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Planning the low-carbon transition in France: doing more with less

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With the creation of the General Secretariat for Ecological Planning (*Secrétariat général à la planification écologique*, SGPE) in July 2022, placed directly under the Prime Minister, the French government sought to highlight its commitment to provide more coordinated and cross-cutting coordination of public action in terms of the ecological transition, in order to make it the “policy of policies”^{[1](#)}. As 2023 begins, a year that is set to be particularly busy for low-carbon transition policies, this blog post invites us to take a step back and to look at the challenges of coordinating and streamlining the various climate governance processes, based on five key observations and issues.

1. 2023 will be a busy year for planning the low-carbon transition

The first observation is that the year 2023 will be characterized by dynamism in terms of climate policy planning processes. Six processes for developing climate plans or roadmaps are already overlapping at the national level:

First are those surrounding the development of the future French energy-climate strategy (*stratégie française énergie-climat*, SFEC), initiated in October 2021, which includes four key tools for climate governance:

1. the third **National low-carbon strategy** (*stratégie nationale bas-carbone*, SNBC), which will notably integrate the carbon budgets over the three five-year periods between 2024 and 2038;
2. the third **Multiannual Energy Plan** (*programmation pluriannuelle de l'énergie*, PPE), covering the period 2024-2033;
3. the third **National Climate Change Adaptation Plan** (NCCAP), covering the period 2023-2027;
4. and the new **Energy and climate planning law** (*loi de programmation énergie-climat*, LPEC), created by the 2019 climate-energy law, which must be renewed every five years.

Then there are two other processes initiated in parallel, namely:

5. the development of the **sectoral decarbonization roadmaps** provided for in Article 301 of the 2021 Climate and Resilience Act, the results of which are expected in early 2023 (see below);
6. the work launched more recently within the framework of the National Council for Refoundation (*Conseil national de la refondation*, CNR), including a thematic entry on “climate and biodiversity” and another on housing, which puts considerable emphasis on ecological transition issues.

Another notable event is the [national debate on a new nuclear reactor programme](#), organized by the National Commission for Public Debate (*Commission nationale du débat public*, CNDP) between October 2022 and February 2023, as well as the “major national consultation” on the energy mix launched in October 2022, including an online consultation, regional meetings and a youth forum.

It is also worth mentioning the existence of the climate action plans of the various ministries, which will soon require revision, even if the deadlines are not entirely clear, according to the [opinion of the High Council on Climate](#) (HCC).

Lastly, we can cite the important work undertaken by the SGPE in terms of defining strategic visions, interministerial coordination and following up on a variety of projects and themes, in conjunction with the processes mentioned above (see section 4).

2. A need to clarify the added value of the different tools

A second observation is that it is sometimes difficult to distinguish the specifications and specific added value of each of these currently ongoing climate governance processes. Indeed, the multiplication of strategic processes creates coordination needs that are particularly significant, because at present they are carried out in parallel, mostly with very ambitious deadlines, and mobilize the same actors, generating a non-negligible risk of oversolicitation and loss of momentum².

A first example concerns the LPEC, which has extremely ambitious timing (with adoption planned before 1 July 2023 according to the Energy Code), as well as a complex linkage with the revision of the SNBC and the PPE, which represents both an “input” (the debate is based on the “provisional” SNBC pathways) and a downstream result (the

final SNBC and PPE, like the underlying reference scenario, will have to be compatible with the objectives and orientations of the LPEC).

The decarbonization roadmaps under article 301 also illustrate these linkage issues. Initially launched within the framework of the France Relance recovery plan for the major industrial sectors (chemicals, cement, steel, etc.), the initiative aimed to materialize the orientations of the SNBC, at a finer and more operational level of detail, for the actors of the industrial value chains. The 2021 Climate and Resilience Act has widened the focus to replicate the approach at the scale of other sectors, namely construction, agriculture, transport and waste.

In this context, the added value of decarbonization roadmaps will depend particularly on two conditions:

- successfully making them an operational support for transformation at the sectoral and value chain level, integrating practical and quantified commitments from professional actors and the State;
- avoiding this becoming a one-off exercise, by transforming these roadmaps into an iterative process and a space for permanent dialogue with the professional actors of the sectors considered.

3. Is the LPEC an unidentified legislative object?

A third observation is that the framework of the future energy and climate planning law must be clarified to make it an effective tool. The framework for this future LPEC on its own, set out in [Article L. 100-1 A of the Energy Code](#), is the same as that of the former implementing decrees for the SNBC and the PPE: to specify the carbon budgets and the main energy objectives. However, considering the productivity of parliamentarians during the three previous energy and climate laws (2015, 2019, 2021)³ as well as the context of the energy crisis, we can anticipate that this law will go far beyond a simple updating of national objectives for 2030 and beyond, which have already been largely obligated by the [reinforcement of European policies and objectives within the framework of the REPowerEU plan and the Fit for 55 package](#).

To avoid the risk of a “catch-all” law, it therefore seems essential to clarify the specifications for this future LPEC through a collective and cross-party exercise.⁴ This could not only guarantee its coherence but would also give it a chance of parliamentary success, considering both the polarizing nature of energy issues and the configuration of the National Assembly, which lacks a clear majority.

4. Too many pilots, not enough planes: what role for the SGPE in an already dense institutional ecosystem?

A fourth observation: the multiplication of plans, roadmaps and strategies developed under energy-climate policies is reflected in the diversification of the institutions involved, which poses a difficult challenge for the positioning of the SGPE. In addition to the executive (and the not always clear division of responsibilities between ministries)⁵, for which the SGPE must play a role of coordination and arbitration, and the parliamentarians, there are consultative bodies that provide advice, such as the French Economic, Social and Environmental Council⁶, the National Council for Ecological Transition (CNT), and the French Higher Energy Council, or expertise such as the HCC and France Stratégie, as well as more operational public agencies, such as the Energy Regulation Commission or Ademe.

This institutional proliferation requires an unprecedented degree of clarity in the allocation of responsibility and the coordination of tasks between actors.

The creation of the SGPE, which has been very favourably received by most observers, raises several issues in this respect. Firstly, regarding the institution's position on its multiple responsibilities listed (below) in the [decree of July 7, 2022](#):

- coordinating the development of national strategies;
- implementing and translating the strategies thus developed into ministerial action plans;
- evaluating policies and the publication of associated indicators;
- validating the coherence of policies implemented with the national strategies;
- preparing the government's responses to the HCC.

In addition to the risk of interference from the different functions of strategist, implementer, defendant and judge of public action, the "omnipresence" of the SGPE raises important issues of coordination with the other actors historically involved in each of these tasks: what is the relationship between the SGPE and the various ministries responsible for drawing up cross-cutting and sectoral national strategies? Will the SGPE be able to limit itself to a coordination role, making the most of the expertise of all actors in the chain? On the other hand, once the major policy options have been defined and structured for all the most difficult areas, will it be able to clarify the decisions made by the executive? At what level can and should political negotiations be held for such trade-offs to be made?⁷

Another major challenge is to provide sufficient (human) resources to meet expectations. With 5 missions, 6 themes, and [22 projects](#) that are complex, cross-cutting and cover a multitude of subjects, the team limited to around 20 people may not be enough.

Given these constraints, the effectiveness of the SGPE will depend largely on its ability to fit usefully into existing institutional ecosystems rather than overlapping with them. Three recommendations can be made in this regard.

- **One of the SGPE's main sources of added value will be its ability to facilitate interministerial political arbitration on the objectives and challenges of the transition, and then to work towards interministerial coordination on operational decisions and the monitoring of these decisions** to ensure that the strategic directions for the ecological transition are better reflected and put into practice within each ministry.
- **To be effective, SGPE action should be based directly on identifying one or more key bottlenecks in each project**, thus ensuring they are removed as quickly as possible through interministerial action. Indeed, the SGPE will not have the resources to deal comprehensively with each of the 22 projects and an exhaustive treatment would in any case be redundant with the existing diagnoses and strategic roadmaps.
- To be fully effective in its coordinating role, SGPE action should **be based on comprehensive analysis of pre-existing governance frameworks for the ecological transition in France**, rather than running the risk of adding sectoral planning exercises; it would be appropriate to begin by presenting a plan to rationalize, prioritize and therefore reorganize existing tools.

5. Streamlining the evaluation and monitoring of strategies and policies: a keystone of effective planning?

The fifth observation concerns ensuring the effective monitoring and evaluation of ecological transition policies, making sure that the priority is for quality rather than quantity as regards processes and reports. This firstly implies avoiding the reflex action of adding an increasing number of evaluation reports to each new law or strategic plan on the low-carbon transition: while the attention given to accountability and evaluation is

commendable, the proliferation of reports is detrimental to the transparency of public action. Probably holding the record in this respect, the 2021 Climate and Resilience Act requires the government to produce 50 (!) new reports⁸. These assessment reports and roadmaps often cover the same ground, as shown by the impressive list of reports and plans on the subject of energy renovation in a [recent IDDRI report](#) (see box on page 38).

Action by the SGPE on evaluation and monitoring could thus usefully begin with a mapping of all the evaluation reports, plans and strategic roadmaps required by the current regulations to clarify their added value, their linkages and the specific terms of reference associated with each⁹. There is also a need to clarify the responsibilities between actors, knowing that the Ministry of Ecological Transition, the HCC (and also the SGPE in future) will have to draw up evaluation reports on climate action before the revision of the SNBC and the PPE.

The same spirit of rationalization could also be useful for indicator dashboards, drawing on the [methodological recommendations published by IDDRI](#). In particular, the identification of key bottlenecks (see recommendation above) should enable priority to be given to indicators that would demonstrate the degree to which these central challenges were being addressed, in order to answer the question: is the transition underway or are obstructions still present? A comparison between the [first SNBC monitoring reports](#) and the current [indicator portal](#) shows significant progress. However, much remains to be done to make it an interactive dashboard with a clear and intuitive design, and with different levels of analysis to meet the needs of different users (decision-makers, stakeholders, journalists, experts and technicians).

On this subject, it seems more important than ever that all organizations and institutions¹⁰ that develop indicators or dashboards work together to **create a single, well-structured tool capable of meeting all needs, rather than a multiplication of individual tools.**

Conclusion: applying sufficiency to climate governance to do more with less

Although it has become a source of complexity over time, the extraordinary diversification of institutions, processes, and tools involved in the French governance of climate policies testifies above all to the declared intent to base ecological transition issues in a cross-cutting manner in public policies. In this sense, it is certainly not a question of rebuilding everything from scratch, or throwing the baby out with the bathwater, but of taking a critical step back to improve what exists. And this is one of the challenges for which the SGPE could make a difference, by placing itself above the fray to review the overall design and to make it more effective, and to support both arbitration and political accountability at the highest level. And as sufficiency is back in favour, it is the principle of rationalization that should prevail in the strengthening of climate governance: preparing for the future by doing more, with less.

¹ Quote from Emmanuel Macron's speech on 16 April 2022. See France Info, May 2, 2022: C'est quoi la planification écologique, dont Emmanuel Macron veut charger son futur Premier ministre ? https://www.francetvinfo.fr/elections/presidentielle/c-est-quoi-la-planification-ecologique-dont-emmanuel-macron-veut-charger-son-futur-premier-ministre_5103736.html

² One of the most illustrative examples of this multiplication concerns the buildings sector, for which we can cite the working group within the framework of the SNBC revision, the Article 301 roadmap (finalized in January 2023), the work undertaken within the framework of the National Council for Refoundation (December 2022-March 2023) and the recent launch of a "commission of enquiry on the effectiveness of public policies in the field of energy renovation of buildings" in the Senate. http://www.senat.fr/commission/enquete/2023_renovation_energetique.html

³ For example, the 2015 Law on the energy transition for green growth has 98 pages in the Official Journal for 215 articles, the 2019 Energy-climate law has 34 pages for 69 articles, and the 2021 Climate-resilience law has 126 pages and 305 articles.

4 Moreover, at this stage it is not clear whether the initiative for this law lies with the parliamentarians or the executive. As this is a planning law, it would be quite logical for the executive to frame the text. However, the very existence of this LPEC is due to parliamentarians who sought to strengthen their influence on the definition of the energy-climate strategy, which had been lacking since the 2015 TECV law.

5 For example, energy renovation policies are currently dealt with in parallel (or successively) by the Minister of Housing (Olivier Klein), the Minister of Ecological Transition and Territorial Cohesion (Christophe Béchu) and the Energy Transition Minister (Agnès Pannier-Runacher), with an increasing involvement of the Prime Minister's office and the SGPE.

6 ESEC, which also produced a recent opinion on the SFEC and the governance of the ecological transition (June 2022).
https://www.lecese.fr/sites/default/files/pdf/Avis/2022/2022_10_gouvernance_transition.pdf

7 On this point, see in particular the note by Pascal Canfin and Thierry Pech: Gouverner la transition écologique (2021, Terra Nova).
<https://tnova.fr/ecologie/transition-energetique/gouverner-la-transition-ecologique/>

8 This compares with only five assessment reports in the 2019 Energy and Climate Law, and 26 for the 2015 Energy Transition Law. Lists are available on request or by searching the texts: <https://www.legifrance.gouv.fr/>

9 We may note, with a touch of irony, that the ESEC's recent opinion on the governance of the ecological transition includes a recommendation to require the government to produce a "scoreboard" of indicators as well as an evaluation report, without mentioning all the other existing elements (page 10).

10 Examples include the Directorate General for Energy and Climate (DGEC) of the Ministry of Ecological Transition, the Statistical Studies and Data Service (Service des données et études statistiques, SDES), INSEE, the High Council on Climate, the Commissioner General for Sustainable Development (Commissariat général au développement durable, CGDD) and the SGPE.

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