

From increasing risks to coordinated adaptation: What role for the EU Resilience Framework?

Adèle Tanguy, Marta Torres Gunfaus (IDDRI)

Europe is already suffering from climate impacts. Combined with environmental and social vulnerabilities, and interdependencies, they already have consequences on well-being and the economy, affecting various critical systems such as health, energy, food, mobility, human habitats, ecosystems and natural resources. As a result, extreme weather and climate events caused more than €208 billion in economic losses across the European Union (EU) between 2021 and 2024 (EEA, 2025a).

Yet adaptation planning at the EU level and across Member States (MS) is still too slow to respond to these impacts and anticipate future risks. The current policy framework, composed of the 2021 Adaptation Strategy and the Climate Law, is deemed insufficient to guide adaptation efforts within a broad set of impacted sectors and assess progress across MS (ECA, 2024, ESABCC, 2026). The European Commission (EC) is planning to fill this gap with a new Integrated Framework on Climate Resilience, expected for the end of 2026.

This *Policy Brief* builds on a literature review and a set of interviews conducted with experts, practitioners and policymakers working at MS and EU levels. It aims at identifying the role an EU framework for resilience can play in supporting its planning at EU level and across MS. Ultimately, it is intended to feed the EC's current effort to draft a proposal for this framework, and to show its relevance, as a necessary tool to answer critical concerns within a broad set of policy domains, to stakeholders outside the climate sphere.

KEY MESSAGES

The need for increased resilience to climate risks in the European Union is calling both for urgent action, and increased political attention to answer growing concerns, such as ensuring the resilience of economic activities and prosperity, people's safety, and insurability. The expectations towards the future Integrated Framework on Climate Resilience are not limited to its content but also relate to the uptake of these issues it can trigger within MS and EU policy sectors. This is essential to shift from a reactive response to climate impacts to one that anticipates the risks and builds preparedness, to avoid suffering from increased losses and damages within all segments of society. Therefore, the capacity to mobilize beyond the climate community to get a real political endorsement within sectors and countries is what will determine the effectiveness of this framework.

The interviews conducted and synthesized in this *Policy Brief* highlight common needs that stakeholders express towards this EU framework on resilience. They relate to enhancing coherence between sectors and countries, supporting action and peer learning, fostering cooperation around resilience—especially with regards to shared and transboundary risks—and ensuring interface with other policy areas to coordinate resilience strategies across sectors, while leaving room for flexibility and context-specificity in the way adaptation is planned across countries.

These needs can be reconciled within an ambitious framework through three specific levers: (1) Setting up common standards and definitions to foster a common understanding; (2) setting up EU-level resilience targets and guidelines as a starting point for nationally-determined specific targets; and (3) ensuring greater coherence of national plans.

1. CONTEXT: ADAPTATION PLANNING AT THE EU LEVEL

1.1. Updating the 2021 legislation

The European Union (EU) adopted in 2021 a framework for adaptation efforts consisting of the Climate Law and the Adaptation Strategy. It does not impose any specific obligations on Member States (MS) other than to have adaptation plans or strategies in place. The lack of substance in these obligations explains today's lack of shared understanding of adaptation priorities and of how to address them across the EU. The 2023 European Climate Risk Assessment (EUCRA) identified 36 major risks for Europe across all sectors and, in addition to emphasizing the importance of urgent action to address these growing climate risks, highlighted the challenge posed by the complexity of risk responsibility allocation for effective adaptation implementation (EEA, 2024).

Since then, the need for effective adaptation planning has gained momentum in the EU and among MS, which are facing increasing climate risks, with the repeated droughts in Southern Europe or increasingly violent and frequent floods, such as in Spain in 2024 or Slovenia in 2023. The consequences of these impacts prove that adaptation measures to date have been too inconsequential or incapable to anticipate these risks and reduce vulnerabilities ahead—an essential point to make sure that systems are more resilient, even in the case of low probability high impact climate hazards. In the case of floods, this means working on land use planning, giving more space to water and improved drainage systems. This is in addition to the need for better planning of post-disaster response.

1.2. The upcoming Integrated Framework for Climate Resilience

As a result, in 2024, the European Commission (EC) responded to the EUCRA with a communication on climate risk management that emphasizes the need for transformational change, the avoidance of maladaptation, and the need for systemic and cross-sectoral action. This was followed by the announcement of a European adaptation plan, later renamed the 'Integrated Framework for Climate Resilience and Risk Management' (IFCRRM), as mentioned by Ursula von der Leyen in her 2025 State of the Union Address. It is scheduled for adoption by the EC by the end of 2026, and the consultation ahead of its adoption embeds it within the current priorities of competitiveness, security, and economic resilience. Certainly, effective adaptation is a necessary condition for these objectives to materialise and be sustained over time. But this requires addressing underpinning vulnerabilities, exacerbated by increasing climate risks. Adaptation is not peripheral—it is foundational to Europe's economic stability, social cohesion, and long-term resilience.

1.3. How can adaptation policies address today's EU concerns?

Protecting economic activities, livelihoods and people

Climate risks are increasingly affecting economic activities and livelihoods. For example, in the agricultural sector—on the front line of climate change—these risks negatively impact the stability of production volumes. This, in turn, affects farmers' incomes and the security of supply along the value chain. In this sector, proactive adaptation to reduce vulnerability to climate risks requires diversification, both at the farm level and through reduced specialization in production areas. Another growing challenge concerns resilient infrastructure—particularly electricity networks and energy systems, transport infrastructure, telecommunications networks, and, more broadly, industrial facilities. Their design and location must take future climatic conditions into account to ensure that they can operate throughout their lifetime. At the same time, limits to resilience must be anticipated, raising important questions such as the level of service disruption society is prepared to accept in the face of extreme events. Climate risks also threaten people's security, particularly in terms of health and the resilience of the built environment. Addressing future risks will therefore require solutions that go beyond merely reinforcing infrastructure and instead integrate broader reflection on land-use planning and the role of blue and green solutions (using nature-based solutions, such as natural cooling, or ecosystems restoration to create retention basins for floods).

Dealing with increasing conflicts, especially with regards to water

There is a growing concern around the increasing economic and security implications of the effects of climate change in relation to water, and in particular water scarcity. This requires anticipatory strategies that also coordinate among themselves, to anticipate and avoid growing conflicts of interest over resources that are depleting. These contradicting resilience strategies can arise when priorities are not debated and strategies coordinated, for instance between sectors and stakeholders, if all water users build their resilience on an increased use of water, but also between territories, such as cities and their peri-urban areas (e.g. flood discharge areas on agricultural land to protect a city located downstream from floods), or even across borders. The link between climate and water resilience therefore highlights the need for a coherent, cross-sectoral approach for anticipation and prevention.

Addressing insurability and securing finance for resilience

The link between climate risks and insurance poses several challenges: the risk of a growing protection gap, the affordability of insurance policies, and the distribution of costs between private and public actors, both for post-disaster financing—particularly when a public reinsurance scheme is in place—and for prevention measures. The management of these

issues is still largely determined by the nature of national insurance schemes, and the range of instruments available beyond insurances, such as reserve funds or catastrophe bonds. While insurance systems differ across MS, several options exist, such as risk-based pricing, premium reductions, or mandatory extension of coverage to finance prevention, as in the French CatNat scheme.¹ Nevertheless, the debate on risk financing cannot be separated from that of risk ownership and adaptation financing to support anticipatory adaptation measures that ultimately reduce the economic and social costs—particularly in terms of compensation and reconstruction—and help avoid reaching the limits of insurability. A report commissioned by the EC assessed that investment needs for climate adaptation across the EU and its MS (including public and private investments) amount to €70 billion per year until 2050 (EC, 2026). However, this estimation only includes the cost of implementation of adaptation actions, to which should be added the cost of additional measures to enhance resilience that are not planned yet. Several enabling factors for the successful mobilization of climate resilience finance by public authorities have been identified by industrial stakeholders and representatives of public and private financial institutions. They include tailored fiscal policy instruments, regulatory frameworks, but also strong governance and administrative capacity, especially at the local level, to manage adaptation projects. This requires both technical assistance and effective coordination between scales but also with the private sector, for a clear alignment between adaptation strategies (EC, 2025).

Responding to growing vulnerabilities and inequalities

Adaptation is not only technical or infrastructural nor a pure economic question; it is deeply social and political. Whereas social vulnerability shapes exposure as well as the ability to anticipate, cope with, and recover from climate shocks, adaptation measures can protect or transform livelihoods, but may also disrupt them. Who participates in adaptation planning and how choices and effects over time are made explicit is critical, to ensure buy-in and alignment with needs of stakeholders and communities, especially vulnerable ones. It is also key for actors such as small and medium-sized enterprises (SMEs) (United, 2025). Adopting a socially just approach to resilience that accounts for these differentiated vulnerabilities may require better understanding of how groups differently suffer from risks within a country (e.g., the social factors that lead to greater vulnerabilities to heatwaves, for instance due to poor housing), but also mobilizing these actors and establishing inclusive decision-making processes, and designing targeted measures to respond to them.

¹ The French natural disaster compensation scheme (Cat Nat), created in 1982, is based on a public-private partnership. It consists of a mandatory surcharge in property and casualty insurance contracts, which is uniform throughout the country. It allows holders of an insurance to be compensated if an interministerial decree recognizes a state of natural disaster in their municipality. See <https://www.ccr.fr/portail-catastrophes-naturelles/garantie/>

2. WHAT COULD AN EU-INTEGRATED FRAMEWORK ON CLIMATE RESILIENCE DO?

For this *Policy Brief*, we conducted a set of interviews with more than 25 stakeholders, involving experts, practitioners—including private sector and sectoral representatives, and policymakers working at MS and EU levels—aimed at better understanding the role this framework can play in enhancing resilience within the EU and across MS. The findings show uncertainties on the levers that this framework can mobilize to meaningfully influence EU sectoral policies and adaptation planning across MS, while several common needs emerge across stakeholders.

2.1. Uncertainties on how to support resilience across policy areas and Member States

Interviewees expressed doubts as to the capacity for a climate policy framework to effectively support resilience across various EU policy areas. While mainstreaming “resilience by design” is seen as essential, there is scepticism about whether it can meaningfully influence trade-offs across policy domains. In the absence of binding standards, some interviewees expect the Framework to clearly define the scope and principles of the “resilience by design” and to identify concrete levers through which these principles can be applied and made effective in practice.

Greater convergence was found concerning the role of the Framework in strengthening regulatory quality of adaptation planning at MS level—albeit uncertainties remained on what the best levers would be. At the same time, interviewees emphasized that the legislative dimension would face significant constraints, notably resistance to new obligations, given the current calls for simplification, both from public and private actors (Kauffmann, 2025). The EC will need to use its coordination and norm-setting roles to highlight the different dimensions of adaptation that national level action should tackle in order to address the right issues, while putting in place the right mechanisms to ensure anticipation and coherence. This could rely on EU-level objectives, in addition to a common framework for setting priorities and clear targets at national level, and standards regarding the different steps of the adaptation policy cycle (risk assessments, planning, implementation, monitoring and evaluation).

2.2. Aligning priorities, strategies and actions

Interviewees also highlighted common needs this Framework could and should meet. The first one is to ensure alignment of priorities at EU level, and coherence between resilience strategies across the EU and within sectors. The Framework can support the alignment of actions by different stakeholders, including public and private actors, financiers, insurers, and

citizens if strategies are shared that build on established key principles—avoiding maladaptation, improving governance for cross-sectoral solutions and supporting transformational change that prevents social and economic disparities (EC, 2024) by articulating priorities and objectives, and building mechanisms that aim at ensuring that these strategies are not contradictory (between policy areas and across jurisdictions, especially in relation to risks that are transboundary across EU countries). Indeed, European countries are highly interconnected (with transboundary ecosystems, networks, infrastructures and value chains) and also face similar risks. This calls for cooperation on their resilience strategies, both for peer-learning but also for alignment and coherence of their strategies in relation to their common challenges—for which the EC is legitimately positioned to play a coordination role.

2.3. Supporting action at all levels

The framework is perceived as an opportunity to catalyze transformative adaptation action at all levels, across EU, MS and subnational levels, thanks to practical support to implementation. This can build on a clarification of responsibilities and liabilities, but also technical assistance, methodologies, and standards to better anticipate risks and integrate them from the outset into decision-making processes. In line with this, it can also help promote mutual learning, including by diffusing practices, helping to communicate on what works and not, the effectiveness of adaptation strategies and measures. In addition, it should also leverage its power to ensure funding mechanisms within EU prerogatives.

2.4. Fostering cross-institutional coordination

Interviewees agree that the principle of "resilience by design" is also essential to support profound transformations in sectors such as agriculture, water, construction and urban planning. These depend on policy decisions distributed across different levels of governance within each of these sectors (Tanguy, 2025). To ensure the implementation of the "resilience by design" principle across policy domains, two avenues can be pursued. First, the EU could establish binding resilience criteria to be integrated across all policy areas. Alternatively, a softer approach could incentivize uptake across domains, combined with a clear mandate for priority sectors (e.g. relevant DGs within the EC) and strong coordination between DG CLIMA and other DGs in implementing the resilience Framework. This second approach requires even more a political uptake of resilience standards within policies and measures widely, in addition to a clear mandate to ensure its application. According to several interviewees, the framing the initiative around "resilience" and "risk management", aligning it with current priorities such as economic security, prosperity and competitiveness, has the potential to mobilize stakeholders beyond the climate and environmental sphere—while making sure that it links economic resilience with broader dimensions of adaptation, such as

ecosystems resilience and social justice, and encompasses all types of adaptation solutions (ETC/CCA, 2021). But most importantly, an effective implementation of resilience principles requires going beyond the narrative through a governance that coordinates across multiple policy areas around this topic, involving the relevant DGs within the EC, and relevant ministries (e.g., economy and finance ministries, as well as DG ECFIN sectoral ministries in climate-exposed and solution-relevant areas—including agriculture, transport and tourism) to coordinate efforts and ensure coherence across adaptation strategies. This could mean identifying a clear mandate within each DG to make sure this principle is integrated, and ensuring an interface between the mandated ones and DG CLIMA.

3. MAKING THE FRAMEWORK DELIVER: THREE PROPOSED LEVERS

Building on the assessment of gaps in the current EU adaptation Framework and the set of interviews, we identify three levers that can be mobilized to enhance adaptation planning through the upcoming Framework:

3.1. Setting up common standards and definitions to foster a common understanding

In order to align strategies among stakeholders, the Framework should seek to create a common understanding of risk and resilience challenges at EU level. For this, it could set up:

Common criteria for climate risk assessments (CRAs), by providing a common definition of the concept of climate risks to be used in CRAs (including, for infrastructure and investment planning, sectoral CRAs, and national to local level CRAs), based on the IPCC AR5 definition of risk and its dimensions of hazard, exposure, vulnerability and adaptive capacity (IPCC, 2023). The Framework could also provide common guidelines for national CRAs building on the EUCRA (EEA, 2024), including common criteria (such as risk severity at different horizons, risk ownership, policy horizon, policy readiness, urgency to act; identification of potential topics, sectors and nexuses to investigate while allowing for flexibility in the use of such information) —in line with the recommendations under discussion within Think7.² As a complement, common reference for adaptation planning could be useful as a minimum baseline to foster a common understanding between all stakeholders, as long as it is complemented by stress tests with more pessimistic scenarios, especially for long-term investments in critical infrastructures and highly vulnerable sectors and territories—for instance by using IPCC's

² Think 7 is the group of think tanks informing the upcoming G7, with a dedicated task force on the topic of insurance. See the Think7 website : <https://www.think7.org/>

SSP3-7.0 for stress-testing (a scenario with a high level of emissions, IPCC, 2023) as a complement to IPCC's SSP2-4.5 (with a level of emissions corresponding to the continuation of currently implemented policies) as a minimum baseline (ESABCC, 2026). In France for instance, critical infrastructure operators, such as in the energy sector, are already considering potential impacts under more adverse scenarios than a 4°C warming by the end of the century.

Integrating guidelines on the assessment of systemic and transboundary climate risks: As highlighted by the ESABCC, the role of the EU is to “act where collective action is more effective than national efforts alone”. This particularly relates to transboundary, cascading and compounding climate risks, for which risk ownership is often ambiguous and that can hardly be dealt with at national level only (ESABCC, 2026).

Guidelines for enhancing policy frameworks: CRAs should not be considered as an end but as support for action, therefore a common understanding of risks is only useful if it leads to clearer planning and implementation of adaptation. The EU can play a role in identifying the enabling conditions, especially with regards to policy, regulatory and legal frameworks. This could be done by leveraging and enhancing existing tools, including guidelines and methodologies from the Climate-ADAPT platform to provide guidance to MS on how to improve legal and regulatory frameworks to support common challenges such as the insurance protection gap, resilient infrastructures and buildings construction standards, and define common guidelines for clarifying risk ownership.

A definition of the scope and principles of the 'Resilience by design': The concept of 'resilience by design' should guide infrastructure planning as well as investments to avoid investing in maladaptation—which means ensuring that financial mechanisms at EU level integrate properly resilience financing, and especially the upcoming Multiannual Financial Framework, both through national plans as well as EU funds (such as the Competitiveness Fund; Lévy & Berghmans, 2025). Regarding EU policy areas, the EC is required to assess climate-consistency of proposed policies as part of their impact assessments, which includes adaptation. However, more clarity could be brought on specific criteria for such assessments, as well as clear processes in case of misalignment with resilience objectives. The Framework is an opportunity to lay out principles to unpack what “resilience by design” means, building on the following dimensions, whether they are set as binding or through a softer approach (see section 2):

- Anticipation: assessing future climate risks in coherence with EU/national level scenarios;
- Preparedness: developing an adaptation strategy and plan to respond to them, stress testing;
- Inclusivity: inclusive processes to ensure uptake and a right response to the needs and vulnerabilities of the targeted group;
- Cooperation: exploring interdependencies and ensuring mutually aligned strategies;

- Iteration, to reevaluate resilience response in the face of occurring climate impacts;
- Recovery and building back better.

A definition and principles of just resilience: Another lever to support the integration of shared values and principles within the common understanding of resilience is to identify a common EU level approach to just resilience—and how to urge attention to the most vulnerable that are already suffering today from climate risks. It can build on existing guidelines, for instance from the EEA briefing “Towards ‘just resilience’: leaving no one behind when adapting to climate change” (EEA, 2022), its 2025 report on social fairness in adaptation (EEA, 2025), and the ETC-CA technical paper on assessing just adaptation (Lager *et al.*, 2023). This should include methodologies for assessing and tackling distributional effects of adaptation policies across social groups, sectors, territories as a way to avoid increasing existing vulnerabilities, make choices explicit and put in place corresponding mechanisms to anticipate and avoid conflicts and discuss trade-offs and compensations.

3.2. Setting up EU-level resilience targets and guidelines as a starting point for nationally-determined specific targets

Common objectives and targets are needed to support a clear common direction for action. As of today, planning at MS level lacks clearly defined adaptation objectives (EEA, 2024; ESABCC, 2025). The current adaptation objectives set out in the 2021 Climate Law reflect the global adaptation objective in Article 7 of the Paris Climate Agreement. However, recent decisions resulting from international negotiations under the UNFCCC have clarified these objectives. The United Arab Emirates Global Resilience Framework, adopted in 2023, sets out 7 thematic targets and 4 targets relating to the adaptation process to inform the Global Goal on Adaptation (GGA) set in the Paris Agreement. In order to align with international commitments—and prepare for EU fulfilment—the EU could update the Climate Law's objective, with the minimum ambition of reaffirming these international targets as an objective to be pursued in order to ensure the EU's resilience, and could aim to adapt it to the EU specific context and resilience challenges—for instance drawing from the EUCRA (EEA, 2024). These EU resilience targets should be time-bound and include sectoral objectives.

These EU targets could provide a starting point for nationally-defined specific targets. Beyond a common understanding of risks and challenges, a clear trajectory for resilience planning requires targets at national level that should reflect societal choices. Ideally, they should rely on and translate political choices that make explicit the level of climate risk that is tolerated and what is prioritized in the face of upcoming trade-offs. To support this, the role of the upcoming EU Framework goes beyond setting up EU level targets but can offer guidance to MS, including an identification of sectors that can be considered and cross-cutting issues that are relevant to the EU context, while

offering flexibility at national level. Similarly, these national targets are no substitutes for locally-led adaptation but rather a framework to set priorities that allow alignment of visions and actions.

3.3. Ensuring greater coherence of national plans

In line with the subsidiarity principle, this Framework should give MS flexibility in the way they define their resilience goals and implement their national strategy, building on existing national adaptation plans that are already determined within each country. The challenge for the EU Framework is to lead MS to take ownership of the EU's goals and design their own national plans with measures tailored to the climate risks they experience, their vulnerabilities and challenges, and their contrasted governance structures when it comes to planning for resilience across territories and sectors. The Resilience Framework should therefore give more clarity on the components that need to be accounted for and made explicit, such as:

- Methodologies and baselines used to provide the information on future climate risks;
- Time-bound objectives; Targeted sectors and prioritization; Definition of risk ownership;
- Cross-sectoral coordination;
- Multi-level governance and coordination;
- External cooperation with regards to transboundary risks (identification of opportunities for cooperation and processes in place for consultation of other MS or external countries on aspects of adaptation plans relating to transboundary climate risks);
- Inclusivity and participation processes—including for the inclusion of affected sectors, groups and territories;
- Policy measures and means of implementation; Monitoring, evaluation and learning systems.

These common elements could help display in a coherent way how action at national level supports the achievement of national and EU-level objectives, foster cooperation and peer-learning between countries. This could be done through an approach relying on an enhanced reporting framework structured around these different components—as suggested by the EC in its public consultation. Currently, national Energy and Climate Plans integrate an adaptation dimension in line with the Article 19 of the EU Governance of the Energy Union and Climate Action (Governance regulation). However, it contains little information compared to the reporting requirements on mitigation. As a result, reporting on adaptation is assessed as weak and lacks harmonization across MS (EEA, 2024; ECA, 2024). This enhanced reporting framework could be placed under the upcoming revision of the Governance regulation or through a standalone resilience regulation—in which case it will be important to make sure there is no double reporting. This could be completed by a mechanism for the EC to review these reports, assess coherence, highlight synergies but also trade-offs and conflicting adaptation strategies, and coordination needs for transboundary risks. Alternatively, these components could constitute non-binding standards promoted by the Resilience Framework for national adaptation plans as a basis for peer-learning, especially within the Adaptation Working Group set up by the EC bringing together national adaptation planners.

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CONTACT

adele.tanguy@iddri.org
marta.torres-gunfaus@iddri.org

Institut du développement durable
et des relations internationales
41, rue du Four – 75006 Paris – France

WWW.IDDRI.ORG

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