



*Employers entrusted to deliver
Sustainability Growth Innovation*

Position Paper

SGI Europe response to the EU Climate Resilience Strategy public consultation

Adopted on 23 February 2026

Executive Summary

- SGI Europe welcomes the opportunity to submit its response to the new EU Climate Resilience Strategy by the European Commission and underlines that **Europe must shift its paradigm from mere protection of assets to anticipatory resilience**. Services of General Interest (SGIs) from the cross-sectoral level, namely energy, water, transport, waste management, postal services and telecommunication sector, are the backbone of the European economy and the **primary providers of essential services across sectors**. Without proactive intervention, climate risks will more severely compromise security, infrastructure, and public health.
- SGI Europe advocates for building strong bridges with the **EU Preparedness Strategy** and supports a **multi-dimensional security framework** that integrates climate adaptation, economic stability, and geopolitical preparedness to ensure essential services remain secure against overlapping threats.
- **Embedding "Resilience by Design" as a core principle:** Resilience must be built into infrastructure planning from the outset rather than treated as an afterthought. This "Resilience by Design" approach ensures that Services of General Interest can withstand shocks and recover rapidly to maintain continuity by:
 - **Utilising circularity as a structural tool for resilience:** A systemic SGI approach to the circular economy is vital for reducing strategic dependencies on imported raw materials. By transforming SGIs into "resource-hubs"—particularly in wastewater material recovery—the EU can secure domestic supplies of critical materials like phosphorus and nitrogen.
 - **Protecting environmental standards for water and public health:** Climate resilience is inherently linked to water quality. SGI Europe calls for the preservation of the **Water Framework Directive (WFD)** and warns against deregulation that might shift the financial burden of pollution from industries onto public utilities and citizens.
 - **Implementing "Nature-Based Solutions (NbS) by Default":** While endorsing NbS (such as restoring wetlands and creating "sponge landscapes") as a primary line of defense, SGI Europe emphasizes these must be coupled with strict **pollution prevention at the source**. Without a comprehensive ban on contaminants like PFAS, NbS risk becoming repositories for pollutants.
 - **Building bridges between water and climate strategies** The strategy must mandate the integration of climate risk assessments into all water infrastructure planning. This includes adopting a **transboundary approach** to river basin management, as water distribution challenges will intensify with increasing scarcity.
 - **Establishing enabling frameworks: Governance, Financing, and Skills**
 - **Governance:** Resilience must safeguard the **"Freedom to Stay,"** ensuring no citizen is forced into environmental displacement.
 - **Finance:** Long-term, predictable investment in the next **Multiannual Financial Framework (2028-2034)** is required, focusing on municipal crisis preparedness and the circular transition.
 - **Skills:** A socially fair transition requires structured dialogue with **EU Social Partners** and the expansion of the **Just Transition Platform** to manage impacts on employment and skills

Introduction

SGI Europe welcomes the opportunity to submit its response to the new EU Climate Resilience Strategy by the European Commission. The European Commission's European Climate Risk Assessment (EEA Report 10/2024) has correctly identified 36 key climate risks that interact to create fundamental system-wide challenges. We fully support these findings, as a European representation of employers from the energy, water, transport, waste management, postal services and telecommunication sector as well as local and regional governments, the recognition that without proactive intervention, these climate risks will more severely compromise security, infrastructures, and public health. **Europe must shift its paradigm from mere protection of assets to anticipatory resilience.** Services of General Interest (SGIs) from the cross-sectoral level are the backbone of the European economy and the primary providers of essential services across sectors. Any disruption to their continuity immediately undermines European cohesion. This instability disproportionately affects vulnerable groups and threatens the '**Freedom to Stay**', the fundamental principle that every citizen must have the right to live and thrive in their chosen community. Without targeted investment in resilient local infrastructure, we risk a '**two-speed Europe**' where only wealthy regions can afford to adapt. If essential services like water and energy fail in less-developed areas, mobility becomes a forced necessity rather than a choice. We must ensure that circular and resilient infrastructure is available across all EU territories to safeguard territorial cohesion and the social promise that no region is left behind.

Following this, **SGI Europe supports the European Commission to adopt its proposal for a principle of Resilience by Design** in the upcoming Climate Resilience Strategy. Resilience must be built into infrastructure planning from the outset, ensuring that systems can not only withstand climate shocks but also recover rapidly to maintain service continuity. Realising structural resilience requires **dedicated, targeted EU-level financing**, such as a Competitiveness Fund for the Circular Economy, to support the modernisation of essential infrastructure across all territories.

SGI Europe strongly endorses the Commission's recognition of a Nature-based solution by default approach as a primary line of defense. In fact, we emphasise that this must be coupled with **robust environmental standards** that prioritise the protection of drinking water resources at their source and the entire life-cycle of critical services via proactive **pollution prevention measures** and implementing the **Water Frameworks Directive (WFD)**.

Additionally, by utilising **circular SGI infrastructure**, such as resilient water systems and advanced wastewater resource recovery, we can move beyond "end-of-pipe" treatments toward a systemic SGI approach. This not only secures vital resources like biogas and phosphate but also reduces strategic dependencies, effectively embedding **Preparedness by design** into the very fabric of our essential public services.

Lastly, a resilient climate architecture must be accompanied by a **structured dialogue with EU Social Partners** to ensure a socially fair transition, focusing on the providing skilled work forces and an adaptable world of work including public health safeguards necessary to protect both the workforce and the citizens served by SGIs. We emphasise that the **Just Transition Platform** must be maintained and expanded. It serves as the vital knowledge hub that facilitates the exchange of best practices and technical assistance, ensuring that the transition is supported by a continuous and stable framework of expertise.

Embedding Resilience by Design in the EU Climate Resilience Strategy

Shifting from reactive protection to anticipatory resilience

SGI Europe advocates for a fundamental shift in the EU's approach to climate adaptation: moving from reactive protection to **anticipatory resilience**. The current landscape of escalating climate challenges including record-breaking heatwaves, severe droughts, and devastating floods, demands a strategy that embeds long-term planning and risk prevention into all relevant policies. SGI Europe has formally detailed this narrative in its **Opinion on "Security Paper: The need for a multi-dimensional security approach to protect critical infrastructures in times of crisis"**, adopted in June 2025¹.

At the heart of this shift lies the principle of **Resilience by Design**. This approach requires that resilience is not an afterthought but is built into EU and national policy and infrastructure planning from the outset, ensuring that systems and SGIs are structurally equipped to respond to and recover from disruptions. Based on this narrative, SGI Europe advocates for **building strong bridges with the EU Preparedness Strategy to align EU policy making that can integrate climate adaptation, economic stability, and geopolitical preparedness to ensure essential services remain secure** against overlapping threats.

The role of these infrastructures becomes even more vital in the context of these multi-dimensional crises, ranging from pandemics and economic recessions to the impacts of climate change and geopolitical instability. Disruptions to one infrastructure can trigger cascading effects across other systems, amplifying societal vulnerability. As highlighted in the 2024 European Risk Assessment Report², ageing assets, increasing service demands, and the impacts of extreme weather events call for urgent and **coordinated action to safeguard these essential systems**.

In this context, SGI Europe puts forward the view that a robust, **multi-dimensional security and resilience framework** is urgently needed to protect critical infrastructures. This strategy must integrate climate adaptation, economic stability, and geopolitical preparedness as interdependent pillars of future EU policy, ensuring that essential services remain secure, accessible, and sustainable in the face of mounting and overlapping threats.

Furthermore, applying **NATO's resilience framework³ to the protection of critical infrastructure offers a comprehensive approach to addressing the increasing complexity of today's economic, climate, conflict-related, and internal security threats**. As defined by NATO, resilience encompasses the capacity to prepare for, resist, respond to, and rapidly recover from disruptions. This is particularly relevant in the civilian domain, where critical infrastructure, energy, water, health, transport, communications, and food systems, form the backbone of national stability and security.

Protection of critical infrastructure data

In the context of the digitalisation of SGIs, sensitive infrastructure data, such as for water and energy supply networks and transportation, poses severe public safety risks if exposed. SGI Europe emphasises that while digital integration is vital, it must not lead to the exposure of critical network data to unauthorised third parties, which would invite hybrid attacks and manipulation.

¹ SGI Europe Opinion: Security Paper: <https://sgieurope.org/publications/opinion-eu-security-and-preparedness/?page=1>

² European Environment Agency (EEA). European Risk Assessment Report. March 2024: <https://www.eea.europa.eu/en/analysis/publications/european-climate-risk-assessment>

³ NATO Resilience Framework: https://www.nato.int/cps/fr/natohq/official_texts_185340.htm?selectedLocale=en

A significant concern is the proposed "GreenData4All" initiative, which seeks to align the **INSPIRE Directive** with horizontal legislation for high-value geodata. Currently, Article 13(1) allows Member States to restrict access to protect public security. However, inconsistent implementation often makes critical data accessible by default, undermining the security of supply. This has been under the Environment Omnibus once more put in question the safety of critical infrastructure data for the aim of simplification.⁴

SGI Europe advocates for explicitly exempting entities affected by the NIS2 and CER Directives from public provision obligations and safeguarding these also in the simplification process. Safeguarding this geodata is a mandatory security requirement, not a mere balancing of interests. Maintaining these exemptions is essential to prevent cascading financial losses and infrastructure disruptions, ensuring that resources remain focused on the necessary green and digital transformations.

Circularity as a structural tool for resilience

A Resilience by Design approach is intrinsically linked to a **circular SGI infrastructure**. By integrating circular economy principles, SGIs can reduce dependencies on imported raw materials and enhance resource security under a sustainable and climate friendly approach to reach the 2050 EU climate targets.

A systemic SGI approach key for Resilience by Design

By adopting a structural, industrial approach, we move away from reactive, waste and "end-of-pipe" treatments. Instead, we integrate circularity throughout the entire value chain, **minimising resource depletion and maximising value retention**.

Indeed, climate resilience is often framed as a defense approach, yet a **true resilience requires a fundamental systemic shift in how we manage our resources**. SGI circular economy infrastructure is the backbone of this transition, extending far beyond conventional waste management or simple recycling.

In a world of increasing climate volatility and resource scarcity, this systemic shift ensures that essential services remain stable, efficient, and capable of enduring external shocks. Ultimately, circular resilience is the engine that transforms SGIs from service providers into the guardians of long-term economic and environmental stability.

A detailed and structurally applicable reference can be read under the adopted **SGI Europe Opinion paper on Strengthening a resilient and circular infrastructure of Services of General Interest (SGIs) A concept paper for enabling systemic investment and policy support for the circular transition in essential public services and services of general interest**.⁵

SGI Europe argues in its position to promote **Recyclable by Design** principles that spans across all SGIs sectors from water, energy, transport to waste, postal services and telecommunication, with case-by-case

⁴ SGI Europe suggests an amendment to article 13 of INSPIRE Directive as follows :

""1. By way of derogation from Article 11(1), Member States **or operators in charge of critical infrastructures as defined in directive (UE) 2022/2557** may **restrict, suspend, or refuse** limit public access to spatial data sets and services through the services referred to in point (a) of Article 11(1) where such access would adversely affect international relations, public security or national defence **or would jeopardize the safety of the critical infrastructures**."

⁵ SGI Europe Opinion to Strengthen SGIs in Circular Economy: <https://sgieurope.org/publications/opinion-strengthening-a-resilient-and-circular-infrastructure-of-services-of-general-interest-sgis/?page=2>

technical norms, standards and valorising the energy and CO₂ emission savings related to recycling and the use of recycled materials, are crucial steps in this direction.

Wastewater material recovery providing climate and economic resilience

Transforming SGIs into resource-hubs that reduce strategic dependencies begins with the **wastewater sector** as it stands as a prime example of an SGI with immense, yet often unrealised, potential for resource recovery within the circular economy.

The process of wastewater treatment already contains the raw materials for a new industry: valuable nutrients like phosphorus and nitrogen, and soil improvers like biochar, are concentrated in the resulting sewage sludge. These materials are essential for agriculture and industry, and their recovery from wastewater treatment plants can significantly reduce Europe's dependence on finite, often imported, virgin resources. This **strategic recovery not only secures a domestic supply of critical materials but also contributes to the EU's climate goals by avoiding the energy-intensive processes** of primary resource extraction.

However, the full realisation of this potential is currently hindered by an outdated regulatory framework. The current legal status of sewage sludge often treats it solely as waste, which hinders the necessary innovation and investment for its valorisation. This perception creates a major barrier for SGIs, as they lack the clear incentives and regulatory certainty to develop advanced technologies for nutrient extraction and to create a market for sludge-based products.

Furthermore, pollution from harmful substances is a key obstacle to a thriving circular economy. Preventing their presence in the environment not only improves water quality but also better enables the recovery and reuse of raw materials. Tackling pollutants at the source allows our wastewater treatment processes to be better aligned with circular economy goals. To address this, the **Sewage Sludge Directive (SSD) must be revised and aligned with the principles of the upcoming EU Climate Resilience Strategy and the EU Circular Economy Act.**

Energy and Waste incentives

SGI Europe proposes the creation of "**Circular Energy Efficiency Certificates**" (CEEC) and "**Circular Carbon Credits**" (CCC). In order to stimulate demand for recycled materials, we propose to incentivise recycling processes and the use of secondary raw materials through a mechanism able to calculate and valorise economically the energy savings and the carbon savings related to the recycling and the use of secondary material instead of primary ones.

Project example by TEEC

The calculation of savings must be based on a solid scientific basis. The analysis must address the whole life cycle of primary and secondary raw materials. The TEEC (Circular Energy Efficiency Certificates) and 3C (Circular Carbon Credits) project⁶, implemented by the Italian National Agency for New Technologies, Energy and Sustainable Economic Development, and UTILITALIA, could be a reference (see attached).

⁶ <https://www.media.enea.it/comunicati-e-news/archivio-anni/anno-2025/ambiente-da-enea-e-utilitalia-un-software-per-misurare-l-economia-circolare-nelle-aziende.html>

If implemented EU-wide, this mechanism would:

- Boost the demand for secondary raw materials.
- Support the resilience of the recycling supply chains against:
 - the increase in production costs (also linked to the increase in energy costs);
 - for industries in supply chains subject to ETS (e.g. paper, glass) the difficulty in competing with extra-EU imports; o the volatility of raw material prices;
- Promote a "circular single market" by providing a unified incentive system.

Protecting Environmental Standards for water and public health to enable climate Resilience

SGI Europe advocates for a robust, action-oriented framework in the new EU Climate Resilience Strategy that prioritises prevention at the source over remediation. While we welcomed the first EU Water Resilience Strategy (EUWRS) as a foundational step toward integrated water management⁷, it failed to push for the decisive, coordinated action required to tackle the origins of water pollution.

For the upcoming Climate Resilience Strategy to succeed where the EUWRS fell short, it must move beyond simply managing scarcity and embrace proactive **pollution prevention** as a core pillar of its **Resilience by Design** concept. Resilience to climate risks in the form of water quantity is inherently linked to water quality. During periods of severe drought, reduced river flows and groundwater levels significantly limit the natural dilution capacity of water bodies, resulting in higher concentrations of pollutants such as nutrients, industrial discharges, and chemical contaminants, thereby leading to a deterioration in overall water quality. This deterioration in water quality restricts the usability of the available water resources, limiting their suitability for drinking water production, agriculture, and industrial use, right when the scarce water resources are most needed.

The necessity of a conditional approach to Nature-Based Solutions (NbS) by Default

SGI Europe fully supports the Commission's Nature-based Solutions by default approach as a primary line of defense. Restoring wetlands, creating riparian buffer zones, and implementing green infrastructure especially in urban areas, such as sponge landscapes for water retention, are cost-effective measures for natural carbon sequestration and flood/drought mitigation or filter pollutants and enhance biodiversity. These approaches improve water quality (instead of costly end-of-pipe technology in waterworks) and contribute to climate adaptation by mitigating the effects of flooding and drought at low costs. Specifically, **SGI Europe specifically call for NbS and natural water retention measures to become a central funding element in the Common Agricultural Policy (CAP) after 2027⁷.**

⁷ Nature-based solutions (NbS) need to play a central role for climate protection and adaption. Restoring wetlands, creating riparian buffer zones, implementing green infrastructure as well as sustainable land use in agriculture and forests enable natural carbon sequestration and mitigate the effects of both floods and droughts at low costs. Reforestation, removal of outdated drainage systems and restored water infiltration into soil in forests, cities, wetlands and sustainable agriculture like organic farming and agroforestry create sponge landscapes for water retention in soil and groundwater. Such measures stabilizing the water cycle represent a core element of climate resilience. Nature-based solutions to water storage and natural water retention measures, as proposed by the outcome of the Strategic Dialogue on the Future of EU Agriculture, must become a central funding element in the next period of the Common Agricultural Policy (CAP) after 2027.

However, **Nature-based solutions can only function effectively if coupled with strict pollution prevention.** While NbS strengthen the water cycle through infiltration and retention, they cannot independently mitigate excessive nutrient loads or 'forever chemicals' like PFAS and TFA. Without addressing these contaminants at the source, **NbS risk becoming repositories for pollutants rather than resilient ecosystems.** NbS to water storage and natural water retention measures should be leveraged for water quantity, as proposed in the outcome of the **Strategic Dialogue on the Future of EU Agriculture.**

SGI Europe therefore asks to give more clarity and strong action on when NbS will be deployed to guide Member States and deliver more sustainable option on purifying drinking water quality.

Pollution prevention at the source

A truly water-resilient system in the face of increasing droughts and floods cannot rely solely on adaptation measures or downstream treatment technologies. Climate resilience in the water sector must be grounded in strong preventive action that tackles pollution at its source. Only by prioritising prevention over remediation can the EU ensure sustainable and affordable water services for the future.

To ensure NbS can truly deliver on their potential, the **Climate Resilience Strategy must bridge existing gaps with robust source-control legislation:**

- **Universal and comprehensive PFAS Ban:** Including TFA, to protect the long-term integrity of drinking water resources. SGI Europe notes, that where exemptions and transitional periods for essential industrial uses are necessary, such as in cases when no alternatives exist yet, they should be allowed as narrow, clearly defined and limited as possible. Until such a ban is fully implemented, all existing discharge permits must be urgently reviewed and revised to prohibit the release of any PFAS into the environment.
- **Revision of REACH:** Modernising chemical legislation to prevent regrettable substitutions and accelerate the phase-out of toxic substances.
- **Full Implementation of the Polluter-Pays Principle:** Ensuring the financial burden of remediation remains with the polluter rather than shifting to public utilities and citizens.
- **Ban End-of-Pipe solutions:** A resilient strategy must not rely solely on channelling vital investments into expensive end-of-pipe treatments. Instead, it must address the sources of contamination by reviewing sectoral legislation and fully implementing **Extended Producer Responsibility (EPR)** schemes in the wastewater sector under the Urban Wastewater Treatment Directive.

Safeguarding the Water Framework Directive (WFD)

Additionally, SGI Europe expresses significant concern regarding the emerging trend of stress-testing foundational environmental laws, specifically the planned 2026 **evaluation of the Water Framework Directive (WFD)**. While understanding the European Commission initiatives for a strategic autonomy for Europe on critical raw materials as proposed in the RESourceEU Action Plan⁸ and therefore propose to remove bureaucratic bottlenecks, we caution that such processes must not become a pretext for deregulation of long negotiated and scientific based environmental protection legislations.

⁸ ReSourceEU Action Plan: https://single-market-economy.ec.europa.eu/document/download/01c448d6-dc93-40d7-9afe-4c2af448d00c_en

Long-term climate resilience for SGIs depends fundamentally on legal certainty and the robust protection of water resources at their source for all of its services they provide. **Weakening the non-deterioration principle to facilitate economic interests, such as raw material extraction, risks causing irreparable damage to local aquifers.** Such a shift would unfairly transfer the financial burden of pollution and remediation from industries onto public utilities and European citizens. With global water resources already depleted, Europe cannot treat water quality as a negotiable burden. **SGI Europe advocate for preserving the WFD's integrity,** ensuring that any simplification applies strictly to reporting procedures rather than eroding the essential environmental standards that safeguard public health and territorial cohesion.

Building strong bridges between EU Water and future Climate Resilience Strategy

The new EU Water Resilience Strategy should be a vehicle to encourage a 'Resilience by Design' approach to adapt a robust and resilient services of general interest infrastructure for the water sector in the upcoming EU Climate Resilience plan. **This requires an explicit link between these two strategies, ensuring a coordinated, cross-sectoral response to challenges such as climate change, economic downturns and security threats.** The strategy must mandate the integration of climate risk assessments and adaptation measures into all water infrastructure planning and investment. This includes water systems, flood protection facilities, ensuring they can withstand both immediate shocks and future, long-term climate-induced problems like droughts and floods.

Adopt a transboundary approach to water management while ensuring water protection in regions

SGI Europe specifically wishes to underline the importance of a **transboundary approach to river basin cooperation** that appears to become more important over time with increasing risks of climate change. Water does not stop at borders. Therefore, cross-border cooperation is necessary in relation to agreements dealing with water distribution and the management of the major European rivers. Here, it is essential to map (system) dependencies to ensure sustainable water supply. Greater data sharing, best practice exchanges, and coordinated efforts through strengthened river basin commissions, such as the **International Commission for the Protection of the Rhine (ICPR), the International Meuse Commission (IMC), and the International Commission for the Protection of the Danube River (ICPDR) are vital for cross-border water management.** Within river basins, problems in the European water system can be passed on to downstream areas or future generations. Enhanced cooperation and information sharing is needed to mitigate the possibility of problem shifting. Mandatory consultation on permits and withdrawals upstream due to downstream effects would significantly increase the resilience of downstream areas. At the moment, there are still too few binding agreements in river basins to meet the challenges of the future. It is wise to make these agreements before the problem becomes too critical. The moment water becomes increasingly scarce, it will become increasingly difficult to make good agreements.⁹

⁹ SGI Europe Reaction paper on EUWRS 2025: <https://sgieurope.org/files/SGI%20Europe%20-%20Position%20paper%20-%20Comments%20on%20the%20EU%20Water%20Resilience%20Strategy.pdf>

Enabling Frameworks: Governance, Financing and Skills

Governance

The **Freedom to Stay** is a cornerstone principle emphasising every citizen's right to live and thrive in their chosen community. As highlighted in the Enrico Letta report, "Much More Than a Market,"¹⁰ this is not merely a social ideal but a direct beneficiary of robust SGIs and resilient climate frameworks. To make this principle a tangible reality, climate resilience must be explicitly integrated as a protective layer for human health.

True territorial cohesion requires that moving away from one's home due to environmental shocks, whether from acute climate disasters or chronic pollution, is avoided. By embedding **Resilience by Design** into SGI infrastructure, **we safeguard the fundamental pillars of public health, such as secure drinking water and stable energy**. We must ensure that resilience funding is explicitly aligned with this principle to prevent a "two-speed Europe," where only high-capacity regions can afford to protect their citizens from environmental displacement.

By prioritising pollution prevention at the source and structural preparedness, the EU can ensure that mobility remains a choice rather than a necessity driven by the loss of a healthy, sustainable living environment.

Finance

EU funding instruments play a crucial role in supporting just transition objectives. The **Just Transition Fund and the Social Climate Fund provide essential support for reskilling, job transitions and mitigating social impacts**, particularly in vulnerable regions. At the same time, it is important to ensure that these instruments remain accessible to local and regional service providers, are well coordinated with skills and employment policies, and are aligned with real workforce and service delivery needs. Funding should act as a supportive lever for implementation and adaptation, not as a channel for introducing new horizontal conditionalities. SGI Europe therefore considers that priority should be given to strengthening coherence and effective use of existing social instruments, improving monitoring and anticipation capacities, and reinforcing structured social dialogue at sectoral and territorial level. Any further EU reflection on just transition should build on evidence and implementation experience, without pre-empting legislative outcomes or social partner negotiations.

Furthermore, **SGI Europe underlines that resilience and preparedness must be embedded by design across the next Multiannual Financial Framework (2028–2034) and provide dedicated budgets for municipal crisis preparedness, rather than relying predominantly on ad-hoc crisis instruments**. Long-term and predictable investments in SGIs are essential to strengthen Europe's resilience, climate adaptation capacity and strategic autonomy.

SGI Europe supports better coordination between EU funding instruments and the **European Semester**, as long as this coordination respects subsidiarity, proportionality and ownership at national, regional and local level. Such coordination can help improve the visibility and coherence of social and territorial investment, particularly in regions facing structural challenges, without turning the Semester into a tool for short-term conditionality undermining long-term investment planning.

¹⁰ <https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf>

Drawing on lessons from the Recovery and Resilience Facility, SGI Europe stresses that the effectiveness of future funding instruments, including the **next Multiannual Financial Framework will depend on the meaningful involvement of local and regional authorities, social partners and SGI providers** throughout planning, implementation and evaluation. This partnership-based approach must be supported by a secure and predictable financial framework, enabling sustained investment in essential services, strengthening territorial cohesion and contributing to the Freedom to Stay across all regions of the Union

Skills and the role of EU Social Partners

Finally, ensuring a socially fair implementation of the EU Climate Resilience Strategy, the results of **the 2024 Tripartite Exchange Seminar** organised by Eurofound, together with Cedefop, the European Environment Agency and the European Training Foundation, highlighted the **central role of social dialogue in anticipating change and managing transition impacts on employment, skills and working conditions**.

The seminar also showed that while just transition is increasingly addressed through social dialogue agendas, its embedding remains uneven across Member States, pointing to the need to strengthen processes and capacities rather than develop more policy instruments. In this context, SGI Europe welcomes the development of the **European Fair Transition Observatory**.¹¹ Such initiatives can help consolidate evidence, improve anticipation of labour market and skills impacts and support policy coordination. Additionally, the **Just Transition Platform** must be maintained and expanded. It serves as the vital knowledge hub that facilitates the exchange of best practices and technical assistance, ensuring that the transition is supported by a continuous and stable framework of expertise.

SGI Europe will actively contribute to these processes and sees them as an appropriate means to assess implementation challenges and inform future reflection, rather than as a precursor to immediate new binding obligations. The diversity of transition pathways across sectors and territories, **the need for Member States to be actors in ensuring the right employment and labour market policies, social partners contributions and joint work such as collective agreements and funds**. Given these complexities and the already dense EU funding landscape, a one-size-fits-all legislative approach is not advisable.

Priority should instead be given to strengthening governance, social dialogue, skills anticipation and the effective use of existing instruments.

¹¹ EFTO: <https://www.prognos.com/en/project/socially-just-climate-neutrality-eu>