

SPAIN'S NON-PAPER FOR A STRONGER EUROPEAN CLIMATE RESILIENCE FRAMEWORK

A. CONTEXT

The climate crisis is already having severe impacts across Europe. Europe is warming faster than any other continent, at approximately twice the global average rate. In 2024 and 2025, global temperatures temporarily exceeded 1.5°C above the pre-industrial baseline, stressing concerns about climate tipping points and irreversible impacts.

These impacts also entail significant economic costs. EU Member States have accumulated €822 billion in losses associated with extreme weather and climate-related events since 1980; between 2021 and 2024 alone, losses amounted to approximately €208 billion. Extreme summer weather could reduce EU GDP by around 1% in 2026 while losses could reach approximately 2.3% of GDP by 2050 and around 7% by 2090 under a high-warming scenario. Climate impacts therefore represent not only an environmental challenge, but a growing risk to European security, to competitiveness and to our prosperity.

In response to these growing climate risks, the European Union has increasingly integrated climate resilience into its policy framework. The **European Green Deal**, launched in 2019, established climate neutrality and climate action as core EU objectives, while the **EU Preparedness Union Strategy 2030**, adopted in 2025, recognized climate change as a major risk requiring stronger preparedness and resilience across Europe.

According to the European State of the Climate 2025 report, at least 95% of Europe experienced above-average annual temperatures in 2025. The year was marked by heatwaves extending from the Arctic to the Mediterranean, net glacier mass loss across all European glacier regions, record sea-surface temperatures, and more than one million hectares burned by wildfires across Europe. With **the Mediterranean region warming 20% faster than the global average**, Southern European countries are experiencing particularly severe heat waves, water scarcity, extreme wildfires and

desertification. This week, UNEP warned that the world is on an increasingly dangerous trajectory, further highlighting the widening gap between the Paris Agreement's 1.5°C goal and the reality of current policies and short-term trajectories—under which breaching this threshold is already considered inevitable, exposing us to escalating climate risks.

In this climate scenario, many Member States are highly exposed, as evidence has shown. Reactive approaches to address climate vulnerability have proved unsustainable and unable to cope with current climate risks, thus representing a growing weakness for our security. We strongly support the new European Integrated Climate Resilience Framework and advocate for greater European ambition on adaptation. At the national level, the Government of Spain has proposed a similar approach through the proposal for a National Pact against Climate Emergency.

B. A STRONGER EUROPEAN ADAPTATION FRAMEWORK

1. ANTICIPATION: RISKS ASSESSMENT, PLANNING AND RESILIENCE BY DESIGN

Europe needs a shared, science-based understanding of climate risks, grounded in the IPCC framework, underpinned by tools such as Climate-ADAPT and Copernicus and reflected in quinquennial climate risks assessments at European, national and regional levels.

The EU should establish a requirement for all public planning and decision-making processes **to systematically assess and integrate climate risks**, based on a common risks-assessment framework and on the best available scientific evidence while making use of existing processes and avoiding unnecessary additional administrative burden. This should ensure that climate risks assessments are not only developed as standalone exercises, but are effectively reflected in planning, investment and policy decisions across sectors and levels of governance. Assessments should also consider alternative futures, extreme scenarios and low-probability high-impact risks. Also, for adaptive interventions to be effective, it is essential to identify who the “risk owners” are and

to secure their active engagement throughout the assessment, planning and implementation process, ensuring that responsibilities, incentives and capacities are aligned with adaptation objectives.

In addition, the principles of *resilience by design* and *climate proofing* should be core elements of the EU Framework. Climate risks should be systematically integrated into the design of infrastructure, investment instruments, land-use planning and sectoral policies, thus ensuring that decisions taken today remain robust under future climate scenarios and do not create new vulnerabilities or maladaptation risks. This framework should also promote nature-based solutions as a key adaptation tool, scaling up investment in proven and scalable adaptation measures.

The EU Framework needs a strong legislative component with binding adaptation objectives at European level for the short, mid and long term, informed by the recommendations of the European Scientific Advisory Board and based on a common reference scenario for planning purposes. These objectives, aligned with science, should initially focus and fast track strategic sectors at risk—including water, health, infrastructure, forests and biodiversity, tourism, agriculture and fisheries—and be gradually extended to all social and economic sectors.

The **Do No Significant Harm (DNSH)** principle should be strengthened and expanded into a “Do No Significant Harm + Resilience” **(DNSH+R) approach**, ensuring that investments and projects not only avoid significant harm to environmental objectives, but also adequately assess and integrate climate risks and reinforce adaptation capacities. **Building on the lessons learnt from the implementation of the DNSH in the Recovery and Resilience Facility**, this should be pursued in a smart and proportionate manner, building on existing processes, tools and reporting requirements, while avoiding unnecessary additional administrative burden. By streamlining and embedding resilience considerations into existing decision-making frameworks, the EU can strengthen Europe’s security, competitiveness and prosperity, while reducing its vulnerability to climate risks.

2. A JOINT EMERGENCY RESPONSE AND A JUST ADAPTATION FRAMEWORK

Europe must be able to act jointly in climate emergencies. A permanent EU Climate Emergency Response System should be established by upgrading rescEU mechanisms into a fully integrated, rapid-deployment capacity equipped with an enhanced pool of shared resources (e.g. a dedicated EU air firefighting fleet), advanced disaster-response tools, data-sharing systems, training schemes and common protocols and scalable logistical frameworks.

Just Resilience must underpin the EU Resilience Framework ensuring a fair distribution of costs and benefits of climate adaptation and taking into consideration the respective responsibilities to establish an appropriate governance framework. Climate vulnerability correlates strongly with social and economic disparities. Promoting social cohesion requires the identification of those more vulnerable to climate risks and enabling meaningful public participation.

Assessing the differential impacts of climate change across the European geography and addressing their social, economic and environmental implications is **key to ensuring regional cohesion and to promoting long term resilience** at EU level.

3. A ROBUST AND SUSTAINABLE FINANCIAL FRAMEWORK

Adaptation requires adequate financing, and the existing adaptation finance gap must be addressed through a multilevel approach. While some climate risks can be managed individually, complex, systemic, transboundary and cascading risks require mechanisms for co-responsibility, coordination and joint investment at EU level.

Climate resilience must be embedded in the EU financial architecture. This requires resilience criteria explicitly addressed in the design of the Multiannual Financial Framework, improving climate adaptation, earmarking and mainstreaming climate resilience as a priority in the Union's budget.

A dedicated European Climate Adaptation Fund should be set up to cooperate with and be complementary to the instruments envisaged under the next Multiannual

Financial Framework and, in particular, to the green and decarbonisation window of the European Competitiveness Fund.

These new needs should come along with new resources that could be generated through innovative mechanisms, such as climate-related levies (like in the premium air-transport) and other fiscal instruments, including **a European Climate Resilience Levy on profits in the oil and gas sector, which will become a European New Own Resource**. This instrument would build on principles already established on European environmental law (internalization of environmental costs through the polluter-pays principle and the extended producer responsibility frameworks). Additional financing options, including common European debt instruments, should also be explored to help bridge the financing gap.

A fiscal framework that fully reflects the climate emergency and supports the investment required for resilience should be established. This resilience framework should strengthen the investments in the EU value chain. Public national investments aimed at strengthening structural and green resilience should be considered within the current National Escape Clause (NEC), where appropriate and subject to its applicable conditions.

The EU finance sector should continue to integrate climate risks into all investment, lending and insurance schemes. EU public financial institutions (e.g. the European Investment Bank (EIB) and the European Investment Fund (EIF)) are leading by example. The Do No Significant Harm (DNSH) principle should be strengthened through a “DNSH + Resilience” (DNSH+R) approach, based on clear and proportionate criteria and avoiding unnecessary additional reporting and due diligence requirements or duplication with existing frameworks, ensuring that investments not only avoid significant environmental harm but also enhance adaptation capacities.

The EU must explore common financial instruments to strengthen climate resilience, such as a **public-private European reinsurance scheme** to cover losses arising from extreme weather and climate-related events, pooling risks across Member States to expand coverage, diversify exposure and benefit from economies of scale, while remaining funded through premiums. This could be addressed through the issuance of

climate risk bonds that would pay off in the event of extreme risks, thus diversifying risk, and simultaneously creating a new financial market of global dimension.

C. CONCLUSION

Climate resilience must be mainstreamed as a cross-cutting priority across all European Union policies and financing instruments. The Integrated Climate Resilience Framework should serve as a common reference point for coordinating EU-wide initiatives and ensuring policy coherence in light of the EU adaptation and climate resilience objectives.

The EU can better protect European citizens, strengthen security, competitiveness and prosperity while reducing European climate vulnerability by combining science-based risks assessment, binding adaptation objectives, DNSH+R, joint emergency response, just resilience and a robust and sustainable financial framework.

At the same time, adaptation and mitigation efforts must remain closely aligned, as the effectiveness and affordability of adaptation will depend on limiting future warming and preventing climate impacts from exceeding the adaptive capacity of societies, ecosystems and economies.

The objective should be a Europe that anticipates and responds collectively to climate risks, reinforces its adaptation capacities and mobilizes adequate public and private investments for climate adaptation.