

European Climate Resilience Framework

A Eurelectric consultation response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2026/12.105/11

WG Sustainable Network Technology (lead)
WG Climate Change and Decarbonisation
WG RES & Storage
WG Hydro
WG Thermal & Nuclear
WG E-Mobility
WG Industrial Competitiveness and Innovation
Distribution & Market Facilitation Committee
Generation & Environment Committee
DT DSO climate resilience

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Open Public Consultation for the new European climate resilience framework

Fields marked with * are mandatory.

Disclaimer

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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

Anton

* Surname

Koninckx

* Email (this won't be published)

akoninckx@eurelectric.org

* Organisation name

255 character(s) maximum

Union of the Electricity Industry - Eurelectric aisbl

* 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.

4271427696-87

*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.

- | | | | |
|---|--|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ San Marino |
| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ São Tomé and Príncipe |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Saudi Arabia |
| ☐ Anguilla | ☐ Eritrea | ☐ Malaysia | ☐ Senegal |
| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eswatini | ☐ Mali | ☐ Seychelles |
| ☐ Argentina | ☐ Ethiopia | ☐ Malta | ☐ Sierra Leone |
| ☐ Armenia | ☐ Falkland Islands | ☐ Marshall Islands | ☐ Singapore |
| ☐ Aruba | ☐ Faroe Islands | ☐ Martinique | ☐ Sint Maarten |
| ☐ Australia | ☐ Fiji | ☐ Mauritania | ☐ Slovakia |
| ☐ Austria | ☐ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |

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

☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Türkiye
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palau	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Palestine	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Panama	☐ Ukraine
☐ China	☐ Israel	☐ Papua New Guinea	☐ United Arab Emirates
☐ Christmas Island	☐ Italy	☐ Paraguay	☐ United Kingdom
☐ Clipperton	☐ Jamaica	☐ Peru	☐ United States
☐ Cocos (Keeling) Islands	☐ Japan	☐ Philippines	☐ United States Minor Outlying Islands
☐ Colombia	☐ Jersey	☐ Pitcairn Islands	☐ Uruguay
☐ Comoros	☐ Jordan	☐ Poland	☐ US Virgin Islands
☐ Congo	☐ Kazakhstan	☐ Portugal	☐ Uzbekistan
☐ Cook Islands	☐ Kenya	☐ Puerto Rico	☐ Vanuatu
☐ Costa Rica	☐ Kiribati	☐ Qatar	☐ Vatican City
☐ Côte d'Ivoire	☐ Kosovo	☐ Réunion	☐ Venezuela
☐ Croatia	☐ Kuwait	☐ Romania	☐ Vietnam
☐ Cuba	☐ Kyrgyzstan	☐ Russia	☐ Wallis and Futuna
☐ Curaçao	☐ Laos	☐ Rwanda	☐ Western Sahara
☐ Cyprus	☐ Latvia	☐ Saint Barthélemy	☐ Yemen
☐ Czechia	☐ Lebanon	☐ Saint Helena Ascension and Tristan da Cunha	☐ 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
- ☒ Energy
- ☐ 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
- ☐ 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

* Contribution publication privacy settings

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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Organisation details and respondent 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. Your name will also be published.

☒ 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?

Based on the current regulatory framework, all assets in the electricity value chain, from electricity generation to electricity networks and the final customer, are exposed to the effects of a growing number and scale of extreme weather events. Given Eurelectric members operate and own critical infrastructure, the sector is perfectly well informed and committed to mitigating extreme weather impacts. Consequently, most members are in the process of improving their preparedness for long-term effects and incorporating them into investment decision.

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?

The power sector has a deep reservoir of experience in operating within weather-dependent conditions and has deployed a host of adaptation measures to manage climate hazards. These include physical hardening and uprating of networks, physical protection measures, additional water spill gates for hydropower dams, resizing of thermal and nuclear plant cooling systems, preparedness planning and emergency response, backup systems, and digital tools to enhance visibility and management of the energy system down to low power voltage levels. Nevertheless, the power sector needs to further adapt and scale resilience to meet the increasing frequency and intensity of extreme weather events with impactful long-term effects (intense wind, droughts, etc.). However, the power sector faces major uncertainty when considering investments in climate-proofing infrastructure, which are typically more expensive and thus not easily justified through standard cost-benefit analysis. Currently, dedicated funding instruments and incentives from national regulations remain insufficient.

An assessment of climate variables at the regional and local levels is necessary in order to define and prioritize the correct allocation of incentives. These incentive schemes should account for the broader societal benefits of investments into resilience measures. Without decisive action focused on electricity system resilience, climate change will increasingly challenge the reliability, affordability, and security of supply.

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

If other, please explain why?

Regulatory frameworks should better incentivize investments in resilience due to their higher upfront cost. Possible incentives could include granting premiums on the rate of return (ROR) for resilience investments, as seen in Italy.

Accelerating the permitting process (building permitting, EIA, etc.) of investments related to climate resilience that are already approved by national regulators or relevant authorities is a key prerequisite for their subsequent implementation.

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

1. Incorporate climate resilience into European and national planning
Harmonised, science-based climate risk assessments and scenarios across the EU, including sector-specific guidance and forward-looking projections, to ensure a shared understanding of climate risks and enable consistent investment and planning decisions. These should be more advisory than mandatory.
2. Mandate national energy regulators to address and incentivise climate adaptation with clear, stable and forward-looking regulatory framework, namely ensuring the implementation and realization of the EU NECPs.
3. Public procurement procedures should promote climate adaptation by design with a voluntary non-price criterion.

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”?

The resilience of the energy sector underpins the functioning of all other sectors. We consider that it must be integrated first and foremost in sectors that provide critical services, have long-lived assets, and are highly exposed to climate impacts meaning it is imperative for both power generators and distribution system operators to apply the principle of “climate resilience by design” in order to proactively fortify, digitalise and streamline the operation of critical electrical infrastructure. For this to be feasible for DSOs, national regulatory authorities should use their mandate to facilitate and incentivise the necessary investments under the regulatory frameworks and streamline authorisation and permitting processes to adapt their infrastructure more quickly.

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

A European Climate Adaptation Plan (H2 2026) – The upcoming Climate Adaptation Plan should emphasise climate adaptation measures for critical infrastructure. To that end, we recommend the Commission to take these steps:

- Assess the risks for critical infrastructure
- Identify critical variables for each sector and corresponding actions
- Ensure alignment with climate adaptation measures in several national energy and climate plans (NECPs)
- Involve and include the main stakeholders, such as the National Regulatory Authorities (NRAs), generators, distribution system operators (DSOs), transmission system operators (TSOs), and isolated systems such as islands nations.

Governance Regulation (2018/1999) - National Regulatory Authorities (NRAs) should be explicitly responsible for implementing climate adaptation of electricity infrastructure and improving crisis management. Adaptation measures should be incentivised and appropriately recognised within national regulatory frameworks for DSOs. Furthermore, NECPs should be amended to explicitly introduce a dimension of physical grid resilience. Currently, it is up to each Member State to decide, and several MS are already including this. Changes to the Governance Regulation would provide all Member States with a clear mandate and make the necessary connection between grids and climate adaptation. These NECPs should:

- Assess the risks posed for critical infrastructure, and others energy assets depending on the criticality of the climate variable by the potential impacts of climate change.
- Identify critical variables for each sector and corresponding actions to be developed by the sectors
- Involve and include the main stakeholders, such as the NRAs, Distribution System Operators, Transmission System Operators and generators.

The Public Procurement Directives – the expected sustainability criteria should include climate adaptation by design as a recognised and rewarded attribute. This should be introduced for the contracting authorities and entities as a voluntary non-price criterion and would ensure that new products have longer lifetimes, contribute to overall system resilience and support manufacturers and projects which include climate adaptation measures into their strategies.

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.

In some cases, policies and regulatory frameworks can hinder effective climate resilience action. For example:

- Lack of full remuneration for resilience-related investments: significant disincentive to building climate-resilient infrastructure because regulatory frameworks often recognise only standard costs, but do not recognise higher upfront costs required to design and build assets capable of withstanding future climate extremes.
- Technical standards are largely based on standard climatic conditions, rather than on forward-looking climate scenarios.
- Existing regulatory frameworks tend to prioritise short-term efficiency and performance objectives (quality of service or cost reductions), while they do not adequately support anticipatory investments in climate resilience, whose benefits materialise over the medium-long term to the energy system and society as a whole.
- Under the current Environmental Impact Assessment Directive, permitting procedures focus on environmental protection while not accounting for climate resilience benefits. As such, projects which enhance climate resilience are not fast-tracked and face permitting delays.

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)					
<i>* 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.</i>	☐	☒	☐	☐	☐

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:

We believe that establishing a common baseline of global warming scenarios which should be tailored for regional/ local downscaling, for risk assessments and planning can ensure informed decision-making when designing climate adaptation efforts. In addition, it would create geographical consistency and increased transparency between regulators, utilities and society of the risks posed by climate change.

The sector uses information from EU or national climate modelling agencies which are based on IPCC scenarios, so as to map climate exposure of their assets, identify their main vulnerabilities and prioritise action. Such mapping must constantly evolve in line with evolutions of Europe's climate and integrate worst-case scenarios given the critical nature of distribute infrastructure. Any additional common EU climate reference trajectories/scenario(s) should be science-based and aligned with other models.

The introduction of binding obligations to use reference scenarios in planning decisions risks reducing Member States' flexibility, increasing administrative burdens and creating overlaps with existing national regulatory frameworks. It is therefore preferable to promote common scenarios as a non-binding technical reference, allowing Member States to adapt them to their specific territorial contexts.

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:

Both the EU and the member states should assess the risks in one joint climate risk assessment, to avoid overlaps and ensure coherence. Specifically, the assessment should include risks posed for critical infrastructure and identify critical variables for the relevant sectors. The assessment should be developed and determined with the relevant experts and sectors. The parameters for these risk assessments should stem from the same sources used for the climate scenarios and account for local specificities, to ensure adequate climate resilience for infrastructure and regulatory consistency across the Member States. Harmonised climate risk assessments at EU and national levels are essential for consistency and comparability. These assessments should be closely aligned with and inform National Energy and Climate Plans (NECPs) to support practical planning and investment decisions while remaining proportionate and flexible to reflect regional and sector-specific risk profiles. This approach should not prevent those who are disproportionately exposed from taking additional measures.

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:

Please refer to our answers for question 7 ("Which policy areas or EU legislative frameworks should prioritise embedding this principle, and how should this be done?").

The development of clear and coordinated adaptation strategies and plans is essential to enable effective implementation. The definition of adaptation targets and the identification of risk owners should remain flexible and proportionate, sector-sensitive and aligned with available mandates, capacities and funding, to ensure accountability without creating rigid or unrealistic obligations. This approach should not prevent those who are disproportionately exposed from taking additional measures.

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:

Development and implementation of adaptation plans should include all relevant stakeholders, including vulnerable communities as well as operators and owners of power sector infrastructure where relevant, so as to complement efforts underway to ensure a just transition.

Monitoring, reporting, evaluation and learning

	Fully agree	Slightly agree	Neutral	Slightly disagree	Fully disagree
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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:

It is important to bear in mind that commonly used KPIs track past power interruptions and climate-related events, but they do not assess how effective planned mitigation or adaptation measures are in the investment stage. Any new initiatives and proposals for KPIs to address this gap should assess to what extent existing frameworks (e.g. CSRD) can address the gap and then complement existing frameworks in a targeted and efficient way to avoid increased administrative burden. For example, companies subject to the CSRD already have to report on climate adaptation under ESRS (E1-4).

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

1. Integrate Adaptation into core governance and planning: Embedding climate adaptation into urban, spatial, and infrastructure planning is essential. Including resilience criteria in zoning plans, public budgets, and sectoral strategies anticipates climate impacts and reduces systemic vulnerabilities. This ensures a systemic transformation rather than isolated interventions.
2. Use of dedicated financial mechanisms to close the Adaptation finance gap: Finance is critical to scaling adaptation globally and closing the adaptation finance gap. Policies should establish targeted funding programs and innovative financial instruments to channel adequate resources toward resilience measures. Mobilizing both public and private capital is essential to ensure timely implementation of adaptation actions and equitable access, particularly for vulnerable regions and critical infrastructure.
3. Use of high-resolution climate data and scenario-based risk management: There is a need for more accessible, application-oriented tools, as well as data and models capable of providing detailed projections at a local scale, with transparency on limitations and levels of uncertainty. These resources should include clear transparency on limitations and uncertainty levels, enabling stakeholders to understand hazards and plan effective adaptation measures.
4. Foster Public-Private Partnerships and Multi-Level Governance: Structured collaboration among all stakeholders through multi-level governance frameworks is essential to address this complex challenge. Such partnerships accelerate implementation and ensure socially legitimate solutions.
5. Accelerate innovation and technology deployment: Technological innovation is a key enabler for adapting energy networks and renewable generation to climate impacts. Digitalization, automation, and advanced materials can significantly enhance resilience in critical infrastructure.

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:

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?

We recommend several suggestions to further enhance the usefulness of this proposed tool for power sector professionals; these include:

- Access to the metrics, models, and data used for this tool; this data should include APIs, be regularly updated, and have variables and thresholds that can be adjusted based on the needs of the user
- The tool should be interoperable with other systems, such as its data being integrable into GIS
- Web sessions and events to support accurate interpretation of the data, clarify limitations and uncertainties, promote the sharing of best practices, and update our sector of updates to data, methodologies, sources, and 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 support Member States in improving telecommunication connectivity for rural areas to enhance the efficiency of electricity grid management systems. Developing advanced telecommunication infrastructure in rural areas is essential to enhance the efficiency of electricity grid management systems. By improving connectivity, DSOs can respond more quickly to outages and support remote communities, ensuring equitable access to reliable energy.

Member States:

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

EU:

Member States:

Due to the vital importance of ensuring a reliable electricity supply for electrically powered medical devices, DSOs play a fundamental role in supporting healthcare needs and promoting social welfare. Experience gained over the years has highlighted the fundamental importance of collaboration between local institutions, such as Civil Protection and the Fire Brigade, and electricity distribution personnel to reduce the impacts of extreme weather and ensure the rapid restoration of the medium- and low-voltage network. These agreements help guarantee maximum efficiency and effectiveness during emergencies caused by climate-related impacts on the electrical system. Training activities and joint exercises play an essential role in enhancing these cooperation agreements and strengthening response and intervention capabilities in crisis situations.

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

EU:

From a power sector perspective as regional and local stakeholders, at the EU level we recommend:

- **Harnessing European resources:** Targeted funding using the Industrial Competitiveness Fund and the Connecting Europe Facility can support regional and local efforts in strengthening resilience. Areas funded can include climate modelling, simulation tools, measurement technologies, and emergency response.
- **Fostering cooperation:** Promote mechanisms that facilitate the creation of cooperation agreements among Distribution System Operators (DSOs). At the same time, the EU should reinforce the European Civil Protection Mechanism and work in close coordination with Member States to develop advanced tools for emergency prediction and management, including early warning systems and harmonized intervention procedures.
- **Information sharing:** Create a knowledge-sharing platform among Member States to exchange lessons learned and innovative solutions.

Member States:

From the perspective of regional and local stakeholder, we recommend that member states:

- o **Facilitate and de-risk investments:** NRAs should design regulatory frameworks that include resilience as a recognised and recoverable cost for utilities in the Regulatory Asset Base (RAB). Member states should reduce any disproportionate financial burden on smaller or resource-limited stakeholders, as well as fund pilot adaptation projects at regional and municipal levels to test innovative resilience measures.
- o **Provide guidance:** offer technical guidance and best-practice frameworks tailored to different sectors, including critical infrastructure and energy systems.
- o **Conduct multi-stakeholder emergency exercises:** Member states and regions can coordinate emergency responses and organise practices involving all relevant stakeholders.
- o **Coordinate proactive efforts:** coordinate efforts with relevant local and regional stakeholders to map the impacts of adverse climate events on local infrastructure, draft contingency response, and fortify infrastructure.
- o **Consider the need to upgrade older networks:** Investment limits often mean that investment in upgrading facilities that need it (for example, the low-voltage network, which has a very high average age) is postponed because there are other more urgent needs, such as new infrastructure for connecting renewables or meeting demand.

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:

At the European level, regional risk groups could be created to identify regions which might face greater challenges as a result of climate change, outdated infrastructure, and/or economic constraints, as well as assist these regions with financing, investment incentives, and targeted interventions.

Member States:

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

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

If other, please explain or complement your answer above:

Exclusion of adaptation requirements and costs in regulatory frameworks and recognized grid costs.

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

- ☒ 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
- ☐ Mandate Member States to set up national platforms or coordination tables where local and regional stakeholders have a legally recognised role and responsibility
- ☒ 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.
- ☐

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 **can 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?

Key climate resilience innovations and technologies for the power sector to enhance competitiveness include:

- Digitalisation: This allows for real-time monitoring capabilities to respond faster and more effectively to adverse climate events and ensure communication to customers with important information.
- Accurate monitoring tools: High-quality climate data, satellite images, and improved climate and system modelling can support planning and investment decisions.
- Redundant communication systems: An example of this could be Lower Earth Orbit (LEO)-satellite communication can ensure asset connectivity during emergencies
- Flexible energy systems: Combining clean generation units, such as renewables, with storage can strengthen security of supply during extreme events.
- High-performance materials: High strength overhead grid conductors using carbon core technologies and polymeric materials resilient to high temperatures for grid underground components can fortify infrastructure.
- Weatherproofing of power systems: Measures include enhanced cooling and anti-icing systems for renewables and grids, flexible hydro operation, and improved cooling for thermal plants.

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 **to 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?

Financial: Climate-resilience infrastructure requires high-upfront capital investment, yet there remains a persistent adaptation finance gap and current tools and mechanisms remain insufficient to attract and effectively channel both public and private capital. Climate resilience investments, such as digitalisation, advanced monitoring, flexibility solutions, climate-proofing of assets, are not always clearly recognised as eligible for cost recovery.

Regulatory: The absence of a clear mandate for incorporating climate resilience into EU frameworks such as NECPs and Distribution Network Development Plans (DNDPs) as well as national regulatory frameworks for DSOs leads to a lack of recognition of and rewards for climate adaptation measures. High-resolution climate data, asset-level vulnerability modelling and scenario-based risk assessment are still not systematically integrated into planning and regulatory frameworks, further limiting the ability to prioritise and justify adaptation measures. Progress requires moving beyond predominantly reactive regulatory frameworks toward forward-looking, systemic approaches that assess the full value of adaptation using climate projections and appropriately incentivise private investment. To ensure that resilience objectives are effectively implemented without undermining the broader delivery of network development, the regulatory frameworks should provide for appropriate safeguards. These could include the introduction of dedicated and additional budget lines within the DNDPs or, alternatively, the establishment of standalone resilience plans supported by dedicated budgets.

Such arrangements would enhance policy coherence, preserve investment prioritisation and provide DSOs with the necessary certainty to operationalise resilience investments required.

Measuring risks: It is currently challenging to translate risks into investment decisions, such as by utilising relevant KPIs to measure the benefits. Introducing KPIs at the EU-level would risk halting the investments in resilience, as different metrics are relevant for different sectors, situations, and climate-related risks.

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

See responses to question 7. National regulatory frameworks should embed climate scenarios and benefit assessments into decision-making, involving public and private stakeholders across sectors and governance levels to deliver targeted tools for different targets (advanced economies, vulnerable communities, etc.). National regulatory frameworks governing DSOs should incentivise and recognise adaptation measures within the Regulatory Asset Base, since regulatory authorities play a key role in ensuring that DSOs are able to invest in the future and proactively strengthen resilience. Such policies should incentivise strategic, system-level investments that exceed the capacity or risk appetite of individual actors, while promoting mechanisms that mobilise finance and improve the management of both financial and operational risks. Further measures should ensure that the power sector has enough skilled workers to be able to undertake resilience-enhancing measures. Additionally, funding measures, through both public and private initiatives can provide the funds needed.

1. Establish clear, stable regulatory frameworks with strong incentives for resilience investments: Regulatory frameworks must be transparent, consistent, and long-term, supported by tariff mechanisms that encourage and reward investments in climate resilience.
2. Develop public-private risk-sharing mechanisms, blended finance and guarantees: Diversify financial instruments—such as guarantees, blended finance, and results-based financing—to reduce risk and attract private capital, while fostering collaboration between public and private sectors.
3. Integrate climate resilience into fiscal planning and public procurement: treat adaptation as an investment rather than a cost. Embedding resilience criteria in budgeting and procurement processes ensures long-term economic and social benefits.
4. Mobilize international and EU-level funds for vulnerable regions and critical infrastructure: Direct financial flows toward areas and assets most exposed to climate risks, ensuring equitable access to resources and accelerating adaptation in high-risk geographies.
5. Grant-Based Mechanisms as a catalyst for high-impact Climate Adaptation: to effectively address the adaptation finance gap and accelerate the implementation of climate-resilience measures across Europe, it is essential to complement market based financial instruments with dedicated grant-based funding mechanisms /programmes. Many high-impact adaptation interventions, such as digital and monitoring infrastructure, protection of critical infrastructure as well feasibility studies for disruptive technologies and first-of-a-kind pilot projects in renewables - deliver substantial social, environmental and economic benefits, yet do not generate sufficient direct financial returns to meet traditional bankability criteria. As a result, these measures often struggle to access loans, private investment or blended-finance structures. Dedicated grant mechanisms at both EU and national levels are therefore critical to enable the deployment of interventions whose value is systemic rather than purely financial. By complementing existing financial instruments, further dedicated grant programmes would mobilise public and private investment, strengthen Europe's resilience to climate impacts, and support a fair and balanced transition.

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?

Current accounting frameworks do not yet fully reflect long-term climate physical risks in asset valuation, particularly for long-lived infrastructure. Further guidance would be beneficial to support the consistent integration of forward-looking climate scenarios into asset valuation, depreciation, impairment testing and investment decision processes, while ensuring proportionality and legal certainty. Regulatory frameworks should incorporate structured learning mechanisms, enabling requirements to be periodically updated based on new climate data, emerging hazards, and ex-post evaluations of resilience performance. Introducing gradual compliance pathways would help operators integrate climate-risk uncertainty into planning and investment decisions while avoiding disproportionate burdens.

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

See responses to question 7. While climate physical risks are increasingly recognised, they are not yet systematically embedded across sectoral and regulatory frameworks. Stronger alignment is needed between climate risk assessments, sectoral regulation and permitting processes, particularly for critical infrastructure. Clear guidance on how to integrate climate physical risks into planning, regulatory approvals and funding decisions would support more consistent and proactive resilience investments.

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?

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

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

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

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

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

If other, please specify:

To support geographically isolated economies, such as islands, additional policy measures should be explored to address climate insurance protection gaps. These could include a mechanism to coordinate national insurance schemes at the EU-level to address cross-border climate risks and their financial implications, as well as public support measures for regions that cannot be easily insured by the market. Proposals which set minimum requirements, such as for insurance, should be carefully evaluated to assess impacts on corporate risk management strategies, potential investments, and cost burdens.

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