EU-ASE's Response to the Climate Resilience Framework Consultation

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Open Public Consultation for the new European climate resilience framework

Fields marked with * are mandatory.

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Introduction

Consent and how to complete this survey
The European Commission will protect any personal data you provide during this consultation.

You can save your replies as a draft and return later to complete the survey.

Some questions are mandatory, especially at the start, while others in thematic sections are optional – answer only those relevant to you.

Please keep free text comments concise.

At the end of the questionnaire, you may upload a document with further comments and views.

For reasons of transparency, organisations and businesses taking part in public consultations of the European Commission are asked to register in the EU's Transparency Register. If already registered, you can skip this step.

Thank you for your contribution!

Introduction
In recent years, Europe has been facing growing damages and costs from climate-related weather extremes. How we act on climate change will shape Europe's future competitiveness, security and prosperity. How we adapt and build climate resilience and preparedness now will determine our quality of life for years to come.

The European Climate Risk Assessment identified 36 key climate risks in Europe that interact to result in fundamental system-wide challenges. If climate change, along with other risk factors, is not properly addressed, it can compromise food and water security, energy and defence capabilities, supply chains, pricing, economic and financial stability, fiscal sustainability and public health more severely. In turn, this affects social cohesion and stability, with vulnerable groups particularly affected.

The assessment also found that European economy and society are not sufficiently prepared for current and future climate risks, with several risks already at critical levels. Without urgent action to cut emissions and build climate resilience, many risks could reach catastrophic levels by the end of this century. Hundreds of thousands of people could lose their lives to heatwaves, and economic losses from coastal floods alone could exceed EUR 1 trillion per year.

Responding to these challenges and in line with the Commission President's Political Guidelines, the Commission is preparing a new and impactful European integrated framework for climate resilience scheduled for adoption in Q4-2026.

Its key objective is to drive transformational change to make Europe significantly better prepared for and more resilient to climate impacts. The new framework will empower all stakeholders to gain control in the increasingly uncertain future, manage climate risks more effectively, seize emerging economic opportunities, and strengthen the EU's position as a global leader in producing and exporting climate resilience technologies, products, services and innovations.

The objectives of the framework include:

- protecting people's health, well-being and livelihoods;
- anticipating and significantly reducing exposure to high-impact risks and losses when conceiving policies, investments and other measures;
- ensuring robust and regular science-based risk assessments as basis for action;
- promoting a shared understanding of future climate conditions among decision-makers in Europe;
- supporting EU Member States, EU candidate countries and the EU neighbourhood – including the regional and local levels – while empowering their societies;
- promoting coordinated and effective action across all levels of government and the private sector;
- and reducing losses, destruction and costs from climate-related impacts by increasing (re)insurance cover.

An open call for evidence was held over the summer. Respondents broadly agreed with the Commission's analysis of the key problems: EU and national policy frameworks for climate resilience are inadequate, missing in many sectors, or poorly implemented. The feedback also showed that regional and local authorities, businesses, households and individuals are not sufficiently aware of climate risks, which significantly limits their preparedness.

As a result, respondents expressed strong support for robust action in this area. They most often called for: (i)

integration of ‘resilience-by-design’ criteria into all public spending, procurement and key sectoral policies; (ii) harmonised risk-assessment standards with shared climate scenarios; (iii) nature-based solutions as default first line of defence; (iv) stable long-term funding for adaptation and resilience; and (v) a systematic integration of climate-related health considerations.

This open public consultation, building on the call for bold and urgent action, offers all interested parties the opportunity to provide feedback on the proposed aspects of the new EU framework for climate resilience, and to share any additional views and suggestions.

About you

* Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ◉ English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian
- ○ Irish
- ○ Italian
- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian

- Spanish
- Swedish

* I am giving my contribution as
  - Academic/research institution
  - Business association
  - Company/business
  - Consumer organisation
  - EU citizen
  - Environmental organisation
  - Non-EU citizen
  - Non-governmental organisation (NGO)
  - Public authority
  - Trade union
  - Other

* First name

Luigi

* Surname

PETITO

* Email (this won't be published)

luigi@bs-europa.eu

* Organisation name

255 character(s) maximum

European Alliance to Save Energy (EU-ASE)

* Organisation size
  - Micro (1 to 9 employees)
  - Small (10 to 49 employees)

- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

37816636575-51

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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- Åland Islands
- Albania
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- Bangladesh
- Barbados
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- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga

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- Cayman Islands
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- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
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- Congo
- Cook Islands
- Costa Rica
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- Croatia
- Cuba
- Curaçao
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- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
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- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
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- Latvia
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- North Korea
- North Macedonia
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- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia

- Democratic Republic of the Congo
- Lesotho
- Saint Kitts and Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

Fields of activity:

- [ ] Agriculture
- [ ] Forestry and fishing
- [ ] Mining and quarrying
- [ ] Manufacturing
- [x] Energy
- [x] Water and waste
- [ ] Construction and real estate
- [ ] Wholesale and retail trade
- [ ] Hotel
- [ ] Food services
- [ ] Publishing
- [ ] Broadcasting
- [ ] Content production and distribution
- [ ] Telecommunication
- [ ] IT
- [ ] Computing
- [ ] Financial and insurance
- [ ] Public administration
- [ ] Defense and security
- [ ] Education and training
- [ ] Research
- [ ] Health, care and social services
- [ ] Arts, sports and recreation
- [ ] Biodiversity and nature protection
- [x] Climate mitigation and adaptation
- [ ] Other

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

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The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- ○ **Anonymous**

  Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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☑ I agree with the personal data protection provisions

General Questions

How well informed do you consider yourself about the potential impacts of climate change that could affect you now and in the future?

	Fully informed	Slightly informed	Neutral	Slightly uninformed	Totally uninformed
* Answer	◉	○	○	○	○

Optional: Please explain why?

The European Alliance to Save Energy is a business-led multistakeholder and cross sectoral organisations. Our members are world leader of energy and water efficiency solutions with operations across all the 27 EU Member States. Our membership includes also large environmental think tank. The full understanding of the impact climate change has on urban resilience is one of the prerequisite of our action that is about advocating for a more efficient, sustainable and resilient Europe.

When advising their clients and partners, our members are confronted with the challenges of designing, deploying, and maintaining solutions that help prevent and mitigate climate-related risks, especially in urban areas. A thorough understanding of the impacts of climate change on urban areas, buildings, industry, utilities, water, waste water and energy infrastructures is therefore essential to enable them to recommend the most appropriate solutions.

How prepared do you consider yourself to face the potential impacts of climate change?

	Fully prepared	Slightly prepared	Neutral	Slightly unprepared	Totally unprepared
* Answer	○	◉	○	○	○

Optional: Please explain why?

Climate change is expected to make climate patterns increasingly unstable and having a significant impact on both energy and water systems. It is complex to fully anticipate and prepare for the full range of extreme events that we may face. Nevertheless, we are convinced that energy and water efficiency solutions, if deployed at scale, can make a significant contribution to strengthen Europe preparedness and resilience to climate-related risks.

Who do you consider to be primarily responsible for preparing for the physical impacts of climate change?

- ○ Individual citizens
- ○ Businesses and private actors
- ○ Local and regional authorities
- ○ National governments
- ◉ The European Union
- ○ All of the above
- ○ other

Which of the following would help you become better prepared for the impacts of climate change?

- ☑ Easier access to data and information relevant to my area/situation

- [x] Expert support to prepare/protect my home/family/company etc. against possible risks, based on this data/information
- [x] Easier access to funding or financing for my/our actions
- [ ] Greater local ownership of planning, implementing measures, and monitoring success
- [x] Better planning and preparation by public authorities
- [x] Other

If other, please explain why?

A strong, clear, and stable policy and regulatory framework, supported by enabling conditions such as adequate funding and capacity-building, is essential to encourage climate-resilient behaviour and to support the deployment at scale of existing water and energy efficiency technologies and solutions.

Please name the three policy actions that would most help you improve your risk awareness and preparedness for climate change impacts:

Given the short-, medium- and long-term risks posed by climate change to human health and safety, business competitiveness, and overall economic performance, EU policies and the regulatory framework should require Member States to:

1. Embedding climate 'resilience-by-design' across policies and investments in infrastructure, industry and buildings.
Integrate resilience-by-design criteria into all future spatial planning, public spending, procurement, and key sectoral policies. In urban areas, policy should aim to establish and maintain a comprehensive, continuously updated database of existing measures and solutions that can enhance climate resilience. In this context water and energy efficiency technologies and solutions should be fully recognised and supported as risk-reduction and prevention tools; digital technologies should be leveraged for predictive risk management, with a particular aim to prevent water stress; data should be made available to train AI models in a GDPR safe way; leakages should be fixed at local level; nature-based solution such as green roofs and walls should be leveraged more because of their multiple benefits to cool down buildings in summer, alleviate the urban heat island effect and provide detention and retention capacity for storm and wastewater management.

As part of this effort, the one-stop shops established to support energy renovation of buildings under the Energy Performance of Buildings Directive (EPBD) should be expanded to also provide technical assistance and capacity-building for increasing the resilience of buildings and neighbourhood.

2. Scaling resilience solutions through stable regulatory frameworks and earmark public funding to accelerate deployment and crowd in private investment.
Provide regulatory certainty and long-term stability to attract private investment in water and energy efficiency solutions and earmark public funding to directly support the installation of climate resilience solutions by citizens and businesses, while enabling public authorities to lead by example. Such funding should be designed to reduce investment risks, leverage additional private capital at scale and support tax incentives schemes and new business models for utilities such as selling energy produced at WWTPs and waste heat recovery for district heating.

3. Strengthen awareness-raising and risk literacy.
Put in place targeted awareness-raising and risk literacy activities to mainstream good practices and encouraging risk assessments and cost/benefit analysis of energy and water efficiency solutions. All public sector entities should be required to be first movers to grow the necessary markets. These activities would, for example, imply informing business how to increase security and maintain their competitiveness by adopting digital solutions to address water scarcity; and public authorities and citizens of the potential on how to increase the resilience of their urban buildings e.g. when faced with extreme weather events through energy efficiency renovation, electrification and the integration of nature based solutions on top and around buildings.

Climate resilience by design

The principle of 'climate resilience by design' means a **proactive effort to consider and prevent plausible high-impact risks and losses from the very beginning when conceiving policies, investments and other measures.** The 2024 Commission Communication on managing climate risks put it simply: 'planning decisions of today need to build on a sound anticipatory assessment of risks' likely to occur in the future. Climate resilience by design differs from measures taken to remedy the damage caused by climate impacts

after they have already occurred.

The Commission intends to ensure that the future climatic conditions are duly integrated into all relevant EU policies and frameworks governing sectors and stakeholders vulnerable to climate change. It also seeks to encourage Member States and all public-sector authorities and private-sector stakeholders to embed this principle in their decisions, ensuring coordinated action across society.

Which sectors are most important for integrating the principle of “climate resilience by design”?

Water resilience must be treated as a cross-sectoral priority. Water and energy systems are interdependent, and climate change increases drought, flood and heat stress risks for industrial production, energy generation and urban infrastructure.
A Climate Resilience Framework should further recognise and promote:

- The Water-energy nexus and water efficiency as a resilience indicator across sectors;
- Circular water systems and reuse in industry and cities;
- Wastewater heat and resource recovery;
- Finance frameworks for water-efficiency investments

Buildings are critical infrastructure, where people live and work, and which also serve as key nodes of a more decentralised, secure, efficient, and renewable energy system. As 85–95% of today’s buildings are expected to still be standing in 2050, it is essential that existing buildings are also made more climate resilient. This could be reflected, for example, in a broader interpretation of what is encompassed under the concept of “building renovation”, so that renovation efforts explicitly contribute to future-proofing buildings against climate risks

Digitalisation is a horizontal enabler across water, wastewater, industry, buildings, mobility and energy systems. The framework should accelerate the use of digital and AI-driven tools for design, efficiency, prediction, real-time detection, measuring, monitoring, flexibility and many other tasks that can significantly reduce risks and increase resilience.

Which policy areas or EU legislative frameworks should prioritise embedding this principle, and how should this be done?

The context in which we operate is increasingly complex. The impacts of climate change and the growing vulnerability of human systems are already dramatic. Between 1980 and 2020, the European Environment Agency (EEA) reports between 85,000 and 145,000 fatalities linked to weather- and climate-related extreme events. Over the same period, total economic losses amounted to approximately EUR 450–520 billion (in 2020 euros).
More recent data underline the accelerating nature of these impacts. Analysis of the 2020–2023 period shows that economic losses were roughly 2.5 times higher than in the previous decade, driven primarily by heatwaves, floods, and droughts (EEA). In addition, according to a recent study commissioned by the Directorate-General for Climate Action (DG CLIMA), Member States and the private sector will need to invest around EUR 70 billion per year until 2050 in climate adaptation in order to reduce exposure to increasing climate hazards and improve resilience.

The human toll and the scale of economic losses associated with climate change in Europe strongly support the need to systematically integrate a “resilience-by-design” approach across the implementation of all existing EU policies and regulatory frameworks, as well as all future legislation. For example, there are many opportunities to reinforce climate resilience by design in the EU legislative framework for buildings by supporting the implementation of the EPBD and EED encouraging Member states to take climate resilience into account in the national Building Renovation Plans.

This principle should serve as a mandatory guiding criterion for policymakers at all levels throughout the preparation of legislative proposals and the negotiation process.
This resilience-by-design principle could be formally established—together with other complementary requirements outlined in this consultation feedback—within a future Climate Resilience Regulation. Such a Regulation should include provisions to strengthen climate adaptation across key sectors, including urban areas, where exposure to climate risks and potential impacts on people, building infrastructure, and economic activity are particularly high.

Are there any existing policies or legislation (at EU, Member State, regional, local level) that prevent you from taking effective action to be better prepared for the impacts of climate change? If so, which ones and please explain how they impair your efforts.

Over the past institutional term, the European Union has adopted a regulatory framework that, if properly implemented, could significantly enhance climate resilience in urban areas. It includes key directives and regulations such as the Energy Efficiency Directive, the Energy Performance of Buildings Directive, the Urban Waste Water Treatment Directive, the Industrial Emission Directive and the Nature Restoration Regulation. Ensuring the full, timely, and correct implementation of these provisions is a prerequisite for policymakers, stakeholders, and citizens to scale up investments in solutions that can enhance urban resilience through water and energy efficiency. Conversely, delays in transposition, partial implementation, or regulatory uncertainty would significantly hinder the ability of actors to take effective climate adaptation actions on the ground.

Legislative framework for climate resilience

The European Climate Law requires the EU and Member States to ensure continuous progress on climate adaptation. Yet, Member States have very different policy frameworks for the assessments, strategies, plans and instruments, which limits the development of a shared understanding of the challenges and coordinated

climate resilience actions across the EU. Policies are often not specific enough to address major climate risks, and the roles and responsibilities of individual sectors in adaptation planning and implementation vary widely.

Overall, **progress in strengthening climate resilience in the EU is slow and uneven and is not keeping pace with accelerating climate change. EU and national resilience policies and measures are currently not fit for purpose.**

Therefore, the Commission intends to prepare a legislative proposal to ensure a more comprehensive, robust and ambitious approach, while fully respecting the principle of subsidiarity, proportionality, avoiding unnecessary administrative burdens and ensuring coherence with sectoral policies. This section invites your views on the scope and key elements of the planned proposal.

The Commission considers that including the below aspects and requirements in its legislative proposal is essential to better prepare our economies and societies for climate change, and to prevent major losses and damage. What is your view on each of them?

Common baseline climate trajectories/scenarios, and acceptable risk levels:

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Determination of the levels of global warming or a similar common baseline* for adaptation decisions that EU and national public policy and investments should consider, for example through common EU climate reference trajectories/scenario(s) ** An example is the decision by France to establish a Reference Trajectory for Adaptation to Climate Change (TRACC), setting +1.5 °C by 2030, +2 °C by 2050, and +3 °C by 2100 as reference for national and regional adaptation strategies. Respondents to the Call for Evidence supported the development of minimum precautionary levels for climate resilience / common reference scenarios / reference warming trajectories.*	◉	○	○	○	○
Duty to consider a common baseline (e.g. reference trajectories/scenarios) of global warming, as described in the preceding bullet point, in climate risk assessments.	◉	○	○	○	○

Duty to apply a precautionary approach by integrating a common baseline into planning decisions by the EU and Member States	◉	○	○	○	○
Common approach for deciding what level of residual risks society / public authorities choose not to eliminate: a way to determine what are we willing to live with and why	◉	○	○	○	○

Comments:

Climate risk assessments:

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Development of climate risk assessments that would also cover the most affected policy sectors, at European level	◉	○	○	○	○
Development of climate risk assessments that would also cover the most affected policy sectors, at national level	◉	○	○	○	○
Common parameters for the scope and content of both EU and national climate risk assessments (e.g. climate scenarios, regularity, sector coverage)	○	◉	○	○	○

Comments:

The EU should develop a clear definition of a “climate-resilient city”, including the underlying level of acceptable climate risk. This definition could then be adapted at national or regional level to account for local circumstances and conditions.

Once such a standard is established, we strongly support conducting climate risk assessments in urban areas to:

1. Identify their current climate vulnerability and distance to the climate-resilient standard;
2. Determine pathways and solutions to close this gap.

These pathways should also be evaluated in terms of cost-effectiveness taking into due account also their impact on security and competitiveness as well societal and environmental benefits and costs

Adaptation planning and determination of risk owners:

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Definition of climate resilience and adaptation targets (possibly including sectoral / thematic targets) for EU institutions and Member States	◉	○	○	○	○
Robust obligation on the EU/Commission to prepare and implement an EU adaptation strategy and plan	◉	○	○	○	○
Climate resilience and adaptation plans should also cover the most affected policy sectors at EU level	◉	○	○	○	○
Robust obligation on Member States to develop national adaptation strategies and plans	◉	○	○	○	○

Adaptation planning and determination of risk owners (cont.):

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Climate resilience and adaptation plans should also cover the most affected policy sectors at national level	◉	○	○	○	○
Identification of risk owners responsible for and mandated to address the identified vulnerabilities	◉	○	○	○	○

Comments:

Climate resilience and adaptation plans are essential tools at all levels of policymaking to ensure that identified climate risks are effectively addressed with solutions tailored to local circumstances. Granular plans at the municipal level are particularly important to assess the specific needs of urban areas, respond to the growing impacts of climate change, and strengthen the climate resilience of cities.

In this context, climate resilience and adaptation plans should integrate other local planning exercises, such as heating and cooling strategies, building renovation and integrated waste water treatment plans; and they should fully embed the resilience-by-design principle for urban greening and building adaptation.

To enhance efficiency and reduce administrative complexity, these plans should be coordinated with other planning requirements established under existing EU legislation. This would help ensure a streamlined approach that maximises synergies across different policy areas while accelerating the deployment of climate-resilient solutions.

Complementing action at EU level by Member State action, in compliance with the subsidiarity principle

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Member States adopting national legal frameworks on climate resilience and adaptation (covering issues such as administrative set-up and coordination mechanisms, regular climate risk and vulnerability assessments, adaptation planning, early-warning mechanisms, governance at regional and local levels, alignment with subnational strategies and plans, inclusion of stakeholders and vulnerable groups, monitoring and evaluation framework)	◉	○	○	○	○
Member States carrying out evaluations at appropriate levels to identify regions and groups of people that are particularly vulnerable to climate change, and developing plans for targeted adaptation measures to help these regions and groups	◉	○	○	○	○
Member States involving all relevant stakeholders, including particularly vulnerable groups, in adaptation policy planning	◉	○	○	○	○

Comments:

The evaluation of climate risk and potential solutions to face these challenges must involve all relevant actors, from the groups most at risk to the providers of solutions to mitigate the impact of climate change, such as providers of solutions for water efficiency, energy efficiency, flexibility, electrification and urban green infrastructure.

Monitoring, reporting, evaluation and learning

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Development of a limited number of performance indicators for both the EU and Member States, for measuring the effectiveness of climate adaptation and resilience measures	◉	○	○	○	○
In line with the simplification agenda, improvement and streamlining of monitoring, reporting, evaluation and learning practices at EU and national levels, through more targeted reporting on climate impacts	◉	○	○	○	○

Incorporation of corresponding resilience progress indicators into existing sector legislation to avoid duplication and new reporting requirements	○	○	◉	○	○

Comments:

We believe that the agreed legislation should not be reopened as its implementation is ongoing. Climate resilience progress indicators should already be integrated into the plans being prepared to fulfil the provisions of the newly adopted legislation following bilateral exchange between the Commission and Member States. At the same time, these indicators and metrics could provide added value if incorporated into future EU and national legislation, helping to standardise monitoring, support accountability, and guide investments in climate-resilient solutions across sectors.

Please specify other impactful measures with transformational impact that the Commission should include in its legislative proposal on climate resilience:

The Framework must ensure alignment across climate, water, energy, digital and industrial legislation. Integrated planning will provide market certainty and unlock the much needed private investment.

Decision-support tools for climate resilience

Access to clear, reliable and practical information about how climate change affects us and what we can do about it, is essential to better manage the risks and develop effective solutions. Open-access web-based tools can help meet this need by **reaching large audiences with tailored, visually engaging and interactive information.** However, most existing tools are designed for experts focusing on scientific rather than practical needs. Furthermore, tools targeting different geographies, climate hazards or sectors often use different methods and reference points to quantify future changes, making comparison difficult. Cross-border information is often missing. The Commission would like to get feedback on how it can best use Europe's wealth of climate data and digital capabilities to **improve access to clear, reliable, practical and coherent information on climate risk and adaptation solutions across regions and sectors.**

Where do you look for information about how climate change could affect you or your activities?

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Sectoral organisations resources, including advisory and support networks	○	◉	○	○	○

Regional and/or local authorities' resources	○	○	○	◉	○
National government resources, including national meteorological services	○	○	○	◉	○
European climate adaptation platforms and/or climate services	○	◉	○	○	○
European scientific programmes and networks	○	◉	○	○	○

Where do you look for information about how climate change could affect you or your activities? (cont.)

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Reach out to a consultancy to find and analyse this information for me	○	◉	○	○	○
In the media, social media and online	○	○	◉	○	○
Using artificial intelligence	○	◉	○	○	○
I have never looked for such information	○	○	○	○	◉

What information would help you determine if and how to take action to better prepare for the effects of climate change?

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Recent economic losses or damage caused by climate events in my area or in activities related to my job	◉	○	○	○	○
Current severity of extreme or unseasonal weather in the area where I live or work (e.g. expected number of days with temperatures exceeding 35 °C)	◉	○	○	○	○
Estimates of future severity of extreme or unseasonal weather in the area where I live or work	◉	○	○	○	○
Current impacts of extreme or unseasonal weather on my community and me in terms of health (e.g. excess mortality due to dangerous heat waves), and economic activities (e.g. crop production losses from heat, damage to energy infrastructure due to floods, etc).	◉	○	○	○	○

What information would help you determine if and how to take action to better prepare for the effects of climate change? (cont.)

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Estimates of future impacts of extreme or unseasonal weather on my community and me in terms of health and well-being, and economic activities	◉	○	○	○	○
Information on insurability of exposed assets	◉	○	○	○	○
Benefits of specific adaptation solutions in reducing impacts on health and wellbeing and specific economic activities.	◉	○	○	○	○

If other information, please specify:

Related to the last point, easy-to-access and install, affordable, climate resilience solutions should be made available to all actors, businesses or citizens that are willing to act to improve the climate resilience of their environment, including their buildings. A lot can be done to provide that possibility, such as including it in existing one-stop-shop services.

The Commission considers developing a user-friendly web-based tool for non-experts that provides authoritative and harmonised quantitative information on climate change across Europe. This tool could translate the common climate scenarios into national, regional and local climate and weather conditions, which can be expected under these scenarios, and help to find possible solutions for addressing the identified risks. The Commission considers this tool essential for informing EU policies, addressing cross-border risks, and supporting people and businesses lacking alternatives. Would you benefit from such a tool?

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Answer	◉	○	○	○	○

What features would help you use that tool?

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Simple language that does not require specialist knowledge	◉	○	○	○	○
Tutorials and onboarding information	◉	○	○	○	○

Visual presentation of information, e.g. on a map	◉	○	○	○	○
Ability to download data or summary reports	◉	○	○	○	○
Clear link between climate risks and adaptation solutions	◉	○	○	○	○

What features would help you use that tool (cont.)?

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Navigation support through an AI-powered chat	◉	○	○	○	○
Links to other trusted sources for more specialised information	◉	○	○	○	○
Access to a help desk	◉	○	○	○	○

What other features would you find helpful?

The list of adaptable solutions should include the wide range of existing technologies and solutions to improve climate resilience at the urban level. Such a list should also be complemented with a database of systems and solutions providers and installers at the national level. This would significantly support local actors to access and deploy these solutions.

Protecting people and supporting regional and local action

Climate change has a detrimental impact on human health, lives and livelihoods, disproportionately affecting the most vulnerable. The new framework should drive EU and Member States measures that help individuals and local communities to be better equipped to face climate risks. Because climate risks vary across Europe, action under the framework should be **place-based and co-designed with local and regional authorities** and communities. Launched in 2021 as a pilot initiative to support pioneer regional and local authorities, the EU Mission on climate adaptation is providing direct support and empowering European regions and local authorities to develop and implement place-based measures towards climate resilience. The new framework provides an opportunity to scale up this support to all regions and communities across Europe.

What policy measures should the EU and Member States take to ensure that the most vulnerable groups and geographical areas receive adequate support and are protected from the disproportionate impacts of climate change?

EU:

The EU should require Member States to set explicit targets and, in coordination with local authorities, identify vulnerable geographical areas and vulnerable population groups. This information is crucial to customise interventions, maximise the impact of public investments, and prioritise the needs of the most vulnerable and disadvantaged communities in climate adaptation and resilience efforts.

Member States:

Member States should ensure that the achievement of targets and the implementation of measures targeting vulnerable areas and populations are supported with adequate financial and technical resources, particularly for citizens or municipalities with limited capacity or expertise in climate adaptation and resilience.

What measures should the EU and Member States take to protect people's health against the impacts of climate change?

EU:

Based on robust scientific evidence, the EU should support Member States in fully implementing existing legislation aimed at increasing the efficiency, the comfort and the quality standards of building as well as legislation restoring urban ecosystems through the integration of blue and green infrastructure. This approach directly protects citizens from the impacts of climate change while delivering multiple co-benefits.

Member States:

Member States should assess vulnerabilities and anticipate risks across small, medium, and large local authorities, prioritising interventions in critical urban areas. Implementing the existing EU regulatory framework, starting with EED, EPBD, UWWTD and NRR should be Member States' top priority.

What measures should the EU and Member States take to provide greater support to regional and local stakeholders?

EU:

The EU should provide tailored guidance and support, including:

- Guidance notes for the transposition of legislation;
- Lists of water and energy efficiency solutions to increase climate resilience depending on local geography;
- Good practice examples implemented across Europe and globally.

Member States:

Member States must also ensure capacity-building and financial/technical support so that regional and local stakeholders have the tools and knowledge to identify climate risks and associated health impacts. Supporting local authorities in the implementation of the current regulatory framework is crucial to achieving resilient and healthy urban environments.

What targeted initiatives should the EU and Member States implement to specifically support the EU's outermost regions in adapting to climate change, considering their particular exposure to extreme weather events and their unique geographical and socio-economic contexts?

EU:

Member States:

What are the most pressing barriers that should be removed to enable action at regional and local level?

- [x] Lack of sufficiently specific data and information about current and future risks to design science-based policies
- [x] Limited access to specialised support (specialist language, too technical, etc.) to help develop impactful measures, provided at national or EU level
- [x] Insufficient funding or financing for regional and local measures, including access to dedicated national and EU funds
- [x] Insufficient institutional capacity to absorb funding and develop a project pipeline.
- [x] Limited engagement of local communities in designing and implementing measures
- [ ] Existing legislation that complicates efforts to deal with climate impacts
- [x] Lack of consistent monitoring and reporting schemes that would provide incentives to act
- [x] Other

If other, please explain or complement your answer above:

Lack of understanding and awareness of the multiple benefits of certain climate resilience solutions such as urban green infrastructures, which while save energy in buildings and in WWTP; improve health; increase climate resilience and restore nature in cities.

How could the EU Mission pilot be leveraged or replicated to support action by all European regional and local stakeholders?

- [x] Encourage Member States to develop Mission-type national initiatives with dedicated financial resources for their implementation
- [ ] Define the roles and responsibilities of National Missions within the Framework
- [x] Mandate Member States to set up national platforms or coordination tables where local and regional stakeholders have a legally recognised role and responsibility
- [x] Encourage Member States to dedicate financial resources to support regional and local action
- [ ] Connect EU funding opportunities with the relevant stakeholders to scale up the regional and local climate adaptation solutions developed within the Mission.
- [ ] Other

Competitiveness – harnessing innovation opportunities

Climate resilience and preparedness go beyond minimising and managing risks. They open **a new world of commercial opportunities and potential to innovate and create new project pipelines and markets.** There is a rapidly growing demand for resilience products and services, such as water technologies, regenerative agriculture solutions, heat and drought resistant crops, climate risk insurance, climate services and the use of space data, risk modelling tools, developing smart systems to predict and prevent supply chain disruptions, climate resilient construction materials and designs, technologies for resilient energy and transport infrastructures, or health system adaptation solutions and innovation. Deploying such technologies c**an enhance the competitiveness of EU companies and key economic sectors** by improving adaptive capacity and opening new export markets. The new Framework aims to support EU companies, SMEs and start-ups in **seizing these opportunities, helping position Europe as a global leader in climate resilience innovation.**

In your sector/industry/area, what are the climate resilience technologies /innovations that you need to develop or scale up to make your sector /industry more competitive?

We are providers of energy and water efficiency solutions. Our technologies and solutions make buildings, neighbourhoods, cities, energy infrastructures, mobility and businesses more climate resilient. We are European companies that would strongly benefit from an ambitious, stable, and binding EU framework for climate resilience. The technologies and solutions already exist; what is needed is a clear and supportive regulatory environment to accelerate investments and enable scale-up.

Our members have an annual turnover of about 70 billion EUR, they have more than 800 facilities across the 28 Member States of the EU; they employ 240000 people across the EU and they own more than 7000 patents filed in the EU. The overall industrial energy efficiency ecosystem that we represent has an annual turnover of 150 billion EUR and employs about 1.2 million people in Europe. And this is an industry that is healthy and is growing in the EU. Europe still has a position of global leadership in water and energy efficiency solutions.

Scaling up our sector would also deliver significant benefits for the wider European economy. Business disruption caused by extreme weather events resulted in at least €43 billion in short-term economic losses in the EU in 2025, with impacts from floods and other extreme events projected to reach €126 billion by 2029. These figures include indirect costs, such as business interruptions, lost production, and supply-chain disruptions (e.g. factory shutdowns and reduced commercial activity), and not only direct physical damage. An ambitious EU climate resilience framework that enables the large-scale deployment of water and energy efficiency solutions would therefore support businesses growth, enhance urban resilience, and reduce economic losses, contributing to Europe's long-term competitiveness and prosperity.

What measures could improve the competitiveness and innovation of climate resilience products/services in your sector/industry the most?

	Very relevant	Relevant	Neutral	Not very relevant	Not relevant at all
Increased public funding and investment	◉	○	○	○	○
Increased private funding and venture capital	◉	○	○	○	○
Improved access to specialised expertise/workforce	◉	○	○	○	○
Improved market certainty and regulatory support	◉	○	○	○	○

What measures could improve the competitiveness and innovation of climate resilience products/services in your sector/industry the most (Cont.)?

	Very relevant	Relevant	Neutral	Not very relevant	Not relevant at all
Access to technologies/ modernisation of equipment	○	○	◉	○	○
Increased consumer awareness and demand	◉	○	○	○	○
Innovative climate risk management and insurance tools (e.g. parametric coverage)	◉	○	○	○	○

If other, please specify:

Finance and insurance

Climate change is already imposing significant measurable costs on consumers, businesses and economies. Extreme weather events and chronic risks such as sea level rise or soil subsidence - damage assets, disrupt supply chains, and reduce productivity, turning them into a mainstream financial concern. Therefore, it is **crucial to factor in climate resilience in investment and financial decisions**, to reduce climate-related economic losses and minimise disruptions to the business continuity and maintain revenues. To fully address the risks, the building of climate resilience would need to be complemented by insurance. Currently, only 25% of the losses are insured and the insurance premiums continue to rise. The scale and systemic nature of climate-related economic impacts make it impossible for governments to bear their cost and will require engagement, including financial contributions, from all levels of governance, economic sectors and the public. The new Framework will put forward policy measures t**o scale up resilience finance** needed to fund the expanding project pipeline. It will also include measures aiming to improve **access to affordable insurance and reduce the widening insurance-protection gap.**

Public sector role in funding climate resilience

	Yes	No
Is it necessary to integrate climate resilience considerations in fiscal planning and financial decisions at all levels of the public sector as well as in the private sector?	◉	○
Would incorporating climate resilience considerations in investments, including public spending and procurement limit economic losses from climate events?	◉	○

Private-sector investments and climate resilience

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
National adaptation plans should be designed to serve as resilience and adaptation investment plans, unlocking the full potential of private-sector funding.	◉	○	○	○	○
The private sector needs more guidance on how to incorporate climate resilience into investment and business decisions.	◉	○	○	○	○
Effective public-private risk sharing mechanisms for climate adaptation investments (such as	◉	○	○	○	○

public-private partnerships, blended finance, disaster bonds, etc.) would increase resources invested in climate resilience and adaptation.					

What are the key obstacles for scaling up investments strengthening climate resilience and adaptation?

We see significant potential for alignment with the insurance sector to scale up investments in climate resilience and adaptation in cities, utilities and businesses. Our technologies and solutions are proven to reduce climate risks at building, neighbourhood, and city level, yet several obstacles continue to limit their wider deployment.

A major challenge is that public authorities, utilities, businesses, investors, and property owners often lack access to clear, actionable, and localised data on their exposure to climate risks and the preventive benefits of resilience solutions. This makes it difficult to fully understand the real cost of inaction, to prioritise preventive investments, and to value solutions that reduce losses before damage occurs. Improving the availability and quality of local hazard, loss, and performance data - including data demonstrating the risk-reduction benefits of energy and water efficiency solutions - would support better risk assessment, enable insurers to reflect prevention in underwriting and pricing, and help unlock greater investment in adaptation.

We recognise that, from an insurer and investor perspective, many adaptation measures do not always generate immediate or direct financial returns, despite their strong capacity to reduce future losses. Stronger collaboration between solution providers, insurers, public authorities, utilities, water tech companies, industries, financial institutions is therefore essential to better quantify, recognise, and reward these benefits. Another key barrier is regulatory fragmentation across Member States. Inconsistent approval procedures, diverging technical standards, and a lack of harmonization create uncertainty and increase transaction costs. This complexity discourages long-term investment and slows market scale-up. A more predictable, harmonised, and stable regulatory framework would significantly enhance investor confidence and support both insurers and solution providers in scaling resilient solutions across Europe.

Finally, households, SMEs, and local authorities often lack sufficient incentives and capacity to invest in risk prevention measures. Without clear policy signals - such as grants, tax incentives, reduced insurance premiums, or technical assistance - many actors delay or forgo investments in resilience. Public policy should place greater emphasis on encouraging and rewarding prevention at local level, making resilience a shared responsibility between citizens, businesses, insurers, and public authorities.
From our perspective, insurers are natural partners in the transition towards more climate-resilient cities. By combining risk expertise, prevention incentives, and scalable solutions, it is possible to reduce losses, strengthen urban resilience, and grow a European market that delivers benefits for citizens, insurers, and the wider economy alike.

What policy measures would help overcome these obstacles and boost climate resilience finance?

From our point of view, scaling up investment in climate resilience in urban areas requires clarity, predictability, and the full implementation of the existing EU regulatory framework. The recently adopted legislation already provide a strong policy direction and a clear mandate for action. Ensuring their full, timely, and consistent implementation is essential to give certainty to public authorities, investors, insurers, and solution providers, and to enable the scaling up of proven resilience solutions.

It is essential to ensure that EU and national legislation and policy frameworks are coherent, mutually

supportive, and consistently implemented. Avoiding regulatory fragmentation, resolving inconsistencies, and facilitating the exchange of best practices - particularly in relation to the implementation of energy- and water-efficiency related legislation - would create a stable and predictable investment environment. Such coherence is a key condition for increasing investor confidence and accelerating investments.

Finally, stronger collaboration between public authorities, insurers, financial institutions, and solution providers is needed to co-design investment structures, align risk assessments, and share risk more effectively. Public–private partnerships can play a crucial role in de-risking projects, and crowding in private capital for large-scale initiatives.

Does the existing EU accounting framework duly reflect the climate physical risks in the valuation of assets? If not, what policy measures do you propose?

We have no expertise in this area.

Do the other existing policy / regulatory frameworks duly account for the climate physical risks? If not, what policy measures do you propose?

We have no expertise in this area.

Climate risk insurance

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
Location-specific comprehensive information on climate hazards could improve insurance uptake.	◉	○	○	○	○
Climate risks insurance products need to be clearer on the hazards they cover	◉	○	○	○	○

What policy / regulatory measures -based on market-based mechanisms- do you propose to address the increasing insurance gap and improve access to affordable insurance?

In our view to increase insurance investments and improve access to affordable insurance, the EU should facilitate data sharing and transparency and invest in prevention and resilience. By encouraging the sharing of data with insurers it is possible to improve risk modelling, enable more accurate pricing, and help insurers design products that reflect real risk and support broader access. At the same time, ensuring that consumers also have access to natural hazard tools, empowering individuals, households, and businesses to better understand their exposure and take informed preventive action. Investing in prevention is also crucial because

prioritising investments in preparedness, buildings infrastructures and risk mitigation creates conditions to reduce underlying risk. Public authorities at all levels should collaborate with solutions providers and insurers to design risk-reduction initiatives and incentivise climate-resilient choices.

- What kind of risk pooling and transfer mechanisms would be most suitable to increase insurance cover for secondary perils in the European Union?

The more investments in prevention (energy and water efficiency solutions) the more involvement from insurers.

- How can insurers in the Union access new capital to back climate-related policies?

We have no expertise in this area.

- How to mobilise private investor interest in insurance-linked investment vehicles?

We have no expertise in this area.

- Is there a need for a European marketplace where climate-related risk can be pooled among insurance companies and non-insurance investors?

We have no expertise in this area.

Additional comments:

What policy measures would be needed to avoid climate insurance protection gaps from having negative repercussions on financial or macroeconomic stability?

- [ ] Promote innovative climate risk diversification and/or transfer approaches to mitigate the concentration of risk within specific sectors or regions.
- [ ] Encourage market-based solutions that connect those who can afford to finance risk with those seeking climate risk coverage – this helps ensure business continuity and avoid disruptions caused by natural catastrophes.
- [ ] Other

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