PNACC-3 focuses on the area-based approach, the financing of measures and the mobilisation of all sectors to ensure the success of climate adaptation.

#### **Case study Germany**

The key points in the <u>German Strategy for Climate Change Adaptation (DAS 2024)</u> include the introduction of measurable targets (33 targets and 45 sub-targets) for adaptation to the impacts of climate change and the emphasis on strong coordination between the federal and state levels. The strategy addresses climate risks through a series of action areas in seven clusters: Infrastructure; Land and land use; Human health and care determination; Urban planning, town and country planning and civil protection; Water; Economy; Cross-sectoral issues. Progress is tracked using an indicator-based monitoring system.

Although the financial sector is not explicitly mentioned in the strategy, it does mention objectives related to financing and investment. In the infrastructure cluster, one of the objectives is to reduce financial risks related to buildings, in the economy cluster, the goal is to analyse physical climate risks as an integral part of investment decisions, and in the cross-sectoral issues cluster, the federal government plans to collect data on financial losses due to damage caused by extreme weather events. While there are no direct answers, opportunities for cooperation seem to lie in partnerships with municipalities and private actors and efforts to improve the exchange of data and standardised methodologies.

In contrast to the Netherlands, where the NAS is designed in a more directional way, Germany has had a more legally enshrined adaptation law since 2024 with binding measurable targets and an obligation to measure progress.

In summary, the main insights from the German DAS are the urgency of timely adaptation to climate change, the need for a comprehensive, cross-sectoral approach and a binding framework through the <u>Federal Climate Change Adaptation Act</u> (KanG). The plan also includes integrating climate adaptation into sectors such as infrastructure, health and the economy.



#### 4. The role of sustainability platforms to accelerate climate adaptation

There are several platforms focused on promoting sustainable finance, sharing knowledge and methods, and contributing to mobilising resources for climate adaptation. These platforms bring together governments, financial institutions and companies. Below we give an overview of the most important ones we encountered.

Platform	Founded by	Key members	Objectives (with regard to climate adaptation)
<u>Sustainable Finance</u> <u>Platform (PvDF)</u>	De Nederlandsche Bank (DNB), 2016	DNB, Ministries (Finance, I&W, LNV, EZK), Dutch Banking Association, Dutch Association of Insurers, Pension Federation, AFM, Invest-NL, Sustainable Finance Lab	Promote cooperation between the financial sector and the government to accelerate sustainable finance, including climate adaptation. Working groups (such as the <u>Climate</u> <u>Adaptation Working Group</u> ) focus on risk analysis, investment opportunities and policy coordination, among other things.
<u>EU Platform on</u> <u>Sustainable Finance</u>	European Commission	European Investment Bank, national regulators, NGOs, financial institutions, academics	Provide advice on the EU taxonomy and sustainable investment criteria. Promotes investments in climate adaptation through clear definitions and standards.
European Investment Bank (EIB) Climate Adaptation Platform	European Investment Bank	Member States, public and private investors, development banks	Financing and technical support for climate adaptation projects. Stimulates public-private partnerships through blended finance and project development.
European Climate Adaptation Platform (Climate-ADAPT)	European Environment Agency (EEA) and the European Commission	Member States, regional authorities, knowledge institutions	Knowledge sharing and policy coordination on climate adaptation. Supports decision- making and collaboration between public and private actors.
<u>InvestEU –</u> <u>Sustainable</u> Infrastructure Window	European Commission, EIB	National promotional banks, private investors	Mobilising investments in sustainable infrastructure, including climate adaptation. Focuses on risk sharing and co- financing.
<u>French Climate</u> <u>Adaptation Finance</u> <u>Platform</u>	French government and financial institutions	French financial institutions, public and private investors	Promoting climate adaptation and resilience by mobilising and aligning public and private investments.
<u>German Climate</u> <u>Adaptation Finance</u> <u>Platform</u>	German government and financial institutions	German financial institutions, public and private investors	Supporting climate adaptation projects through public and private partnerships and funding.



Platforms contribute to raising awareness and developing innovative financial solutions. However, there is no one-size-fits-all approach: Each platform has its own composition and governance.

The blog series '<u>National Platforms for Adaptation & Resilience Parts 1</u> and <u>2</u>' (CADLAS, 2025), explores these platforms further. A distinctive feature of national platforms is that they are set up on a country-by-country basis, with structures that vary depending on the national context and are designed to involve stakeholders in both leadership and supporting roles. As the demand for adaptation finance grows, the success of these platforms will depend on strong, inclusive partnerships and a clear emphasis on locally-led solutions. Strengthening national platforms is therefore crucial for scaling up adaptation finance and achieving climate-resilient development.



## In-depth 2 Interviews key points

For this study, we interviewed 36 individuals, 18 of whom were from the government (mainly NAS challenge leads) and 18 from the financial sector. See In-depth 4 for an overview. In these interviews, we asked the following three basic questions:

- What do you need from others for your challenge?
- What do you have to offer to others?
- Where do you see possibilities/opportunities to accelerate this?

In the dialogues we had, we further explored parts of the questions on the basis of the following questions:

- 1. In your opinion, where do you find the common ground between the 15 adaptation challenges of the NAS, the business community/the parties in the economy and the financial sector?
- 2. Where do you think cooperation in the field of communication is most promising, between governments, companies and financial institutions?
- 3. Is more needed in terms of policy and regulations? If so, what?
- 4. Public-private funding What funding need do you foresee for the adaptation challenge(s) you are working on/that is (are) important to you, and what part of this could possibly be met with public-private partnerships and with the contribution of private money?
- 5. Insurance solutions Do you also expect an extra demand for (and changes in) insurance solutions?
- 6. Investment by investors Is more money from institutional investors needed for investments in adaptation? For what and how much?
- 7. Do you also see common ground for sharing data and knowledge? And how can that be set up? Or is it already happening sufficiently?
- 8. What inspiration and potential acceleration and embedding of a public-private partnership with regard to working on climate resilience could the Dutch climate agreement and the associated Climate Commitment of financial institutions possibly offer?

#### Key messages from the interviews

The interviews with stakeholders from the financial sector and leads have provided both us and them with valuable insights into priorities and mutual expectations. This information helped inform the research and recommendations of the report. In our view, it also contributes to strengthening mutual collaboration.

The most important message the financial sector gave is that they *need consistent government policy* with regard to climate adaptation. The need for *clearer identification of roles and responsibilities* between government, business, citizens and financial institutions in taking climate resilience measures also became evident.

The main message from the NAS challenge leads is that this project *has provided valuable insight into the functioning of the financial sector* and the way in which this sector can *contribute to the climate adaptation challenges* within the National Climate Adaptation Strategy. It also provides insight into which preconditions from the government can help to make this contribution possible.

In addition, the interviews have shown that the *current objectives in the NAS are still quite abstract for financial institutions*, which makes the practical implementation in cooperation with customers difficult. More clarity on this would enable financial institutions to respond more targeted to the measures within the NAS, so that adaptation processes can be supported more effectively and efficiently for customers.

#### Below is a brief explanation of each topic:

- The scope: main goals and approach of the NAS per challenge.
- Expectations of stakeholders, financial institutions and companies about cooperation on climate adaptation and investing in resilience.
- What is needed to be able to properly fulfil one's own role/assignment/approach.
- Financial solutions that fit the measures/investments
- Opportunities for public-private partnerships and acceleration of climate resilience.
- Communication and action perspective of people and companies.
- Costs and benefits of climate adaptation. Affordability of measures and available resources.
- Risks, effectiveness and efficiency of measures.
- Impact analysis and exploration of approaches also per sector

#### The scope: main goals and approach of the NAS per challenge

On the basis of a summary overview of the 15 key challenges of the NAS and four clusters from the Climate Adaptation Working Group, we discussed the main goals and the approach in the interviews. The angle was different for each dialogue and we zoomed in on a particular challenge or sector. The interviews lasted an hour each.

#### Expectations of stakeholders, financial institutions and companies

During the dialogues, we reflected on different perspectives. A recurring theme is the clearer description of collaboration possibilities and division of roles. Financial institutions and businesses must consider local conditions and customers. The translation of the NAS into regional strategies may provide more guidance at a later stage.

Companies have to deal with more sustainability priorities, such as water and environmental risks. Organisations such as VNO-NCW and MKB-NL support their supporters and collect information from their members. In this regard, they were present at a number of the meetings of the Sustainable Finance Platform and NL AAA Climate-proof.



**Opportunity for follow-up** – In our view, there has been limited opportunity so far to engage with the business sectors and individual companies on these topics. We believe the coming months present a valuable window to initiate more discussions, ideally facilitated by the NAS and, for example, the Platform for Sustainable Finance.

#### What is needed to be able to properly fulfil one's own role/task

Each party we spoke to has different needs or can possibly handle certain things very well on their own. It is difficult to generalise this. However, several discussions revealed a strong ambition and a major task to make and keep the Netherlands climate-resilient, and that the available resources must align with this. On behalf of the Dutch industry, the financial institutions and VNO-NCW indicated that consistent and clear government policy is particularly important to them, clarity about the division of responsibilities, a certain degree of standardisation in data that is collected and requested, and a common picture of where the greatest risks lie. After all, if uncertainty arises about what the government will do, the division of responsibilities, which risks are significant and how big they are, there is a risk that companies, customers and citizens will drop out and say "then we will wait until this is clear".

#### Financial solutions that fit the measures/investments

We have explained the financial solutions as set out in the report of the Climate Adaptation Working Group. We mentioned examples of pilots in which government and business work together. We explored this further in the interviews. Furthermore, information is included on the website of Rijksdienst voor Ondernemend Nederland (RVO) and klimaatadaptatieportaal.nl as a reference.

#### **Opportunities for public-private collaboration**

Opportunities were seen in the field of joint communication, data sharing, cooperation in the field of risk analyses and an unambiguous interpretation of, for example, flood data or heat data. (Re)confirmation was given that a significant part of the investments and financing of climate resilience measures are public, both in terms of management/governance and in terms of financing. The government is in charge, but together we are looking for the proper involvement of the business community, citizens and financial institutions.

#### **Opportunity for follow-up** – Pilots, gaining experience, sharing and disseminating lessons.

#### Affordability of measures and available resources

Affordability and the relationship between ambitions and resources were mentioned several times. We want to achieve a lot, but are the resources available? How can everyone participate, especially those who have to but cannot? How do you make it affordable for them as well? What are the costs of doing too little or acting too late? How do we achieve a fair cost-benefit distribution? The idea that climate adaptation is expensive and only pays off in the long term is incorrect. Good urban planning principles and climate-adaptive measures are needed to keep things affordable. The 'insurance gap' and the question of whether buildings in certain areas, such as outside the dikes, could be insurable under certain conditions and therefore also more financeable, were also discussed.



#### **Risks, effectiveness and efficiency of measures**

In the interviews, more detail was given about the risks and the measures that will be included in the National Climate Adaptation Strategy. In addition, we discussed risks for individual companies and specific areas. Suggestions have been made about reports that can serve as a source for possible follow-up discussions about this.

#### Communication and action perspective of people and companies

Climate change means something different to citizens than it does to companies, with differences in knowledge, attitudes and behaviour. The ministry prepares communication for different target groups, and good communication is considered important by everyone. Awareness of future risks is not as high as desired, even at Seveso companies, where risk awareness is usually already higher. When communicating about climate risks and taking measures, it is important that this is in line with the knowledge of the recipient and receptivity to this information. In addition, he must also be able to do something with it.

The financial institutions and VNO NCW that we spoke to about this see a directing role and an initiative role in the government and, for example, in the municipalities. However, financial institutions may be able to support this with their own communication. The basic level of knowledge about climate risks and what you can do about them is generally limited.

**Opportunity for follow-up** – A pragmatic proposal is to coordinate communication around the NAS more between the government and the business community, parties such as the Homeowners' Association and financial institutions from 2026 onwards.

#### Making impact analysis and exploration of approaches per sector

Impact analyses provide a detailed and relevant picture for specific sectors. Agriculture and housing/built environment have already been chosen as sectors in the NAS. What about other sectors? Translating the NAS into what this means for them and what is expected of that sector is important.

In the interviews it became clear that choosing sectoral examples can help with the recognition of the problem and making examples more concrete of what can be done about it. It can be added that the desk study also mentions examples of sectoral approaches, in the description of national adaptation strategies of other European member states.

**Opportunity for follow-up** – We recommend to elaborate this for all sectors, together with the sector organisations.



# In-depth 3 Working session key points

On 21 May, we organised a working session with 35 representatives of the adaptation challenges and the financial sector (see participants in In-depth 4). We list a number of key points below.

Aim of the working session – To test and supplement the results of analysis, and to increase collaboration between stakeholders to strengthen joint efforts for climate adaptation.

**Introduction to the NAS** – The NAS challenge leads will each define a chapter, and there will also be an overarching chapter on governance and financing.



Figure: Overview of the fifteen challenges and the five priorities of the Dutch NAS. Source: <u>National Climate</u> <u>Adaptation Plan (NAP'23)</u>

**Interest of the financial sector** – The impact of climate change, such as the impact of drought on farmers, is already there. This impact also affects insurers and banks. The major challenge of climate adaptation and investing in resilience in the Netherlands requires collaboration between two major players: government and financial sector. A representative of an insurer expressed the hope on behalf of the financial sector that this will be faster by better aligning rules, policies and implementation. The financial sector can strengthen this process of economic change through its role.

**Explanation of draft findings and plenary reflection** – After a brief explanation of the findings so far, as elaborated in the main report, a number of insights were further discussed in the working session:

• **Consistent government policy** – Focussing on consistent and strong government policies, regulation and subsidies. And with special attention to vulnerable groups.

- National funds for climate adaptation These funds can be developed and used as a possible instrument.
- Inclusive and just approach Supporting vulnerable groups and sectors is important, but the exact approach has not yet been fully developed. The 'Climate-resilient housing for all' challenge is already working on this. In addition, a Social Impact Analysis is carried out for the NAS as a whole.
- Water indicator A 'Water Indicator' is being investigated, on the initiative of the Ministry of Infrastructure and Water Management. Several participants also indicated that they were interested in a broader label that covers more risks.
- Sectoral approach The national adaptation strategy is government policy, but requires broad sectoral cooperation outside the government. Financial institutions can seek affiliation, similar to the affiliation earlier with the national climate agreement. Shared responsibilities also make cooperation with the private sector essential.
- International perspective A look at how other countries do this:
  - The national strategy is in line with EU and UN frameworks and member states have their own plans. There is a lot to learn from each other.
  - Other countries are working on similar challenges.
  - While legislation is binding, voluntary agreements can also be effective.

#### Insights from in-depth exploration of 15 key challenges divided into 5 subgroups

- *Climate adaptation in housing taxation:* Houses run the risk of becoming unsellable if no action is taken. While gradual adoption is important, financial incentives are crucial to facilitate the necessary changes.
- *Standards for climate-resilient new construction:* Establishing clear achievable standards can accelerate mainstream adoption and prevention, especially if financial institutions support it.
- Data: Clear, accessible data is essential.
- *Collaboration*: Involve industry organisations more; apply no-regret measures such as with the energy transition.
- *Infrastructure or utilities*: In order to accelerate infrastructure projects with limited budgets, the government can link them to other challenges and possibly also explore public-private forms, such as the example of reinforcing the Afsluitdijk.

#### Plenary general insights and conclusion

- The financial sector is showing willingness to contribute.
- There is a shared interest, but there is a need for clarity on the role of the financial sector: direct financing versus financial and other instruments.
- Collaboration enhances better communication and facilitates shared solutions.
- There is a need for concrete goals and consistent government policy; the NAS aims to provide structure in this.
- Climate adaptation is a chain, from infrastructure to insurance, and all parts are important.
- There is a commitment to work together more structurally after the adoption of the NAS.
- There is a need for the private sector to be (more) involved in decision-making; such as by inviting to discussions industry associations.



# In-depth 4 Stakeholders consulted

Below we give an overview of the people we have spoken to in individual interviews or in the joint working session. In addition, we received input via email.

#### **Ministries**

Organisation	NAS key challenge	Interview	Working session	Only by mail
Min I&W	Well-protected against sea level rise	$\checkmark$	√	
Min I&W	Well-protected against flooding	√	✓	
Min I&W	Future-proof freshwater supply		√	
Min I&W	Good water quality			✓
Min LVVN	Climate resilient agriculture	√	√	
Min LVVN	Climate resilient nature	✓		
Min I&W	Well-protected hazardous industries	✓	√	
Min VRO	Heatproof cities	~		
Min VWS	Heatproof cities/Staying healthy in times of climate change	√	~	
Min OCW	Well-protected cultural heritage			✓
Min VRO	Green climate-adaptive new developments	$\checkmark$		
Min VRO	Climate-resilient housing for all	√	√	
Min VRO	Green and healthy working landscapes	√	√	
Min EZ	Industry	✓	√	
Min I&W	Strong and resilient infrastructure; Financial sector	√	√	
Min I&W	Strong and resilient infrastructure	✓	√	
Min I&W/ Deltares	Strong and resilient infrastructure	√	~	
Min EZ	Utilities	~		
Min I&W	Caribbean Netherlands	~		
Min I&W	Caribbean Netherlands		√	
Min I&W	International	✓		



# Financial sector and other stakeholders (largely Working Group on Climate Adaptation)

Name	Organisation	WG Climate Adaptation cluster or otherwise	Interview	Working session	Only by mail
Henrik Fliflet	ABN AMRO	Former member of Housing cluster		~	
Christiaan Schreuder	ABN AMRO	Former member of Housing cluster		✓	
Josephine Jessen	ABN AMRO	Housing cluster	$\checkmark$		
Paul Heemskerk	ABN AMRO	NVB project group Foundation/Climate Risks	√		
Patrick Wijsman	ABN AMRO	Housing cluster			$\checkmark$
Patricia Alblas	Achmea Bank	Housing cluster	$\checkmark$	✓	
Gijs Kloek	Achmea	Core group, Data cluster	√	✓	
Gerard van Noordenburg	Agriver	Business cluster		✓	
Esther Egeter	a.s.r.	Data cluster	√	√	
Martijn van Gelderen	BPD	Housing cluster			√
Iwona Hillebrandt	ING	Housing cluster	$\checkmark$		
Jan van der Doelen	ING	Business cluster	$\checkmark$		
Emy de Kock	Interpolis	Business cluster	$\checkmark$		
Manon Schouten- Tolboom	Interpolis	Business cluster		~	
Kees-Jan van Henten	NHG	Housing cluster		<b>√</b>	
Erik Koldewijn	NN Bank	Housing cluster		<b>√</b>	
Marieke Beugel	Nationale- Nederlanden	Business cluster	~		
Nynke Vries	NVB	Coordination group			~
Ninette Giphart	NVB	Housing cluster and NVB Working Group Housing	~	~	
Tim Segboer	NWB Bank				~
Hielke van der Aa	NWB Bank	Data cluster			✓
Jennifer Willems	Rabobank	Business cluster	$\checkmark$		
Vincent van Dongen	Rabobank	Housing cluster	$\checkmark$		
Jan-Willem Vogels	Rabobank	Business cluster	√		
Thomas Dekker	SVn	Business cluster	√	✓	
Harold Hendriks	Univé	Business cluster	√	√	
Hans Rietveld	Dutch Association of Insurers	Housing cluster		~	
Vylon Ooms	Dutch Association of Insurers	Coordination group		√	
Willem van Toor	VNO-NCW		√		

