Submission by the Coalition for Disaster Resilient Infrastructure (CDRI)

Focus: In response to the Adaptation Committee's call for submissions on improving reporting on adaptation action and progress under decision 2/CMA.5, paragraph 45

1. Introduction

CDRI welcomes the opportunity to respond to the Adaptation Committee's call for submissions issued in the context of decision 2/CMA.5, paragraph 45. Under that paragraph, the CMA invited the Adaptation Committee, in collaboration with the Consultative Group of Experts (CGE) and the Least Developed Countries Expert Group (LEG), to develop recommendations on how to improve reporting on adaptation action and progress, including with a view to informing the review and update of the modalities, procedures, and guidelines (MPGs) for the transparency framework under Article 13 of the Paris Agreement. Decision 2/CMA.5 also affirms that implementation of the UAE Framework for Global Climate Resilience should not create any additional reporting burden and invites Parties to use existing vehicles such as adaptation communications, biennial transparency reports (BTRs), national adaptation plans (NAPs), national communications (NCs) and nationally determined contributions (NDCs).

CDRI is a global coalition committed to strengthening infrastructure resilience against climate and disaster risks. There is increasing recognition that resilient infrastructure is not peripheral to adaptation; it is one of the core enabling conditions for adaptation actions. CDRI's Action Agenda on Integrating Disaster Resilient Infrastructure in National Adaptation Strategies[1] was launched at COP30 in Belem. This Action Agenda, developed by 39 global experts from CDRI's Community of Practice, notes that infrastructure resilience is increasingly recognized in national adaptation planning. Nearly half of submitted NAPs reference Disaster Resilient Infrastructure (DRI), yet implementation remains fragmented and uneven. CDRI's research shows that resilience considerations need to be embedded across the full infrastructure lifecycle, and supported by risk analytics, governance, finance, monitoring, and maintenance.

CDRI would like to submit that adaptation reporting, in its present form, has a structural gap whereby it consistently under-reports infrastructure resilience as a cross-sectoral enabler. Closing this gap would simultaneously improve the quality of national adaptation reporting and the usefulness of reported information for the Global Stocktake.

2. Reporting vehicles currently used and suggestions to enhance effective reporting of adaptation action and progress

CDRI is a coalition of 65 members, including 53 Member States who engage with the various reporting vehicles under the UNFCCC process. CDRI works extensively with, and draws lessons from, the reporting vehicles that Parties already use adaptation communications, BTRs, NAPs, NDCs and NCs. Decision 9/CMA.1 allows adaptation communications to be submitted as a component of or in conjunction with a NAP, NDC, NC, or the reports on impacts and adaptation under Article 13. The UNFCCC also confirms that BTRs include information on

[1] CDRI. (2025). Action Agenda on Integrating Disaster Resilient Infrastructure in National Adaptation Strategies. https://cdri.world/action-agenda/

climate change impacts and adaptation, and that Parties may combine BTRs and NCs where appropriate.

The current system can generate useful adaptation information, but it often disperses that information across multiple documents, prepared for different purposes and timelines, with uneven cross-referencing and varying levels of detail. The Adaptation Committee's supplementary guidance was designed to help Parties enhance quality, reduce duplication and reporting burden, and benefit from synergies across adaptation-related reporting arrangements. SBI 62 also recognized the value of coherence across NAPs, adaptation communications, NDCs, BTRs and NCs.

At present, the fragmentation of reporting is most acute for infrastructure resilience. Asset-level data, service continuity information, and climate-related loss and damage to systems sit across different line ministries and reporting cycles.

CDRI therefore recommends a **"report once, use many times"** approach built around existing vehicles rather than new ones. In practical terms:

- First, **NAPs** are best suited to reporting national adaptation priorities, institutional arrangements, sectoral vulnerabilities, project pipelines, and implementation barriers. They are especially useful for showing how adaptation is being translated into country systems and sector planning. However, the CDRI Action Agenda finds that in many NAPs, infrastructure resilience remains aspirational or fragmented rather than operationalized.
- Second, **Adaptation Communications and NDCs** are valuable for communicating strategic direction, national priorities, progress narratives and links to the Global Goal on Adaptation. Decision 9/CMA.1 allows for flexibility and invites Parties to submit adaptation communications in time to inform each Global Stocktake.
- Third, **Biennial Transparency Reports (BTRs)** should become the principal vehicle for reporting measurable progress on implementation, effectiveness, monitoring and evaluation, lessons learned, and support needs. The Modalities, Procedures and Guidelines (MPGs) contain the relevant architecture for progress reporting under Article 7. The 2025 UNFCCC synthesis of BTRs shows that Parties are already reporting adaptation priorities, integration into sectoral strategies, and monitoring systems, but the reporting depth remains uneven.
- Fourth, **National Communications** remain useful where Parties continue to rely on them as broader contextual documents, particularly when adaptation information is not yet fully developed in BTRs.

To improve effectiveness, the Parties and the secretariat should adopt a common cross-referencing logic across these vehicles. Decision 18/CMA.1 already permits Parties to cross-reference previously reported adaptation information and focus on updates. This flexibility should be used more systematically, allowing NAPs, NDCs, adaptation communications and BTRs to operate as linked components of one adaptation reporting ecosystem rather than as separate silos.

3. Recommendations on improving existing guidelines and guidance

Chapter IV of the annex to decision 18/CMA.1 provides a comprehensive structure covering national circumstances and institutions, impacts and vulnerabilities, priorities and barriers, strategies and actions, progress of implementation, monitoring and evaluation, effectiveness and sustainability, loss and damage-related information, and lessons learned. The main gaps therefore lie in **operational usability, comparability, and consistency**.

a. Improve guidance on what constitutes progress

The Modalities, Procedures, and Guidelines (MPGs) ask Parties to report on achievements, impacts, resilience, effectiveness, and indicators, but they do not yet give enough practical guidance on how to distinguish between:

- Inputs, such as finance, institutional arrangements, or capacity-building;
- Activities, such as policies, plans, risk assessments, retrofitting programmes, or early warning expansion; and
- Outcomes, such as reduced service disruption, increased resilience, avoided losses, sustained access to essential services, or improved recovery time.

CDRI recommends that future guidance include simple examples of adaptation results chains and a limited set of optional indicator families that Parties can adapt to national context. For infrastructure-related adaptation, progress reporting should move beyond merely listing completed projects toward showing whether essential services became more reliable during climate shocks.

b. Strengthen guidance on domestic monitoring systems

The MPGs already encourage Parties to report on domestic systems for monitoring and evaluation. However, the GIR Report 2025[2] shows that systematic use of standardized systems to measure disaster-related infrastructure damage remains rare: only 16 percent of surveyed respondents reported systematic nationwide use, while 31 percent rely on international methodologies only for large disasters. This suggests that monitoring is often reactive rather than institutionalized.

CDRI recommends that the guidance place stronger emphasis on:

- National databases on climate-related losses and damages to infrastructure.
- Infrastructure asset registries.
- Service disruption and downtime data.
- Domestic monitoring, evaluation and learning systems; and
- Regular, repeated assessment cycles, including annual or biennial reviews where feasible. GIR 2025 specifically recommends strengthening national databases on infrastructure losses and damages, and its readiness framework stresses repeat assessments to track improvement over time.

[2] CDRI. (2025). Global Infrastructure Resilience (GIR) Report, Second Edition. https://cdri.world/resilience-dividend/global-infrastructure-resilience-report-second-edition/

c. Improve reporting on finance and support for adaptation

The current framework is stronger on adaptation action than on the financial traceability of that action. CDRI recommends disaster- and climate-budget tagging, risk and resilience scorecards, and national taxonomies for adaptation to enable more consistent tracking and reporting of resilience investments. GIR 2025 also highlights the need for dedicated budget lines, contingency instruments, resilience standards, and investment taxonomies.

CDRI recommends that the guidance encourage Parties to report, where possible, on:

- Public expenditure for infrastructure adaptation and resilience;
- Support received for implementation of adaptation priorities;
- Finance gaps and barriers;
- Uptake and use of risk-informed public investment tools; and
- Application of resilience standards or taxonomies.

d. Provide better guidance for system-level and cross-sectoral adaptation

Adaptation reporting remains biased toward sector-specific actions, even though climate risk is systemic. However, infrastructure failure cascades across food, water, health, communications, and economic systems. Therefore, it is important that adaptation reporting should capture interdependencies and service continuity.

Guidance should therefore better support reporting on:

- Cross-sector coordination.
- Links between national and subnational action.
- Critical infrastructure and service continuity.
- Cascading risks and compound events; and
- Stakeholder engagement, including local communities and the private sector.

4. Improving alignment, coherence and effectiveness across the Convention and the Paris Agreement – Lessons Learned

Three lessons stand out.

First, coherence is more important than proliferation.

The lesson from practice is that Parties need better alignment among existing reporting vehicles. The UAE Framework invites Parties to report relevant qualitative and quantitative information through adaptation communications, BTRs, NAPs, NCs and NDCs. The focus should be on making these vehicles interoperable.

Second, comparability is most useful in a few core areas.

Adaptation is context specific. However, a reasonable degree of consistency would be highly valuable in five areas:

1. **Risk basis**: whether reporting is grounded in current and projected hazards, impacts, and vulnerabilities.
2. **Implementation status**: whether actions are planned, ongoing, completed, or updated.
3. **Results and effectiveness**: whether actions reduced impacts, increased resilience, or improved continuity of essential services.
4. **Finance and support**: whether adaptation action is costed, tagged, supported, and linked to investment planning.
5. **Monitoring systems**: whether domestic systems exist to track progress, outcomes, and lessons learned.

Third, reporting should better inform the Global Stocktake.

Under decision 19/CMA.1, the Global Stocktake draws on the state of adaptation efforts, support, experience, and priorities–including adaptation communications, and reports under Article 13. The 2025 BTR synthesis shows that Parties are already reporting information that can inform collective progress, including links to the Global Goal on Adaptation, sector priorities, cross-cutting elements and monitoring systems.

To make adaptation reporting more useful for future Stocktakes, CDRI recommends that:

- Parties be encouraged to indicate explicitly how reported actions relate to the UAE Framework targets and the iterative adaptation cycle.
- Synthesis products organize information around comparable themes such as water, food, health, ecosystems, infrastructure, urban systems, and loss and damage.
- Reporting gives greater attention to outcomes, effectiveness, and sustainability–and not only plans and hazards.
- Adaptation reporting includes more information on implementation constraints, especially regarding capacity, finance, data, and institutional coordination; and
- The State of Adaptation Action Portal be used as a practical coherence tool linking information already contained in national reports and communications. The Adaptation Committee's portal[3] compiles Party-reported adaptation arrangements and actions for all Parties and is intended to strengthen collective understanding and support tracking of global progress.

5. CDRI's specific recommendations on Disaster Resilient Infrastructure in adaptation reporting

Adaptation reporting under the Convention and the Paris Agreement would be materially improved if it more clearly captured **Disaster Resilient Infrastructure as a cross-sector enabler of adaptation**. Infrastructure underpins water security, health systems, food systems, transport, energy, communications, and emergency response. The GIR Report 2025 and the Action Agenda both show that weak infrastructure resilience can undermine adaptation gains across sectors, while resilient infrastructure can generate large resilience dividends over time.

[3] https://unfccc.int/adaptation_country_portal

The GIR Report 2025 finds that global average annual losses related to buildings and infrastructure exceed US$ 700 billion, and that indirect economic costs from infrastructure service failures are on average 7.4 times greater than direct physical damage costs. For the Adaptation Committee's purposes, this matters because outcome-level reporting on whether adaptation is reducing real-world risk cannot be meaningful if the systems that translate climate shocks into economic and human losses remain largely invisible in the reporting architecture.

Accordingly, CDRI recommends that future guidance encourage Parties, where relevant, to report on:

- Critical infrastructure exposed to climate hazards.
- Multi-hazard risk assessments and resilience diagnostics undertaken.
- Adoption or updating of resilience standards, codes, and regulations.
- Retrofitting and maintenance of adaptation-critical assets.
- Continuity of essential services during shocks.
- Losses, downtime, and recovery time associated with climate-related disruptions.
- Resilience-related public expenditure, budget tagging and financing instruments; and
- Institutional arrangements linking ministries of finance, planning, infrastructure, environment, and disaster risk management.

Therefore, the Adaptation Committee's revised guidance should include a dedicated module on reporting infrastructure resilience. The Committee should work closely with the LEG and the CGE to develop a set of infrastructure-specific adaptation indicators for use in BTRs. It should also recommend to the CMA that infrastructure resilience be included as a distinct reporting category in the State of Adaptation Action Portal.

6. Conclusion

Improving adaptation reporting does not require new reporting obligations. It requires better use of the existing architecture, stronger coherence across vehicles, more practical guidance on outcomes and effectiveness, stronger domestic monitoring systems, and clearer reporting on implementation, finance, and service resilience. This would both reduce burden and improve the usefulness of reported information for national decision-making and for the Global Stocktake.

CDRI would be pleased to support further work by the Adaptation Committee, the CGE, and the LEG on practical options to strengthen adaptation reporting, particularly in relation to risk-informed planning, resilient infrastructure, monitoring systems, and finance tracking. CDRI's analysis on infrastructure resilience in the Global Goal on Adaptation, the Global Stocktake UAE Dialogue, and Least Developed Countries' adaptation planning, developed in parallel submissions to these processes, provides further evidence to the recommendations made here, and is available to the Committee on request.

Request to Parties to the UNFCCC and the UNFCCC Secretariat

CDRI wishes to confirm its availability to provide technical expertise that would support the work of Adaptation Committee as it relates to Climate- and Disaster Resilient Infrastructure.

Submitted by: Coalition for Disaster Resilient Infrastructure (CDRI)

CDRI is a global coalition dedicated to enhancing the resilience of infrastructure systems to climate and disaster risks. With 65 Members, it includes national governments, international organizations, academia, and the private sector collaborating to share knowledge, conduct research, and invest in Disaster Resilient Infrastructure.

To learn more about CDRI visit https://cdri.world/

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