



Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With 200 member organisations active in 40 European countries, representing over 1,700 NGOs and more than 40 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.

14 October 2026

CAN Europe's perspective on the upcoming "European climate resilience and risk management – integrated framework"

To: Commissioner Wopke Hoekstra

Cc: Executive Vice-President Teresa Ribera; Commissioner Jessika Roswall, Commissioner Dan Jørgensen

Dear Commissioner,

As European Commission President von der Leyen noted in her speech on the State of the European Union on 16 September 2026, this summer was the "summer of truth". Almost no part of our continent was spared from the heatwaves and the associated droughts and wildfires.

Europe is the fastest-warming continent, and science is clear. Continued use of fossil fuels and overexploitation of resources is driving the climate crisis and exposing people, communities and economies to ever greater risks.¹ Every fraction of a degree of avoided temperature rise matters. Europe must act on both sides of the equation: rapidly phase out fossil fuels while urgently strengthening resilience to protect people from the impacts we can no longer avoid.

As the [ESABCC report](#) published on 17 February highlighted, current adaptation efforts in the EU are insufficient, following other similar findings such as those by the [European Court of Auditors](#). The ESABCC highlighted, amongst others, that the expected climate impacts "could increasingly weaken Europe's competitiveness, strain public budgets and increase security risks", if adaptation is not stepped up. Therefore, it is critical that the **"European climate resilience and risk management – integrated framework"** which the European Commission plans to present in October 2026 will show the possible pathways and political agreements necessary and conducive to making the EU's adaptation efforts fit for purpose.

CAN Europe priorities

Representing more than 200 member organisations from across Europe, which operate in a variety of contexts, CAN Europe, after participating in the previous two official consultations on the framework, highlights the following priorities:

Based on best available science

¹ Excess deaths connected to the heatwaves across Europe are estimated to be well above 35,000 lives lost. The economic consequences are also enormous. The bank Triodos estimated in a report published on 18 August 2026 that "heat-related disruption could shave around 1% off the European Union's gross domestic product, equivalent to roughly €180 billion (\$208 billion) in economic losses", driven primarily by weaker labour productivity.

The EU should base this framework on the latest available science, including from the Intergovernmental Panel on Climate Change (IPCC), the United Nations Environment Programme (UNEP)'s Adaptation Gap reports, and European Climate Risk Assessment (EUCRA). This must include higher warming scenarios² derived from the currently insufficient level of aggregate emission reduction efforts, while pursuing efforts to keep within the Paris Agreement 1.5°C goal. At the same time, current climate reality shows that things can also get worse than expected. It is also clear that adaptation and resilience building are a continuous process, as societies learn, as climate impacts unfold, and as new scientific findings might require adjustments in political strategies and implementation efforts.

Adaptation and mitigation must go hand in hand

Adaptation and mitigation go hand in hand. That was also highlighted by European Commission President von der Leyen in her SOTEU speech, and has been a fundamental approach also in the Paris Agreement. It would be almost impossible and overly costly to adapt to a world of 2 or 3°C average temperature increase, with Europe warming even faster. The EU must stay the course on mitigation and achieve domestic climate neutrality by 2040 to do its fair share. In very concrete terms, there is a huge potential for measures that create synergies between adaptation and mitigation (e.g. agroecology; forests/sinks, renewables for cooling, water access, etc.), which the EU's strategy and the heatwave action plan that the Commission President announced should highlight. This summer's heatwaves have shown how closely extreme heat, housing affordability and climate resilience are connected - as we have witnessed via CAN Europe's [work on buildings](#). Poorly insulated and inefficient homes leave tenants and low-income households particularly exposed. This makes renovation, passive cooling and access to efficient renewable heating and cooling not only a mitigation measure, but a critical tool for protecting health, reducing energy bills and strengthening social protection and climate resilience.

Intermediary targets and milestones

The framework should set intermediary targets and milestones (for 2030 and 2040) towards the adaptation goals reflected in the European Climate Law (Article 5) as well as the Paris Agreement (Article 7). This should include indicators to track progress, taking into account agreements under the Global Goal on Adaptation (GGA).

A just resilience approach is critical

Environmental inequalities across Europe impact the resilience of people. Neighbourhoods with lower socio-economic status often have fewer and lower-quality parks and trees. Children, elderly populations, and people with pre-existing health issues suffer the most from air pollution, high temperatures, and transport noise. Thus, the framework must be guided by a just resilience

² e.g. the 2026 [Brussels Declaration](#) of Non-state Actors suggests a common reference scenario based on approx. 3°C global warming trajectory.

approach which aims to address these inequalities, prioritising support to households and communities that are most exposed to climate risks and with the least resources to adapt, while ensuring it benefits large segments of society and is developed in an intersectional, inclusive approach. Just transition policies across sectors should support high-quality jobs which are resilient to increasing climate impacts (e.g. adjustments to working hours due to heat stress). The discussed “risk ownership” approach has valuable elements, but must not result in leaving particularly vulnerable segments of society alone with the risks. A just resilience approach should also recognise climate-related human mobility as an integral dimension of adaptation, supporting people’s meaningful choices to remain and adapt, move safely or relocate with dignity where necessary.

Mainstreaming through “resilience by design”

As also highlighted by ESABCC, it should be guided by a “fair and just resilience by design” approach. The framework should enhance the mainstreaming of adaptation in all levels of governance and sectoral policies, showing that a greener and resilient economy will preserve and create jobs that reduce inequalities and create a safer, prosperous society, fostering green and social innovation and reducing climate-related fiscal risks.

Make nature-based solutions the first line of defence against climate disasters

Preserving and restoring Europe’s ecosystems is critical. Using nature in adaptation can maximise the co-benefits that nature-based solutions provide for water, food security and health. Nature can be one of our most powerful allies in tackling the climate crisis, and healthy ecosystems are foundational to social wellbeing. Hence, any rollback of existing legislation must be resisted, and instead, the new framework should promote the implementation of measures in areas such as the Nature Restoration Law or the Water Framework Directive.

In light of the critical role of nature-based solutions for resilience, and information that the framework might not give sufficient attention to this, CAN Europe also signed the [recent letter](#) to “Make nature-based solutions the first line of defence against climate”, supported by more than 30 diverse organisations. Specifically, this letter urged the Commission to:

- Drive the systemic integration of nature-based solutions for climate adaptation as a key priority in the legislative part of the European Framework for Climate Resilience;
- Provide legal incentives and financing mechanisms for Member States to manage landscapes and water systems in a way that prioritises water and climate resilience and the preservation of key ecosystem services. This should include national targets for additional natural water retention in landscapes to be achieved through locally driven approaches that reflect territorial needs and capacities, and mobilising and aligning public and private investment to scale up nature-based solutions.

Funding for adaptation

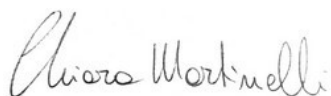
It will be critical to dedicate sufficient funds to adaptation, even if “resilience by design” will be applied. The EU should ensure that such funds are made more easily accessible to community-led initiatives under the next Multiannual Financial Framework (MFF). CAN Europe [calls for a €2 trillion EU budget](#) that allocates 50% for closing the climate and biodiversity investment gaps. EU funds should have accurate horizontal mainstreaming targets and earmarking, including strong definitions of qualifying adaptation actions; a more robust implementation of the ‘Do No Significant Harm’ (DNSH) principle, including adaptation objectives and avoiding maladaptation; dedicated finance for a socially just transition should be protected and expanded. Funds should be generated by applying progressive taxation options reflecting the polluter pays principle, including fossil fuel taxation and specifically a levy on fossil fuel profits and luxury emissions (e.g. private jets), as highlighted in this [recent civil society letter](#).

Europe’s global obligation on climate adaptation

Finally, the EU’s climate resilience and risk management efforts do not take place in a borderless vacuum. Climate impacts do not care about administrative boundaries. What happens outside the EU, both successes and failures in adaptation, will directly concern Europe. It will therefore be critical for the EU to increase climate finance for vulnerable countries of the Global South as part of its responsibility to support such affected areas. In the next MFF, the Commission’s proposal for EUR 200 billion for Global Europe should be maintained, and the EU institutions should agree on 15% biodiversity and 35% climate spending targets (equal distribution to mitigation, adaptation and addressing loss and damage), as well as 85% of projects promoting gender equality. CAN Europe will also measure the proposals by the European Commission against its positions once they are published.

CAN Europe stands ready to further engage on the upcoming framework.

Yours sincerely



Chiara Martinelli, Director