HAUT CONSEIL
pour le CLIMAT

CLIMATE RISKS: FRANCE MUST FACE UP TO ITS RESPONSIBILITIES

2026 Annual Report
HIGH COUNCIL FOR CLIMATE

JULY 2026

EXECUTIVE SUMMARY

The High Council for Climate's annual report assesses public policy action for the year 2025, taking into account developments up to May 2026. It is based on rigorous scientific data, and its analysis is built on the most comprehensive understanding possible of the measures implemented and their effects.

Ten years after the Paris Climate Agreement, the level of global warming caused by human activities has reached 1.4 °C, and climatic conditions are becoming increasingly dangerous forhealth, ecosystems, infrastructure and economic activities, whilst geopolitical conflicts linked to fossil fuels are intensifying, threatening sovereignty and security.

France must take action to address these challenges and scale up its climate policies on mitigation and adaptation.

Against this backdrop, the report analyses France's climate policies, makes recommendations and proposes new directions for discussion to address the challenges of the coming years.

1. The impacts of climate change are becoming more pronounced, leading to vital adaptation needs, and reinforcing the need to stop contributing to global warming by achieving carbon neutrality.

1.1 - Global warming is continuing at a rapid pace; stabilising it will depend primarily on a sharp and rapid reduction in GHG emissions until carbon neutrality is achieved.

By 2025, the level of global warming caused by human activities will reach 1.4 °C above the pre-industrial reference period of 1850–1900, and is continuing at a record pace. Warming is amplified over continents, particularly in Europe. It is leading to a sharp increase in the frequency and intensity of extreme weather events, at global, European and French levels, both in mainland France and in the overseas territories: an increase in heatwaves, starting as early as May, as in 2026; more severe agricultural droughts and conditions that are themselves more conducive to wildfires; an increase in the intensity of extreme rainfall; continued heat accumulation in the ocean; the thawing of the cryosphere; and an acceleration in sea-level rise.

The level of global warming caused by human activities will soon reach 1.5 °C. It is now inevitable that an average global warming level of 1.5 °C will be reached within a few years. This finding highlights that progress in reducing GHG emissions is too slow and too limited compared with the most ambitious target of the Paris Climate Agreement. Since its publication in 2015, the 6th IPCC report has revised the amplification of climate risks for a given level of warming upwards and highlighted a sharp increase in climate risks within the 1.5 °C to 2 °C warming range in many regions of the world, including Europe and small islands.

Future warming will depend on total future global GHG emissions and will continue until carbon neutrality (global net-zero CO_2 emissions, combined with a significant reduction in emissions of other GHGs) is achieved. The European Union's (EU) historical emissions account for around 10.5 per cent of current global warming, just behind those of China (12.9 per cent) and the United States (17.6 per cent). The EU and France can put an end to their contribution to global warming by reducing their net greenhouse gas (GHG) emissions to zero.

It is still possible to limit global warming to well below 2 °C and close to 1.5 °C, but efforts to reduce global GHG emissions are not yet sufficient to put us on such a trajectory. Extrapolating from the scenario based on current policies, which does not take into account the additional commitments under the Nationally Determined Contributions (NDCs) set out in the Paris Agreement, would lead to globalwarming exceeding 2 °C by 2050 and reaching nearly 3 °C by 2100, according to the central estimate of this extrapolation and the median climate response.

France adopted a single Reference Trajectory for Adaptation to Climate Change (TRACC) which anticipates global warming of 2 °C by 2050 and 3 °C by 2100, as well as its consequences for mainland France (i.e. +4 °C by 2100) and the overseas territories. However, on a global scale, it cannot be ruled out that the level of warming could reach 3.5 °C, and it remains possible, in the event of a strong climate response, that it could rise to 4 °C. Conversely, the full implementation of the nationally determined contributions (NDCs) would make it possible to limit global warming to around 2.5 °C by 2100.

In mainland France and Corsica, the observed warming amounts to 2.2 °C (annual average) between 1900–1930 and 2016–2025. The level of warming attributed to human activities is estimated at 1.7 °C for 2016–2025 and 1.9 °C in 2025. The year 2025 is the fourth warmest on record since 1900 (+2.4 °C), behind 2022, 2023 and 2020, and ahead of 2024, with one in every two days warmer than seasonal norms (1991–2020 averages) compared with just one in five days cooler than norms, and 10 times as many heat records as cold records. The warming observed in France is continuing at a rapid pace across all seasons, and is most pronounced in summer. The increase in the frequency, duration, intensity and the season affected by heat events is a direct consequence of global warming. Whilst temperatures exceeding 40 °C were extremely rare in mainland France and Corsica during the 20th century, temperatures exceeding 40 °C have been recorded every year in recent years.

French overseas territories are highly exposed to climate-related hazards, particularly cyclones, which can be accompanied by extreme winds, heavy rain, heavy swells and flooding. The proportion of high-intensity tropical cyclones is increasing. The number of hot days and nights is rising sharply as a result of global warming.

1.2 - To mitigate these impacts, it is urgent to prioritise adaptation measures and to scale up action on adaptation.

The increasing severity of the impacts on education, health, society, the economy and the environment – particularly in France – results from the intensification of several climate hazards, but also from large exposure to these hazards. It reveals multiple vulnerabilities among people, infrastructure, activities and ecosystems. The gap between actual adaptation efforts and the sharp rise in adaptation needs in a rapidly changing climate is driving this worsening of impacts. They are becoming recurrent: disruption to children's education, heat-related excess mortality, increased spread of vector-borne diseases, agricultural losses, water stress, high costs of damage caused by flooding and clay swelling, rising insurance costs, coastal erosion, forest dieback and coral bleaching. In 2025, the International Court of Justice pointed out to the close links between protecting the climate system, preserving ecosystems and safeguarding fundamental human rights, which underpin States' obligations regarding climate change.

Infrastructure, land-use planning, managed ecosystems, economic activities and socio-cultural practices are suited to a climate that no longer exists. Preparing for new climatic conditions and future changes can only be achieved by drawing on scientific knowledge, whilst taking into account the uncertainties surrounding future developments, including high-risk scenarios.

France's systems of compensation and mutualisation of losses and damage are undermined by the worsening impacts of climate change. The natural disaster compensation scheme, local authority insurance and crop insurance are particularly vulnerable to the rising costs of damage caused by climate change. Losses and damage resulting from the deterioration of living conditions, or even the uninhabitability of certain areas, cannot be mutualised through an insurance system and require the establishment of dedicated funds.

The adaptation measures that are currently being implemented in France are insufficient to contain the rapid increase in climate risks. It is still possible to improve France's resilience, protect the most vulnerable, limit the worsening of damage and some of these risks, but only if there is a significant increase in the scale, scope and speed of implementation of adaptation measures, which requires additional investment.

The adaptive capacities of many human systems and ecosystems are already reaching their limits. More and more limits will be exceeded within the warming ranges projected by TRACC between 2030 and 2050, resulting in losses and damage (HCC, Annual Report 2025; HCC, Special Report on the PNACC 3 2025). Reaching adaptation limits leads to losses of habitats and ecosystem services, reduced heat-related work capacity, losses in agricultural yields, water rationing during periods of drought, and reduced habitability, particularly in mountainous areas, coastal zones or areas exposed to floodwater runoff. Exceeding adaptation limits may result from global warming exceeding a level that places unsustainable constraints on the system in question (hard adaptation limits), or from a lack of adaptation measures or funding for their implementation (soft adaptation limits). Trade-offs will need to be made regarding the levels and nature of the losses and damage that will have to be borne in France.

The scale of the risks and the uncertainties associated with climate variability and regional hydroclimatic and hydrological projections are steering adaptation stakeholders towards robust adaptation strategies. Examples of robust adaptation strategies include avoiding exposure to risks, or reducing dependence on water resources to prevent further strain on these resources. In order to test the robustness of their adaptation measures, stakeholders must be able to supplement the TRACC baseline scenario with high-risk contingency scenarios, including a scenario of significant warming that could be harmonised at national or European level.

Adaptation measures bring significant benefits that extend far beyond climate policy alone, particularly in terms of health and quality of life. These benefits also include a reduction in energy poverty, the creation of local jobs that cannot be relocated, the strengthening of business competitiveness, and the minimisation of agricultural losses. Policies designed with inequalities in mind from the outset can also help to reduce them. Nature-based solutions are increasingly being implemented, particularly in urban greening initiatives. They improve physical and mental health and quality of life, but they need to be scaled up to realise their full potential.

2. Against a backdrop of climate emergency and conflicts, the 10-year review of the Paris agreement justifies ambitious climate action, for sovereignty and security.

2.1 - The climate emergency, geopolitical conflicts and access to resources: three issues inextricably linked to sovereignty and national security.

Fossil fuels are at the root of climate change, and control over them fuels geopolitical conflicts: thirteen major military conflicts since 1956, which have claimed millions of lives, are directly linked to fossil fuels, and military budgets have surged by 66 per cent between 2020 and 2026, driven in particular by the war in Ukraine and the ongoing conflict in the Middle East.

Conflicts over fossil fuels have contradictory effects on the energy transition: they reduce demand for fossil fuels due to high prices and accelerate the shift towards renewables. On the other hand, they increase energy insecurity and debt, and stimulate the exploration of new, high-cost deposits, delaying the phase-out of fossil fuels and creating future stranded assets, whilst increasing military emissions. They put pressure on budgets for the energy transition, destroy ecosystems and increase people's vulnerability to climate change.

The energy transition must strive to create the conditions for strategic autonomy over a number of critical resources. The use of metals and minerals, which are necessary for the energy transition, replicates the same mechanisms of supply concentration, embargoes and geopolitical tensions, but across a different geographical landscape dominated by China (which accounts for over 80 per cent of rare-earth processing). Resource efficiency and the circular economy can contribute to building strategic autonomy.

2.2 - Global transition dynamics are progressing rapidly towards the decarbonisation of electricity generation and consumption, but are stagnating in the food systems sector, whilst artificial intelligence is giving rise to new competition for resources.

The decarbonisation of the electricity sector is accelerating. For the first time in 2025, 43 per cent of the world's electricity is generated from low-carbon sources, and the increase in global electricity demand in 2025 has been met by renewables (solar +30 per cent, wind +8 per cent).

The electrification of end-use sectors is progressing at an unprecedented rate. 25 per cent of new vehicles sold worldwide in 2025 were electric, as defined by the International Energy Agency (IEA) (a third of which were plug-in hybrids), and in the United States, heat pumps outsold gas boilers by 30 per cent in terms of sales volume in 2024.

The transition of the food system remains the poor relation of the climate transition. Agricultural emissions continue to rise (+1.6 per cent per year), food losses and waste remain at 32 per cent of production with no improvement since 2015, the overconsumption of animal protein continues in developed economies, and more than 15 per cent of the world's fossil fuels are consumed by the food system.

Artificial intelligence is driving unprecedented competition for electrical resources and public funding. The priority given to the development of artificial intelligence, over human development, adds to the uncertainties surrounding socio-economic transitions. Whilst artificial intelligence (AI) applications targeted at the energy transition (network optimisation, leak detection) offer potential for reducing GHG emissions, generative AI is monopolising low-carbon electricity generation capacity at the expense of its use as a substitute for fossil fuels, and is creating demand for new thermal power stations in the absence of regulation.

2.3 - The cost of inaction is much higher than the cost of the transition, making unilateral decarbonisation by major economies a rational choice, with considerable welfare gains for societies.

The Network for Greening the Financial System (NGFS) estimates losses of 15 per cent of GDP by 2050 under a 2°C warming scenario and 30 per cent by 2100 under a 3°C scenario, with an upper bound of up to 50 per cent given the model's uncertainties. By way of comparison, the additional net investment required for decarbonisation, relative to current investment levels, is estimated at just 1–2 per cent of annual global GDP by 2030.

2.4 - The 10th anniversary of the Paris Agreement shows thatthe institutional framework has held up and enabled initial progress in limiting global warming, even though countries' commitments remain structurally insufficient.

The implementation of the commitments made under the Paris Agreement has slowed the rate of increase in global fossil fuel emissions. Extrapolating from the climate policies in place prior to 2015 would have led to an estimated warming of around 3.6 °C by 2100, compared with a warming trajectory of 2.8 °C based solely on current policies, and +2.3–2.5 °C based on the extrapolation of the implementation of current Nationally Determined Contributions (NDCs). This reduction is significant, but it remains structurally insufficient to limit warming to below 2 °C. The efforts required after the NDC deadlines to achieve these emission reductions remain substantial.

Four sets of public policy measures (information, taxation, subsidies and regulation) are needed in tandem to enable emissions reductions. Carbon pricing must be combined with coherent packages of subsidies and regulatory instruments, making low-carbon alternatives available and accessible. The integration of social justice and redistributive measures is essential for the democratic acceptance and effectiveness of climate policies.

The advisory opinion of the International Court of Justice of 23 July 2025 marks a turning point by reinforcing the legal standing of the Paris Agreement. It establishes that states' climate obligations fall under binding customary international law, identifies 1.5 °C as the primary temperature target, and paves the way for greater enforceability of national commitments.

2.5 - Over the past 10 years, the European Union (EU) and France have established a framework for action and have laid the foundations for an effective transition, which now need to be strengthened.

Like any Party subject to these enhanced obligations, and drawing on the European policy framework, France exemplifies, at its own level, these ten years of progress and limitations, which now call for a broader mobilisation of the lever of sufficiency – a lever that has so far been under-utilised.

As the world's fourth-largest emitter, the EU adopted the world's most ambitious climate regulatory framework : the European Green Deal. It is centred on the European Union Emissions Trading System (EU ETS). The EU ETS enabled a genuine decoupling of growth from emissions. However, it does not fully guarantee that the target of -55 per cent by 2030 will be met nor, according to the Draghi and Lefta reports, that it will trigger the structural changes necessary for industrial competitiveness. This implementation shortfall is compounded by a persistent investment shortfall of several hundred billion euros per year in low-carbon technologies, despite 30 per cent of the multiannual financial framework being earmarked for climate action, due to the lack of a pooled funding mechanism comparable to the US Inflation Reduction Act (IRA). Furthermore, the war in Ukraine has transformed the energy transition into a lever for sovereignty, with an accelerated phase-out of Russian gas via REPowerEU, but at the cost of new structural dependencies, notably on US liquefied natural gas, the volatility of which has increased further with the conflict in Iran in the spring of 2026. Furthermore, the shift towards a more interventionist industrial policy, targeting strategic sectors (batteries, hydrogen, semiconductors), is exacerbating tensions between Member States. This climate and industrial ambition, already weakened internally, is further undermined by the US withdrawal from the Paris Agreement, China's growing influence on climate issues and the proliferation of trade tensions, which are shaking the alliances upon which the EU had built its multilateral influence.

Since the Paris Agreement in 2015, France has developed an increasingly comprehensive legal framework for climate action, structured around three major laws, sectoral strategies and strengthened environmental planning; however, its effectiveness remains incomplete. The regulations are in place, but their implementation suffers from a lack of administrative and financial resources, numerous exemptions and a recurring tendency to water down legal requirements as soon as they become politically or economically sensitive. This framework has enabled real progress (carbon neutrality embedded in law, sectoral carbon budgets, climate litigation), but ten years on, the gap persists between the ambition of the legislation and the results: insufficiently reduced emissions, partial implementation, constraints regularly relaxed under social or economic pressure, and increasing precarity. The weakening of ambitious schemes such as integrated water management and the 'Zero Land-Take' (ZAN) policy, the inadequacy and instability of financial support mechanisms, the fragmentation and complexity of the regulatory framework, and the erosion of environmental procedural rights all illustrate this gap between legal ambition and the levers deployed to achieve the objectives.

Over the last ten years, three forms of precarity (energy, transport and food) have worsened. Mobility insecurity now affects 15 million people, whilst energy insecurity, although stable in terms of the proportion of households affected (10.8 per cent), is becoming more severe in its most acute forms, with 1.2 million households having experienced restrictions on their energy supply in 2024 (+24 per cent year-on-year), whilst food insecurity has risen from 9 per cent in 2016 to 12 per cent in 2024 (peaking at 16 per cent in 2022). These three forms of precarity reflect the very high dependence of a section of the population on fossil fuels; this is why they must be taken into account in climate transition policies. The inability of a significant proportion of the population to access transition initiatives (renovation, low-carbon transport, sustainable food) is the main obstacle to support for climate policies.

Public and private green investment has risen by 50 per cent over ten years in constant euros, but fell by 5 per cent in 2024 – a worrying downturn given that it is expected to almost double by 2030. Investment in fossil fuels, mainly comprising purchases of combustion-engine vehicles, remains stable at around 70 billion euros per year.

Effective carbon pricing rose by 40 per cent in constant euros over the period, driven mainly by the first phase of the EU Emissions Trading Scheme (EU ETS) for industry and energy, but it fell back to 2015 levels in 2025 for transport, remains very low for agriculture, and was even negative in some sectors in 2022 due to price caps.

France's gross territorial emissions fell by 22 per cent between 2015 and 2025, and by 34 per cent since 1990. Following a slight increase at the start of the period (between 2015 and 2017), they have generally been on a downward trend since 2018, with the exception of the rebound in 2021 following the Covid-19 crisis. This trend follows a period of stable emissions between 1990 and 2005, followed by an irregular decline between 2005 and 2014. Emissions imported from other countries also fell between 2015 and 2024, but by only 6 per cent.

The reduction in emissions between 2015 and 2024 is driven overwhelmingly by technological measures (energy efficiency, fuel substitution, decarbonisation of energy carriers), whilst demand reduction (energy efficiency in transport, buildings and diets) remains largely untapped. Technological levers are particularly dominant in the buildings sector and in electricity generation, where energy intensity and the energy mix combine to have a significant impact. In transport, carbon intensity and energy intensity are the dominant factors.

Socio-economic factors play a mixed role: whilst they act as mitigating factors in agriculture and electricity generation (where they correspond to the decarbonisation of the overall electricity mix), they act as amplifying factors in road freight transport, buildings and district heating, where economic and demographic growth partially offset technological progress.

Based on this review of the first ten years of the Paris Agreement, the HCC continues its analysis of France's climate action in 2025. Beyond the findings and policy recommendations for the year – to which the Government must respond within the framework laid down by law – the HCC proposes overarching guidelines to drive forward climate policies that are currently inadequate in the face of the adaptation and mitigation challenges of the next ten years.

3. The national framework for public action on climate change was supplemented in 2025 and 2026, but its implementation suffers from persistent weaknesses and setbacks.

The HCC welcomed the publication, in 2025 and 2026, of the 3rd National Climate Change Adaptation Plan (PNACC), the 3rd Multi-Annual Energy Programme (PPE) and the final draft of the 3rd National Low-Carbon Strategy (SNBC). The first progress report on the implementation of PNACC 3, one year after its publication in 2025, reveals a mixed picture regarding climate change adaptation. The incorporation of the reference warming trajectory for climate change adaptation (TRACC) into the Environment Code marks a significant development as it strengthens its legal scope, but the implementation of PNACC 3 measures remains dependent on financial resources, and their tangible impact on France's adaptation efforts has yet to be demonstrated. On the energy front, the PPE 3, published in February 2026, provides the clarity that various sectors have been seeking for over two years, and enables the launch of calls for tenders that are essential for sectors such as offshore wind power. However, its operational measures will need to be aligned with the central scenario adopted in the SNBC 3, as the latter was published after the PPE 3, whereas it should normally provide the framework for its content.

The HCC emphasises the importance of the swift adoption and implementation of SNBC 3. Several improvements have been made to the draft SNBC 3, which was put out for final consultation in early June 2026, some in response to the opinions published, including that of the HCC. This draft strengthens the short-term ambition for gross emissions reduction. By 2040, however, the gross emissions reduction target has been slightly relaxed, but greater offsetting through captured CO_2 ensures compatibility with the European Union's (EU) collective objective. Beyond that, achieving the 2050 carbon neutrality target remains subject to significant uncertainties.

Together, these three documents form the foundation of the French Energy and Climate Strategy (SFEC), launched in 2021, and facilitate coherence between climate, energy and adaptation policies. However, the binding nature of the SFEC – which is not set out in a standalone document nor underpinned by higher-level legislation – remains fragile. The SFEC is not backed by funding commensurate with the needs, whereas **achieving the mitigation targets requires a doubling of public and private low-carbon investment and a halving of carbon-intensive investment.**

The HCC emphasises that the challenge now lies in the rapid and comprehensive implementation of the SFEC. Whilst the electrification plan and the multi-annual strategy for financing the ecological transition (SPAFTE) constitute a significant part of the SNBC's operationalisation, the implementation roadmap requested by the HCC in its Advice to the French Government on the draft SNBC 3 (March 2026) remains necessary. The credibility of SNBC 3 would be strengthened by ensuring centralised operational monitoring, in the form of an annual roadmap setting out all the relevant measures and the associated resources. The challenges of aligning sectoral policies and budgetary planning documents with SNBC 3 also remain significant and require coordination at interministerial level, for example in transport (taxation of heavy goods vehicle and aviation fuels), or in agriculture (the Common Agricultural Policy and sovereignty conferences).

The progress made possible by the electrification plan presented in April 2026, which places the electrification of end-use sectors at the heart of efforts to decarbonise, is to be welcomed. The electrification plan, presented in response to the shock in fossil fuel prices linked to the conflict in the Middle East, paves the way towards decarbonisation and energy sovereignty. This response is welcome compared to a scheme lacking sufficient focus, which would have relied solely on short-term financial aid in the form of subsidies for fossil fuels. The electrification plan reinforces the levers identified in the PPE and the SNBC, confirms funding that was previously unsecured, but introduces few new commitments. The announcements in the electrification plan still need to be clarified, and its overall benefit – in particular the additionality of the measures, which rely largely on a reorientation of energy-saving certificates (CEE) – will need to be assessed.

Finally, local authorities, through their planning and land-use management tools, are key players in climate policy, both in terms of reducing greenhouse gas emissions and adaptation. Efforts to simplify access to financing solutions, engineering services and operational tools must continue, underpinned by stable, transparent and adequate financial, technical and administrative support from the State that is commensurate with the challenges at hand. The implementation of an ambitious national spatial planning policy covering both mitigation and adaptation is also essential for the success of climate policies.

The continuity of interministerial coordination of the ecological transition has been ensured, though without reaching the initial level of ambition set when 'France Nation Verte' was launched in 2022. The General Secretariat for Ecological Planning (SGPE), which played a central role in bringing together the various ministries to prepare the SNBC 3, is being retained. Its direct reporting line to the Prime Minister is essential to enable it to carry out its interministerial remit of ensuring policy coherence and ecological planning.

The weakening of measures relating to climate issues observed in parliamentary debates in 2025 and early 2026 serves as a warning. The HCC is particularly concerned about setbacks in integrated water management. Other setbacks have been observed, notably regarding land sealing. The organisational reform envisaged by the State for some of its agencies, including Ademe, which carries out key operational tasks relating to the regional implementation of the ecological transition, carries the risk of weakening operational delivery through a loss of expertise. These setbacks reflect the weakening of the political commitment to the transition.

4. In 2025, emissions reductions are insufficient, whilst the carbon sink is undermined by climate change.

4.1 - The rate of emissions reduction observed for 2025 has slowed further, postponing efforts to future years.

In 2025, France emitted 359 Mt CO_2eq according to Citepa's preliminary estimate, representing a reduction of 7.6 Mt CO_2eq compared with 2024. The transport sector is the largest contributor to domestic greenhouse gas emissions, accounting for 34 per cent of total gross emissions, followed by agriculture (21 per cent), industry (16 per cent), buildings (15 per cent), energy (9 per cent) and waste (4 per cent). The majority of greenhouse gas emissions (65 per cent) still stem from the combustion of fossil fuels.

The rate of reduction in gross emissions slowed in 2025. According to the consolidated estimate, the fall in emissions between 2023 and 2024 was 3.0 per cent. The preliminary estimate for the reduction between 2024 and 2025 is 2.1 per cent, falling from367 Mt CO_2eq to 359 Mt CO_2eq. This provisional figure should be interpreted with caution, pending a consolidated figure. It nevertheless confirms the continued slowdown in decarbonisation observed in 2024 (-3.0 per cent), following more significant reductions in 2022 and 2023 (-3.9 per cent and -6.8 per cent, respectively).

The SNBC 3 trajectory, taking into account this slowdown in 2024 and 2025, postpones the acceleration in the reduction of emissions to 2026 and 2027. The indicative annual caps for 2024 and 2025 are met because the SNBC 3 trajectory has been aligned with the slowdown observed for these two years. Compared with the previously estimated reduction in 2025, in order to comply with the 3rd carbon budget (2024–2028), the rate of reduction must accelerate and at least double, to reach an average of more than 4 per cent per year in 2026, 2027 and 2028. Consequently, the projected decarbonisation effort is largely deferred to the end of the SNBC 3 period, whilst policy changes are expected. Compliance with the forthcoming sectoral carbon budgets remains uncertain and depends largely on the roll-out and acceleration of the conditions for success identified in each sector.

By comparison, in the EU, according to preliminary estimates based on economic activity indicators, emissions are thought to have remained virtually stable in 2025. In Germany and Spain, too, initial estimates indicate that gross emissions remained virtually stable. By contrast, emissions are rising in the Netherlands and Austria (by nearly 1 per cent and over 2 per cent, respectively), whilst they are falling by nearly 2 per cent in the United Kingdom. The differences in trends between European countries depend on numerous factors, including their energy mix.

The details of the year-on-year downward trends by emission sector in the SNBC are as follows:

- **Emissions from the transport sector amount to 122.9 Mt CO_2eq in 2025, representing 34 per cent of gross territorial emissions.** Emissions from this sector fell by 2.4 Mt CO_2eq between 2024 and 2025, a decrease of 1.9 per cent, whereas they had fallen by 1.5 Mt CO_2eq between 2023 and 2024 These emissions consist mainly of emissions from passenger cars (55 per cent), heavy goods vehicles (22 per cent), light commercial vehicles (13 per cent), domestic air travel (4 per cent) and buses and coaches (2 per cent). A reduction 2.4 times greater is required in 2026, and an even larger reduction in subsequent years, to keep pace with the emissions reduction trajectory set out in the SNBC 3.
- **Emissions from the agricultural sector amount to 77.5 Mt CO_2eq in 2024, the most recent year for which estimates are available, representing 21 per cent of territorial emissions (excluding the land use sector, LULUCF).** Livestock farming accounts for 59 per cent of the sector's GHG emissions (45.7 Mt CO_2eq), mainly in the form of methane (94 per cent of the sub-sector's direct emissions), whilst arable farming accounts for 27 per cent of the sector's emissions (21.1 Mt CO_2 eq), mainly in the form of nitrous oxide (89 per cent of the sub-sector's emissions). Emissions from agriculture fell by 0.6 Mt CO_2eq in 2024 compared with 2023, representing a decrease of 0.7 per cent. This reduction was driven mainly by the livestock (-0.4 Mt CO_2eq) and arable farming (-0.2 Mt CO_2eq) sub-sectors. To meet the SNBC 3 targets, the reduction in 2026 will need to be 3.4 times greater than the reduction observed between 2023 and 2024, and then accelerate sharply after 2030.
- **Emissions from the industrial sector amount to 58.4 Mt CO_2eq in 2025, accounting for 16.2 per cent of territorial emissions.** The rate of decline in emissions is accelerating this year, standing at -5.2 per cent between 2024 and 2025, compared with -3.6 per cent between 2022 and 2023. The sharpest declines are seen in the chemicals (-9.8 per cent) and ferrous metals (-7.6 per cent) sub-sectors, which together account for more than two-thirds of the reduction in industrial emissions. To meet the targets of the SNBC 3, the levels of emissions reductions observed will need to be maintained over the coming years, without relying on further declines in production but by stabilising and strengthening the implementation of decarbonisation projects.
- **Emissions from the buildings sector amount to 54.9 Mt CO_2eq in 2025, accounting for 15 per cent of territorial emissions.** The reduction in emissions in

2025 compared with 2024 is 1.2 Mt CO_2eq, or -2.1 per cent, whereas, by way of comparison, the average reduction over the last five years was -5 per cent. Adjusted for meteorological variations, the reduction in emissions in 2025 would be greater, at -2.3 Mt CO_2eq. Emissions from the buildings sector are primarily (82 per cent) linked to the consumption of fossil fuels for heating and domestic hot water. The fall in emissions between 2024 and 2025 is mainly due to a reduction in natural gas consumption (-0.7 Mt CO_2 eq) and, to a lesser extent, to a fall in domestic heating oil consumption (-0.1 Mt CO_2 eq). To meet the SNBC 3 targets, the reduction in emissions for the sector in 2026 will need to be, on average, 2.6 times greater than the (relative) reduction observed between 2023 and 2024.

- **Emissions from the energy sector are projected to stand at 31.4 Mt CO_2eq in 2025, accounting for 9 per cent of territorial emissions.** Following several years of sharp declines, estimates show a slight increase in emissions from the energy production sector (+0.6 per cent). This trend is mainly driven by rising emissions from oil refining, partly offset by improvements in the carbon intensity of district heating networks. To meet the SNBC 3 targets, the sector's emissions trend will need to reverse in 2026.
- **Emissions from centralised waste treatment, which account for 4.2 per cent of territorial emissions, totalled 15.3 Mt CO_2eq in 2024 (the most recent year for which figures are available), representing a slight decrease from the previous year, but remaining at a level higher than that at the end of 2018.** Emissions from the sector fell by 2.2 per cent in 2024, the most recent year for which estimates are available, compared with 2023 (-0.34 Mt CO_2 eq) following two years of stagnation, in line with the trend in emissions linked to waste storage, which remain the dominant source (75 per cent of the sector's emissions). However, the emissions data relating to waste disposal are subject to debate, as the industry considers them to be overestimated. A methodological review has been launched. To meet the SNBC 3 targets, the sector will need to reverse the trend, albeit with relatively modest efforts in 2026 (x1.1), with the main efforts being postponed until after 2030.

4.2 - In 2025, the reductions in emissions are insufficient and partly due to a decline in economic activity.

In 2025, half of the reduction in emissions is attributable to a trend-driven decline in activity in industry and livestock farming. Of the total reduction of 7.6 Mt CO_2eq, 3.2 Mt relates to the industrial sector, reflecting the continued decline in industrial activity seen in recent years. The transport sector, the second-largest contributor to this reduction, remains below the required rate of reduction. In agriculture, contrasting trends are observed between the continued downward trend in livestock farming for the most recent estimated year (2024) – mainly due to a reduction in the size of the cattle herd – and a slight increase in emissions from crops. These explanatory factors cannot be considered satisfactory, given that SNBC 3 aims to decarbonise industry and promote green reindustrialisation; and seeks to slow the decline in the cattle herd. Emissions from the energy production sector have risen slightly due to stable emissions from electricity generation and an increase in those from refining. The trend for the waste sector for 2024–2025 has not been estimated. Between 2023 and 2024, the last year for which estimates are available, the reduction is estimated at -0.3 Mt CO_2eq (i.e. -2.2 per cent). Emissions from international aviation exceed pre-Covid levels and are deviating from the target trajectory. The digital sector, whose carbon footprint is expanding, is now subject to specific targets under the SNBC 3, but closer monitoring of emissions will be necessary.

Unlike in 2024, cyclical factors have tended to slow the decline in emissions in 2025. Their cumulative effect is adverse, and without this cyclical effect, emissions could have fallen slightly more sharply. In particular, the impact of meteorological variations has slowed the decline in emissions from buildings and energy production. In the buildings and transport sectors, the reductions remain limited, but they are reproducible in subsequent years even without favourable external conditions. They will nevertheless need to accelerate in order to stay on track. The stagnation in emissions from centralised electricity generation illustrates the difficulty, from now on, of achieving reproducible reductions in the energy sector.

Imported emissions account for the majority of France's carbon footprint: they exceed domestic emissions and are falling at a slower rate. Management of these imported emissions has improved, but remains less responsive than that of domestic emissions.

Imported emissions come mainly from the European Union and China, followed by fossil fuel-exporting countries. To reduce them, it is necessary both to target the products and services most affected (fossil fuels, building materials, food products, digital technology) and to strengthen demand management itself.

Emissions covered by the ETS 1 are falling more rapidly than other emissions. Emissions covered by the ETS 1[I] (electricity and heat generation facilities, manufacturing industry, air operators for intra-European flights) fell between 2015 and 2025. In 2024, the EU ETS Phase 1 covers 71 per cent of emissions from the energy production sector and 63 per cent of the industrial sector (but nearly 90 per cent for the metallurgy and minerals sub-sectors). Overall, the rate of reduction in total emissions covered by ETS 1 is faster than for other emissions, with decreases of -17 per cent in 2023, -10 per cent in 2024 and -14 per cent in 2025. In the industrial sector, the reductions are also the result of a downward trend in production. Emissions not covered by ETS 1 have seen smaller and declining reductions: -4 per cent in 2023, -1 per cent in 2024 and -0.4 per cent in 2025.

4.3 - The carbon sink based on land use, land-use change and forestry (LULUCF) has deteriorated significantly since 2015, linked to the impacts of climate change on forests, and remains fragile.

Carbon sinks play a vital role in achieving and maintaining climate neutrality by 2050. Climate neutrality involves striking a balance between sources of anthropogenic GHG emissions (known as residual or unavoidable emissions) and anthropogenic removals, and maintaining a net sink after 2050. Currently, only the land use, land-use change and forestry (LULUCF) sector, or land sector, generates removals, mainly via the forest carbon sink.

France's net LULUCF emissions average -53 Mt CO_2eq/year over the period 2015–24 (including the French Guiana rainforest), which offsets approximately 14 per cent of France's gross territorial emissions (11 per cent excluding the French Guiana rainforest). This figure should be treated with caution given the methodological uncertainties. The net LULUCF sink has decreased by 11 Mt CO_2 eq compared with the 2005–2014 period (-64 Mt CO_2 eq/year), representing a fall of 17 per cent. Since 2014, the relative stability of the net LULUCF sink has masked the deterioration in forest health, with the proportion of deadwood having increased and its accumulation accounting for almost half of the forest sink by 2024. Emissions linked to land-use change and carbon loss from agricultural land are not decreasing, even though reducing them would provide a significant lever for action in the short term.

The trend in France's LULUCF carbon sink follows the overall trend for the LULUCF carbon sink in Europe, which increased from 1990 to 2015 and has since been declining since 2015 due to the impacts of climate change. In 2024, France ranks fourth behind Italy, Sweden and Spain in terms of its contribution to the European LULUCF sink (16.4 per cent). However, this sector is becoming a net emitter for certain Member States (including forested countries such as Austria, Germany and Finland). It is projected that the EU's forest carbon sink will decrease by a further 39 per cent by 2030, with around 13 to 18 per cent of European forests potentially becoming net carbon sources by 2030, highlighting the challenges of protecting existing forest carbon stocks and strengthening forest resilience.

The carbon sink in Guyana's unharvested forests is now the subject of an estimate, raising the question of how it should be factored into the SNBC's climate trajectory. Until now, only fluxes from land clearing (including illegal clearing) and those linked to logging and regrowth had been calculated. In the 2026 edition of the national GHG inventory, a new estimate of -10 Mt CO_2-eq/year is proposed, based on field measurements in unlogged areas. The future of this Guyanese carbon sink is uncertain, particularly due to the impacts of climate change. In national inventories, it is important to clearly distinguish between the natural response of forests and the effects of management; this means that its inclusion in the calculation of national net emissions should be treated with caution.

4.4 - Nature restoration makes a significant contribution to climate change mitigation and adaptation objectives and is essential to achieving the goals of the Paris Agreement.

The HCC has analysed the draft National Nature Restoration Plan (PNRN), which presents an opportunity to strengthen synergies and alignment between public policies relating to biodiversity and climate. Areas for improvement, particularly regarding alignment with SNBC 3 and the inclusion of overseas territories, have been identified. Functional and resilient ecosystems provide numerous services to

I. Emissions Trading Scheme, or ETS.

society, including carbon sequestration, but these are being compromised by direct and indirect human pressures, such as climate change. The deterioration in forest health is linked not only to climate change but also to the state of their biodiversity. Biodiversity and the high carbon stocks in overseas territories underline the importance of robust nature conservation policies, including in these territories where climate and biodiversity issues are particularly pressing.

Reducing the pressures on ecosystems helps to maintain their carbon sequestration potential and is a priority for climate action. Halting the degradation of ecosystems – given their complexity and the time required for their restoration, particularly in the context of climate change – must remain the priority. Both the costs and the difficulty of restoring ecosystems increase as degradation worsens; measures to prevent degradation are more effective than restoring degraded ecosystems.

The draft PNRN is not sufficiently aligned with the SNBC 3, even though it presents an opportunity to strengthen outcomes in terms of mitigation and adaptation. In particular, the synergistic measures identified in the SNBC 3 relating to agro-forestry ecosystems are only partially incorporated into the draft PNRN (restoration of hedgerows, etc.), whereas their integration would, in addition to adaptation benefits, yield significant mitigation gains through additional carbon sequestration and emissions reductions.

5. Social and economic policies must support transition to better protect the population, with a greater benefit than inaction.

5.1 - The most unjust transition is the one that does not take place[I]: delays today in mitigation and adaptation are factors contributing to precariousness and inequality, and ultimately to deadlocks.

The recent increase in the severity of extreme weather events is leading to greater losses and damage for people and communities, particularly the most vulnerable. The increasing frequency of heatwaves is leading to greater exposure to heat stress in homes, schools, hospitals and (unsuitable) workplaces, primarily affecting low-income households – particularly in the overseas territories – and is impacting the physical and mental health of certain categories of workers, whilst reducing children's ability to learn, thereby widening inequalities in educational attainment.

Continued reliance on fossil fuels perpetuates the French economy's vulnerability to global geopolitical instability and gives rise to social risks: worsening energy poverty and rising agricultural production costs, with potential long-term effects on food insecurity, rising inequality and poverty. The crisis in the Strait of Hormuz in 2026 caused fuel prices to soar, which is putting pressure on the purchasing power of households heavily reliant on their combustion-engine cars – and disproportionately so for the most low-income among them – and risks exacerbating 'mobility insecurity'. The potential future impact on household energy bills could force households to forgo basic energy needs.

The assessment of climate vulnerabilities at the regional level, the identification of equity issues linked to adaptation policies, and their incorporation into policy design and implementation remain inadequate, despite these being major social justice issues. The State's response remains structurally inadequate in terms of fair adaptation, whether in relation to standards for decent housing in the face of heat, resilient urban planning, specific vulnerabilities in overseas territories or climate risk management, leaving the most vulnerable populations inadequately supported by mechanisms of national solidarity.

Delays in adaptation and mitigation policies create a lock-in effect that exacerbates inequalities and makes future public action both more complex and more costly. The postponement of the transition and adaptation is a direct driver of precariousness, likely to turn existing vulnerabilities into situations of long-term poverty.

I. Quote from Nicolas Duvoux, Chair of the National Council for Policies to Combat Poverty and Social Exclusion (CNLE).

5.2 - The past year (2025–2026) has been characterised by a more accurate assessment of social justice issues in the final draft of SNBC 3 and by a greater focus of public support on the most low-income households; however, this is hampered by the insufficient scale of the schemes and the lack of sustainable funding and compensation mechanisms.

Climate policies must take greater account of climate inequalities in conjunction with social policies, and put in place redistributive measures capable of ensuring public support and the effectiveness of the transition. The increased targeting of support for access to electric vehicles and energy-efficiency renovations towards low-income households is consistent with the objectives of controlling public expenditure (e.g. MaPrimeRénov', social leasing of electric vehicles, heat pump leasing), but these schemes remain insufficient to meet needs. In the face of shocks to energy and agricultural input prices, delays in the transition mean that support measures are needed for the purchase of fuel oil, gas or synthetic fertilisers. Such support in response to shocks must remain targeted and temporary, so as not to constitute a blanket subsidy for fossil fuels. An increase in the amount of the 'vulnerability' Energy efficiency certificate (CEE) as a proportion of the total CEE allocation for the 6th period (+27 per cent) is necessary, given that its share has decreased compared with the 5th period.

The implementation of the employment and skills policy is underway, but the regional-level bodies and tools for employment policy do not sufficiently incorporate the challenges of the transition, whilst the development of employment roadmaps has not been the subject of specific guidance within the framework of the regional COP meetings. In industrial sectors undergoing decline or transformation, support for the retraining of workers and the local economy is hampered by a failure to put the Just Transition Fund into practice and by poor coordination of industrial and employment policies with the challenges of the energy transition.

The increased vulnerability of certain workers and schoolchildren to heatwaves makes it essential and urgent to adapt working conditions, education and schools and universities to mitigate the health impacts of climate change and safeguard the republican principle of equal opportunities. The year 2025 saw several advances in the implementation of the PNACC 3 measures, namely the publication of a decree strengthening employers' obligations regarding the prevention of heat-related risks and an order setting Météo-France's orange and red heatwave alert levels as the thresholds entitling workers to the construction industry's adverse weather scheme; and the publication of a heatwave plan for schools by the Ministry of National Education, a plan which proved difficult to implement during the heatwave of June 2026.

5.3 - Building an economy that is more resilient to climate and geopolitical shocks linked to fossil fuels requires phasing out fossil fuels and a stronger fiscal commitment, with the benefits far outweighing the cost of inaction.

Maintaining a carbon-intensive economy exposes France to significant costs. The consequences of the closure of the Strait of Hormuz in 2026 on household purchasing power and the state budget illustrate this point. Beyond the shocks to the fossil fuel sector, a carbon-intensive economy exacerbates the impacts of climate change and generates healthcare costs. The implementation of the three components of the SFEC (PPE, SNBC, PNACC) is therefore desirable from an economic perspective.

Implementing the three pillars of the SFEC requires a greater budgetary commitment, even though the State has little room for manoeuvre. Direct State funding can be reduced by strengthening price signals (taxation) and regulation. An increasing proportion of the funding for the transition is being taken off the public budget through the mobilisation of the CEE scheme. Nevertheless, the stagnation in public funding appears to be at odds with strategic ambitions and could undermine private investment. Clarification of the interplay between the various instruments (taxation, subsidies, regulation)and a commitment to a multi-year trajectory for public expenditure on mitigation and adaptation are necessary. For example, the reallocation of public funding flows and the reduction of 'brown' expenditure are mentioned in the SNBC 3, but the SPAFTE projects that expenditure detrimental to mitigation will stabilise between 2026 and 2028. In addition, four key mechanisms (fossil-fuel tax loopholes) are still not classified as detrimental in the green budget, even though they remain in place today, resulting in an additional revenue loss of €7.77 billion for the State.

Given the volatility of fossil fuel prices, funding for mitigation policies must be

safeguarded and may be accompanied by targeted support measures. The Electrification Plan sends a positive signal, but it relies primarily on the Energy Efficiency Certificates (CEE) scheme and its impact is limited by the lack of additional funding. The use of targeted, flat-rate support measures appears appropriate to assist vulnerable households and businesses that are dependent on fossil fuels. This helps to limit the budgetary cost whilst maintaining an incentive for stakeholders who have room for manoeuvre. Accelerated support for the transition away from fossil fuels, targeted at those who are most dependent on them and are financially vulnerable, is the most appropriate response in both the short and long term.

Current investment trends reveal a significant gap compared with the requirements for implementing the SFEC. In the baseline scenario, investment (both public and private) fell in 2024 and stagnated in 2025. They are expected to double by 2030 to meet the objectives of the SNBC 3, whilst carbon-intensive investments are expected to be halved. Funding for climate change adaptation remains a blind spot in planning documents. Key structural choices have yet to be defined.

Credible climate policies, incorporating resource efficiency, help to preserve economic and financial stability. The green transition constitutes a major economic and social transformation that must be anticipated and managed. Its effects on key economic indicators remain uncertain, but its sectoral and regional impacts may be significant. It is necessary to anticipate the consequences of the transition. In this context, the promotion of sufficiency deserves support, as demand management has so far been the least utilised lever for the transition.

Investments in the green transition help to build a French economy that is more resilient to climate and geopolitical shocks. The French economy is, and will be, increasingly affected by climate change. Proactive adaptation to climate change appears to be a driver of economic and social resilience. It helps to avoid future costs associated with climate shocks. Mitigation policies, insofar as they reduce dependence on imported fossil fuels, protect the French economy from the economic consequences of geopolitical shocks. Furthermore, climate change has a negative impact on the health, educational attainment, employment and incomes of the most vulnerable populations. The gains and co-benefits of the transition in these areas are considerable. As such, the green transition appears to be essential for France's future economic and social stability.

6. It is in France's interest to champion climate issues ambitiously at European and international levels.

Global emissions per unit of GDP have been falling steadily since 2010. Whilst absolute CO_2 emissions continue to rise, the rate of increase has slowed compared with the decade prior to the Paris Agreement. In 2024, China (29.2 per cent of the global total), the United States (11.1 per cent), India (8.2 per cent), the EU-27 (5.9 per cent), Russia (4.8 per cent) and Indonesia (2.5 per cent) were the world's largest emitters of GHGs. In 2020, India became the world's third-largest emitter of GHGs, overtaking the EU-27. By 2025, China's emissions are projected to have plateaued, thanks to a moderate increase in fossil fuel consumption combined with exceptional growth in renewable and nuclear energy. India's emissions are projected to have risen by 1.4 per cent, a slower rate than in recent years, due to an early monsoon that reduced the need for air conditioning during the hottest months and strong growth in renewable energy. In the United States, following two years of decline, emissions rebounded (+1.9 per cent) in 2025. Finally, in the EU, according to provisional data, emissions are estimated to have levelled off in 2025 compared with 2024, whilst the EU has seen a 37 per cent reduction in emissions since 1990 (excluding international transport).

6.1 - At European level, France must support these ambitions, and in particular long-standing and effective mechanisms such as the Emissions Trading Scheme (ETS) and long-term investment planning.

Despite a number of setbacks to the Green Deal's initial ambition, European climate legislation remains in place for the time being, with a strong refocus on competitiveness. This reorientation is accompanied by a broad drive towards

simplification, which could, however, lead to a form of deregulation, or even a step backwards on certain major climate policies, particularly in the context of the review of the European regulatory framework, even though the EU has set an ambitious target of a 90 per cent reduction in GHG emissions by 2040 compared with 1990.

Maintaining a steady course towards climate transition is essential for guiding investment and providing clarity for economic actors, stimulating industrial innovation and ensuring the EU's competitive position in the decarbonised global economy. In 2025, France shifted from a highly ambitious stance to one in which it made its support for climate ambition more contingent on a number of favourable conditions, particularly at the time of adopting the 2040 target. On several sensitive policy issues, however, it has stayed the course despite significant diplomatic costs (Made in Europe, the automotive package, MERCOSUR).

The major initiatives over the next two years will be decisive in equipping the EU with sectoral policies (energy and climate, transport, the Common Agricultural Policy, etc.) and credible financial resources (the future multiannual financial framework) to enable it to achieve the 2040 target and carbon neutrality by 2050. This will require resolving a number of issues, both at the political level (sovereignty, security, international trade) and at the scientific and technical levels (natural carbon sinks, the use of international credits, accounting for carbon removals, etc.).

France's interest lies in supporting an adjusted but robust ETS 1: one with a clear trajectory, predictable prices, social safeguards and links to low-carbon industrial investment. Adjustments, such as a more responsive stability reserve and safeguards against disorderly price rises, can preserve a credible carbon signal whilst avoiding volatility that is destabilising from an economic and political perspective. The introduction of international carbon credits into the ETS 1 does not appear desirable. The use of permanent carbon sinks and international carbon credits generally calls for particular vigilance with regard to verifying environmental integrity.

Any structural overhaul of the ETS 2 should be avoided, and priority should be given to targeted price-smoothing mechanisms, in particular through a more responsive stability reserve. Carbon pricing is set to play an increasingly important role in sectors where emissions are still falling slowly, notably the building and transport sectors. The implementation of the ETS 2 must form part of a coherent set of public policies and be accompanied by robust social justice measures, which are essential to its success.

The EU's security and sovereignty objectives are fully aligned with the pursuit of an ambitious climate policy. Maintaining a balance between ETS 1, ETS 2, effort sharing and taking into account changes in the natural carbon sink under LULUCF is a key challenge for the post-2030 European climate architecture. The extension of flexibilities must not undermine the environmental integrity of the European framework. The deterioration of the European carbon sink calls for domestic nature restoration measures rather than accounting offsets. The use of auction revenues must better support the financing of the transition. The principle of significant 'frontloading[I]' appears appropriate to enable the investments required for the decarbonisation of European industry to be made immediately.

The climate transition requires long-term investment planning, in line with the EU's industrial strategy. The next multiannual financial framework (MFF) for the period 2028–2034 must provide an opportunity to fully align the European budget with the EU's climate ambitions. It is also a matter of greening the Common Agricultural Policy (CAP) and taking greater account of the funding needs for adaptation.

6.2 - Faced with a challenging geopolitical situation, characterised by the decline of multilateralism, new forms of cooperation must emerge at the international level: strengthening the channels of scientific diplomacy can contribute to this.

COP 30 succeeded in preserving the near-universality of the regime established by the Paris Agreement and in reaffirming countries' commitment to climate multilateralism. COP 31 will be a transitional COP. In particular, it must enable the launch of the 2nd global stocktake, which will be finalised at COP 33, and prepare for COP 32 (Addis Ababa), which will focus on adaptation. Despite some progress, mainly in the area of adaptation, the outcomes from Belém were disappointing in light of expectations regarding increased ambition. The initiatives spearheaded by the

I. The establishment of an advance allocation of revenue from ETS auctions, in order to free up the funding capacity needed immediately for the massive investments required for the transition. France estimates that nearly €100 billion could thus be raised to support the decarbonisation of European industry.

Brazilian presidency of COP 30 and at the Santa Marta Summit on a phased and coordinated phase-out of fossil fuels will need to be consolidated and translated into concrete results at COP31.

In a fragmented geopolitical context, proactive states are seeking to develop new forms of multilateral cooperation, bypassing the difficulties of the formal consensus-based decision-making process. Following Belém, a reorientation of French and European climate diplomacy is required. The decline of multilateralism can be seen as an opportunity to reorient partnerships, rebuild alliances and re-establish a dialogue based on trust with developing countries. This involves, in particular, deepening cooperation on targeted decarbonisation issues (phasing out fossil fuels, technology transfer, innovation, just transition), and supporting the adaptation efforts (linked to the Sustainable Development Goals and health) of vulnerable developing countries. From this perspective, maintaining an adequate level of international climate finance and official development assistance remains a strategic imperative for France.

In a challenging geopolitical context, scientific cooperation can serve as a key lever for France's diplomatic strategy, which should better incorporate the challenge of combating climate disinformation. The IPCC's 7th Assessment Cycle is subject to tensions regarding the publication timetable for its three volumes. A first group of countries favours publication in 2028, to inform the second global assessment; another group, including China, India and Saudi Arabia, is calling for a longer cycle, which could, however, weaken the report's political impact. These tensions raise deep concerns about the context in which the assessment of the state of scientific knowledge is being prepared, concerns further exacerbated by the reduction in IPCC funding following the US withdrawal.

The challenges of the climate transition are now closely intertwined with industrial policies, investment strategies and the restructuring of global value chains. This convergence calls for a rethinking of the instruments of economic, energy and trade cooperation, moving beyond traditional frameworks. For the EU and France, this means basing their actions on diversified and better-balanced bilateral or regional strategic partnerships, capable of jointly advancing the climate and development agendas without compromising their competitiveness and economic resilience.

Trade policy can be used as a lever of external influence to promote European environmental standards. Aligning the European trade agenda with the climate agenda remains politically sensitive and technically complex, as evidenced by the difficulties surrounding the implementation of mirror measures or the conclusion of trade agreements, and the EU is struggling to maintain a consistent approach on this issue.

Establishing a European target for reducing imported emissions would enable the EU to consolidate its global climate leadership, whilst serving its ambitions for reindustrialisation and economic sovereignty. The reorientation of trade practices and the adoption of a carbon footprint target must form part of a broader international cooperation strategy, aimed at supporting the decarbonisation of developing trading partners, and including, in particular, sectoral dialogues, technical assistance and adequate funding.

Current climate policies are insufficient to achieve carbon neutrality by 2050 and to prevent a significant worsening of climate risks. The HCC therefore proposes overarching guidelines to steer the development of French climate policies in the medium term. These complement the recommendations in this report on new or ongoing climate policies, to which the Government must respond within the framework provided for by law.

Eleven guidelines are thus put forward for discussion, grouped into three areas: social and economic measures for the protection of the population, for investment and innovation, and for the governance of the transition.

SOCIAL AND ECONOMIC GUIDELINES **FOR THE PROTECTION OF THE POPULATION**

GUIDELINE 1 – Strengthen adaptation and define the arrangements for national solidarity in the face of losses and damage caused by climate change.

- Scale up the implementation of adaptation measures by anticipating future climate patterns and prioritising no-regret, robust strategies that deliver co-benefits for health and decarbonisation.
- Strengthen the capacity to manage crises caused by climate change, particularly in overseas territories.
- Significantly strengthen prevention as a priority lever.
- Make land-use planning and urban planning key drivers of adaptation and mitigation.
- Ensure the effectiveness of the role of insurance in pooling losses and damages[I] whilst managing the associated risks of exclusion and destabilisation.
- Enable the public purchase of land to support the transition.

GUIDELINE 2 – Ensuring that the transition is physically and financially accessible, taking into account households' varying capacities to take action.

- Harness the new European financial frameworks to support vulnerable and low-income households.
- Involve stakeholders providing the second-hand market more closely and carry out a thorough reform of social leasing to turn it into a large-scale, long-term scheme.
- Develop comprehensive networks for public transport and active mobility.
- Create the conditions for large-scale funding of energy-efficiency refurbishment in block-of-flats.

I. Agricultural crop insurance is dealt with specifically in Guideline 4.

GUIDELINE 3 – In situations where fossil fuel prices are rising, protect vulnerable and low-income households, and invest in alternatives.

- Allocate, via the Finance Act, those funds falling within the national budget (e.g. ETS 2 revenue, in addition of the Social Climate Fund) – without any limitations – to supplementary measures for low-income households through the Social Climate Plan.
- Work with social protection organisations to tailor and allocate direct financial support to help people through the transition by the time it is accessible, to identify the households most affected, assess the potential impact on other support schemes, and mobilise existing social benefit channels.

GUIDELINE 4 – Building a resilient, fair and low-carbon food system.

- Transform food supply and food environments to steer demand.
- Build food sovereignty measured in terms of autonomy in inputs, going beyond strict food sovereignty.
- Reorient the Common Agricultural Policy (CAP) towards the principle of 'public money for public goods' and the strengthening of farm resilience.
- Integrate climate change adaptation and water management as key priorities.

GUIDELINES
FOR INVESTMENT AND INNOVATION

GUIDELINE 5 – Decouple the price of low-carbon electricity from the spot market, ensure a stable price signal, reward flexibility and develop storage.

- Secure returns for investors in new low-carbon capacity and explore redistribution to consumers.
- Promote demand-side flexibility through dynamic pricing schemes.
- Balance the system in the face of intermittency through the management of generation and storage.

GUIDELINE 6 – Make private transition investments profitable through price signals, public guarantees and long-term contracts.

- Address the gap in funding for medium-sized projects through public guarantees and co-investment, conditional on social commitments.
- Shape demand through public procurement and long-term contracts with social clauses, and guide the investment decisions of private sector stakeholders.
- Rely on European instruments for large-scale projects.

GUIDELINE 7 – Strengthen sovereignty over low-carbon technologies and build a coherent European industrial, commercial and scientific policy.

- Develop a balanced trade defence policy aligned with industrial decarbonisation.
- Develop an investment policy for strategic technologies consistent with Guideline 6 and European instruments.
- Treat scientific and technological cooperation as a global climate public good.

GUIDELINE 8 – Incorporate the capacity to act into the principles governing climate policy financing

- An additional contribution earmarked for the transition.
- Climate due diligence as a possible route to incentive-based exemptions.
- Intergenerational equity as a complementary dimension.

GUIDELINES **FOR GOVERNANCE**

GUIDELINE 9 – Strengthen the French legal framework to better achieve the goal of carbon neutrality.

- Amend the Constitution to explicitly enshrine climate protection and the principle of non-regression, which could apply to emissions trajectories.
- Consolidate case law through the Council of State and the Constitutional Council, by invoking Article 1erof the Environmental Charter (the right to live in a balanced environment that is conducive to good health) and the opinion of the International Court of Justice (2025) to gradually develop a mechanism for monitoring the ambition of climate trajectories, without a formal amendment.
- Enact a comprehensive framework climate law setting out the objectives, the State's obligations regarding both means and results, and the mechanisms for independent oversight.

GUIDELINE 10 – Develop a multi-annual planning framework that embeds a shared long-term vision.

- Enact a law on the planning of the ecological transition (LPTE), similar to the military planning law, to be passed at the start of the parliamentary term.
- Establish a framework for the sequencing of policy instruments.
- Implement a participatory forward-looking approach to build consensus and social support.

GUIDELINE 11 – Strengthen the independent evaluation of climate policies by the HCC and the Court of Auditors, including the monitoring of budgetary planning.

- Provide for the HCC and the Court of Auditors to produce an annual joint opinion on the consistency between the LPTE and the SNBC 3 carbon budgets, creating a mechanism for cross-accountability.
- Convene the ecological planning council once a year in the presence of the Court of Auditors and the HCC, based on the joint opinion on the LPTE.
- Strengthen the institutional autonomy of the HCC.

RECOMMENDATIONS

For 2026, the HCC has drawn up a set of 82 recommendations. The HCC's recommendations set out in the 2025 annual report (and previous annual and special reports) may no longer apply if their subject matter has been sufficiently addressed by the Government, or may be renewed, with or without amendment, if this is not the case.

2. CHAPTER 2. IMPACTS OF CLIMATE CHANGE AND BENEFITS OF ADAPTATION FOR FRENCH SOCIETY AND THE FRENCH ECONOMY

Recommendations made in earlier HCC reports are reiterated

On the subjects of impacts and adaptation, the Government's responses to recommendations 1.1, 1.3, 1.4, 1.5, 1.6 and 1.7 of the 2025 annual report indicate that actions have been initiated, which the HCC will monitor to ensure that the level of ambition is sufficient in terms of methodology, the stakeholders involved, the resources allocated and the scope ultimately adopted.

The following recommendations have not been adequately addressed and are reiterated:

2.1 **Improving the assessment of multiple vulnerabilities to climate risks and taking these into account** to ensure access to adaptation for all, the protection of the most vulnerable, the adaptation of employment and housing, and the participation of the most vulnerable in decision-making (Ministries responsible for health, the ecological transition, social cohesion, employment, housing, urban affairs, and spatial planning and development; SGPE; amended Recommendation 2025).

2.2 **Develop the Adaptation Resource Centre (CRACC) into a decision-support portal for adaptation**, enabling an assessment of the feasibility, effectiveness, co-benefits and various limitations of adaptation measures at local level. Strengthen this portal through an iterative and participatory process involving local stakeholders, with a view to defining adaptation pathways aimed at preventing and reducing loss and damage (Ministries responsible for the ecological transition and research; amended Recommendation 2025).

2.3 **To clarify the implications of adaptation and mitigation choices for loss and damage, and to develop principles for resolving disputes** that enable the costs of such loss and damage to be shared between the State, local authorities, insurance companies, businesses and households, *through* a governance framework that ensures the participation of the individuals, organisations and regions most affected in decision-making processes (Ministries responsible for the ecological transition, theeconomy and finance, spatial planning, housing, cities and regions; amended Recommendation 2025).

New recommendations

2.4 **Ensure that the communication material on preparing for heatwaves is available from May through to September,** aimed at institutions and organisations, in particular employers, sports federations, and managers of venues open to the public, including those not identified as vulnerable (Ministries responsible for health, social cohesion, labour, youth, community life and sport; 2026; New recommendation).

2.5 **Implement and fund adaptation and prevention measures to tackle heatwaves, enabling short-term responses for vulnerable groups:** prioritise equipping health, social and medico-social care facilities, as well as schools and universities, with nearby green spaces that are cool, refreshing and well-ventilated (installation of shutters, shade structures, ceiling fans (air circulators), cooling networks, and fixed air-conditioning systems rather than portable units, prioritising reversible heat pumps and minimising adverse effects) (Ministries responsible for health, the green transition, spatial planning, housing, urban affairs, the economy and finance, SGPE; 2026; New recommendation).

2.6 Strengthen the regulatory framework for occupational health by using a composite heat stress reference indicator combining temperature and humidity to determine thresholds for suspending work (Ministry of Labour; 2026; New recommendation);

2.7 **Strengthen the regulatory framework on housing that poses a risk during heatwaves** by incorporating standards of habitability relating to high temperatures and by making summer comfort a mandatory requirement in the Energy Performance Certificate (EPC). Revise town planning regulations relating to heritage protection that restrict the installation of solar shading (shutters, awnings, reflective roofing) (Ministries responsible for the Ecological Transition, Labour, Urban Affairs, Housing and Culture; 2026; New recommendation).

2.8 **Increase the availability and general accessibility of cool, shaded, green and well-ventilated public spaces,** as well as supervised bathing areas, which are accessible free of charge during heatwaves (Ministries responsible for the Ecological Transition, Health, Social Cohesion, Spatial Planning, the Economy and Finance, Housing, and Urban Affairs, SGPE; 2026; New recommendation).

2.9 **Supplement the TRACC with scenarios for high-risk events,** in particular heatwaves (land and marine), droughts, extreme precipitation (simultaneous, composite and cascading events), and sea-level rise, for which land-use planning decisions may lock in future choices for decades or even more than a century (Ministry responsible for the Ecological Transition; 2026; New recommendation).

2.10 **Encourage the simultaneous implementation of energy-efficiency refurbishment works and measures to reduce vulnerability to climate risks** (notably heatwaves, droughts, floods and coastal flooding) (Ministries responsible for the Ecological Transition, Urban Affairs, Planning and Housing; 2026; New recommendation).

3. CHAPTER 3. MONITORING NATIONAL EMISSIONS AND COMPLIANCE WITH CARBON BUDGETS

Recommendations made in earlier HCC reports are reiterated

3.1 **Continue to improve the reliability and transparency of the national emissions inventory,** particularly with regard to the preliminary estimate for the previous year and for sectors characterised by high uncertainty (LULUCF, agriculture, waste) (Ministry for Ecological Transition; Recommendation 2025).

New recommendations

3.2 **Account for carbon fluxes from the unexploited forests of French Guiana separately,** so as not to include fluxes considered non-anthropogenic in global models within the carbon neutrality target (Ministry for Ecological Transition; 2026; New recommendation).

3.3 **Improve the monitoring of changes in the carbon footprint, and in particular of imported emissions,** using more up-to-date indicators to better manage these changes, and incorporate the monitoring of imported deforestation (Ministry for Ecological Transition; 2026; New recommendation).

3.4 **Improve the system for monitoring the environmental impacts of digital technology,** in particular domestic and imported GHG emissions; and work with data producers to improve the reliability and harmonise estimates of the impact of data centres on electricity consumption (Ministry for Ecological Transition, Planning and Territories; 2026; New recommendation).

4. CHAPTER 4. MONITORING OF EMISSIONS AND PUBLIC POLICIES BY SECTOR

TRANSPORTS

Recommendations previously made in earlier HCC reports, reiterated

4.1 **Carry out a comprehensive assessment of major road projects and identify those that must be abandoned to ensure compliance with ecological planning objectives, and in particular with SNBC 3.** Assess the total costs of all major projects currently underway and planned at national level, in terms of GHG emissions, induced traffic, land sealing, and public finances (Ministries responsible for transport, planning and regional development, Recommendation 2025, amended).

4.2 **To guarantee, through public funding, the additional investment required for the modernisation and regeneration of the rail network**, with a view to reaching an additional €1.5 billion per year from 2028, indexed in line with inflation, as set out in the draft performance contract between the State and SNCF Réseau (Ministries responsible for transport, the economy and finance; Amended Recommendation 2025).

4.3 **Gradually align the taxation of heavy goods vehicles and their fuels with the objectives of SNBC 3**, in order to promote electric powertrains over biodiesel and natural gas for vehicles (NGV), using clear roadmaps (Ministry of the Economy and Finance; Amended Recommendation 2025).

4.4 **Introduce a pathway towards greener freight transport for shippers**, including the use of a range of lower-emission modes (electric vehicles, rail and river freight, cycle logistics), coupled with penalties for non-compliance (Ministry of Transport; amended Recommendation 2025).

4.5 **Raise the tax on airline tickets to its 2025 level and advocate for the extension of the first EU Emissions Trading Scheme (EU ETS-1) to flights outside the European Economic Area (EEA)** (Ministries responsible for transport, the economy and finance, SGAE; Amended Recommendation 2025).

New recommandations

4.6 **Adopt a moratorium on increasing the capacity of French airports, including Charles de Gaulle Airport, in order to curb the rise in air traffic.** In line with SNBC 3, plan for the pooling of resources and the eventual closure of certain airports and air routes in consultation with the local authorities concerned, whilst planning for the introduction of low-carbon alternatives (rail links) (Ministries responsible for transport, planning and regional development; 2026; New recommendation).

AGRICULTURE AND FOOD

Many of the recommendations set out in the HCC's thematic report on the French food system (2024) remain valid. Some require in-depth consultation in order to bring about long-term change, and are included as guidelines in this report.

Recommendations previously made in earlier HCC reports, reiterated

4.7 **Provide greater guidance and support to stakeholders in the processing, distribution and catering sectors** to develop a food supply aligned with the recommendations of the National Nutrition and Health Programme (PNNS) and the objectives of the SNANC (a more plant-based diet, less imported meat), by ensuring transparency in procurement and, where necessary, mobilise regulatory tools (Ministries responsible for agriculture and health; Recommendation from the 2024 Agriculture and Food Report, reformulated).

4.8 **Ensure the long-term sustainability of funding and support for local authorities:** support for local food projects (PATs) aimed at promoting healthy, low-carbon diets and fair pricing in school catering; support for achieving the Egalim objectives (Ministries responsible for agriculture, the economy and finance, regional affairs, and local authorities; Recommendation from the 2026 Regions Report, reworded).

New recommandations

4.9 **Take short-term measures to organise, without delay, water conservation in agriculture and consultations on water management:** draw up and implement a water conservation plan for agriculture (as provided for in the Water Plan); set a target for agricultural water consumption in addition to the target for stabilising water abstraction set out in the Water Plan; maintain consultation processes when authorisation is sought for the construction of alternative reservoirs, ensuring that all stakeholders are involved in a balanced manner to combat the monopolisation of the resource and conflicts over its use; maintain the legal standing of water development and management plans; support genetic research into the development and improvement of crop varieties and livestock breeds that are more resistant to water and heat stress, and support agronomic research to develop more water-efficient and diversified agricultural and livestock farming practices to improve resistance to water stress (Ministries responsible for agriculture, the ecological transition and regional affairs; 2026; New recommendation).

4.10 **To advocate at European level for a strengthening of the climate and environmental ambition of the Common Agricultural Policy (CAP) and to ensure that France's next national CAP implementation plan contributes to the achievement of France's climate targets.** This involves, in particular, a ring-fenced budget for agri-environmental and climate actions, 100 per cent funding for these actions from European funds, the strengthening of the common cross-compliance framework, the phasing out of coupled support for high-emission sectors, and better targeting of

income support towards farms that contribute most to the agro-ecological transition (Ministry of Agriculture, SGAE; 2026; New recommendation).

4.11 **Ensure that the decisions and actions arising from the food sovereignty conferences are consistent with the objectives and guidelines of the SNBC 3** (Ministry of Agriculture and Ecological Transition, SGPE; 2026; New recommendation).

4.12 **Assess the crop insurance scheme and its ability to encourage farmers to adopt effective adaptation practices and to avoid the risks of maladaptation.** Revise the scheme accordingly, introducing mandatory conditions where necessary (Ministry of Agriculture; 2026; New recommendation).

INDUSTRY

Recommendations 3.14, 3.16, 3.17 and 3.18 (HCC RA25) are currently being implemented.

New recommandations

4.13 **Identify and prioritise the technologies, sectors, projects and strategic partners that are essential to the emergence of decarbonisation sectors in France.** Define key links for which production within France or the European Union is essential to achieving climate targets and ensuring the country's sovereignty, taking into account the successes and failures of decarbonisation projects. Define a judicious selection of trading partners, particularly at European level, by mobilising the relevant instruments (ETS, IAA, MACF) (Ministries responsible for industry, the ecological transition, foreign and European affairs, SGAE; 2026; New recommendation).

4.14 **To carry out a detailed assessment of the impact of industrial decarbonisation on employment in the regions concerned, particularly within micro-enterprises, SMEs and mid-cap companies.** To ensure the success of projects and their integration into local communities, examine in particular the expected impact on the local employment landscape, on training needs and provision, on alignment with the local industrial fabric, and on working conditions, particularly in relation to the challenges of regional adaptation. Support regions in their industrial transformations linked to the green transition, taking into account their disparities in terms of resources, historical industrial base, material resources and infrastructure (Ministries responsible for industry, employment and vocational training, and the green transition; 2026; new recommendation).

4.15 **Continue and strengthen work on adaptation.** Make it compulsory for industrial sectors to draw up an adaptation roadmap. Continue the work currently underway on regional adaptation challenges at the level of manufacturers and other stakeholders. Carry out a risk assessment of the threats posed by climate change to the country's industrial value chains, examining in particular the impact of the location of decarbonisation sectors (gigafactories, technology clusters) (Ministries responsible for industry and the ecological transition; 2026; New recommendation).

BUILDINGS

Recommendations previously made in earlier HCC reports, reiterated

4.16 **Establish a multi-year framework for public support for comprehensive energy-efficiency renovations within the support schemes**, in order to meet the sector's decarbonisation targets, by accelerating high-performance renovations over the long term and prioritising areas and households experiencing energy poverty within a constrained budgetary context (Ministries responsible for the ecological transition, urban affairs, housing, the Economy and Finance; Amended Recommendation 2025).

4.17 **Assess the impact of the ban on letting energy-inefficient properties (G+ from 2023, G in 2025)** on access to housing for the most vulnerable, as well as on the decarbonisation of the housing stock (Ministries responsible for the ecological transition, urban affairs and housing, the economy and finance; Amended Recommendation 2025).

New recommandations

4.18 **Put in place support for the ecological transition for small-scale commercial and service sector buildings not subject to the commercial and service sector decree** (Ministries responsible for the ecological transition, urban affairs, housing, planning and regional development, the economy and finance; 2026; New recommendation).

ENERGY

Recommendations previously made in earlier HCC reports, reiterated

4.19 **Consolidate the strategy for phasing out fossil fuels** by setting the necessary regulatory milestones, taking into account the lifespan of equipment (Ministries responsible for the ecological transition, energy, and the economy and finance; amended Recommendation 2025).

4.20 **Introduce a ban on the installation and replacement of gas boilers as soon as possible,** taking into account the average 20-year lifespan of heating systems, in order to comply with the Energy Performance of Buildings Directive (Ministries responsible for the ecological transition, energy, and the economy and finance; amended Recommendation 2025).

New recommandations

4.21 **Launch calls for tenders not only to develop the sector, but also to address specific challenges**such as winter consumption peaks, e.g. Promote vertical and façade-mounted solar panels (which generate more electricity in winter and provide a more consistent output) (Ministries responsible for the ecological transition, energy, the economy and finance; 2026; new recommendation).

4.22 **Strengthen the measures undertaken since 2022 regarding energy efficiency, to incorporate more structural and collective measures, going beyond individual actions alone, and propose immediately a range of new measures enabling a reduction of 200 TWh in final energy consumption within four years**, in order to comply with the requirements set out in the Energy Efficiency Directive (EED), in addition to the efforts already announced (Ministries responsible for the ecological transition and for energy; 2026; New recommendation).

4.23 **Developing a more detailed strategy (backed by incentives or regulations to guide stakeholders) for the development of biogenic carbon capture and utilisation (biogenic CCU) in anaerobic digestion plants**, thereby reconciling several challenges that currently lead to conflicting developments: on the one hand, agricultural considerations favouring decentralised development as close as possible to farms; on the other hand, energy and carbon utilisation considerations favouring concentration around hubs and infrastructure. (Ministries responsible for the ecological transition, agriculture, energy, industry, and the economy and finance; SGPE; 2026; New recommendation).

WASTE

Recommendations previously made in earlier HCC reports, reiterated

4.24 **Propose the legislative changes needed to remove the barriers to the roll-out of the functional economy** – which prioritises use over ownership – as identified by the CESE and the National Consumer Council (for example, a value-added tax compensation fund for local authorities, and accounting standards that favour ownership over rental). Put in place incentive schemes that go beyond simply providing information and disseminating best practice (e.g. examine the feasibility of an incentive VAT rate for renting) (Ministries responsible for the ecological transition, industry, and the economy and finance; amended Recommendation 2025).

New recommandations

4.25 **Ensure strong political backing for the obligation to incorporate environmental clauses into public procurement from 2026 onwards** and for the principle of exemplary public services, in addition to continuing efforts to train public procurers (Ministries responsible for the ecological transition, industry, and the economy and finance; 2026; New recommendation).

4.26 **Support the roll-out of source-separated bio-waste collection in a more targeted manner in regions where landfill is used more extensively than incineration** (e.g. Corsica, Centre-Val de Loire) in order to maximise climate benefits (Ministries responsible for the ecological transition, spatial planning and regional development; 2026; New recommendation).

4.27 **Take further measures to accelerate compliance with the objectives of the Energy Transition for Green Growth Act in terms of incentive-based pricing for waste management** (increasing the number of people covered from 10.2 to 25 million, initially planned for 2025) (Ministries responsible for the ecological transition, spatial planning and territorial development; 2026; New recommendation).

4.28 **Structure Extended Producer Responsibility (EPR) schemes by continuing to plan pathways for the integration of recycled materials** (particularly in the textile sector, following the example of the plastics sector), thereby ensuring a market and, consequently, investment (Ministries responsible for the ecological transition, industry, and regional planning; 2026; New recommendation).

4.29 **Introduce an incentive to cover the costs of managing waste from Extended Producer Responsibility (EPR) sectors that falls outside the separate collection scheme**, whilst encouraging a reduction in the volume of such waste (Ministries responsible for the Ecological Transition and Industry; 2026; New recommendation).

Recommendations previously made in earlier HCC reports, reiterated

4.30 **In order to ensure a closed-loop biomass cycle, redirect the use of wood towards long-lasting products, reuse, recycling and substitution of materials**, with a view to striking a balance between maintaining the carbon sink and a moderate increase in timber harvests. Re-evaluate, in light of resource availability and demand (both current and future), the sustainability of existing biomass power stations and their compatibility with PPE 3 and SNBC 3. Accelerate the transposition of the RED III Directive concerning the implementation of the biomass use hierarchy principle (Ministries responsible for forests, the ecological transition, industry, the economy and finance; amended Recommendation 2025).

4.31 **Ensure that the National Biomass Mobilisation Strategy (SNMB), the future National Forest and Timber Plan (PNFB), the CAP and the National Nature Restoration Plan (PNRN) are fully aligned with the components of the French Energy and Climate Strategy (SFEC).** Strengthen the resources allocated to the Biomass Information System (GIS biomasse) in order to better identify uncertainties regarding the risks of resource depletion, and reassess the PPE 3/SNBC 3 targets in the light of the best available scientific data (Ministries responsible for forests, agriculture, the ecological transition and industry; SGPE; 2026; Amended Recommendation 2025).

4.32 **Implement, through the future national forestry and timber plan, a strategy for adaptation across the entire forestry and timber sector and its workforce, including downstream activities,** in order to ensure that the resource base is aligned with the sector's needs through long-term planning (hardwoods, various grades of timber, etc.) and to address occupational health issues (job adaptation) (Ministries responsible for forestry, the ecological transition, employment and vocational training; amended Recommendation 2025).

4.33 **Incorporate qualitative criteria into public forestry and agricultural policies at all levels concerning biodiversity and the resilience of forests and agricultural soils, in addition to the carbon sequestration objective of the LULUCF sector.** (Ministries responsible for forestry, the ecological transition and agriculture; amended Recommendation 2025).

4.34 **Revise the specifications for forest regeneration in the light of the best available scientific evidence (diversification of tree species, provenances, silvicultural practices, guidelines for clear-cutting, etc.)** and combine investment resources with capacity-building initiatives, in order to ensure the effectiveness of public aid and target action at vulnerable stands (Ministries responsible for forests, the ecological transition, the economy and finance; amended Recommendation 2025).

4.35 **Ensure the implementation and effectiveness of measures to prevent and reduce the destruction of hedgerows, in the decree implementing Article 37 of the Agricultural and Forestry Framework Act (2025),** particularly in the case of high-quality mature hedgerows. Where authorisation is granted for the removal of hedgerows, establish a compensationcoefficient strictly greater than 1 and provide for a qualitative improvement compared with the destroyed hedgerows (e.g. ecosystem services) (Ministries responsible for agriculture and the ecological transition; amended Recommendation 2025).

4.36 Reduce emissions caused by land sealing and take into account the conservation of soil carbon stocks and biomass with the aim of achieving zero net land sealing (ZAN), whilst ensuring that the trajectory remains consistent with the target set by the Climate and Resilience Act. Explore the possibilities for establishing a (monetary) safeguard value linked to non-land-sealing (derived from the cost associated with this constraint), which could be utilised in socio-economic developments (Ministry responsible for the ecological transition; Recommendation 2025).

New recommandations

4.37 Deploy resources to reduce and quantify uncertainties relating to the LULUCF sink. Accelerate the roll-out of the overseas forest inventory using dedicated, long-term resources. In particular, to better monitor and quantify the impact of agricultural and forestry practices on soil carbon, and to better distinguish CO_2 fluxes linked to local human activities from the natural response of vegetation and soils to climate change and climate variability) (Ministries responsible for the ecological transition, forests, agriculture and overseas territories; 2026; New recommendation).

4.38 Increase the resources allocated to capacity-building in developing countries in the area of LULUCF inventories and the implementation of their nationally determined contributions (NDCs). The aim is to use cooperation measures to prevent market mechanisms under Article 6 of the Paris Agreement from monopolising mitigation capacity to the detriment of their NDCs (Ministries responsible for the ecological transition, forests, agriculture, European and international affairs, SGAE; 2026; New recommendation).

4.39 Do not develop marine carbon dioxide removal (CDR) projects that pose proven risks to biodiversity (e.g. fertilisation, alkalisation) under carbon markets (domestic and international). Encourage the generation of scientific knowledge in this field and maintain a precautionary approach regarding the development of European and international regulations, as well as methodologies relating to marine CDR (Ministries responsible for the ecological transition, the sea, fisheries, European and international affairs, SGAE; 2026; New recommendation).

5. CHAPTER 5. PUBLIC POLICY FRAMEWORK

ASSESSMENT OF THE OVERALL FRAMEWORK FOR PUBLIC ACTION

Recommendations previously made in earlier HCC reports, reiterated

SNBC

5.1 Continue measures to regulate advertising so that it does not promote carbon-intensive consumption patterns incompatible with the National Low-Carbon Strategy (SNBC) (Ministry for Ecological Transition, SGPE; Recommendation 2025).

5.2 Accompany SNBC 3 with an operational annual implementation roadmap closely coordinated with budgetary planning, strengthening the investments required for decarbonisation and ensuring the stability of the measures (Ministries responsible for the Ecological Transition, the Economy and Finance, SGPE; Recommendation: Advice to the French Government on the SNBC 3, 2026).

5.3 **Accompany the publication of SNBC 3 with the release of all underlying data** (parameters, assumptions, emissions), in line with an open data approach (Ministry for Ecological Transition; Recommendation from the Advice to the French Government on the SNBC 3, 2026).

Political stewardship

5.4 Strengthen **the SGPE's role in inter-ministerial coordination**, **reporting directly to the Prime Minister**, for the monitoring of the SFEC, in collaboration with all ministries concerned with climate change issues (SGPE; amended Recommendation 2025).

New recommandations

Political stewardship

5.5 **Extend the environmental impact assessment of draft legislation to include bills and executive orders;** ensure that these assessments give greater consideration to mitigation and adaptation issues from a systemic perspective, whilst guaranteeing consistency with climate strategies (Ministries responsible for Justice, Relations with Parliament, and the Ecological Transition; SGPE; 2026; New recommendation).

Consistency between climate and biodiversity: National Nature Restoration Plan (PNRN)

5.6 **Strengthen the measures identified in the draft PNRN to ensure consistency with the PNACC 3, the PPE 3 and the SNBC 3, by incorporating the quantified targets for the agricultural synergy levers identified by the SNBC 3.** The measures to alleviate pressures set out in the draft PNRN must also be strengthened (Ministries responsible for forests, agriculture and ecological transition, SGPE; 2026; New recommendation).

5.7 **Include the overseas territories in the PNRN and thereby accelerate the development of the restoration roadmaps provided for in the National Biodiversity Strategy (SNB 3)**, which must be accompanied by a precise timetable and sustainable means of implementation (Ministries responsible for forests, agriculture, overseas territories and the ecological transition; 2026; New recommendation).

Territories and spatial planning

5.8 **Launch a third National Urban Renewal Agency (ANRU 3) programme from 2026 onwards, capable of addressing the challenges faced by neighbourhoods characterised by high levels of vulnerability, energy poverty, and issues relating to renovation and adaptation** (Ministries responsible for the ecological transition, urban affairs and housing, and spatial planning; 2026; New recommendation).

5.9 **Tighten the restrictions on the geographical location of data centres** by taking better account of competition for resources (water, electricity, land) and the associated health risks (heat islands, air pollution) (Ministries responsible for the ecological transition, urban affairs and housing, industry, health, and spatial planning and territorial development; 2026; New recommendation).

ECONOMIC ISSUES

Recommendations previously made in earlier HCC reports, reiterated

5.10 **To address the investment needs identified at sectoral level by clarifying, within the SPAFTE, the interplay between the various instruments deployed (regulations, grants, price signals)**, in order to derive a multi-year public funding trajectory that is compatible with compliance with SNBC 3 and incorporates a gradual reduction in gross tax expenditures; specify the distribution of costs between businesses, households, local authorities and central government resulting from this *policy mix*, as well as between the various categories of households (Ministries responsible for the ecological transition, the economy and finance, SGPE; amended Recommendation 2025).

5.11 **Incorporate into the SPAFTE a multi-annual financing plan for the PNACC 3**, specifying for each measure the funding requirements, the distribution of the burden amongst the stakeholders (private and public, and between central government and local authorities), the budget appropriations allocated and spent, as well as the incentive and regulatory measures envisaged for its implementation (Ministries responsible for the ecological transition, the economy and finance, SGPE; Amended Recommendation from the Advice to the French Government on the PNACC, 2025).

New recommandations

5.12 **In the short term, in the 2027 Draft Finance Bill, set the scale of the Green Fund so as to enable local authorities to implement priority adaptation measures** (Ministries responsible for the ecological transition, spatial planning, local authorities, the economy and finance; 2026; New recommendation).

5.13 **Strengthen the integration of the ecological transition into the forthcoming Public Finance Programming Act currently being drafted,** by taking into account the necessary increase in funding requirements when determining the spending limits for the missions and programmes mobilised to finance the ecological transition (Ministries responsible for the ecological transition, the economy and finance, SGPE; 2026; New recommendation).

SOCIAL ISSUES

Given the cross-cutting nature of the subject, other aspects of social issues are addressed throughout the report's recommendations, particularly in the sections on impacts and adaptation, agriculture and food, buildings, industry, regions and spatial planning.

Recommendations previously made in earlier HCC reports, reiterated

5.14 **Draw up the Social Climate Plan and launch consultations** to adopt measures to provide compensation and investment support for households (Ministries responsible for the ecological transition, social cohesion, SGPE; amended Recommendation 2025).

New recommandations

5.15 **Establish the means to identify households facing energy insecurity – those heavily reliant on fossil fuels and under financial strain –** in order to support them through the transition by means of financial assistance (energy-saving certificates (CEE) for households in energy insecurity, energy vouchers, MaPri-meRénov', ÉcoPTZ, etc.) (Ministries responsible for the ecological transition, energy, urban affairs, housing, the

economy and finance, and social cohesion; SGPE; 2026; New recommendation).

5.16 **Identify, at forthcoming regional Conferences of the Parties (COPs), the multiple dimensions of households' vulnerability** to the impacts of climate change and to mitigation policies, as well as the challenges relating to training and employment, document at local level the nature and scale of these challenges (Ministries responsible for the ecological transition, employment and vocational training, and social cohesion, SGPE; 2026; New recommendation).

5.17 **Engage local stakeholders in training and employment to align schemes with regional priorities regarding mitigation and adaptation.** Strengthen support for SMEs, micro-enterprises and mid-sized companies to promote social dialogue on working conditions and career management. Improve the integration of the green transition into initial training and retraining support schemes, and into the funding of dedicated regional policies (Ministries responsible for the green transition, employment and vocational training, national education, higher education, labour, and the General Secretariat for Economic Policy; 2026; New recommendation).

6. CHAPTER 6. EUROPEAN AND INTERNATIONAL CLIMATE DIPLOMACY

CLIMATE DIPLOMACY AT THE EUROPEAN LEVEL

Recommendations previously made in earlier HCC reports, reiterated

6.1 **Work towards the development of a European climate investment plan** (Ministries responsible for the economy and finance, the ecological transition, SGAE; Recommendation 2025).

6.2 **Promote a greater contribution from all sectoral policies to the EU's climate objectives, in terms of both mitigation and adaptation, particularly in the context of post-2027 CAP reforms. Fully align the European budget with the EU's climate ambitions during discussions on the 2028–2034 multiannual financial framework** (Ministries responsible for Agriculture, the Economy and Finance, the Ecological Transition, Foreign and European Affairs, SGAE; Recommendation 2025, amended).

6.3 **To advocate, in European negotiations, for an adjusted yet robust EU ETS 1: one with a clear trajectory, predictable prices, social safeguards and links to low-carbon industrial investment.** Adjustments, such as a more responsive stability reserve and safeguards against disorderly price rises, can preserve a credible carbon signal whilst avoiding destabilising economic and political volatility. **Exclude international carbon credits from the operation of the EU ETS 1** (Ministries responsible for the ecological transition, energy, industry, foreign affairs and European affairs, SGAE; amended Recommendation 2025).

New recommandations

6.4 **Adopt a cautious approach to the integration of permanent carbon removals and international carbon credits into the European climate architecture,** ensuring that these tools do not replace domestic emissions reductions and subjecting their use to a strict methodological framework (Ministries responsible for the Ecological Transition, Finance and Industry, Agriculture, Foreign and European Affairs, SGAE; 2026; New recommendation).

6.5 **Explore the possibility of introducing a European tax on windfall profits made by oil companies**, in order to support the future European electrification plan (Ministries responsible for the ecological transition, energy, industry and finance, foreign and European affairs, SGAE; 2026; New recommendation).

6.6 **Continue to advocate, at European level, for the adoption of a target to reduce the European Union's imported emissions**, in line with the French approach and in conjunction with the EU's objectives of green reindustrialisation and sovereignty (Ministries responsible for the ecological transition, trade, industry, foreign and European affairs, SGAE; 2026; New recommendation).

CLIMATE DIPLOMACY AT INTERNATIONAL LEVEL

Recommendations previously made in earlier HCC reports, reiterated

6.7 **To promote, at European level, the alignment of trade practices and strategic**

partnerships with the EU's climate objectives and to embed them within a broader international cooperation strategy, in order to support the decarbonisation of global value chains and the sustainable development of partner countries (Ministries responsible for the economy and finance, the ecological transition, and foreign and European affairs, Amended Recommendation 2025).

6.8 **Promote, amongst European institutions and other Member States, in conjunction with international initiatives on this subject, a European plan for the phase-out of fossil fuels, accompanied by a precise timetable and a cut-off date for the phase-out of each energy source, and underpinned by measures to reduce demand through energy efficiency and energy conservation.** Completely abolish subsidies for fossil fuels in the EU, in accordance with existing commitments (Ministries responsible for the ecological transition, foreign and European affairs, the economy and finance, SGAE; amended Recommendation 2025).

6.9 **Increase official development assistance for climate action and continue to promote the provision of international, bilateral and multilateral financial support** for climate action in low-income countries, both in terms of mitigation (the development and implementation of NDCs) and adaptation (National Adaptation Plans), including through support for the development of innovative financing mechanisms (Ministries for Foreign and European Affairs, the Economy and Finance, and the Ecological Transition; amended Recommendation 2025).

6.10 **Publish an annual review of the so-called 'sectoral' international coalitions and initiatives supported by France, and specify France's contribution to their objectives as well as how this has evolved (e.g. the Global Methane Pledge)** (Ministry for Foreign and European Affairs; amended Recommendation 2025).

New recommandations

6.11 **Promote a reorientation of European climate diplomacy to rebuild alliances and re-establish a dialogue based on trust with developing countries.** In particular, deepen cooperation on targeted decarbonisation issues (phasing out fossil fuels, technology transfer, innovation, just transition), and support for the adaptation efforts of vulnerable low-income countries (in line with the Sustainable Development Goals and issues such as health, biodiversity and food security, etc.); Incorporate the expertise of the overseas territories into the preparatory events for COP31 in the Pacific region and strengthen regional diplomacy (Ministries responsible for the ecological transition, foreign and European affairs, and overseas territories; 2026; New recommendation).

6.12 **Strengthen French science diplomacy by further engaging the scientific community in international negotiations relevant to mitigation and adaptation.** Ensure the continuity of Earth observation capabilities and the availability of associated data. Strengthen scientific cooperation on climate change (mitigation and adaptation) and the fight against climate disinformation (Ministries responsible for research, foreign affairs and European affairs; 2026; New recommendation).

HAUT CONSEIL
pour le CLIMAT

CLIMATE RISKS: FRANCE MUST FACE UP TO ITS RESPONSIBILITIES

www.hautconseilclimat.fr