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REGULATORY SCRUTINY BOARD OPINION

Impact assessment / European Integrated Framework for Climate Resilience

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EUROPEAN COMMISSION
REGULATORY SCRUTINY BOARD

Brussels,
RSB

Opinion

Title: Impact assessment / European Integrated Framework for Climate Resilience

Overall 2nd opinion: POSITIVE WITH RESERVATIONS

(A) Policy context

This initiative aims to address climate resilience as a vital element of wide societal resilience and preparedness through developing a new EU policy framework for strengthening climate resilience. The new framework follows the first European Climate Risk Assessment (EUCRA) and the 2024 Commission Communication on managing climate risks. The European Integrated Framework for Climate Resilience aims to support the ability of the EU and its Member States to tackle the significant impacts and risks identified in the EUCRA. It includes elements such as climate resilience objectives, common reference global warming trajectory, risk ownership, climate risk management in sectoral policies, climate resilience by design, minimum requirement for climate risk assessment, and common parameters for adaptation strategies and plans.

(B) Key issues

The Board notes the improvements to the revised report responding to the Board's previous opinion.

However, the report still contains significant shortcomings. The Board gives a positive opinion with reservations because it expects the lead Service to rectify the following aspects:

(1) The evidence behind the problem of insufficient physical preparedness and the interplay between policies and physical preparedness are not clearly presented.

(2) The causal link between options and expected effects, including possible secondary consequences for private actors, is only partially demonstrated.

(3) The costs and the benefits are not presented sufficiently clearly.

(4) The coherence of the initiative with the post-2030 climate and energy package is not sufficiently assessed, including as regards potential overlaps, unnecessary administrative burden and enforcement.

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111
regulatory-scrutiny-board@ec.europa.eu

(C) What to improve

(1) The problem of fragmented, uneven and insufficient preparedness, and its magnitude should be more thoroughly substantiated with relevant evidence, in particular as regards the physical preparedness of the different sectors in Member States. Building on the available evidence, e.g. from the European Climate Risk Assessment (EUCRA), the report should present an analysis of the physical preparedness and resilience of the different sectors to demonstrate gaps in physical preparedness, to analyse avoidable risks and establish gaps in policies. The problem section should be streamlined to avoid repetitions.

(2) The report should provide more details on the process and methodology for the assessment of the residual risks and risk tolerance. The report should better demonstrate the causal link between the different options, expected effects and better explain what types of measures will need to be undertaken by different categories of actors in order for the risks to be reduced below the maximum tolerable level. The report should provide more detail on the public-sector concepts and envisaged climate-proof sector standards addressed to the private sector, the implementation timeframes and the enforcement of each policy option. The report should explain whether public bodies that are assigned ownership of particular risks may in turn need to regulate the behaviour of private citizens and businesses in order to address the risks and achieve the envisaged benefits, and how any related unintended consequences will be assessed.

(3) The report should better substantiate the calculations of certain costs, e.g. for the Climate Viewer and Resilience Navigator. The assessment of costs and benefits should take into account the same types of costs and benefits for each option. The administrative costs (or costs savings) for the public authorities should be better estimated and included in the burden reduction table.

(4) Based on an improved analysis of causal links between the different options and their effects, the report should demonstrate how benefit-cost ratios (BCRs), additional investments and return on investment (ROIs), used in estimating benefits under the different options, relate to the specific options and measures. The report should be transparent on which impacts, both in terms of costs and benefits, will directly stem from this intervention and which impacts are expected from follow-up interventions.

(5) The report should better describe how the preferred option will be implemented and enforced. It should also further discuss simplification and streamlining possibilities with other existing or forthcoming initiatives of the energy and climate framework, with a view to reducing burden for public authorities and private actors.

The report should better analyse the added value of a compulsory Better regulation check and should clarify whether it is a part of the preferred option.

(D) Conclusion **The lead Service may proceed with the initiative.** **The lead Service must revise the report and its executive summary in accordance with the Board's findings before launching the interservice consultation.**	
Full title	Proposal for a Regulation of the European Parliament and of the Council establishing the framework for achieving climate preparedness and resilience and laying down harmonised rules on climate risk management, and amending Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action
Reference number	PLAN/2025/1038, PLAN/2025/1040
Submitted to RSB on	10 July 2026
Date of RSB meeting	Written procedure

EUROPEAN COMMISSION
REGULATORY SCRUTINY BOARD

Brussels,
RSB

Opinion

Title: Impact assessment / European Integrated Framework for Climate Resilience

Overall opinion: NEGATIVE

(A) Policy context

This initiative aims to address climate resilience as a vital element of wide societal resilience and preparedness through developing a new EU policy framework for strengthening climate resilience. The new framework follows the first European Climate Risk Assessment (EUCRA) and the 2024 Commission Communication on managing climate risks. The European Integrated Framework for Climate Resilience aims to support the ability of the EU and its Member States to tackle the significant impacts and risks identified in the EUCRA. It includes elements such as climate resilience objectives, common reference global warming trajectory, risk ownership, climate risk management in sectoral policies, climate resilience by design, minimum requirement for climate risk assessment, and common parameters for adaptation strategies and plans.

(B) Key issues

The Board notes the additional information provided and commitments to make changes to the report.

However, the Board gives a negative opinion because the report contains the following serious shortcomings that the lead Service must address:

(1) The problem related to the lack of preparedness and its magnitude is not clearly defined nor sufficiently substantiated with evidence.

(2) The causal pathways from measures to outputs and impacts are not clearly established. The description of the options is not sufficiently specific and does not adequately distinguish between mandatory and voluntary measures.

(3) Coherence of the initiative with existing and forthcoming initiatives is not sufficiently assessed, in particular as regards potential overlaps and unnecessary administrative burden.

(4) The costs and the benefits resulting from the options are not sufficiently assessed. The methodology and assumptions behind the effectiveness and efficiency of the options are not transparent.

(C) What to improve

(1) The report should clearly define the scope of the intervention, both in terms of content and legal instruments. The report should not be limited to noting policy gaps in the existing legal frameworks or public interventions: based on a better analysis of the current state of preparedness across the EU, the report should provide more robust evidence substantiating the analysis of the problem related to lack of preparedness including its magnitude. The report should analyse better the remaining avoidable risks at sector level and overall. The report should explain why the existing legislative framework on climate resilience and adaptation does not suffice to address the identified societal problems and substantiate the claimed regulatory failure with available evidence. The report should more clearly differentiate between issues stemming from lack of rules and those stemming from lack of proper implementation of the rules. The report should also substantiate the existence of the claimed market failures to be addressed by the initiative.

(2) The report should be clearer on the causal pathway from measures to outputs, results and impact, to the extent possible building on available evidence, including from Member States. The report should specify the measures more clearly and especially be clearer about which obligations stem from the proposed measures and explain how the different instruments, including mandatory and voluntary, would interact with each other. The concept of risk ownership needs to be further analysed, including in terms of its relation to the rights and responsibilities regarding the assets exposed to climate risks, including in relation to other actors. The report should clearly specify the envisaged flexibilities within mandatory obligations and how a harmonised approach to the assessment of residual risks and the implementation of climate resilience by design will be ensured.

(3) The report should further improve the assessment of coherence with existing and forthcoming initiatives, including, where relevant, economic governance and sectoral ones. The report should analyse more in depth the potential for overlaps and increased regulatory or administrative burden. In particular, the proposed inclusion of climate resilience check in the better regulation requirements should be revisited in the context of the simplification agenda and the reduction of administrative burden.

(4) The impact analysis of each option should be transparent about the underpinning methodology, assumptions and evidence used. The costs and benefits should be further assessed to include quantitative elements where feasible or at least indicate the order of magnitude of the identified impacts. Benefits and costs should be reported at the same level, therefore if benefits are to be realised due to sectoral initiatives, the related costs should be reflected accordingly.

(5) The report should further strengthen the comparison of options and their scoring based on the improved assessment of benefits and costs. The key trade-offs between the options should be more clearly indicated.

Some more technical comments have been sent directly to the author Service.

(D) Conclusion **The lead DG must revise the report and its executive summary in accordance with the Board's findings and resubmit it for a final RSB opinion.**	
Full title	Proposal for a Regulation of the European Parliament and of the Council establishing the framework for achieving climate preparedness and resilience and laying down harmonised rules on climate risk management, and amending Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action
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