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Climate change adaptation laws and policies

A review of trends, gaps and opportunities in 35 countries

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Policy report

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Summary

Climate change impacts are intensifying, yet adaptation efforts are not keeping pace with the scale and urgency of emerging risks. Closing this gap requires strong domestic legal and policy frameworks to translate international adaptation commitments made under the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris Agreement into action and to provide an enabling environment for implementation. This includes mobilising and allocating finance, institutionalising adaptation into public and private decision-making, and integrating adaptation into countries' broader development priorities. But a lack of global analysis, tracking the evolution of these laws and policies over time, has hampered the ability to assess progress, identify gaps and best practices, and understand how legal and policy frameworks can support scalable adaptation implementation.

This report aims to expand the knowledge base on adaptation-relevant laws and policies. It identifies and analyses 902 of these laws and policies over time across 35 countries representing diverse regions, socioeconomic contexts and levels of exposure to climate risks. The analysis complements assessments by supranational institutions, including the United Nations Environment Programme (UNEP) and the UNFCCC.

The analysis shows that the pace of policymaking on adaptation has accelerated in recent years: 75% of adaptation-relevant laws and policies have been adopted since the Paris Agreement in 2015, and 46% since 2020. In 60% of identified documents, adaptation and related concepts (including resilience and disaster risk management) are predominant. However, the rapid growth in volume of laws and policies does not, on its own, signify whether and how adaptation actions are being prioritised.

This is a timely study as countries recently agreed on a list of indicators to measure adaptation progress under the Global Goal on Adaptation (GGA). This long-awaited agreement was made at the 30th meeting of the Conference of the Parties to the UNFCCC (COP30) in Belém, Brazil, in November 2025. Countries were also called upon to triple adaptation funding by 2035. Agreeing on the indicators is an important milestone in the process initiated under the 2015 Paris Agreement, which established the GGA, as it facilitates assessment of global progress and accountability towards the 11 global adaptation targets under the Goal.

Overarching recommendations

Based on our analysis, we provide three main policy recommendations for legislators and policymakers around the world:

1. Foster a whole-of-government approach to adaptation and systematically invest in institutional coordination mechanisms, both horizontally and vertically.
2. Institutionalise adaptation within public financial management and fiscal policy frameworks.
3. Increase policy coherence and integration of adaptation across disaster risk management and development policy domains.

Key findings

Over time, among the 35 countries under examination, adaptation has become more explicit in overarching multi-sectoral climate change laws and policies, evolving with political priorities. The prominence of adaptation as a national objective is beginning to translate into laws and policies across adaptation-relevant sectors.

- We identify three waves in the framing of adaptation objectives: from an early mitigation-centred focus on emissions reduction, towards more explicitly emphasising vulnerability, to embedding adaptation within economic transitions and climate-resilient development.
- Between 2020 and 2024, more than 50% of the reviewed Nationally Determined Contributions (NDCs) had a high emphasis on adaptation. All these were submitted by Global South countries.
- Over one-third of sectoral laws and policies identified as relevant for adaptation are focused on environmental policy, including forestry and biodiversity protection.
- Agriculture and food, and infrastructure and transport each make up around 10% of adaptation-relevant sectoral laws and policies.
- However, there are very few national sectoral documents that specifically integrate adaptation with water security, human health and cultural heritage, areas included under the framework for the GGA.

Among the 35 countries, significant progress is also being made in legal and policy frameworks for national adaptation planning and risk assessment; however, compliance, regular updating and transparency on progress are lacking.

- Close to two-thirds of the countries have a legal requirement to produce a National Adaptation Plan and to conduct risk and vulnerability assessments.
- Eighteen of the countries have also enacted climate framework laws to guide and coordinate government action on adaptation.
- Progress reporting is a clear gap. Only about half of the countries have a legal requirement to publish reports assessing progress on adaptation, and even where such a requirement is in place, we find that close to half have not regularly published these reports.

Recommended actions: Effective governance of adaptation requires a cohesive approach stemming from strengthening legal frameworks, institutional coordination and capacity across national and subnational levels to ensure accountability, coherence and regular review of adaptation actions. Overarching adaptation plans can also be useful tools to help align sectoral policies with national objectives and clearly communicate responsibilities, progress and financing needs.

Since the Paris Agreement, a clear diversification of financial instruments is apparent in the 35 countries, from disaster risk relief towards mobilisation of private capital. Nonetheless, further progress can be made to better integrate climate adaptation into financial and economic planning frameworks.

- We identify 84 laws and policies, spanning 26 countries, specifically focused on integrating finance and investment into adaptation.
- Three key categories of policy objectives are emphasised: the central role of public finance; the need for governance frameworks to channel finance; and the importance of international climate finance.
- Within the sample, 75% of finance-related laws and policies have been introduced in Global South countries, many of which focus on linking domestic financial reforms with international financing mechanisms.

- Blended finance and green bonds represent more innovative financial mechanisms that are receiving growing attention.

Recommended actions: Adaptation finance should be anchored within domestic public financial management systems, including through systematic costing of adaptation measures, increasing the number of fiscal policies that recognise adaptation as a necessary investment in resilience, assessing budgeting frameworks, advancing taxonomies, and empowering Ministries of Finance with legal mandates to act on climate adaptation.

Adaptation and disaster risk management (DRM) are clearly interlinked processes, and it is crucial that both are considered as part of effective forward-looking risk management. Despite progress towards more comprehensive DRM approaches in the 35 countries, the linkage between adaptation and DRM is still lacking.

- Around half of the identified DRM laws and policies include hazard prevention, mitigation or reduction as part of their overarching goals.
- About one-quarter explicitly position resilience and vulnerability reduction as a core objective. However, the proportion of DRM laws and policies that meaningfully integrate climate adaptation remains consistently low.
- Most DRM laws and policies relevant to adaptation establish overarching frameworks, with only around 20% focused on specific hazards. Most of these focus on desertification, drought or flooding.

Recommended actions: DRM laws and policies should be systematically aligned with adaptation frameworks, including through embedding climate risk and vulnerability assessments into disaster risk planning, and developing both multi-hazard and hazard-specific laws and policies that explicitly link short-term risk management with long-term climate resilience, particularly for emerging risks like extreme heat.

There is evidence of increased mainstreaming of adaptation considerations in national economic development agendas within the 35 countries, particularly in those from the Global South. However, there is a shortfall in policies targeted at integrating adaptation with gender equity and social inclusion (GESI). This hinders alignment between goals for attaining climate resilience, poverty reduction, sustainable livelihoods and inclusive societies.

- We identify 78 development plans, spanning 30 countries, that incorporate some level of adaptation. Of these, 26 plans include adaptation at a significant level, all originating from 13 countries in the Global South.
- Around one-third of assessed development plans explicitly link adaptation to poverty reduction, inequality reduction or improvements in social wellbeing.
- However, only 13 of the 35 countries have at least one law or policy that explicitly integrates climate adaptation measures into GESI-focused plans.

Recommended actions: Governments should ensure that adaptation is integrated into national growth strategies, industrial policy and fiscal planning, and ensure that a gender-sensitive and intersectional approach is adopted in adaptation planning and implementation. This includes introducing laws and policies that consider how vulnerabilities to climate impacts are shaped by intersecting identities, including gender, race, socioeconomic status, age, disabilities and others.

1. Introduction

Climate change impacts are increasingly frequent and severe and the gap between adaptation finance needs and international adaptation finance flows remains large (UNEP, 2025). However, despite increasing urgency and attention to climate adaptation in both research and policy, there is a lack of comparative global analysis of national (domestic) adaptation legislation and policies.

Unlike climate mitigation — where responses such as carbon pricing, emission targets and renewable energy mandates have been widely tracked and analysed (Iacobuta et al., 2018; Eskander et al., 2024; Caucheteux et al., 2025) — adaptation laws and policies have received less systematic scrutiny. Empirical studies on the impact of climate legislation, particularly climate framework laws, have also focused mainly on advanced economies and mitigation actions (Averchenkova et al., 2024). Previous academic research on adaptation policy has focused more on national and local adaptation planning, monitoring and assessment of progress, or barriers to implementation (Leiter, 2021; Lesnikowski et al., 2016; Lee et al., 2022; Reckien et al., 2023; 2025). There is little global research on adaptation laws, with some exceptions focused on specific hazards such as floods (Mehryar and Surminski, 2020) or specific countries or regions (e.g. Craig, 2022, for the US).

This report addresses the gap by examining how adaptation, disaster risk management and resilience are defined and operationalised across the national laws and policies of 35 countries. It contributes to the growing body of research that tracks and takes stock of adaptation legislation and policies globally (Nachmany et al., 2019; UNEP Adaptation Gap Reports). It highlights the diverse approaches taken to integrate adaptation into national legal frameworks, the sectoral focus of adaptation policies, key policy objectives, and the extent to which legal requirements for adaptation governance are already in place.

The report is intended to support policymakers, international institutions and stakeholders by providing independent, comparative evidence on national legislative and policy progress in implementing adaptation commitments under the Paris Agreement. It responds directly to the Global Stocktake and the UNEP Adaptation Gap Reports, complementing countries' self-reported information with systematic analysis of how adaptation laws and policies are defined, scoped and implemented across jurisdictions. It also enables benchmarking and baselining for adaptation efforts and strengthens the evidence base for policy dialogue, research and accountability.

Box 1.1. Data sources

Our primary source is the Climate Change Laws of the World Database. The database, although by no means fully comprehensive, represents one of the largest collections of national climate laws and policies in existence. It includes documents that are directly relevant to climate change mitigation, adaptation, loss and damage, and disaster risk management. Only documents introduced by national legislatures, national executive bodies, or the European Union equivalents are included. Drawing on the database as a starting point enables us to focus on laws and policies demonstrably motivated by climate change concerns, rather than, for example, emergency response or conservation policies in general.

We added documents to this dataset based on a desk review of relevant government or ministry websites, communications to the United Nations Framework Convention on Climate Change (UNFCCC), the IFRC Disaster Law Database, and where one is available for the relevant country, the most recent World Bank Country Climate and Development Report.

Our approach

It is challenging to identify all documents relevant to adaptation, as the subject covers a wide range of actions and processes that help societies adjust to the impacts of climate change. Adaptation is multi-sectoral and, compared to mitigation, difficult to track, with relative

'fuzziness' or conceptual ambiguity as a policy area (Leiter and Pringle, 2018; Ford and Berrang-Ford, 2016). The laws and policies in our dataset were identified by the research team, which reviewed each document for its relevance to adaptation, disaster risk management or resilience. See Box 1.1 for our data sources, Box 1.2 for our definitions and the Appendix for our identification and review process.

Box 1.2. Definitions of the concepts used in this report

Adaptation: In human systems, the process of adjustment to actual or expected climate change and its effects, to moderate harm or exploit beneficial opportunities (IPCC, 2022). We include DRM and resilience-related laws and policies within our scope for reviewing and identifying adaptation-relevant documents, given their interlinkages with adaptation and their frequent interchangeable use in policy contexts.

Disaster risk management (DRM): The application of policies, strategies and other measures to prevent new disaster risk, reduce existing disaster risk and manage residual risk (through disaster preparedness, response and recovery), thereby contributing to the strengthening of resilience and reduction of disaster losses (IFRC, 2024).

Disaster risk reduction (DRR): This is the policy objective of DRM — i.e. prevention of new disaster risk, reduction of existing disaster risk and management of residual risk (IFRC, 2024).

In this report, we use the term '**DRM laws and policies**' to refer to laws and policies related to DRR, preparedness, response and recovery, as it relates to *climate change*.

Resilience: The capacity to prepare for, respond to, and recover from the impacts of hazardous climatic events while incurring minimal damage to societal wellbeing, the economy and the environment (Mehryar, 2022; adapted from IPCC, 2022).

Laws: Documents that have been approved by the national legislature.

Policies: Documents that have been approved by a national-level executive decision-making body (e.g. strategies and plans), and/or set out a current governmental policy objective or set of policy objectives.

Best efforts were made to locate adaptation-relevant measures, but we recognise that this report may not capture countries' full regulatory responses to adaptation, and the data is likely less comprehensive for documents where 'adaptation', 'resilience' or 'disaster risk reduction/management' (or similar search terms) are not explicitly mentioned. Our understanding of relevance to adaptation draws on the work and progress of adaptation experts across academic and policy spheres (see Box 1.3).

Importantly, not all documents place the same level of emphasis on adaptation. For comprehensiveness, we have included documents that include *any* policy objective or measures relevant to adaptation, DRM, or resilience, and where relevant in the analysis of this report, we distinguish between low- and high-relevance documents. More detail on this is included in the Appendix.

Our main objective is to understand the status of domestic adaptation governance and policy, rather than reporting under the UNFCCC and the Paris Agreement. Thus, while we refer to party submissions to the UNFCCC (e.g. biennial transparency reports, national communications and adaptation communications) to identify and collect relevant adaptation laws and policies, these submissions are excluded from the numerical count of countries' national laws and policies. However, we have included National Adaptation Plans (NAPs) and Nationally Determined Contributions (NDCs), given their role in setting the direction of national adaptation policy and communicating national priorities to climate change.

We acknowledge that our dataset has limitations. It is limited to legislation and policy introduced by national legislatures and executive bodies. While national-level analysis provides useful insight

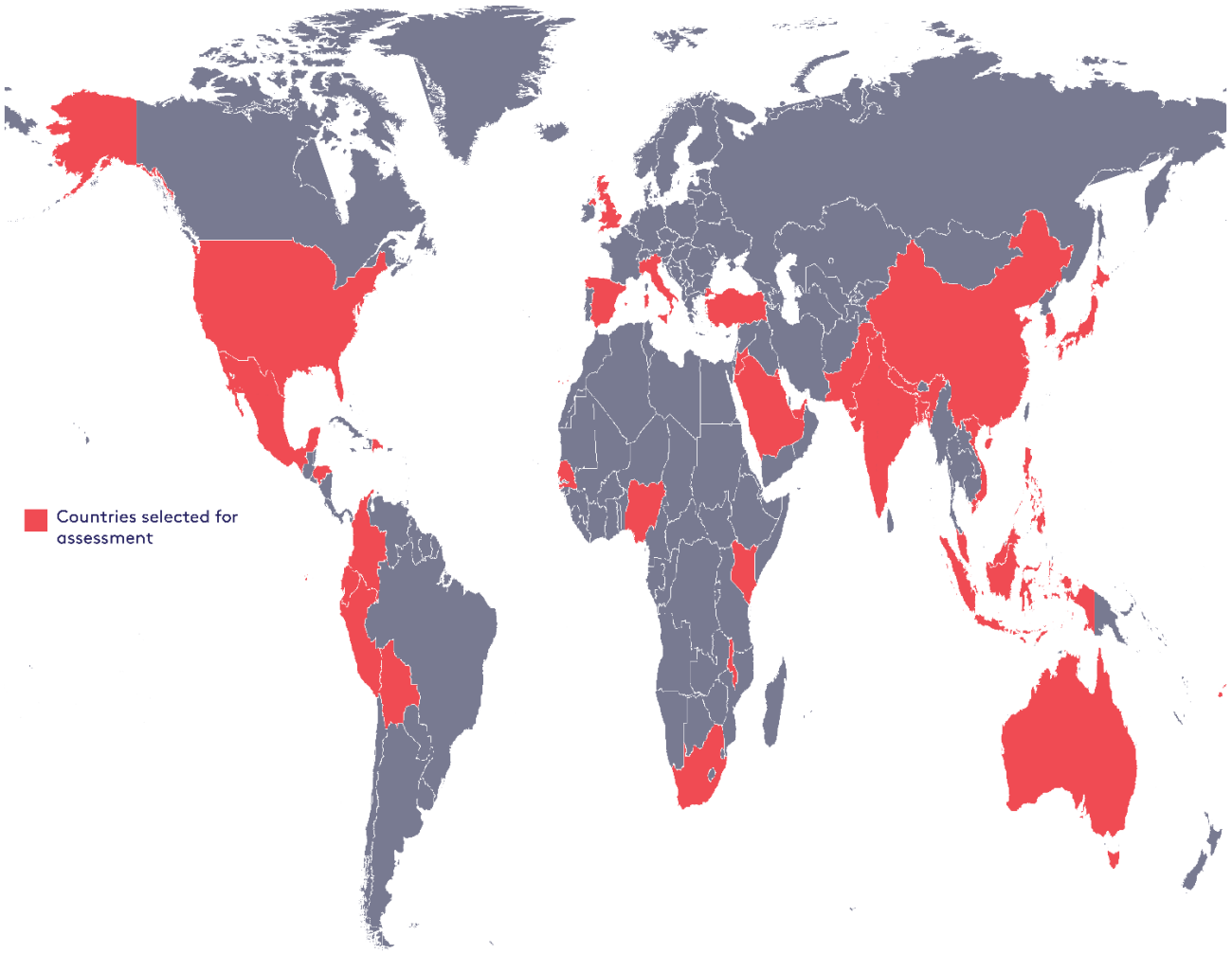
into a country's adaptation priorities and governance approaches, important adaptation measures occurring at the local level may not be reflected in this report. We have also not focused on analysing loss and damage (L&D) laws and policies and identifying where they are distinct from adaptation. L&D has been referred to as the "limits of adaptation" (McNamara and Jackson, 2018: 2), but in practice, adaptation measures can also address L&D. See the Appendix for further details on the limitations of this report.

Countries covered by the assessment

The report covers 35 countries: Australia, Bangladesh, Barbados, Bolivia, China, Colombia, the Dominican Republic, Ecuador, Fiji, Honduras, India, Indonesia, Italy, Japan, Jordan, Kenya, Kuwait, Malawi, Malaysia, Mexico, Nepal, Nigeria, Pakistan, Peru, the Philippines, Saudi Arabia, Senegal, South Africa, South Korea, Spain, Turkey, the United Arab Emirates, the United Kingdom, the United States and Vietnam (see Figure 1.1).

The study countries are distributed across the following geographical regions: East Asia and the Pacific (9), South Asia (4), Europe and Central Asia (4), the Middle East (4), Latin America and the Caribbean (8), Sub-Saharan Africa (5) and North America (1).

Figure 1.1. Countries selected for assessment



Source: Authors

We selected these countries as they represent the diversity of adaptation governance across geographical regions, income groups, vulnerability to physical climate impacts, exposure to different types of climate hazards and disasters, negotiating groups in the UNFCCC process, and

federal or unitary political systems. Table A1 in the Appendix sets out the classification of countries across these characteristics. Given our focus on adaptation and vulnerability, we cover a larger proportion of Global South countries (28 out of 35), compared to the Global North (7 countries).[1]

The use of the term 'Global South' is based broadly on economic inequalities and socioeconomic and historical contexts. We recognise that this is not a homogeneous group of countries and that the term itself is contested and subject to interpretation. While it risks oversimplifying the diversity within each group, we adopt it to recognise and emphasise how climate adaptation and vulnerability to climate risk and impacts are highly correlated to historical and contemporary patterns of wealth and power.

Box 1.3. Initiatives for understanding progress on climate adaptation

The report complements existing initiatives and previous research seeking to understand progress on adaptation actions across state and non-state actors.

- IPCC assessments: The Intergovernmental Panel on Climate Change (IPCC) is the most authoritative international source on the causes and potential consequences of climate change. IPCC Working Group II assesses the vulnerability of socioeconomic and natural systems to climate change, its impacts, and the options for adapting to it. The next cycle, the Seventh Assessment Report, is expected to be published between 2028 and 2029.
- Global progress on adaptation: The UN Environment Programme (UNEP) publishes the annual 'Adaptation Gap Report', which provides independent assessments on progress made globally on adaptation planning, financing and implementation. The Secretariat of the UNFCCC, Subsidiary Body for Implementation, also publishes annual reports on progress in formulating and implementing National Adaptation Plans (NAPs).
- Country assessments to facilitate climate finance: The Assessing Sovereign Climate-related Opportunities and Risks (ASCOR) Project is an investor-led project, providing an independent tool and indicators to assess how countries are managing the transition and the impacts of climate change (Scheer et al., 2025).
- National progress reports: Countries may compile their own progress reports on the implementation of adaptation actions (Leiter, 2021). In some countries, these are prepared by expert advisory bodies with legal mandates to regularly assess and report on the government's published adaptation programmes. For example, in April 2025, the UK Climate Change Committee published its independent assessment of the UK's Third National Adaptation Programme.

Structure of the report

- Section 2 provides an overview of global trends and key developments across adaptation laws and policies over time.
- Section 3 concludes and provides recommendations with specific actionable guidance — connecting our findings to the broader debate on adaptation at the international and local levels.
- The Appendix details the methodology. For a list of adaptation-relevant laws and policies reviewed for this report, please see the separate Annex.

[1] The distinction between 'Global South' and 'Global North' is based on economic inequalities. The term and inclusion of countries in each group are contested. We use the list of G77 countries and China to determine if a country is in the Global South.

2. Key trends in adaptation laws and policies over time

All 902 national laws and policies identified across the 35 countries in this study were introduced between 1982 and 2025 (see Figure 2.1) and display substantial diversity in the extent to which they refer to adaptation. Figure 2.2 summarises the types of adaptation-relevant laws and policies identified, while Figure 2.3 provides an overview of the types of sectoral laws and policies with adaptation relevance.

Below, we draw key insights from this data covering the growth, diversification and evolution of adaptation-relevant laws and policies, with particular emphasis on trends in national adaptation planning, finance, governance and integration with disaster risk management and development planning.

Our analysis covers all adaptation-relevant documents (low, medium and high relevance) from the 35 countries in the study unless otherwise noted. A sectoral law or policy with one provision relevant to adaptation may still have a significant impact on progress towards adaptation. For example, the predominant focus of a planning law may not be on adaptation, however it may contain important provisions, such as requiring developers to conduct climate risk assessments for new infrastructure projects.

A. Growth and diversification of national adaptation-relevant laws and policies

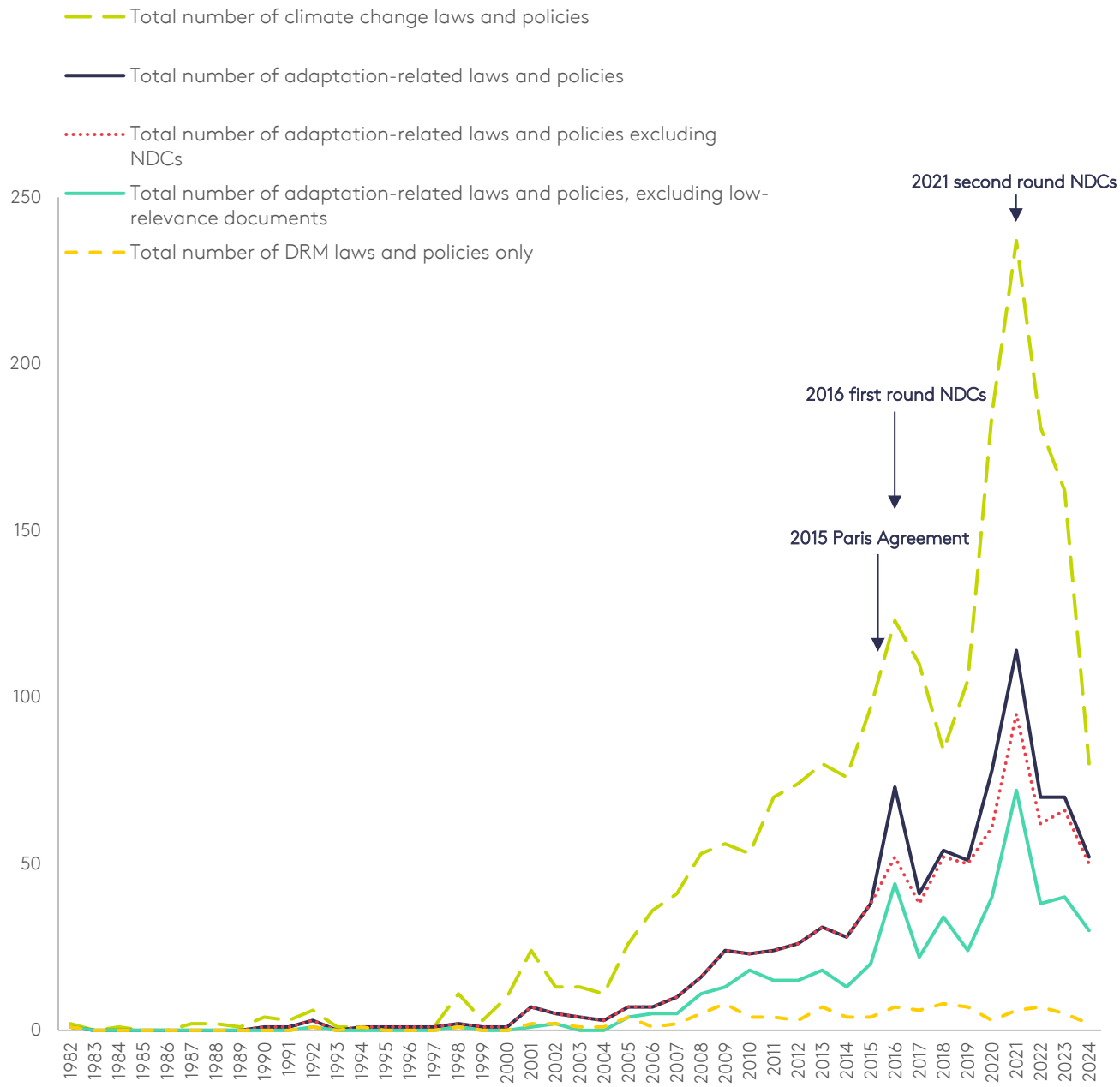
Rapid growth in adaptation-relevant laws and policies since 2015

Seventy-five per cent of all the adaptation laws and policies have been introduced since 2015, the year the Paris Agreement was adopted, and the first time adaptation was placed on an equal footing with mitigation at the international level. Nearly half (46%) of all adaptation-relevant laws and policies have been introduced since 2020. Although the number of laws and policies introduced is not necessarily an indicator of effective climate action, this growth indicates a significant increase in policymakers' attention moving towards adaptation, disaster risk management and resilience.

Adaptation-relevant documents constitute close to half of the total climate change laws and policies recorded for the countries studied in the Climate Change Laws of the World database. However, the degree to which adaptation is considered varies significantly across documents. Approximately 40% of the identified documents have low relevance to adaptation, whereas around 60% consider adaptation, resilience or disaster risk management to a significant (high) level (see the Appendix for how we define degrees of relevance). This suggests that half of all climate change-related laws and policies across the countries analysed remain exclusively mitigation-focused and less than one-third recognise and address adaptation to a substantive degree.

The rapid growth of adaptation-relevant laws and policies replicates the trend of climate change laws and policies overall (i.e. including mitigation-related documents) introduced over this period. This pattern likely reflects the increase in climate policy overall after the adoption of the Paris Agreement, under which adaptation was formally recognised as a key priority, marking a shift from the UNFCCC where adaptation received less explicit legal and policy emphasis (Schipper, 2006). Ratifying, then developing, approving and enacting laws and policies to implement the goals of the Paris Agreement requires time. As shown in Figure 2.1, the number of DRM-specific laws and policies (although relevant to climate adaptation) has remained relatively stable over time.

Figure 2.1. Number of national adaptation laws and policies between 1982 and 2024



Note: To avoid bias towards complete calendar years, we have excluded 2025 from the figure. NDCs = Nationally Determined Contributions. DRM = disaster risk management.

Source: Authors

A significant number of laws and policies were introduced in 2016 and 2021

The peaks in 2016 and 2021 of adaptation-relevant laws and policies stem partly from the cycle for submission of NDCs and five-year planning cycles. As shown in Figure 2.1, excluding NDCs still shows a peak in both years, although notably less sharp. Our dataset includes regular publication of socioeconomic development plans (where relevant to adaptation), for example Bangladesh's Eighth Five Year Plan, as well as sector-specific climate plans like Jordan's Green Growth National Action Plans in each of its agriculture, tourism, waste, transport, energy and water sectors. We analyse development plans in further detail below.

Part of the peak in 2021 specifically relates to the US — which was the source of just under 25% of the documents in this year. In 2021 the head of each federal agency was required, in accordance

with Executive Order 14008 introduced by former President Biden at the beginning of his administration, to publish a climate action plan setting out steps the agency could take within its operations to strengthen adaptation and increase resilience to the impacts of climate change. This Executive Order and the related plans were revoked under the second Trump administration and are no longer in force (see Executive Order 14148). Political will is crucial for making progress on adaptation.

Adaptation-relevant laws and policies encompass a wide range of document types, topics and sectors. While introduction and agreement on adaptation themes, targets and indicators are relatively new at the international level, we see an increasing number of domestic sectoral laws and policies across several of these areas, particularly ecosystem and biodiversity, agriculture, infrastructure and poverty alleviation.

Adaptation-relevant laws and policies range from national adaptation plans, strategies, policies or laws which are specifically and comprehensively focused on adaptation, to sectoral laws that include only one provision relevant to adaptation (see Figure 2.2). For example, Resolution No. 40590 issued under Colombia's Legislation on Electric Power Generation Projects primarily establishes a mechanism for long-term electricity generation contracts; however, it also sets a goal to strengthen the resilience of the grid to climate change impacts.

Across the spectrum of adaptation-relevant laws and policies, the most prevalent policy objectives include pursuing sustainable development and livelihoods; strengthening national climate adaptation planning, implementation and evaluation; and ecosystem and biodiversity protection. This indicates that the countries are tackling adaptation both as a climate issue and as a broader environmental, sustainability and development issue. See the Appendix for our methodology for identifying objectives.

These overarching objectives are broadly aligned with the core aims of the Global Goal on Adaptation (GGA). Under Article 7 of the Paris Agreement, the GGA is established to enhance adaptive capacity, strengthen resilience and reduce vulnerability to climate change, "with a view to contributing to sustainable development and ensuring an adequate adaptation response in the context of the temperature goal". At the 28th meeting of the Conference of the Parties (COP28) in Dubai, UAE, in 2023, countries established four global targets around the adaptation policy cycle, covering: impact, vulnerability and risk assessment; planning; implementation; and monitoring, evaluation and learning, and seven thematic targets as the UAE Framework for Global Climate Resilience, covering: water security; food security and agriculture; human health; ecosystem and biodiversity; infrastructure; poverty and livelihoods; and cultural heritage. Indicators were subsequently agreed at COP30 in November 2025, the 'Belém Adaptation Indicators', which were intended to measure progress towards these 11 targets under the GGA and organised under each of these areas.

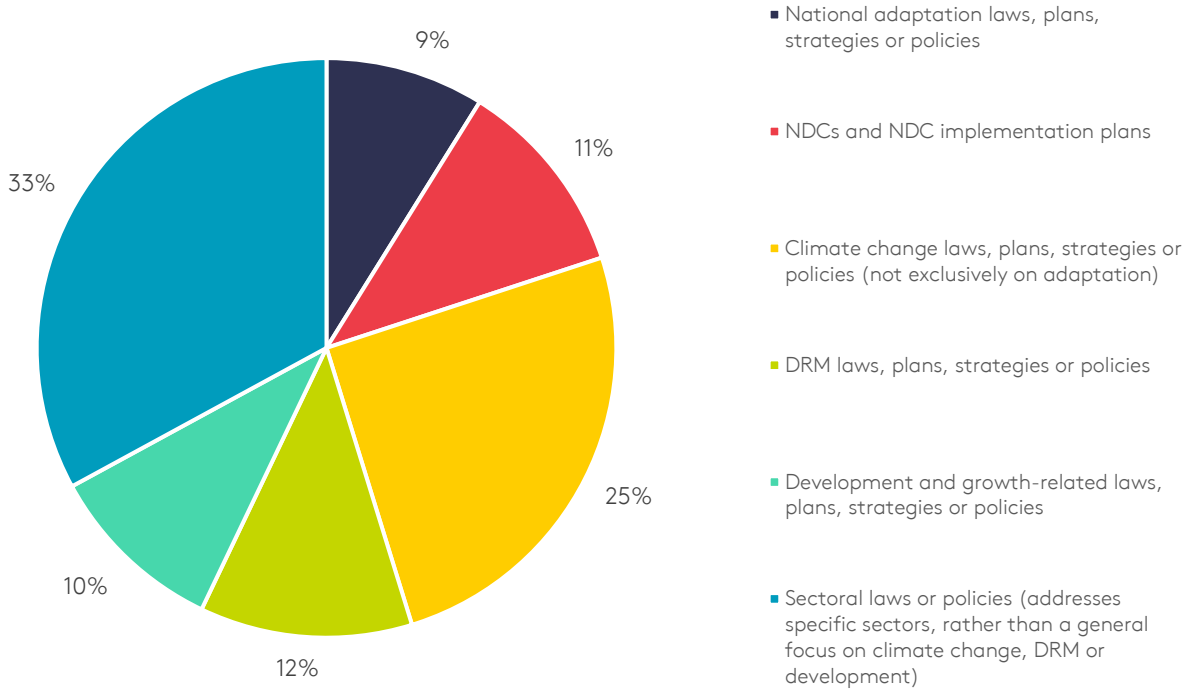
Although the GGA themes, targets and indicators have only been adopted recently, domestic adaptation-relevant laws and policies already exist across some of these areas. On poverty alleviation, for example, we identify increased mainstreaming of adaptation in socioeconomic development policies — see Section E. We also identify a significant number of adaptation finance-related laws and policies and discuss these in detail in Section C. Costing of sectoral adaptation measures is important for planning and financing. Research published in 2025 found that the disclosure of adaptation finance needs and costed measures in biennial transparency reports are so far concentrated in agriculture, water and sanitation (Hizliok et al., 2025).

Among identified sectoral laws and policies — defined as documents targeting one specific sector rather than having a general focus on climate change, DRM or development — over one-third are focused on establishing cross-cutting environmental frameworks or protecting terrestrial and freshwater ecosystems (see Figure 2.3). Thirty out of the 35 countries have at least one law or policy in this category — spanning framework environmental legislation (e.g. Mexico's Law on General Ecological Balance and Protection of the Environment), laws targeting specific resources (e.g. Peru's Forestry and Wildlife Law or China's Qinghai-Tibet Plateau Ecological Protection Law), forestry policies (e.g. Nepal's Forestry Sector Strategy 2016–2025), and biodiversity strategies (e.g.

the Philippines' Expanded National Integrated Protected Areas System Act). A small proportion of sectoral laws and policies specifically focus on marine and coastal protection (e.g. Vietnam's Decree 119/2016/ND-CP and PM Decision 120/2015 on Sustainable Management, Protection and Development of Coastal Forests).

Agriculture and food, and infrastructure and transport each make up around 10% of adaptation-relevant sectoral laws and policies. However, while we find some examples of agricultural policies with high relevance to adaptation priorities (e.g. Nepal's Agriculture Development Strategy 2015–2035, Jordan's National Strategy for Agricultural Development 2016–2025, and Kenya's Agricultural Sector Transformation and Growth Strategy 2019–2029), close to 60% of these sectoral documents only consider adaptation to a low degree of relevance. We find a small percentage (around 6%) of sectoral policies on water security, with more recent policies notably targeted towards the themes under the UAE Framework, for example Peru's Roadmap to a Circular Economy in Water and Sanitation by 2030, published in 2024. However, we find very few sectoral documents specifically about human health and cultural heritage.

Figure 2.2. Types of national adaptation-relevant laws and policies overall, 1982–2025 (see the Appendix for definitions)



Source: Authors

Figure 2.3. Sectoral laws and policies (not directly on climate change) with adaptation relevance — sorted by prevalence

Source: Authors

Geographical distribution of adaptation-relevant laws and policies

Across assessed countries, Vietnam, Nepal, the UK, Spain and the US have the largest overall numbers of adaptation-relevant laws and policies (see Table 2.1). However, the number of documents alone may not reflect the extent to which adaptation is considered, nor signify effective implementation in practice. If we exclude low-relevance documents (based on only content review), Fiji becomes the fourth-largest country by number of documents — with the UK no longer positioned within the top 10. For high-relevance documents, Colombia and the Philippines are within the top five countries for the number of laws and policies. See the Appendix for our definition of degrees of relevance. If we isolate only national adaptation plans and strategies, most of the countries have a similar number of documents (except for the US, which published a NAP and sectoral adaptation plans from nine federal agencies in 2021, as discussed above).

Countries ultimately adopt diverse governance approaches, driven by their distinct legal cultures and socioeconomic and political circumstances (Sridhar et al., 2022), and adaptation itself is highly context-specific. Rather than focus on the volume of legislation or policy documents, it is crucial that progress in domestic adaptation action is focused on identifying and tracking measures across the iterative adaptation cycle and thematic areas, in accordance with national circumstances.

Table 2.1. Top 15 countries by total and high-relevance adaptation-relevant laws and policies

Top 15 countries: Total number of adaptation-relevant laws and policies	Top 15 countries: Number of high-relevance adaptation laws and policies
1. Vietnam	1. Vietnam
2. Nepal	2. Spain
3. United Kingdom	3. Colombia
4. Spain	4. Philippines
5. United States	5. United States
6. Bolivia	6. Bangladesh
7. Peru	7. Ecuador
8. Colombia	8. Fiji
9. Fiji	9. Nepal
10. Australia	10. Peru
11. Jordan	11. Jordan
12. Indonesia	12. Kenya
13. Philippines	13. Pakistan
14. Mexico	14. Australia
15. Bangladesh	15. Malawi

Source: Authors

B. Legal and policy frameworks for iterative adaptation cycles

The adaptation policy cycle is iterative, covering impact, vulnerability and risk assessments; planning; implementation; and monitoring and evaluation (UNFCCC, 2025).

We observe good progress in establishing legal frameworks for national adaptation planning and risk assessment; however, there are gaps in compliance, regular review and progress reporting.

A national adaptation planning instrument is a "catch-all term that covers policies, strategies and plans that are designed to guide/drive a country's national adaptation process" (UNEP, 2025). This includes NAPs directly submitted to the UNFCCC-hosted database but importantly can also refer to documents not formally submitted to this platform that may be named national adaptation strategy, roadmap or similar. In this report, we use 'national adaptation plan (NAP)' to refer to any strategy-setting document that provides a framework for coordinating national adaptation efforts, as well as action plans and programmes, that may be more implementation-oriented. For example, in addition to a National Adaptation Plan covering 2021–2050, Nepal has produced a framework for local adaptation action plans, an adaptation 'programme of action' and a tool for long-term climate-resilient planning.

Close to two-thirds (22 out of 35) of the countries assessed have a legal requirement to produce a NAP, out of which 18 have published at least one.[2] While the increase in national laws that mandate reporting has "promoted adaptation responses" across public agencies and non-state actors (IPCC, 2022), we also find six countries that have published a NAP despite not having an explicit domestic legal requirement to do so.[3] Altogether, three-quarters (26 out of 35) of all

[2] We identify legal requirements in: Colombia, Ecuador, Fiji, Honduras, Italy, Japan, Jordan, Kenya, Malawi, Mexico, Nepal, Nigeria, Pakistan, Peru, the Philippines, South Africa, South Korea, Spain, Turkey, the UAE, the UK and Vietnam.

[3] These are Australia, Bangladesh, China, the Dominican Republic, Indonesia and Kuwait.

countries assessed have developed and published NAPs.[4] Several of the countries have additionally published sectoral NAPs, with agricultural and health sector plans (five in each category) emerging as the most common.[5] This progress on national adaptation planning is mirrored at the global scale: the most recent UNEP Adaptation Gap Report 2025 found that 87% of country Parties to the UNFCCC have such a document in place. Nonetheless, as highlighted by UNEP (2025), regular updating of plans remains a gap. In our reviewed countries, we similarly only find two with a regular cycle of updates (South Korea and the UK), each with three plans published over five-year periods.

We also find some countries that have not yet published formal plans but have disclosed that they are in the process. Malawi and Nigeria both published frameworks in 2020 to guide the NAP process and Mexico disclosed that it began developing its NAP with support from the Green Climate Fund in May 2025 (Reyes, 2025). Similarly, we find reference to a draft UAE National Adaptation Action Plan in development. However, although the UAE's Federal Decree-Law No. (11) of 2024 on the Reduction of Climate Change Effects also requires ministries to develop and implement *sectoral* adaptation plans, none have so far been published.

Knowledge on risks, impacts and their consequences is crucial for identifying and designing effective adaptation responses (IPCC, 2022). Risk and vulnerability assessments (RVAs) should inform national adaptation planning and policies. We find 23 countries that have a legal requirement to develop an RVA — although the level of detail specified in the law around the process for developing and publishing the assessment varies.

For example, Australia's Climate Change Act 2022 includes a requirement to prepare an annual climate change statement within six months of the end of each financial year. While this statement must include information on "risks to Australia from climate change impacts", the law lacks detail on whether the statement is required to also assess future risks and vulnerabilities. By contrast, Spain's climate framework law explicitly requires the ministry responsible for climate change, in collaboration with other ministerial departments and the Autonomous Communities, to prepare and publish reports, at least every five years, on the evolution of the impacts and risks arising from climate change and on the policies and measures aimed at increasing resilience and reducing vulnerability to climate change in Spain. In practice, the form and level of detail of RVAs published by the countries are also diverse (Hizliok et al., 2025). The majority of assessed countries with a legal requirement to develop an RVA have published one; however, this spans from detailed assessments like Fiji's 2017 Climate and Vulnerability Assessment, which includes an appendix of 125 proposed interventions to address such risks, with costing and allocation of responsibility to relevant government agencies, to countries that incorporate their assessments into a section of their national communications to the UNFCCC (e.g. Malawi).[6]

However, the gap in the legal frameworks across the countries is largest when it comes to progress reporting. Only 19 have a legal requirement to prepare and publish reports assessing progress on adaptation. Out of the laws that specify the frequency of progress reporting, Honduras stands out by requiring the Interinstitutional Technical Committee on Climate Change to report every quarter on the progress of the Climate Change Adaptation Plan. Most laws require progress reporting either annually, or every two or five years. However, even where a legal requirement is in place, we find that close to half (including Honduras) have not regularly published these reports, indicating weak enforcement and accountability. This aligns with results from other independent assessments, which conclude that monitoring and evaluation on the implementation of adaptation policies remain relatively scarce and underutilised (Leiter, 2021;

[4] Countries with published NAPs: Australia, Bangladesh, China, Colombia, the Dominican Republic, Ecuador, Fiji, Honduras, Indonesia, Italy, Japan, Jordan, Kenya, Kuwait, Nepal, Pakistan, Peru, the Philippines, Senegal, South Africa, South Korea, Spain, Turkey, the UK, the US and Vietnam.

[5] The Dominican Republic, Japan, Nepal, Senegal and the US have NAPs for the agriculture sector and Bangladesh, China, Jordan, Nepal and South Africa have developed NAPs for the health sector.

[6] Out of the countries with legal requirements to produce an RVA, at the time of data collection we did not find evidence of a published document for the Dominican Republic, Nigeria, South Africa or the UAE.

Hizliok et al., 2025; IPCC, 2022). See Box 2.1 on the increasing use of litigation to address accountability gaps.

Box 2.1. Legal challenges to national adaptation laws and policies

Litigation can play an important role in challenging the absence of comprehensive national adaptation governance or, when necessary, highlighting the lack of compliance with existing legislation. Over 120 cases have been filed globally challenging either the ambition or implementation of government climate action (Setzer and Higham, 2025). While many challenges continue to focus on the ambition and progress on emissions reduction targets, a growing body of cases (around one-third) also target governments for failing to consider and take sufficient measures to address physical climate risks and impacts. These cases highlight the lack of adaptation action as a central issue and often rely heavily on evidencing the vulnerability of individuals to the impacts of climate change.

One of the earliest cases focused on adaptation was decided in 2015 (*Leghari v. Federation of Pakistan*), where a lawyer whose family owned a farm successfully challenged the government's failure to meet its adaptation objective. The Court ordered several government ministries to nominate a focal person to ensure implementation of the existing National Climate Change Policy and Framework, and to establish an advisory body composed of representatives of key ministries, nongovernmental organisations (NGOs) and experts to monitor the government's progress. More recently, an NGO and two individuals vulnerable to climate change challenged the UK's Third National Adaptation Programme, arguing that it is too vague and does not meet the legal requirements under the UK Climate Change Act of 2008. See *R (Friends of the Earth Ltd, Mr Kevin Jordan and Mr Doug Paulley) v. Secretary of State for Environment, Food & Rural Affairs*. Under the Act, the government must assess climate risks every five years and publish adaptation plans setting out objectives and policies to address such risks. Cases like these highlight the urgent need for clarity and consensus on benchmarks for adaptation action, and clear frameworks on how progress on adaptation can be measured and assessed.

Over time, adaptation has become more explicit in multi-sectoral climate change laws and policies, reflecting their function as narrative and direction-setting documents framed to suit domestic contexts and focus political attention.

Apart from NAPs, many of the countries also publish overarching multi-sectoral climate change strategies, action plans and roadmaps that integrate both mitigation and adaptation objectives. The explicit objectives of early climate laws and policies primarily focus on mitigation — establishing frameworks to comply with international obligations and accelerate low-carbon growth. These objectives, largely in early Global North climate instruments, prioritised reducing greenhouse gas emissions. Adaptation was less visible and framed as a secondary co-benefit. Policies commonly set out aims to reduce anthropogenic emissions (e.g. Italy's Climate Change Action Plan 2007), or to enhance competitiveness in climate-related sectors (e.g. Spain's Plan to Promote the Internationalisation of the Spanish Economy in Sectors Associated with Climate Change 2009).

However, as climate impacts intensified and vulnerabilities became more visible, more explicit adaptation policy objectives emerged — illustrating a shift towards a more socially grounded understanding of adaptation. This second wave, largely in the mid to late-2010s, contains objectives for resilience, prioritising human security, social equity and ecosystem protection. This is particularly prominent in climate-vulnerable countries, where policies explicitly reference strengthening agricultural resilience (e.g. Kenya's Climate Smart Agriculture Strategy 2017–2026), safeguarding water and health systems (e.g. Fiji's Climate Change and Health Strategic Action Plan 2016), or advancing gender-responsive climate action and protecting Indigenous and marginalised communities (e.g. Peru's Action Plan on Gender and Climate Change). In parallel, as discussed above, we see a rapid rise in climate framework laws establishing governance mechanisms to tackle both mitigation and adaptation.

More recently, as impacts of the climate crisis intensify and it remains clear that collective mitigation efforts have not been enough (see e.g. the UNEP Emissions Gap Report 2021 and each report since), we observe adaptation being positioned as a core pillar of national economic security in many of the countries. This follows a shift overall in climate change laws and policies to establishing objectives on long-term economic transformation, often described through framings of just transition, green growth, clean energy and net zero transition. For example, Fiji's Climate Change Act 2021 links carbon targets with community relocation, ocean protection and climate-risk governance.

Likewise, net zero strategies in Spain, Italy, Japan, South Africa, Turkey, Indonesia and the UK outline whole-of-economy transitions that seek not only to decarbonise energy systems but also to safeguard workers, infrastructure and ecosystems from climate impacts. Jordan's National Climate Change Policy 2022–2050, which sets out a vision to pursue carbon neutrality while ensuring all sectors remain resilient, further illustrates this shift. These policies acknowledge that responding to climate change requires restructuring economies to be both low-carbon and climate-resilient, embedding adaptation into systems of governance, investment and societal wellbeing. Climate narratives that account for social impacts and are embedded in national laws and policy may be more likely to persist across successive governments (Sridhar et al., 2022).

Adaptation's increasing prominence among the 35 countries' priorities can also be observed in the evolution of NDCs. Under the Paris Agreement, every five years countries must submit NDCs which outline how they plan to reduce emissions and adapt to climate change impacts. There have been three rounds of NDC submissions so far: 2016, 2020 and 2025. In the first round, we only identify three NDCs (out of 35 countries) which considered adaptation to a significant extent: those of Ecuador, Malawi and South Africa. Between 2020 and 2024, however, more than 50% of NDCs studied were highly relevant to adaptation and set out national priorities for adaptation — all of which were from Global South countries. In 2025, we identify 10 out of 18 (55%) NDCs submitted by October (the cut-off date for our analysis) that strongly feature adaptation — again, all from countries in the Global South.

However, the prominence given to adaptation does not necessarily translate into systematic costing and disclosure of adaptation finance needs. Recent analysis shows that, among developing countries, 31 of 47 disclose costed mitigation needs, compared with 26 of 47 for adaptation, based on information reported through NDCs, NAPs and Biennial Transparency Reports (Hizliok et al., 2025). Despite contributing the least to climate change, the costs of adaptation in 2035 are estimated at approximately US$310–365 billion a year for all developing countries — of this total, the cost for least-developed countries and small island developing states is US$36.7 billion a year (UNEP, 2025). We discuss adaptation finance-related laws and policies further in Section C.

Eighteen out of the 35 countries analysed enacted climate framework laws at an increasing pace after the adoption of the Paris Agreement, helping mandate and coordinate institutional and governance action on adaptation. Two-thirds of these laws were enacted after 2015.[7]

As with overarching climate plans developed by an executive body, climate framework laws (passed by a legislature) set out the strategic direction of national climate change policy and often establish mechanisms for government coordination and transparency. They are multi-sectoral in scope and seek to provide a coherent legal basis for climate action in the relevant country (Higham et al., 2021). These laws help facilitate a whole-of-government response to climate change and drive accountability in climate action, for example, through requirements to create economy-wide plans or report on progress, or obligations on ministers to take climate

[7] Australia, Colombia, Fiji, Honduras, Japan, Jordan, Kenya, Mexico, Nigeria, Pakistan, Peru, the Philippines, South Africa, South Korea, Spain, Turkey, the UK and Vietnam.

change into account in the exercise of their functions or to consult independent experts and the public (Averchenkova et al., 2024).

Across the 35 countries reviewed, only one climate framework law was identified that exclusively targets adaptation (Japan's Climate Change Adaptation Act). Most of these laws establish one body to coordinate both adaptation and mitigation; however, legal frameworks for DRM are often created separately — out of these 18 countries, 10 also had overarching DRM laws (see further in Section D).[8] Pakistan is a unique example in our assessed countries where governance of adaptation, mitigation and DRM appears to be integrated across national and sub-national levels. Its Climate Change Act 2017 establishes a Climate Change Council, with a legal mandate to coordinate, supervise and guide mainstreaming of climate change in public decision-making; approve and monitor implementation of adaptation and mitigation policies, strategies, plans, programmes and projects (including provincial and local adaptation action plans), and approve guidelines for the protection of habitats and biodiversity adversely affected or threatened by climate change (see Articles 3 and 4). The Council serves as both an inter-ministerial coordination body and an institution for expert advice — the prime minister appoints representatives from industry, NGOs, academia and other experts to the Council. The chairman of the National Disaster Management Authority is also a permanent member of the Council.

However, not all countries adopt this integrated approach. Japan's Act on Promotion of Global Warming Countermeasures (on mitigation) establishes a Global Warming Countermeasures Promotion Headquarters, headed by the prime minister, to facilitate inter-ministerial coordination, whereas the Climate Change Adaptation Act identifies the existing Ministry of Environment to coordinate and prepare the NAP. This reflects the broader trend revealed in Section A that adaptation policy is being managed closely with ecosystem and biodiversity protection. This distinct approach to mitigation and adaptation planning is also evident in the relevant provisions seeking expert advice on policy development. Japan's Adaptation Act clearly requires the Minister of Environment to first hear the opinion of the Central Environment Council before preparing a report assessing climate change impacts. However, the mitigation-focused law does not explicitly require expert advice at specific stages in the policy cycle — it only refers to the government conducting and promoting research on emission reduction technologies.

Across climate framework laws more broadly, provisions embedding stakeholder engagement and consultation in policymaking remain weak (Averchenkova and Chan, 2023). A promising development, where stakeholder engagement is explicitly focused on the implementation of adaptation actions at the local level, is the Philippines' climate framework law, the Republic Act 9729 (as amended by Republic Act 10174). This Act establishes a climate fund — the People's Survival Fund — and for adaptation projects supported by the fund, the law explicitly allows for community representatives and NGOs to participate as observers in project identification and the monitoring and evaluation process of the Climate Change Commission (a national government agency attached to the Office of the President).

C. Evolution of domestic adaptation finance-related laws and policies

Accelerating public and private investment in adaptation is a key element of the broader efforts needed to reduce the impact of climate change. As shown throughout this report, the multi-sectoral nature of adaptation actions often means that policy instruments are spread across multiple policy documents. This fragmentation creates challenges for financial institutions to understand how different policies work together. At the domestic level, the number of laws and policies intensified sharply after 2010, corresponding with the post-Copenhagen (2009) and Paris Agreement (2015) eras.

[8] Colombia, Fiji, Japan, Pakistan, Peru, the Philippines, South Africa, South Korea, Turkey and Vietnam.

Recent COP discussions have started to shift the framing of NDCs and NAPs from planning documents to instruments that help mobilise and structure finance, particularly through disclosing more systematic costing of adaptation measures (UNFCCC, 2023). Under the Paris Agreement, developing country Parties are mandated to identify and communicate adaptation needs and associated support requirements.

Analysis of domestic adaptation finance-related laws and policies over time indicate a gradual shift from planning to implementation post-Paris that requires costed adaptation priorities, integration of adaptation into public financial management, access to domestic, private and international capital, and systems to track adaptation-relevant expenditure.

We identify 84 laws and policies, spanning 26 countries, specifically focused on finance and investment in adaptation — transitioning from disaster risk relief to mobilisation of private capital.[9] Two-thirds of these are from Global South countries, many of which focus on linking domestic financial reforms with international financing mechanisms, such as accreditation to multilateral climate funds or frameworks to mobilise blended finance. Over time, we find a clear diversification of financial instruments:

- **Before 2010**, finance-related legal frameworks, statutes and regulations establishing the rules, institutions and instruments through which finance is authorised, raised and disbursed are predominantly risk transfer and relief instruments like the Barbados Catastrophe Fund Act (2007) and the Philippines Disaster Risk Reduction and Management Act (2010) that promote post-disaster liquidity. However, already in 2010, there is evidence of countries establishing dedicated trust funds, financed by domestic revenues, for investment in adaptation (e.g. Bangladesh's Climate Change Trust Act). Similar models emerge more frequently elsewhere towards the end of the decade.
- **Between 2010 and 2015**, some countries started establishing dedicated funds and institutional mechanisms for adaptation finance, often financed by domestic revenues. Examples include the People's Survival Fund Act (Philippines, 2012) which established a local-access modality, pioneering devolved adaptation finance.
- **Following adoption of the Paris Agreement (2015)**, countries increasingly align adaptation finance systems with NDC implementation and international reporting. Between 2019 and 2021, attention shifts towards the role of financial regulators and central banks in promoting climate finance. The Bangladesh Sustainable Finance Policy (2020), Malaysia's Climate Change Principle-based Taxonomy (2021), and Central Bank of Kenya — Guidance on Climate-Related Risk Management (2021) require banks to integrate environmental risk into lending and disclosure.

After 2020, climate finance-related laws and policies seem to follow the momentum around COVID-19 recovery and net zero alignment, expanding to include more market-based instruments such as green bonds, taxonomies for sustainable investment, and contingent debt. While international public adaptation finance fell slightly in 2023, largely due to a drop in funding from multilateral development banks (UNEP, 2025), the overall post-2020 period can be seen as a reflection of the structural growth of tools from grants and loans to private sector and blended finance regimes. See Table 2.2 for examples of recent post-2020 instruments. Note that this list is not exhaustive.

[9] We identified these laws and policies based on a review of the explicit objectives of each document. This spans across all types of documents identified in Figure 2.2.

Table 2.2. Examples of post-2020 adaptation-finance-relevant instruments

Category	Illustrative examples
Green/sustainable taxonomies: regulatory classification systems that define which economic activities qualify as environmentally sustainable. They aim at guiding investors and financial institutions in identifying, assessing and reporting climate-related investments.	In 2021, Malaysia promoted a framework (the Climate Change Principle Based Taxonomy) requiring banks to evaluate environmental and social risks in lending decisions — embedding adaptation into financial supervision. Mexico's 2023 Sustainable Taxonomy (Taxonomia Sostenible de México) defines eligible economic activities for green and adaptation investments, providing guidance for domestic markets in line with international climate disclosure norms, although financial institutions are not yet legally required to apply it to green or sustainable products.
Sovereign green bonds: debt instruments issued by governments or corporations to raise capital for projects with environmental or social benefits.	Fiji's 2022 Sustainable Development Bond Framework promoted procedures for issuing green, blue and social bonds. Ecuador's 2023 Sovereign Green Bond Framework (Interministerial Agreement No. MEF-SNP-MAATE-01) enables the issuance of bonds to finance water security, biodiversity and agricultural resilience initiatives in line with international standards.
Private sector and blended finance frameworks: aimed at the mobilisation of commercial capital for adaptation by combining public, private and concessional finance. These frameworks aim at creating an enabling environment for investors.	The Philippines' 2020 Sustainable Finance Roadmap provides a coordinated plan to attract private capital through blended finance, credit enhancement and also taxonomy-linked instruments. Ecuador's 2021–2030 National Climate Finance Strategy aims to integrate domestic and international resources in a blended model (e.g. public, private and multilateral finance) for climate adaptation.

Source: Authors

We find three key categories of policy objectives emphasised across domestic adaptation finance-related laws and policies: the central role of public finance; the need for governance frameworks to channel finance; and the importance of international climate finance.

1. Build, expand or direct public financial mechanisms to manage climate and disaster risks:

About half of the laws and policies identified focus on creating, expanding or directing financial mechanisms to reduce climate and disaster risks, strengthen adaptation, and accelerate shifts towards low-carbon, climate-resilient development. This distribution of policy objectives reflects international guidance that emphasises the central role of public finance and institutions in delivering adaptation, given that most priority adaptation investments are public goods or quasi-public goods (UNEP, 2025).

This includes setting up ex-ante mechanisms, such as contingent credit lines, resilience bonds, financial reserves or insurance schemes, or ex-post mechanisms that respond to disasters or shocks after they occur, including emergency relief funds, reconstruction grants, post-event budget allocations and credit rescheduling. For instance, Colombia set up an Adaptation Fund (Decree No. 4.819) in response to the destructive effects of the 'La Niña' phenomenon in 2010. Whereas, Bolivia's Programme to Support Sustainable Economic Recovery and Climate Change Resilience (Supreme Decree 4802) utilises a €200 million credit facility to combine climate adaptation with economic recovery post-pandemic.

Countries in the study are also developing investment roadmaps, green finance frameworks, bond issuance standards and public–private financing strategies to mobilise significant domestic and international capital. For example, Mexico's Sustainable Finance Mobilization Strategy (Estrategia de Movilización de Financiamiento Sostenible) aims to leverage national and international public and private capital to close sustainable development goal financing gaps, while the UK's Markets

for Nature Policy Framework seeks to establish high-integrity investment opportunities in natural capital.

2. Strengthen climate-aligned financial governance and regulation

Around one-third of the laws and policies analysed focus on the creation or improvement of legal frameworks, rules, institutions and oversight systems that govern how climate finance is planned, managed and disclosed. This includes integrating climate and sustainability risks into financial regulation, improving transparency and accountability, aligning public financial management with climate objectives, and ensuring that financial institutions operate in ways that support resilience and low-carbon development. Examples include Australia's Treasury Laws Amendment Act (2024), which integrates climate-related reporting into financial market oversight. Similarly, Fiji's NDC Implementation Roadmap (2018–2030) provides a phased approach to financing mitigation and adaptation, targeting energy and transport sectors, with explicit funding estimates linked to NDC goals.

3. Secure and manage international climate finance and partnerships

A smaller but still relevant subset of policy objectives focuses on authorising external loans, coordinating with development partners and channelling resources into national systems. Bolivia, particularly, has multiple agreements with the World Bank, the European Investment Bank, and the International Fund for Agricultural Development, leveraging multilateral partnerships to channel international funds towards adaptation priorities. Spain and the UK's climate finance policies, on the contrary, aim to channel global resources, such as development assistance, towards developing countries and cross-border resilience programmes.

Note that the above categories reflect the relative concentration of recurring themes and explicit objectives that appear throughout the dataset. This does not provide an exhaustive list of all types of instruments referred to within each document to mobilise and manage adaptation finance.

D. Disaster risk management approaches and integration with climate adaptation

In 2015, in addition to the adoption of the Paris Agreement in December, the Sendai Framework for Disaster Risk Reduction (2015–2030) was adopted at the Third UN World Conference on Disaster Risk Reduction in March. This followed the Hyogo Framework for Action, that served as the global DRM framework between 2005 and 2015. The Sendai Framework outlined targets and priorities to prevent new and reduce existing disaster risks. It specifically called for DRM to be multi-hazard and multi-sectoral, where DRM measures would be integrated into programmes across poverty reduction, sustainable development, natural resource management, the environment, urban development and adaptation to climate change (see para. 47 of the Sendai Framework).

Since 2015, we have observed an increasing shift away from purely response-centric DRM laws and policies to more comprehensive approaches that encompass disaster prevention, preparedness, response and recovery as well as resilience building.

We identify 108 DRM laws and policies in total, half of which were introduced over the past decade and appear to include more prevention, mitigation or hazard reduction objectives as part of their overarching objectives. Around one-quarter of total DRM documents, most of them introduced since 2017, explicitly place resilience and vulnerability reduction at the centre of their objectives. This is crucial, as even where laws and policies are not framed explicitly as climate adaptation-relevant, objectives on strengthening resilience and reducing vulnerability in DRM can act as key enablers of more anticipatory and long-term approaches to adaptation. By contrast, many pre-2017 DRM laws and policies (around one-third of identified DRM documents) anchor their objectives only in preparedness, response and recovery, for example, coordinating

emergency response, saving lives and properties during and after disasters, or establishing post-disaster relief funds.

Most DRM laws and policies relevant to adaptation establish overarching frameworks, with only around 20% focusing on specific hazards. Most of these focus on desertification, drought or flooding.

While the Sendai Framework does not differentiate between hazards, it is important for governments and legislatures to develop both hazard-specific and multi-hazard (sometimes referred to as whole-of-hazard) laws and policies. Hazard-specific frameworks address the distinct characteristics, risks and technical requirements of individual hazards, while multi-hazard documents set out a holistic, integrated and coordinated approach to DRM. Around 80% of identified DRM laws and policies appear to be multi-hazard DRM documents, rather than hazard-specific (based on an initial review of their explicit policy objectives and titles) (e.g. Nepal's Disaster Management Act 2017, Colombia's Law 1523 adopting the National Policy of Risk Management and the National System of Risk Management, and the Philippines' Disaster Reduction and Management Act). However, a more detailed content analysis is needed to determine the extent to which these documents genuinely incorporate a comprehensive approach. This is particularly important as disaster risks are increasingly interconnected and driven by compound, cascading and climate-intensified hazards, meaning that DRM laws and policies are far more effective when they adopt a multi-hazard, systems-based approach.

Nonetheless, it is also important to enact hazard-specific laws and policies, or other supporting documents like procedures and guidelines — while ensuring that they are anchored in a comprehensive DRM law and policy to ensure consistency and avoid duplication and gaps (IFRC, 2024). Hazard-specific plans, procedures or guidelines are particularly important for emerging hazards exacerbated by climate change in countries with less prior experience and preparedness for such hazards, such as heat-related risks in Northern European countries and flood-related risks in Middle Eastern countries. In our dataset, we only identified two policies specific to extreme heat (both from India) and one policy on wildfires in the US.[10] Overarching DRM legislation can provide a framework for coherent DRM governance and establish legal requirements for instruments on specific hazards to be developed and regularly updated.

The proportion of DRM laws and policies that meaningfully integrate climate adaptation remains consistently low, also reflecting long-standing institutional silos at the international level.

Although the overall number of DRM laws and policies with *strong* adaptation components has grown since 2009, this increase has simply mirrored the overall rise in the number of DRM documents overall, with the proportion of high-relevance documents remaining constant (see Figure 2.1). DRM and climate adaptation have been governed through separate international frameworks and processes, notably the Sendai Framework and the UNFCCC, which encourage countries to develop parallel, rather than integrated, laws and policies. Around half of total DRM laws and policies, distributed across time, show little recognition of climate change impacts and future risks, which suggests a focus on managing current disasters rather than preparing for or protecting against future climate-induced or climate-altered disasters.

Meaningful integration between DRM and adaptation could involve, for example, requiring climate risk and vulnerability assessments to inform disaster planning, aligning institutional mandates and budgeting for both DRM and adaptation, and embedding adaptation priorities into core disaster risk reduction strategies and regulatory instruments to ensure long-term

[10] Note that there may be countries with disaster risk management laws or policies (often introduced more than two decades ago) that do not explicitly consider climate change and its implications but may also be relevant to governing emergency responses to forest fires (e.g. South Africa's National Veld and Forest Fire Act No. 101 of 1998).

resilience planning (IFRC, 2022). These provide steps to ensure the DRM is designed with climate change in mind.

E. Development planning as a vehicle for climate adaptation

Integrating climate change adaptation into national development strategies is essential (UNFCCC, 2017) for strengthening the resilience of development outcomes, contributing to more efficient use of resources and avoiding investments that could unintentionally lead to maladaptation (UNDP-UNEP, 2011; Mogelgaard et al., 2018), especially in countries most vulnerable to climate impacts.

Within our scope of countries, we identify 78 development plans, spanning 30 countries, that incorporate some level of adaptation. Within this, 26 plans include adaptation at a significant level, all originating from 13 countries in the Global South.

These include national socioeconomic and sustainable development plans, strategies, visions and frameworks, commonly focusing on achieving inclusive and equitable economic growth, reducing poverty, integrating adaptation and mitigation into national planning and long-term visions, and/or balancing sustainable development and the environment and natural resources. Bangladesh offers a notable example, with its National Sustainable Development Strategy 2010–2021, Perspective Plan 2021–2041 and consecutive Five-Year Plans (e.g. the Eighth plan, covering 2020–2025), all of which strongly embed climate change adaptation objectives and actions. Similarly, Colombia's National Development Plan 2022–2026, Honduras' National Vision 2010–2038 and Vietnam's Socio-Economic Development Plan 2021–2025 explicitly integrate both adaptation and mitigation into development strategies as a pathway to long-term resilience and sustainability.

This growing number of development plans with strong adaptation components reflects a targeted mainstreaming of climate adaptation considerations into national development agendas, rather than treating adaptation as a standalone policy domain. When adaptation is embedded in holistic planning instruments such as national visions and socioeconomic strategies, countries can better align climate resilience with broader goals like poverty reduction, sustainable livelihoods and inclusive prosperity. This integration not only safeguards development gains but also reveals important patterns in how states prioritise climate risk and adaptation over time.

Around one-third of assessed development plans explicitly link adaptation to poverty reduction, inequality reduction or improvements in social wellbeing — reflecting a clear understanding that climate vulnerability is closely connected to persistent socioeconomic disparities and that resilience-building is central to inclusive development outcomes.

The prominence of national 'visions', multi-decade transformation strategies and future-oriented roadmaps also indicates that climate resilience is becoming embedded in the long-term identity of national development planning. Many of the development plans that integrate adaptation have pathways extended to 2040, 2050, and even 2100 (e.g. Vietnam's Mekong Delta Vision 2050, Fiji's Vision 2050, Nigeria's Agenda 2050, Peru's National Development Plan 2050, and Bangladesh's Delta Plan 2100). This long-range perspective underscores that adaptation is treated as a generational challenge requiring continuity beyond political cycles.

Some development plans (e.g. in Malaysia, Kenya and Indonesia) explicitly connect adaptation with ambitions for industrial upgrading, economic diversification and high-income transitions. For example, Malaysia's Thirteen Plan (2026–2030) and its New Industrial Master Plan focus on transforming the country into a globally competitive industrial economy and advancing its transition towards high-income development, both of which integrate adaptation and climate resilience considerations at a significant level. Kenya's Vision 2030 to transform the country into a newly industrialising, middle-income country also explicitly links climate resilience into its economic transformation. This trend, although still very limited among the countries, suggests an emerging shift in policy thinking: climate resilience is beginning to be perceived as a prerequisite

for economic transformation rather than a trade-off with growth in these countries. Instead of being positioned as competing objectives, development and adaptation reinforce one another.

However, despite the impacts of climate change disproportionately affecting women and exacerbating existing inequalities (Winter et al., 2024), we do not find many laws or policies that explicitly target gender and intersectional considerations in adaptation planning, implementation and evaluation (see Box 2.2). Neglecting gender considerations in adaptation policy development can undermine the effectiveness of finance (Cichocka et al., 2024). For example, previous research conducted in Sub-Saharan Africa found that small- and medium-sized enterprises with female leadership in their management or ownership structures are more likely to adopt a long-term perspective in their climate adaptation behaviour, and that female business leadership can support innovation in adaptation (Gannon et al., 2024).

Box 2.2. Gender equity and social inclusion (GESI) in adaptation-relevant laws and policies

Only 13 out of the 35 countries reviewed have at least one law or policy on GESI that is either directly focused on climate change, such as climate change and gender action plans, or explicitly integrates adaptation measures into GESI-focused plans. Bangladesh, the Dominican Republic, Ecuador, Nepal, Nigeria, Mexico, and Peru stand out for having dedicated Gender and Climate Change Action Plans, outlining specific measures to address the intersection of gender and climate resilience. In contrast, Fiji, Honduras and the Philippines embed climate change and adaptation within their broader national gender policies and action plans, potentially signalling a more integrated approach to mainstreaming gender and adaptation across policy areas.

It is important that gender and adaptation policy adopts an intersectional approach, recognising that experiences of climate change impacts are shaped by intersecting identities, including race, socioeconomic status, geographic location, ethnicity, disability and age, among others (Phuong et al., 2023). Economic factors like income frequently intersect with gender to affect climate vulnerability (Stadler et al., 2025). Addressing compounded vulnerability requires a holistic risk and impact assessment that integrates intersectionality and accordingly designs targeted interventions.

Implementing these actions also requires significant scaling up of finance that is sensitive to these disparities. We identify only a small number of forward-looking plans targeted at providing financial support in the context of the climate transition; however, these appear largely mitigation focused. This reflects the current landscape of global climate finance flows — where mitigation makes up the large majority: US$1,780 billion in 2023 versus US$65 billion for adaptation (Climate Policy Initiative, 2025). See for example Spain's Just Transition Strategy (2021), South Africa's Just Transition Framework (2020), Vietnam's Resource Mobilisation Plan (2023) and Indonesia's Comprehensive Investment and Policy Plan (2023), all of which include some emphasis on the fair distribution of benefits and support for vulnerable groups. For South Africa, Vietnam and Indonesia, this is closely tied to their involvement in just energy transition partnerships (JETPs) — multilateral platforms between developed and emerging economies, aimed at delivering climate finance to support the transition in an equitable manner (IHRB, 2024).

3. Conclusion and recommendations

Adaptation-relevant laws and policies have developed steadily since the adoption of the Paris Agreement in 2015, accelerating most prominently over the last five years. Our analysis has highlighted the diversity around what constitutes an adaptation-relevant law or policy, ranging from National Adaptation Plans (NAPs), climate framework laws, biodiversity protection policies, sustainable finance taxonomies and disaster risk management laws, to socioeconomic development policies and many others.

The evolution of domestic laws and policies has broadly followed international climate action agendas, with gradual shifts from planning to implementation and increased linkages between domestic financial reforms and international climate finance mechanisms. Given agreed thematic and process targets under the UAE Framework for Global Climate Resilience, in the next decade, we expect the number of domestic adaptation-relevant laws and policies across these key policy areas to increase. Despite promising signs of mainstreaming of adaptation beyond climate policy, there remain gaps in integration across policy domains, particularly with financial and development planning (Lebel et al., 2012), and opportunities for more adaptation actions in critical sectors like water, health and cultural heritage. The new Belém Adaptation Indicators provide a foundation for countries to regularly measure and report progress across sectors and processes.

Climate risks are inherently systemic: a single hazard event can trigger multiple, cascading impacts across sectors such as health, infrastructure, water and food systems (Lawrence et al., 2020; Zscheischler et al., 2018). Responsibility for managing these impacts must not be siloed within ministries, agencies and levels of government. Fragmentation can result in coordination failures and inefficient allocation of resources. This multi-sectoral and multi-governance nature of adaptation reinforces the importance of comprehensive adaptation plans, investment roadmaps and progress reports to synthesise how various laws and policies work together to deliver national and local adaptation actions.

NAPs and NDCs can help drive investment by clarifying priorities, roles and signals to private finance providers (OECD/UNDP, 2025). However, given their high-level nature, countries must also demonstrate commitment and deliver policy certainty with regulatory, institutional and budgetary alignment — embedding adaptation across planning cycles and sectoral policies. Without integration into domestic laws and policies, the potential for direction-setting documents like NAPs and NDCs to catalyse sustained adaptation investment will remain limited.

An increasing number of countries have now introduced legal requirements to produce NAPs (either standalone or integrated with mitigation) and to conduct risk and vulnerability assessments. However, compliance with and regular updating of these documents is uneven. Legal mandates to periodically report on progress are also less widespread. Cross-party political support for framework legislation that establishes overarching institutions and processes may help sustain political will for implementation and mitigate the risk of backsliding in times of political change (Averchenkova et al., 2024). Adaptation efforts should be iterative, accountable and aligned with evolving climate risks.

Adaptation and DRM are treated as parallel policy domains rather than parts of a single, forward-looking risk management continuum. To better address future climate risks and prevent climate-related loss and damage, DRM laws and policies should be systematically aligned with legal and policy frameworks designed for adaptation, for example, by embedding climate risk and vulnerability assessments into disaster risk planning and aligning institutional mandates and financing for both adaptation and DRM (IFRC, 2022; Mehryar and Surminski, 2021; Ishiwatari, 2025).

Ultimately, effective adaptation planning and implementation also depend on strong coordination across national, regional and local levels. This report has primarily focused on policy objectives at the national level and the intentions of policymakers. Future research should provide

complementary analysis on how national actions can inform and support adaptation measures at the local level, investigating whether laws and policies account for lived experiences and encourage place-based adaptation.

Key policy insights and recommendations for legislators and policymakers around the world

1. Foster a whole-of-government approach to adaptation and systematically invest in institutional coordination mechanisms, both horizontally and vertically.

Legal frameworks can help strengthen accountability across the adaptation cycle. While the global thematic and process targets under the UAE Framework for Global Climate Resilience and the Belém Adaptation Indicators have only been agreed recently, it is prudent for policymakers to assess whether sectoral laws and policies across these areas account for climate impacts and how they may contribute to national objectives on adaptation and economic transformation. Overarching plans can be useful platforms for communicating how these sectoral actions work together, and to disclose costing measures to help structure finance.

Actions can include:

- Establishing legally binding requirements for national adaptation planning, risk and vulnerability assessments and progress reporting.
- Investing in capacity building and resources to address adaptation issues effectively across the adaptation policy cycle. This includes allocating resources to actions that mitigate the risk of the 'regulate and forget' effect (i.e. adoption and enforcement of regulations without regularly reviewing their impact), for example, through mandatory ex-ante and ex-post evaluations, regulatory impact assessments and ongoing stakeholder engagement (OECD, 2023).
- Enacting new or strengthening existing climate framework laws to clarify institutional responsibilities of both national and subnational authorities on adaptation planning, implementation, and monitoring and evaluation, including clarifying how these responsibilities are aligned or integrated with governance approaches on mitigation and disaster risk management.
- Assessing whether and how sectoral laws and policies across water security, food security and agriculture, human health, ecosystem and biodiversity, infrastructure, poverty and livelihoods, and cultural heritage (i.e. Global Goal on Adaptation thematic targets for assessing adaptation progress) account for climate impacts and can contribute to adaptation.
- Using NAPs and other comprehensive overarching framework documents to communicate how adaptation-relevant laws and policies across sectors and governance levels are aligned to national adaptation objectives, as well as signposting finance needs and costing of measures to help structure finance.

2. Institutionalise adaptation within public financial management and fiscal policy frameworks.

Financing of adaptation requires a systematic approach. Governments should acknowledge that climate change adaptation is a critical factor for all economic policy concerns (Coalition of Finance Ministers for Climate Action, 2025). With the outcome in the Belém package calling for efforts to reach a new US$120 billion target as part of the broader US$300 billion in climate finance (Alayza and Larsen, 2025), governments need to be more proactive.

Building on guidance from the Coalition of Finance Ministers for Climate Action and existing research on adaptation finance (see e.g. D'Orazio, 2025), this can include:

- Systematic costing and prioritisation of adaptation investments in NDCs, NAPs and sector strategies to build structured, bankable adaptation investment pipelines.
- Advancing harmonisation of climate finance instruments at the regional level through taxonomies and disclosure frameworks, helping to reduce fragmentation, lower transaction costs and improve investor confidence — with support from international partners.
- Increasing fiscal policies that recognise adaptation as a macro-critical public good and as an investment in resilience.
- Assessing existing budgeting practices, and if appropriate, introducing medium-term budget frameworks and programme budgeting, supported by climate budget tagging and expenditure tracking.
- Empowering Ministries of Finance to drive forward climate adaptation, including introducing legal mandates to act on climate and investing in capacity-building across government agencies, supporting them to integrate climate risk, vulnerability and impact assessments and tools into their core functions: economic strategy and vision; fiscal policies and budget management; and financial policy and oversight of the financial system.

3. Increase policy coherence and integration of adaptation across DRM and development policy domains.

Adaptation and DRM are crucially linked and need to be addressed as such (IFRC, 2022). To better address future climate risks and prevent climate-induced loss and damages, DRM laws and policies should be systematically aligned with adaptation frameworks. Adaptation and resilience should also be promoted as a core development and economic priority.

Actions can include:

- Embedding climate risk and vulnerability assessments into disaster risk planning, integrating national adaptation goals into comprehensive DRM regulatory frameworks, and aligning financing for both adaptation and DRM.
- Ensuring that DRM laws and policies place a greater emphasis on prevention, resilience building and forward-looking climate risk projection rather than a primary focus on emergency responses to current or past disasters (see IFRC, 2022 and IFRC, 2024).
- Developing overarching multi-hazard approaches in DRM laws and policies to strengthen the link between short-term risk management and long-term climate resilience.
- Within overarching DRM frameworks, developing and aligning hazard-specific laws and policies to address the distinct characteristics of individual hazards and avoid fragmentation — particularly for emerging climate-driven risks like extreme heat.
- Integrating adaptation into national growth strategies, industrial policy and fiscal planning, with goals to promote resilience as a core development and economic priority rather than a niche environmental concern. This includes explicitly linking adaptation objectives to economic transformation, poverty reduction and reducing inequality.
- Adopting a gender-sensitive and intersectional approach to adaptation planning and implementation and introducing laws and policies that explicitly recognise and target compound vulnerabilities, while learning from the unique insights and knowledge of those disproportionately affected by climate impacts.

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Appendix: Methodology

Data collection

The primary source of information for this report was the Climate Change Laws of the World Database, maintained by the Grantham Research Institute on Climate Change and the Environment. This database contains more than 5,000 domestic climate law and policy documents from every country in the world and from the European Union. In the database, laws refer to documents that have been approved by the national legislature, while policies refer to documents that have been approved by a national-level executive decision-making body, and/or set out a current governmental policy objective or set of policy objectives.

To the best of our knowledge, the database is the most comprehensive resource of its kind. The data is regularly updated by researchers at the Grantham Research Institute and Climate Policy Radar following a publicly available methodology. However, given the pace and scale of climate policymaking globally, there are inevitable gaps in data collection.

For this report, we added documents to our adaptation laws and policies dataset based on a desk review of relevant government or ministry websites, a review of the relevant country's latest communication to the UNFCCC, the IFRC Disaster Law Database, and where one is available for the relevant country, the most recent World Bank Country Climate and Development Report.

Our data from Climate Change Laws of the World was based on a downloaded file dated 18 August 2025. Documents obtained from additional sources were included up to the end of October 2025.

Given that our primary objective is to understand the status of domestic adaptation governance and policy, rather than country reporting to the UNFCCC, we chose to exclude party submissions to the UNFCCC (e.g. national inventory reports, biennial transparency reports, national communications). We only referred to these to identify adaptation-relevant laws and policies. These documents were excluded from the final numerical count of countries' national laws and policies. However, we included NAPs and NDCs, given their role in setting the direction of national adaptation policy and communicating national priorities on climate change.

Identification of adaptation laws and policies

Documents were included in our adaptation laws and policies dataset based on a review by at least one member of the research team of the document for policy objectives or measures relevant to: adaptation, disaster risk reduction/management, or resilience — in the context of climate change. We adopted the following definitions for each concept:

- Adaptation: In human systems, the process of adjustment to actual or expected climate change and its effects, to moderate harm or exploit beneficial opportunities (IPCC, 2022). In this report, adaptation is seen as being part of, and contributing to, DRM and resilience.
- Disaster risk management (DRM): Application of policies, strategies and other measures to prevent new disaster risk, reduce existing disaster risk and manage residual risk (through disaster preparedness, response and recovery), thereby contributing to the strengthening of resilience and reduction of disaster losses (IFRC, 2024).
- Disaster risk reduction (DRR): This is the policy objective of DRM — i.e. prevention of new and reduction of existing disaster risk and management of residual risk (IFRC, 2024).
- Resilience: The capacity to prepare for, respond to and recover from the impacts of hazardous climatic events while incurring minimal damage to societal wellbeing, the economy and the environment (Mehryar, 2022, adapted from IPCC, 2022).

Apart from explicit references to each of these concepts (using keyword searches), we looked for measures particularly across the following sectors: water; agriculture; biodiversity; health;

infrastructure; cultural heritage and knowledge; coastal protection; energy; forestry, marine and fisheries; and transportation. These sectors were chosen based on a review of categories perceived as adaptation-relevant by:

- Themes, targets and indicators identified by the UNFCCC under the Global Goal on Adaptation: water; agriculture and food; health; ecosystem and biodiversity; infrastructure and human settlements; poverty and livelihoods; and cultural heritage and knowledge (see e.g. CMA.5).
- Adaptation policy sectors identified by Climate ADAPT, managed by the European Environment Agency and the European Commission: agriculture; biodiversity; buildings; business and industry; coastal areas; cultural heritage; disaster risk reduction; energy; financial; forestry; health; ICT (information and communication technology); land use planning; marine and fisheries; mountain areas; tourism; transport; urban; and water management.
- Vulnerability sectors identified by the Notre Dame Global Adaptation Initiative: water; food; health; ecosystems; human habitat; coastal infrastructure; energy infrastructure; and transportation infrastructure.

In the process of identifying adaptation-relevant documents, we assigned a low, medium or high level of adaptation-relevance to each document. This was based on the extent to which adaptation, DRR/M or resilience features across the length of the document. This assessment was a subjective exercise and is not intended to be interpreted as a finding of the extent of implementation of adaptation measures in that country. This classification enabled the research team to focus parts of the analysis in this report on documents that are primarily on adaptation. While we aimed to make the review of each document as uniform as possible, determining the presence (or absence) of relevance to adaptation remains a subjective assessment.

For non-English documents, we either relied on automated translation (ChatGPT and DeepL Translate) or, where relevant, a member of the research team with necessary language abilities (Spanish, French, Italian and Chinese) was assigned such a document for review.

Limitations of this report

We acknowledge that there are limitations to our dataset. It is limited to legislation and policy introduced by national legislatures and executive bodies and may not represent the status of adaptation policy at subnational levels.

We have made our best efforts to locate adaptation-relevant measures, but we recognise that this may not capture countries' full regulatory responses to adaptation and the data is likely less comprehensive for documents where 'adaptation', 'resilience' or 'disaster risk reduction/management' (or similar search terms) are not explicitly mentioned.

We have also not separately identified or distinguished loss and damage (L&D) laws and policies. As mentioned in the report, L&D has been referred to in the literature as the policy domain beyond the limits of adaptation (McNamara and Jackson, 2018); however, in practice, there are often blurred boundaries between measures relevant to L&D and adaptation, given that both address the consequences of physical climate impacts. For example, insurance policies may address both adaptation in the form of anticipatory risk transfer and L&D in the form of monetary compensation for damages. In this report, we have chosen to focus on how measures may contribute to adaptation. Future research may focus on L&D as the key policy objective.

Classification and review of adaptation-relevant laws and policies

To facilitate analysis across this report, we classified documents in multiple ways to explore and analyse trends across them.

First, at a high level, we categorised them based on their title, as a proxy for policymakers' and legislators' primary policy objectives:

- Laws, plans, strategies or policies explicitly addressing only adaptation, for example, NAPs, climate change adaptation acts, national adaptation strategies, or adaptation programmes. We refer to these as 'national adaptation laws, plans, strategies or policies' in Figure 2.2.
- Laws, plans, strategies or policies explicitly addressing climate change or climate action in general. This includes, for example, climate action plans, climate change acts and climate finance strategies. We refer to these as 'climate change laws, plans, strategies or policies (not exclusively on adaptation)' in Figure 2.2.
- Laws, plans, strategies or policies explicitly addressing only disaster risk management or a specific hazard. This includes, for example, a national strategy for disaster risk management, a national disaster response plan, drought management plans, or in one case, a storm and flood insurance act. We refer to these as 'DRM laws, plans, strategies or policies' in Figure 2.2.
- Laws, plans, strategies or policies explicitly addressing socioeconomic development or growth. This includes, for example, growth and development strategies, national visions, development plans, and green growth frameworks. We refer to these as 'development and growth-related laws, plans, strategies or policies' in Figure 2.2.
- All other documents were considered as 'Sectoral laws or policies (addresses specific sectors, rather than a general focus on climate change, DRM or development)' in Figure 2.2. Examples include forest laws, environmental policies, transport plans and biodiversity strategies.
- We also separated out NDCs and their related implementation plans, given their distinct nature and content required under the Paris Agreement.

To complement this explicit title-based categorisation, we reviewed sectoral policies and laws and added an additional classification based on which key sector the objectives and measures appear to be targeted towards — this is summarised in Figure 2.3. This is different from the above typology. For example, in Figure 2.2, Australia's National Disaster Mental Health and Wellbeing Framework is classified as a 'DRM' for the *type* of document, but in Figure 2.3 it is classified under 'health' as its primary *topic*. We assign one sector per document. This allows us to identify the most prevalent themes across adaptation laws and policies, and compare them to those referred to by others, as discussed above. There are limitations to this approach, as many documents are inherently cross-cutting across more than one topic or sector. Our aim is to provide a snapshot of how policymakers globally are targeting adaptation actions.

Lastly, the authors also used Chat GPT to extract key detailed objectives 'as explicitly mentioned in the document' across the identified adaptation laws and policies, in addition to translation of non-English documents. After using this tool/service, we reviewed and edited the content as needed and take full responsibility for the content of this report. The list of detailed objectives was then used to create different categories of high-level objectives for various topics, including finance, climate change focused, DRR/M, and socioeconomic development.

Scope of countries

We selected countries to cover diversity across geographical regions, income groups, vulnerability to physical climate impacts, exposure to different types of climate hazards and disasters, negotiating groups in the UNFCCC process, and federal or unitary political systems. Table A1 provides these classifications by country. In finalising the 35 countries, we also consulted with partners in the Zurich Climate Resilience Alliance and across the Grantham Research Institute and TPI Global Climate Transition Centre (Assessing Sovereign Climate-related Opportunities and Risks (ASCOR) Project team).

Table A1. Classification of countries across selection characteristics

Country	Geographical region	Income group[a]	Federal or unitary system	Climate Risk Index ranking[b]	Political/climate negotiating groups	Global South or Global North[c]
Australia	East Asia and Pacific	High	Federal	36 for 2022 85 for 1993–2022 (annual averages)	Umbrella Group	Global North
Bangladesh	South Asia	Lower middle	Unitary	46 for 2022 31 for 1993–2022 (annual averages)	G77 and China; Least Developed Countries (LDCs)	Global South
Barbados	Latin America & Caribbean	High	Unitary	137 for 2022 161 for 1993–2022 (annual averages)	G77 and China; Small Island Developing States (SIDS); Alliance of Small Island States (AOSIS)	Global South
Bolivia	Latin America & Caribbean	Lower middle	Unitary	67 for 2022 74 for 1993–2022 (annual averages)	G77 and China	Global South
China	East Asia and Pacific	Upper middle	Unitary	51 for 2022 2 for 1993–2022 (annual averages)	G77 and China	Global South
Colombia	Latin America & Caribbean	Upper middle	Unitary	79 for 2022 108 for 1993–2022 (annual averages)	G77 and China; Independent Association of Latin America and the Caribbean (AILAC)	Global South
Dominican Republic	Latin America & Caribbean	Upper middle	Unitary	42 for 2022 78 for 1993–2022 (annual averages)	G77 and China; Small Island Developing States (SIDS); Alliance of Small Island States (AOSIS)	Global South
Ecuador	Latin America & Caribbean	Upper middle	Unitary	75 for 2022 131 for 1993–2022 (annual averages)	G77 and China	Global South
Fiji	East Asia and Pacific	Upper middle	Unitary	27 for 2022 11 for 1993–2022 (annual averages)	G77 and China; Small Island Developing States (SIDS); Alliance of Small Island States (AOSIS)	Global South
Honduras	Latin America & Caribbean	Lower middle	Unitary	73 for 2022 3 for 1993–2022 (annual averages)	G77 and China	Global South
India	South Asia	Lower middle	Federal	49 for 2022	G77 and China	Global South

				6 for 1993–2022 (annual averages)		
Indonesia	East Asia and Pacific	Upper middle	Unitary	93 for 2022 115 for 1993–2022 (annual averages)	G77 and China	Global South
Italy	Europe and Central Asia	High	Unitary	3 for 2022 5 for 1993–2022 (annual averages)	European Union (EU)	Global North
Japan	East Asia and Pacific	High	Unitary	69 for 2022 122 for 1993–2022 (annual averages)	Umbrella Group	Global North
Jordan	Middle East	Upper middle	Unitary	125 for 2022 156 for 1993–2022 (annual averages)	G77 and China; Arab Group	Global South
Kenya	Sub-Saharan Africa	Lower middle	Unitary	131 for 2022 36 for 1993–2022 (annual averages)	G77 and China; African Group of Negotiators (AGN)	Global South
Kuwait	Middle East	High	Unitary	136 for 2022 172 for 1993–2022 (annual averages)	G77 and China; Arab Group	Global South
Malawi	Sub-Saharan Africa	Low	Unitary	26 for 2022 34 for 1993–2022 (annual averages)	G77 and China; Least Developed Countries (LDCs); African Group of Negotiators (AGN)	Global South
Malaysia	East Asia and Pacific	Upper middle	Unitary	91 for 2022 135 for 1993–2022 (annual averages)	G77 and China	Global South
Mexico	Latin America & Caribbean	Upper middle	Federal	98 for 2022 112 for 1993–2022 (annual averages)	Environmental Integrity Group (EIG)	Global South
Nepal	South Asia	Lower middle	Federal	78 for 2022 69 for 1993–2022 (annual averages)	G77 and China; Least Developed Countries (LDCs)	Global South
Nigeria	Sub-Saharan Africa	Lower middle	Federal	8 for 2022 123 for 1993–2022 (annual averages)	G77 and China; African Group of Negotiators (AGN)	Global South
Pakistan	South Asia	Lower middle	Federal	1 for 2022 56 for 1993–2022 (annual averages)	G77 and China	Global South
Peru	Latin America & Caribbean	Upper middle	Unitary	109 for 2022	G77 and China; Independent Association of	Global South

				90 for 1993–2022 (annual averages)	Latin America and the Caribbean (AILAC)	
Philippines	East Asia and Pacific	Lower middle	Unitary	43 for 2022 10 for 1993–2022 (annual averages)	G77 and China	Global South
Saudi Arabia	Middle East	High	Unitary	152 for 2022 167 for 1993–2022 (annual averages)	G77 and China; Arab Group	Global South
Senegal	Sub-Saharan Africa	Lower middle	Unitary	108 for 2022 121 for 1993–2022 (annual averages)	G77 and China; Least Developed Countries (LDCs); African Group of Negotiators (AGN)	Global South
South Africa	Sub-Saharan Africa	Upper middle	Unitary	20 for 2022 79 for 1993–2022 (annual averages)	G77 and China; African Group of Negotiators (AGN)	Global South
South Korea/Republic of Korea	East Asia and Pacific	High	Unitary	86 for 2022 143 for 1993–2022 (annual averages)	Environmental Integrity Group (EIG)	Global North
Spain	Europe and Central Asia	High	Unitary	5 for 2022 8 for 1993–2022 (annual averages)	European Union (EU)	Global North
Turkey/Republic of Türkiye	Europe and Central Asia	Upper middle	Unitary	120 in 2022 153 for 1993–2022 (annual averages)	G77 and China	Global South
United Arab Emirates	Middle East	High	Federal	164 for 2022 174 for 1993–2022 (annual averages)	G77 and China; Arab Group	Global South
United Kingdom	Europe and Central Asia	High	Unitary	39 for 2022 61 for 1993–2022 (annual averages)	Umbrella Group	Global North
United States	North America	High	Federal	7 for 2022 13 for 1993–2022 (annual averages)	Umbrella Group	Global North
Vietnam	East Asia and Pacific	Lower middle	Unitary	81 for 2022 54 for 1993–2022 (annual averages)	G77 and China	Global South

Notes: a. Classification of income groups is sourced from the World Bank Country and Lending Groups (accessed 20 October 2025). b. The Climate Risk Index is published by NGO, Germanwatch. The Index analyses to what extent countries have been affected by the impacts of weather-related loss events (storms, floods, heat waves, etc.). It ranks countries by their economic and human effects, with the most affected country ranked highest. The Index is based on publicly available historical data from the EM-DAT international disaster database, World Bank and International Monetary Fund. These figures are from the

latest Climate Risk Index 2025, covering 1993–2022 data (Adil et al., 2025). d. The distinction between 'Global South' and 'Global North' is based on economic inequalities. The term and inclusion of countries in each group are contested. We use the list of G77 countries and China to determine if a country is in the Global South.

Source: Authors