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Europe's new Climate Resilience Framework: who is risking what and who is responsible?

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This summer, high temperatures caused more than two thirds of Europe's 50,000 deaths in urban areas. Record droughts affected drinking water supply, power production and fluvial shipping. Altogether, [the impacts of climate change to the region already represent hundreds of billions of euros](#). But responsibility for who should prevent and manage what risks (between governments, local authorities, private actors) is not always fully clear. The EU Integrated Framework on Climate Resilience (IFCR), whose draft is released this week by the European Commission, aims to bring more structure in how this is addressed. This blog post explores IFCR expectations and what is needed to make sure it responds to the challenge, based on original IDDRI research on climate resilience of critical infrastructure and the allocation of roles and responsibilities in EU Member States.

Climate resilience: The latest hot topic on the European agenda

The EU has an Adaptation Strategy adopted in 2021. The Climate Law of the same year requires Member States to have at least one national adaptation strategy or plan, but it does not provide clear guidelines or harmonize their content. The [2024 European Climate Risk Assessment \(EUCRA\)](#) identified 36 major risks for Europe across all sectors and assessed the level of policy preparedness to address them, while attempting to identify who is responsible for these risks—the EU or the Member States.

This was followed by the announcement by the European Commission of the development of an “Integrated Framework for Climate Resilience” (IFCR), aimed at ensuring more transformational changes, the avoidance of maladaptation, and the need for systemic and cross-sectoral action to address interdependencies. Since then, climate change impacts and adaptation have rapidly gained prominence in Member States and in the public debate at EU level. For instance, it was featured in Ursula von der Leyen’s State of the Union addresses in 2025 and 2026. Similarly, the [European Investment Bank \(EIB\) Group presented this week a new plan to double its adaptation financing](#) to reach at least €30billion by 2030.

Climate change is becoming a very concrete issue for economic actors and citizens alike, whose physical safety and access to public services has been directly affected. It is not surprising that adaptation has gained political attention. The framework, composed of a Commission’s communication and proposed regulation, was released on Wednesday, 28 October. What for, and will it meet expectations?

The main challenge: assigning responsibilities to avoid delaying action

There is broad consensus that urgent action is needed to prepare for a changing climate. But turning this recognition into action raises practical challenges as a result of unclear roles and responsibilities, which became apparent this summer. During the June heatwave in France for instance, [SNCF had to cancel 10% of trains in the Paris region](#) amid concerns over high temperatures. When railway tracks risk overheating and expanding, who should decide when train services must be suspended? Should decisions be made pre-emptively, and according to which thresholds? Who, between the government, local authorities and the asset managers and service operators can, or should, make this decision, and how to coordinate? Should passengers be compensated, and how? How can we ensure that essential needs—such as traveling to access medical care—are not hindered? What level of investment should be unlocked to prevent these situations in the long term, and where in priority?

These questions point to a broader challenge: climate resilience is not only a matter of technical solutions, but also of assigning responsibilities and establishing clear rules for action. An IDDRI study published today on the climate resilience of critical infrastructure across several European countries provides evidence of this challenge (IDDRI, 2026). Decision-making is fragmented across stakeholders and policy frameworks, and criteria used to determine acceptable levels of resilience vary, from ensuring economic viability to the wider societal value of critical infrastructure. In the absence of explicit public directives, operators have to make strategic decisions and set the resilience levels and underlying criteria.

This challenge becomes more acute when infrastructure systems are highly interconnected across sectors and national borders; IDDRI’s *Study* therefore discusses the importance of addressing these issues at EU level. A [note published](#) in May 2026 [by Adaptation Without Borders and Strategic Climate Risks](#) suggested a

governance architecture to manage these systemic and transboundary risks. Risk ownership would then be assigned according to whether a single entity can clearly be identified (e.g., a Member State, private operator), or shared solutions are needed across countries and actors, calling for the setup of a task force to define them. Systemic risks at the scale of the EU or linked to EU competence or shared with outside regions would fall under the responsibility of the European Commission.

The challenge, then, is not simply to build more resilient infrastructure, but to establish the governance needed to make decisions on how to adapt before a crisis occurs. Clarifying responsibilities, aligning incentives and coordinating action across levels of governance are essential to ensure that climate risks do not fall into the gaps between institutions—and that the costs of inaction are not borne by society at large.

The new European Commission's Integrated Framework for Climate Resilience: can it rise to this challenge?

The European Commission's proposal for an Integrated Framework on Climate Resilience (IFCR) contains three main elements: (1) a legislative proposal, (2) a communication, and (3) digital tools including a European Climate Viewer to visualize climate risks and identify adaptation options.

Relevant to the clarification of responsibilities at EU level and within Member States, the legislative proposal contains a common reference scenario based on a 3°C global warming trajectory by 2100 and duty to consider it in both national and EU climate risk assessments; setting objectives and measurable targets for most vulnerable policy sectors and identifying risk owners for most important climate risks and sectors, both at EU and national levels.

To support risk ownership within EU policy areas, the framework promotes “resilience by design” as a guiding principle for all levels of governance, and applicable across all sectoral policies, promoting anticipatory and proactive approaches. It is also explicitly linked to several EU sectoral policies and initiatives, including the Taxonomy Regulation, the Critical Entities Resilience Directive and Risk-Preparedness Regulation and the Regulation on the Governance of the Climate Union through which countries report on their climate action—building on existing mechanisms rather than creating additional reporting requirements. The IFCR therefore seeks to reduce fragmentation and create more coherence in the way resilience is addressed.

Overall, the IFCR can help organize the allocation of responsibilities, including through principles, coordination mechanisms and specific duties to Member States, who can ultimately designate them within national regulation. Effectiveness of the IFCR's uptake across Commission services, and particularly the resilience by design principles, will require strong leadership within the Commission. And, as negotiations begin, strong voices will be needed within Member States and at the European Parliament to ensure the level of ambition set by the Commission is maintained throughout the process.

Getting down to national choices on adaptation

While countries are already planning and implementing adaptation measures, the IFCR seeks to give more direction to Member States on how to attribute risk ownership. This is intended at streamlining methodologies,

rather than setting EU-wide targets in areas where jurisdiction is primarily national. Ultimately, the level of resilience to be pursued and who is responsible for delivering it depend on each country's and sector-specific governance and financing models, as well as social pacts that support adaptation choices. These choices reflect not only exposure to climate risks, but also what is considered critical given the importance of the economic, social and societal considerations in a specific context.

The IFRC has the opportunity to serve as a lever to raise these questions at the relevant levels and foster exchanges across countries on how to best address them. Member States can view it as an opportunity to clarify who owns and manages climate risks and address raising concerns over deterioration of trust in political leadership and public services, strained public budgets and insurance models, and unsettled business cases.

For example, in the case of train traffic disruptions (as they occurred in France this summer), the IFRC does not aim to define specific responsibilities, but rather to encourage states to clearly specify the processes—including who participates in which decisions regarding adaptation. In France, much of the work of assigning responsibilities, including to operators, has already been done through the [third National Adaptation Plan published last year \(PNACC-3\)](#). Therefore, the European framework's contribution is primarily to make this explicit using common methodologies and language across Member States.

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