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Environmental Implementation Review 2025
Country Report - FRANCE

Accompanying the document

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions

2025 Environmental Implementation Review for prosperity and security

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Executive summary

In May 2016, the European Commission launched the Environmental Implementation Review "EIR", a regular reporting tool based on analysis, dialogue and collaboration with EU Member States to improve the implementation of the existing EU environmental policy and legislation ([1]). Following previous cycles in 2017, 2019 and 2022, this report assesses the progress made while describing the main outstanding challenges and opportunities regarding environmental legal implementation in France. The purpose of this report is to provide information on the implementation performance and to highlight the most effective ways to address the implementation gaps that impact human health and the environment and hamper the economic development and competitiveness of the country. The report relies on detailed sectoral implementation reports collected or issued by the Commission under specific environmental legislation.

The main challenges set out below have been selected from Part I of this report, 'Thematic areas', taking into consideration factors such as the gravity of the environmental implementation, in light of the impact on the quality of life of the citizens, the distance to target and financial implications.

France is well on track with regard to its transition to a **circular economy**, in terms of secondary use of materials, resource productivity and EU Ecolabel promotion. Green procurement environmental criteria also increased significantly, a success praised in late 2024 by the French Court of Auditors. On a less positive note, **waste management** remains a challenge, one shared by many other Member States. France is at risk of not reaching the 2025 target for reuse and recycling of municipal waste, which led to the launch of an infringement case in July 2024.

The protection of **biodiversity** and **natural capital** remains an issue of particular concern, despite the ambition of the national biodiversity strategy for 2030, and despite France's international commitments. There are gaps between France's ambition and effective measures. Some gaps have led to infringement cases. As in many other Member States, intensive agriculture practices and land artificialisation put pressure on ecosystems. Measures adopted to support reforestation, although appropriate to combat climate change and damage to the health of forests, did not sufficiently account for biodiversity considerations. On a positive note, France is doing well in fighting invasive alien species.

With regard to **pollution**, progress is being made on air quality, though actions to reduce pollutants are still needed. Industrial accidents prevention is also improving, despite an ongoing infringement case on citizens' information and involvement in this area. In July 2024, the Commission referred France to the Court of Justice of the European Union (CJEU) for failure to comply with the requirements of the Noise Directive, with regard to missing action plans for agglomerations and major roads. In the field of water quality, France is facing challenges that are common to many Member States, as evidenced by the Commission's assessment of the third cycle of river basin management plans and the second cycle of flood management plans. Specifically, there is a need to improve river continuity and ecological flows and to reduce pollution from pesticides and nutrients released by intensive agriculture. In the same vein, the Commission decided to refer France to the CJEU for nitrates pollution in drinking water. The assessment of per- and polyfluoroalkyl substances (PFAS) in drinking water will apply from 2026. Finally, in 2024, the CJEU found that France failed to comply with treatment and monitoring obligations for urban wastewater in 78 areas, impacting more than 6 million inhabitants. With regard to climate protection, the Commission launched an infringement case against France on 25 January 2024 for failure to fully transpose the Emissions Trading System Directive.

In terms of **funding** for the ecological transition, France performs well on green budgeting practices. The phase-out of environmentally harmful subsidies remains a structural concern, exacerbated by the energy crisis. The overall environmental **investment** need to enable France to meet its environmental objectives is estimated to be EUR 63.8 billion per year. The investment gap amounts to EUR 21.1 billion per year.

Finally, to improve **governance**, more data is needed on the duration of environmental impact assessments.

([1]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Delivering the benefits of EU environmental policies through a regular environmental implementation review, COM(2016) 316 final of 27 May 2016, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2016%3A316%3AFIN.

Part I: Thematic areas

1. Circular economy and waste management

Transitioning to a circular economy

Advancing the transition to a circular economy in the EU will reduce the environmental and climate impact of our industrial systems by reducing input materials, keeping products and materials in the loop for longer and reducing waste generation, thus decoupling economic growth from resource consumption. A circular economy has considerable potential to increase competitiveness and job creation and will also promote innovation and provide access to new markets. With the 2020 circular economy action plan (CEAP) ([2]) measures either in place or going through the legislative process, EU Member States will now have to focus on a swift and effective implementation.

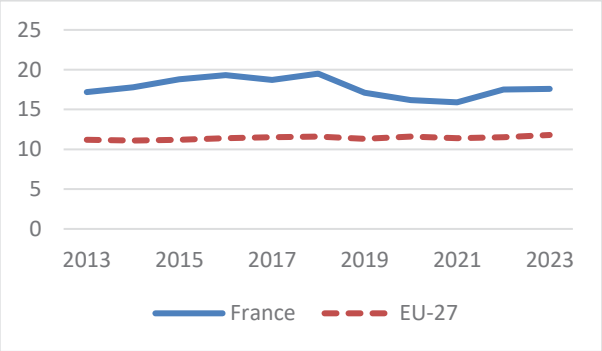
The 2020 CEAP launched the legislative process for a set of initiatives that will now have to be implemented by national governments across the EU. These initiatives were all introduced following a holistic life-cycle approach, with measures addressing the different stages of a product's life cycle, from design through use to end of life.

In the CEAP, the EU sets as its overarching objective the doubling of its circular material use rate (CMUR) by 2030.

The CMUR is a measure of one aspect of circularity: the share of the total amount of material used in the economy that is accounted for by recycled waste. A higher CMUR value means that more secondary materials were used as a substitute for raw materials, thus reducing the environmental impacts of extracting primary material.

France's circular use of material is and has been higher than the EU average, at 17.6 % of total material use in 2023, against the EU average of 11.8 % (Figure 1). The rate has been comparatively stable for more than a decade, with a slight increase since 2013.

Figure 1: CMUR (%), 2013–2023

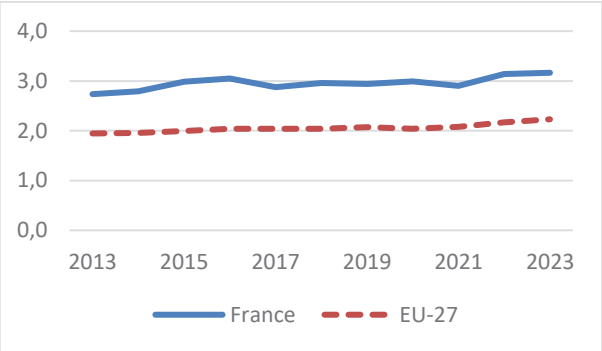


Source: Eurostat, 'Circular material use rate', env_ac_cur, last updated 13 November 2024, accessed 10 December 2024, https://ec.europa.eu/eurostat/databrowser/product/view/env_ac_cur.

Resource productivity measures the total amount of materials directly used by an economy in relation to gross domestic product (GDP). Improving resource productivity can help to minimise negative impacts on the environment and reduce dependency on volatile raw material markets.

France's resource productivity has been steadily higher than the EU average, having generated EUR 3.16 per kg of material consumed in 2023 compared with the EU average of EUR 2.23 per kg (Figure 2).

Figure 2: Resource productivity (EUR/kg), 2013–2023



NB: The unit of measurement used is EUR/kg chain-linked volume (2015). *Source:* Eurostat, 'Resource productivity', last updated 7 August 2024, accessed 10 December 2024, https://ec.europa.eu/eurostat/databrowser/product/view/env_ac_rp.

([2]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A new circular economy action plan for a cleaner and more competitive Europe, COM(2020) 98 final of 11 March 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A98%3AFIN.

Policies and measures

In parallel with European initiatives under the CEAP, Member States are encouraged to adopt and implement circular strategies at the national, regional and city levels. These should be tailored to each national and local reality, to harness the proximity economy's potential ([3]), while following the principles of a holistic whole-value-chain approach.

Since the launch of the online European Circular Economy Stakeholder Platform in 2017 ([4]), national, regional and local authorities have used the platform to share their strategies, roadmaps and good practices, for example alternative business models and innovative technologies.

France adopted a circular economy roadmap in 2018 ([5]) and a waste management plan in 2019 ([6]). The roadmap is set to reduce resource use and consumption by 30 % by 2030 (compared with 2010), to reduce landfilling of non-hazardous waste by 50 % by 2025 (compared with 2010) and to reach an ambitious 100 % recycling rate of plastics by 2025. On this basis and following progress stemming from the national recovery and resilience plan (RRP) ([7]), various initiatives are being rolled out to enable the circular economy transition, including extended producer responsibility (EPR) schemes for a wide set of sectors. Eco-design targets are being expanded to more sectors

France's climate policy also includes a circular economy angle. The Climate and Resilience Law ([8]) adopted in August 2021 includes many references and measures related to the circular economy, for example, sustainable public procurement and environmental information on product for consumers, though criticisms have been expressed about the *haute valeur environnementale* labelling[9].

To further integrate the ecological transition into all sectors of public action, in 2022 France introduced an ecological planning process. This approach allows for coordinated action and is based on the rolling-out of action plans focusing on specific policy areas. A number of projects are under way to refine and enrich the plan, particularly on the subjects of the circular economy and adaptation.

After the 2015 regional reorganisation, the new economic development, innovation and internationalisation regional strategies often include support for the circular economy among their priorities.

Green public procurement

Public procurement accounts for a large proportion of European consumption, with public authorities' purchasing power representing around 14 % of EU GDP. Public procurement using green or circular criteria (life-cycle analysis, platform as a service, second hand) can help drive the demand for sustainable products that meet reparability and recyclability standards.

More than EUR 160 billion are spent each year on public procurement by the French state, local authorities and municipalities, promoted by the waste management plan mentioned above. Since 2021, specific public procurement provisions have obliged contracting authorities to acquire certain products derived from reuse or re-employment or products that include recycled materials. In line with the new decree published in 2024, the mandatory percentages will gradually increase until 2030. In addition, free acquisitions through donations are now included in this scheme. A National Sustainable Purchasing Plan (PNAD) 2022-2025 supports public buyers in the implementation of these obligations by providing tools, training and advisors to integrate sustainable aspects into purchasing processes.

In its report dated 6 December 2024 ([10]), the French Court of Auditors highlighted the success of integration of environmental criteria in public procurements, which rose to 55 % in 2023 from 20 % in 2022. The Climate and Resilience Law foresees a target of 100 % by August 2026.

([3]) European Commission, 'Proximity and social economy ecosystem', European Commission website, https://single-market-economy.ec.europa.eu/sectors/proximity-and-social-economy_en.

([4]) Circular Economy Stakeholder Platform (https://circulareconomy.europa.eu/platform/en/strategies).

([5]) https://www.ecologie.gouv.fr/sites/default/files/documents/FREC%20-%20Plan%20Ressources%20pour%20la%20France%202018.pdf.

([6]) Ministry of Ecological Transition and Solidaire, *Plan national de gestion des déchets*, Paris, 2019, https://www.ecologie.gouv.fr/sites/default/files/documents/Plan%20national%20des%20dechets_octobre%202019.pdf.

([7]) See the updated 2023 RRP (https://www.tresor.economie.gouv.fr/Articles/53f6c4b5-4d49-42ba-b778-140c53b6b3f5/files/23723bb4-2c21-4fdf-9943-c6d53e95eb35).

([8]) Loi No 2021-1104 du 22 août 2021 portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets (https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043956924).

([9]) https://www.quechoisir.org/action-ufc-que-choisir-label-hve-il-trompe-le-consommateur-la-justice-doit-le-condamner-n105322/.

([10]) https://www.ccomptes.fr/fr/publications/la-prise-en-compte-des-enjeux-du-developpement-durable-dans-les-achats-de-letat.

The EU Ecolabel and the eco-management and audit scheme

The number of EU Ecolabel product groups and the number of eco-management and audit scheme (EMAS)-licensed organisations in each country provide some indication of the extent to which the private sector and national stakeholders in that country are actively engaged in the transition to a circular economy. The EU Ecolabel is awarded to products with best-in-class environmental performance. EMAS is a voluntary environment management scheme aimed at reducing the environmental impacts of organisations.

As of September 2024, France had 12 539 products out of 98 977, and 490 licences out of 2 983 registered in the EU Ecolabel scheme ([11]). This places France among the top countries for the uptake of the EU Ecolabel.

As of November 2022, France had 14 organisations registered for EMAS, which is very low for a large Member State. France has no accredited EMAS verifier.

The priority actions included in the 2022 environmental implementation report (EIR) only focused on waste and not on the circular economy more broadly. While France is strengthening its circular economy policy framework, a coherent approach to the implementation of the measures in place is key.

2025 Priority action

- Speed up the transition to a circular economy by implementing an updated national strategy and the EU framework and recommendations, in particular to complement it with upstream circularity measures.

Waste management

Turning waste into a resource is supported by:

(i) addressing the full life cycle of products, from conception to end of life, by setting requirements on the design of products to ensure that they are more sustainable;
(ii) fully implementing EU waste legislation, which includes the waste hierarchy, the obligation to ensure separate collection of waste, landfill diversion targets, etc.;
(iii) reducing waste generation per capita and in absolute terms;
(iv) increasing the recycling rates of waste containing critical raw materials (CRMs), with a view to reducing dependencies and building resilient value chains, and stimulating demand for recycled content in all products;
(v) limiting energy recovery to non-recyclable materials; and
(vi) phasing out landfilling of recyclable or recoverable waste.

One of the main objectives of EU waste law is to decouple economic growth from its environmental impacts.

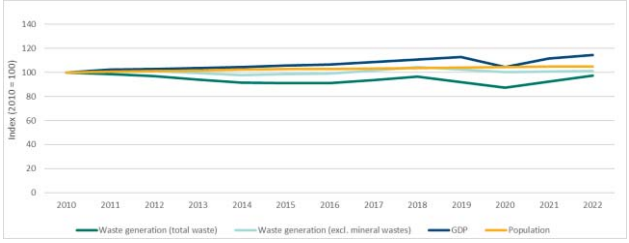
The EU's approach to waste management is based on the waste treatment hierarchy: prevention, preparing for reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery).

All legislative proposals in the field of waste management put forward by the Commission since 2021 are intended to encourage Member States to promote better product design, to require producers to cover the costs of managing the waste resulting from their products and to ensure that waste is managed at the higher levels of the waste hierarchy.

In 2022, 345 million tons of waste was generated in France, nearly the same as in 2018. In 2020, the COVID-19 pandemic led to a decrease in waste in all economic sectors, mainly industry and construction, while household waste increased because of lockdowns and remote working. The increase after 2020 can be mainly attributed to the largest waste categories, namely soil and mineral waste from construction and demolition. Excluding major mineral waste results in the stabilisation of the overall waste generation. France's GDP has shown a steady growth, but dropped significantly in 2020, most likely due to the COVID-19 outbreak, and total waste generation followed suit.

Overall, there appears to be only a slight decoupling between economic growth and waste generation, and since around 2016, total waste generation has followed the GDP trend.

Figure 3: Generation of waste (total and excluding major mineral wastes), population and GDP, 2010–2022



([11]) European Commission, 'EU Ecolabel facts and figures', European Commission website, https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel/businesses/ecolabel-facts-and-figures_en.

Sources: Eurostat, 'GDP and main components (output, expenditure and income)', nama_10_gdp, accessed 15 October 2024, https://ec.europa.eu/eurostat/databrowser/view/nama_10_gdp__custom_9301905/default/table; Eurostat, 'Generation of waste by waste category, hazardousness and NACE Rev. 2 activity', env_wasgen, last updated 30 September 2024, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/env_wasgen/default/table?lang=en; Eurostat, 'Population change – Demographic balance and crude rates at national level', demo_grind, accessed 15 October 2024, https://ec.europa.eu/eurostat/databrowser/view/demo_gind/default/table?lang=en&category=demo.demo_ind.

Critical raw materials

The recovery of CRMs is covered by the French roadmap for circular economy and is also the focus of a dedicated strategy on recyclability, recycling and incorporation of precious metals ([12]). Dedicated funding has been allocated to this issue through various instruments ([13]), and notably has been adopted under the France 2030 investment plan. Many measures to favour reuse or increased recycling of CRMs are implemented through EPR schemes.

Construction and demolition waste

Construction and demolition waste accounts for almost 40 % of all waste generated in the EU. A recent study ([14]) by the Joint Research Centre shows that preparing for reuse and recycling operations are preferred over incineration and landfilling from an environmental perspective for most of the different streams of construction and demolition waste. However, the economics are often unfavourable for preparing for reuse and recycling compared with incineration and landfilling. If available technology were to be applied, it is estimated that the increase in preparing for reuse and recycling would lead to an additional 33 Mt of greenhouse gas (GHG) emission savings annually (more than, for example, the combined annual GHG emissions of Estonia, Latvia and Luxembourg).

The preparing for reuse and recycling rate of mineral construction and demolition waste in France in 2022 was 65 %, compared with the EU average of 79.8 %. Measures to further increase the preparing for reuse and recycling rate of construction and demolition waste include separate collection at source, for instance through digitalised pre-demolition audits ([15]) ('resource assessments'), EPR and other economic instruments, and upstream measures such as increasing the recycled content in construction products and the circular design ([16]) of construction works.

Boosting implementation – the 2023 *Waste Early Warning Report*

This section focuses on the management of municipal waste ([17]), for which EU law sets mandatory recycling targets. In June 2023, the Commission published the *Waste Early Warning Report* ([18]) identifying the general trends in waste management and the Member States at risk of missing 2025 waste targets (see Figure 4). France is in the category of countries at risk of missing the municipal waste target but not the packaging waste target.

([12]) https://www.info.gouv.fr/upload/media/organization/0001/01/sites_default_files_contenu_piece-jointe_2021_09_20210913_dp_stratgie_recyclage_pia4.pdf.

([13]) https://www.cnrs.fr/fr/pepr/recyclage.

([14]) European Commission: Joint Research Centre, Cristóbal García, J., Caro, D. et al., *Techno-economic and environmental assessment of construction and demolition waste management in the European Union*, Publications Office of the European Union, Luxembourg, 2024, https://publications.jrc.ec.europa.eu/repository/handle/JRC135470.

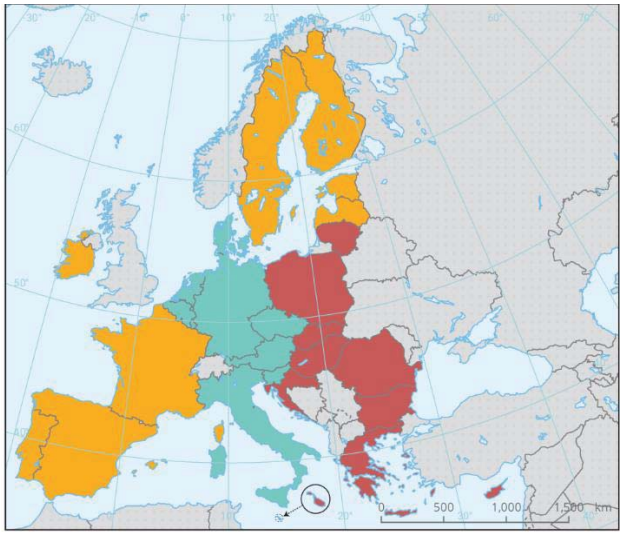
([15]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *EU Construction & Demolition Waste Management Protocol including guidelines for pre-demolition and pre-renovation audits of construction works – Updated edition 2024*, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/d63d5a8f-64e8-11ef-a8ba-01aa75ed71a1/language-en.

([16]) European Commission, *Circular Economy – Principles for buildings design*, Brussels, 2020, https://ec.europa.eu/docsroom/documents/39984.

([17]) Municipal waste consists of (i) mixed waste and separately collected waste from households, including paper and cardboard, glass, metals, plastics, biowaste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, and bulky waste, including mattresses and furniture; and (ii) mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households (Directive 2008/98/EC, Article 3.2b).

([18]) https://environment.ec.europa.eu/publications/waste-early-warning-report_en.

Figure 4: Member States' prospects of meeting the preparing for reuse and recycling targets for municipal waste and packaging waste



- Member States not at risk of missing the 55 % preparing for reuse and recycling target for municipal waste and the 65 % recycling target for packaging waste
- Member States at risk of missing the preparing for reuse and recycling target for municipal waste but not at risk of missing the recycling target for packaging waste
- Member states at risk of missing both targets
- Outside coverage

Source: European Environment Agency (EEA), 'Many EU Member States not on track to meet recycling targets for municipal waste and packaging waste', briefing No 28/2022, Copenhagen, 2023. Reference data © ESRI.

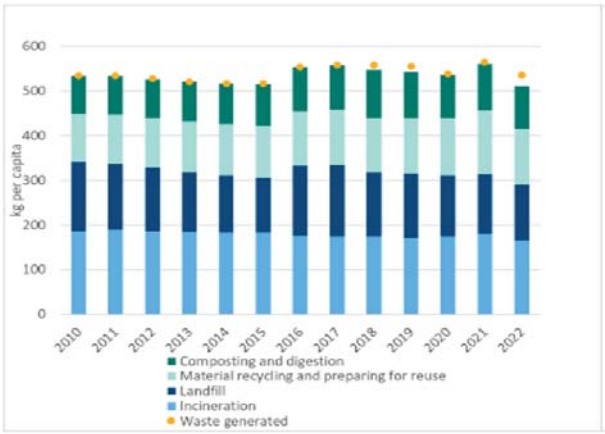
Under certain conditions, the EU waste legislation enables Member States to postpone the deadlines for reaching certain waste management targets, notably in the fields of municipal waste, packaging waste and landfilling. Member States are entitled to the postponement if they notify the Commission within the deadline set out in EU waste law, and if they submit an implementation plan setting out the steps to reach the postponed targets within a new time frame. Regarding the 2025 targets, 11 Member States, not including France, have used this prerogative.

In the *Waste Early Warning Report*, the Commission recommended that Member States accelerate their efforts to improve their recycling performance. The Commission is, on one hand, working together with the national authorities and stakeholders to speed up the implementation of measures necessary to meet the targets, including through dedicated financing. On the other hand, the Commission is pursuing enforcement actions against those Member States, including France, that, based on data submitted to the Commission, do not achieve the targets of the Waste Framework Directive[19], the Packaging and Packaging Waste Directive[20] and the Directive on Waste Electrical and Electronic Equipment[21] .

Municipal waste

Municipal waste generation in France slightly decreased between 2010 and 2016 (Figure 5). After an increase in 2016, which was due to the broadening of the reporting scope and changes in the collection of treatment data, the generation of waste per capita remained relatively stable. In 2022, the country generated 535 kg per capita of municipal waste, which is very close to the estimated EU-27 average of 513 kg per capita.

Figure 5: Municipal waste management and recycling (including preparation for reuse), 2010–2022



Source: Eurostat, 'Municipal waste by waste **management** operations', accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

The recycling rate of municipal waste has slightly increased from 36 % in 2010 to 41 % in 2022 (Figure 6), which is below the (estimated) EU-27 average of 49 % for the same year. The incineration rate in France has remained stable, sitting at 31 % in 2022. In the same

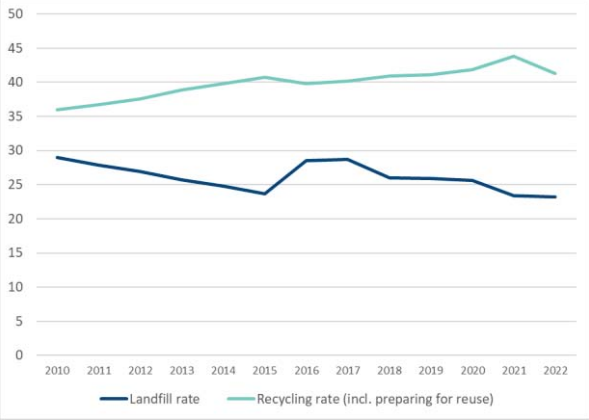
19 Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, Directive - 2008/98 - EN - Waste framework directive - EUR-Lex.

20 European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (OJ L 365, 31/12/1994, p. 10–23), Directive - 94/62 - EN - EUR-Lex.

21 Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) (OJ L 197, 24.7.2012, p. 38), Directive - 2012/19 - EN - EUR-Lex

period, the landfilling rate decreased from 29 % in 2010 to 23 % in 2022.

Figure 6: Recycling (including preparation for reuse) and landfill rates (%), 2010–2022



Source: Eurostat, 'Municipal waste by waste management operations', accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

Starting in 2016, treated amounts have been directly derived from a survey of treatment facilities instead of collectors. From reference year 2020, new reporting rules apply for calculating recycled municipal waste, pursuant to the targets laid down in Article 11.2(c–e) of Directive 2008/98/EC. However, it is unclear from the information available whether these new reporting rules have been implemented in France yet.

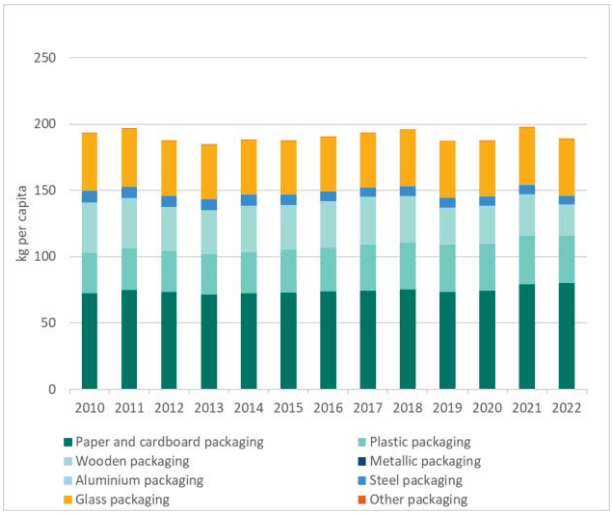
In this respect, the Commission started an infringement procedure in July 2024 against France for its failure to comply with waste targets in the Waste Framework Directive and the Directive on Waste Electrical and Electronic Equipment ([22]).

Good transposition of EU waste law is also paramount to ensure its successful implementation. In this respect, the Commission launched infringement procedures against France for its failure to correctly transpose the amended Waste Framework Directive (Directive 2018/851) ([23]) and the Single-use Plastics Directive (Directive (EU) 2019/904) ([24]).

Packaging waste

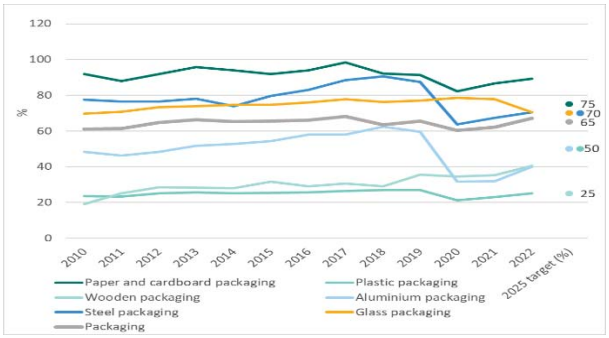
France's packaging waste generation has remained relatively stable since 2010 (Figure 7). The country generated 188 kg per capita in 2022, which is very close to the (estimated) EU-27 average of 186 kg per capita in the same year ([25]). This is mainly driven by paper and cardboard and glass packaging waste, which represent the highest shares of packaging waste.

Figure 7: Packaging waste generation, 2010–2022



***Source:* Eurostat, 'Packaging waste by waste management operations', last updated 23 October 2024,** https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en**.**

Figure 8: Packaging waste recycling rates (%), 2010–2022



Source: Eurostat, 'Packaging waste by waste management operations', last updated 23 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en.

Plastic packaging waste has the lowest recycling rate out of all packaging materials (Figure 8). The volume of plastic packaging collected is limited because separate collection is restricted in most municipalities to plastic bottles. Consequently, the European Commission's *Waste Early Warning Report* highlights that separate

([22]) INFR(2024)2141; see the July 2024 infringements package (https://ec.europa.eu/commission/presscorner/detail/en/inf_24_3228).

([23]) INFR(2024)2017; see the April 2024 infringements package (https://ec.europa.eu/commission/presscorner/detail/en/inf_24_1941).

([24]) INFR(2024)2096; see the October 2024 infringements package (https://ec.europa.eu/commission/presscorner/detail/en/inf_24_4561).

([25]) The EU average might have been influenced by not all Member States fully applying the reporting rules for packaging waste set out in Commission Implementing Decision (EU) 2019/665.

collection systems should be extended and improved, especially for plastic waste. Legislative changes were implemented in 2022, mandating the separate collection of all plastic packaging and an extension and simplification of the sorting instructions and process for citizens. The effect of these measures remains to be seen.

Policies to encourage waste prevention

Waste management plans and waste prevention programmes are instrumental to the full implementation of EU waste legislation. They set out key provisions and investments to ensure compliance with existing and new legal requirements (e.g. on waste prevention, on separate collection for certain waste streams, on recycling and on landfill targets).

France's 2019 national waste prevention programme for 2021–2027 ([26]) consists of five key areas, with specified sub-targets and indicators to monitor progress. Priority waste streams are household waste, food waste, waste from consumer products and waste from economic activities, mainly the building and public sectors. The programme was updated in January 2020; it includes several measures to promote reuse, supported by funds financed through EPR schemes.

Compared with other Member States, France's programme stands out for its comprehensive description of planned waste prevention actions. Nevertheless, no specific budget for the implementation of the programme is indicated.

France then adopted an Anti-Waste Law for a Circular Economy in 2020 ([27]). Regional waste management plans and waste prevention plans complement the national plan.

Policies to encourage separate collection and recycling

More specifically, the Anti-Waste Law for a Circular Economy aims at reusing and recycling 60 % of household waste by 2030 and at banning the marketing of all single-use plastic packaging by 2040. Furthermore, the national waste management plan sets a target of 100 % separate collection for household plastics packaging by 2025.

In France, residual waste and most types of recyclable waste are collected door to door. However, plastics collection is limited to plastic packaging. From 2025, separate collection of biowaste will become mandatory.

Until now, only 9 % of the French population has been covered by a pay-as-you-throw system for waste collection.

France is a pioneer in implementing EPR schemes, which are approved by public authorities to reach the collection, reuse and recycling targets set in decrees. The schemes are financed by their members. In 2021, 9.4 Mt of waste was collected through the EPR schemes. By 2025, there are meant to be 23 EPR schemes covering close to all consumer goods.

Producer responsibility organisations may benefit from the introduction of additional support tools to increase packaging recycling. In return, enforcement mechanisms will apply if targets are not met.

In 2020, the recyclability, recycling and reincorporation of materials strategy was launched as part of the France Relance recovery plan. It aims to improve the performance of secondary raw materials markets by identifying obstacles and points for action at the different stages of the recycling value chain in plastics, composite materials, textiles, paper/cardboard and strategic metals.

Policies to discourage landfilling or incineration

France has a ban on the landfilling of waste collected for recycling and waste originating from municipalities and economic actors without source separation schemes. France also levies a landfill tax with rates between EUR 30/ton and EUR 175/ton depending on the type of landfill and waste. The lower end of this range is close to the EU average, and the higher end is considerably higher than the EU average. The landfill tax will further increase by 2025. An incineration tax has been in place since 2009 and has increased throughout the years. A substantial increase in the general tax on polluting activities for thermal treatment facilities is planned with the aim of making reuse and material recovery more competitive. In 2025, the rates will increase to between EUR 7.5/ton and EUR 25/ton, depending on the energy efficiency of the incineration plant.

There has been some progress in the implementation of the 2022 priority actions. New initiatives were launched, but progress on the separate collection of waste remains limited, and the recycling rate of plastic packaging remains very low.

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26 https://www.prevention-dechets.gouv.fr/plan-national-prevention-dechets-ses-objectifs-ses-mesures.html.

([27]) Loi No 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire (https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000041553759/#:~:text=LOI%20n°%202020%2D105,économie%20circulaire%20(1)%20%2D%20Légifrance).

2025 priority actions

- Improve separate collection at the source (e.g. through using economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness).
- Improve municipal waste preparation for reuse and recycling.
- Increase the collection and recycling rate of waste electrical and electronic equipment (WEEE).
- Invest in waste prevention measures to reduce the total amount of waste generated.
- Implement and expand the pay-as-you-throw system for businesses and households.
- Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the early warning reports where applicable.

2. Biodiversity and natural capital

Global and EU biodiversity frameworks

Biological diversity and healthy ecosystems are critical for our societies, underpin our economies and well-being and are essential for climate change adaptation and mitigation. The Kunming–Montreal global biodiversity framework (GBF), adopted in December 2022, sets comprehensive and measurable targets to tackle biodiversity loss by 2030. To implement this global framework and integrate biodiversity considerations into national decision-making, the EU – as well as all Member States – had to submit national biodiversity strategies and action plans (NBSAPs), or to communicate national targets aligned with the global targets, by the end of 2024.

The EU biodiversity strategy for 2030 (BDS) aims to put EU biodiversity on a path to recovery by 2030. It sets quantified targets intended to protect and restore nature and manage ecosystems in a sustainable manner, as well as measures to enable implementation and commitments to support global biodiversity. A BDS actions tracker ([28]) and a dashboard of indicators ([29]) provide information on implementation progress.

The recently adopted EU Nature Restoration Regulation ([30]) is the first EU-wide, comprehensive law of its kind and a key instrument for the EU to deliver on the global biodiversity targets for 2030. It lays down an overarching objective at the EU level to put in place effective restoration measures on 20 % of EU land and sea by 2030 and for all ecosystems in need of restoration by 2050. To achieve this, it sets binding targets for Member States to restore and maintain ecosystems, as well as an effective implementation framework based on national restoration plans.

The BDS is the main instrument used by the EU to deliver on its obligation under the GBF. The Commission has submitted to the Convention on Biological Diversity its report on GBF-aligned EU targets that stem from the BDS and from other policy instruments under the European Green Deal.

Member States' NBSAPs need to provide coherent frameworks for national delivery on the global and EU 2030 biodiversity targets. In line with the global obligations, NBSAPs should also include a biodiversity financing plan and a capacity-building plan, based on needs assessments, as well as an overview of the national indicators used to measure progress.

France's national biodiversity strategy for 2030 ([31]) was adopted in November 2023, following extensive consultations with sub-national authorities and citizens, and a co-creation process with scientists, sector stakeholders and professional organisations. The strategy responds to the EU and global biodiversity targets for 2030, and makes links with national strategies, plans and legislation in other relevant areas. It sets 40 measures in four key areas: (i) reducing pressures, (ii) restoring degraded biodiversity, (iii) mobilising stakeholders and (iv) securing the means to deliver results, as well as indicators to track progress. In July 2024, France also uploaded these measures to the Convention on Biological Diversity's online reporting tool ([32]).

The EU aims to allocate to biodiversity objectives at least 7.5 % of annual spending under the EU budget in 2024, rising to 10 % in 2026 and 2027. For details on biodiversity financing and investments for France, see Chapter 5.

Nature protection and restoration – Natura 2000

Natura 2000 ([33]), the largest coordinated network of protected areas in the world, is key to the achievement of the objectives set out in the Birds and Habitats Directives. These objectives are to ensure the long-term protection, conservation and survival of Europe's most valuable and threatened species and habitats and the ecosystems they underpin. Key milestones towards meeting the objectives of the Birds and Habitats Directives are (i) the setting up of a complete and coherent Natura 2000 network; (ii) the designation of sites of community importance (SCIs) as

([28]) EU Biodiversity Strategy Actions Tracker (https://dopa.jrc.ec.europa.eu/kcbd/actions-tracker/).

([29]) EU Biodiversity Strategy Dashboard (https://dopa.jrc.ec.europa.eu/kcbd/EUBDS2030-dashboard/?version=1).

([30]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj; see also the Commission web page on the law (https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en).

([31]) Government of France, *Living in Harmony with Nature – National biodiversity strategy 2030*, Paris, 2023, https://www.ecologie.gouv.fr/sites/default/files/documents/National-Biodiversity-Strategy-2030.pdf.

([32]) https://ort.cbd.int/national-targets?countries=fr.

([33]) Natura 2000 comprises sites of community importance (SCIs), designated pursuant to the Habitats Directive, as well as special protection areas (SPAs), classified pursuant to the Birds Directive. Numbers of protected areas in Figure 9 do not add up to the total of SCIs plus SPAs, because some SCIs and SPAs overlap. A special area of conservation (SAC) is an SCI designated by a Member State.

special areas of conservation (SACs) ([34]); and (iii) effective management of all Natura 2000 sites through the setting of site-specific conservation objectives and measures.

Setting up a complete and coherent network of Natura 2000 sites

The setting up of a complete and coherent network of Natura 2000 sites is a cornerstone of the EU's international commitments, under the BDS and GBF, to legally protect a minimum of 30 % of its land area and 30 % of its sea area by 2030.

Meeting these commitments requires the full implementation of Article 3 of the Habitats Directive. The Natura 2000 network should represent a complete and coherent ecological network composed of sites hosting natural habitat types and species of community interest. The Natura 2000 network enables the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored to a favourable conservation status in their natural range.

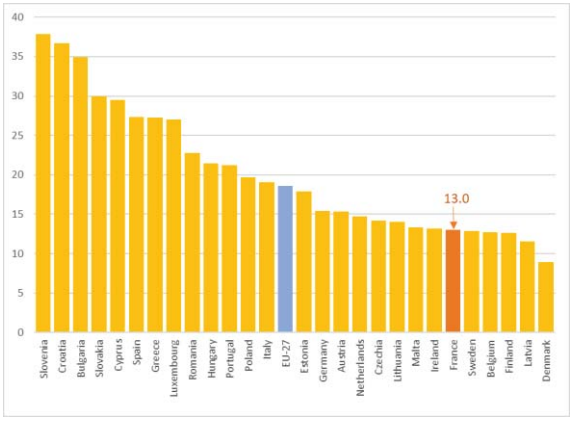
France hosts 130 habitat types and 291 species ([35]) covered under the Habitats Directive. The country also hosts populations of 145 bird taxa listed in the Birds Directive Annex I ([36]).

In 2023, 13 % of the national land area of France was covered by Natura 2000 sites (EU-27 average: 18.6 %) (Figure 9). Special protection areas (SPAs) classified under the Birds Directive covered 8 % of the territory (EU-27 average: 12.8 %), with insufficiencies for migratory birds and in marine coastal areas. SCIs under the Habitats Directive covered 8.9 % (EU average: 14.3 %); an assessment of their gaps is ongoing. Therefore, France has still to complete its Natura 2000 network, in particular the marine network. An EU pilot dialogue on assessing gaps is ongoing with France.

On a positive note, France legally protects 28.1 % of its terrestrial areas and 45.3 % of its marine areas, beyond the EU-27 averages of 26.1 % and 12.3 %, respectively ([37]). This includes Natura 2000 sites and other nationally designated protected areas.

France reported 4.2 % of highly protected area in 2023 in biodiversity pledges – protected areas.

Figure 9: Natura 2000 terrestrial protected area coverage per Member State (%), 2023



Source: European Environment Agency (EEA), 'Natura 2000 Barometer', 2023 data, accessed March 2025, https://www.eea.europa.eu/data-and-maps/dashboards/natura-2000-barometer.

Designating special areas of conservation and setting site-specific conservation objectives and measures

To ensure that SCIs contribute to the objectives of the Habitats Directive, Member States must designate them as SACs, setting site-specific conservation objectives based on the ecological needs of the species and habitats present on the sites. Such site-specific conservation objectives should define attributes and targets that describe the habitats' or species' condition as favourable or unfavourable, addressing key pressures and threats. Under Article 6 of the Habitats Directive, Member States must establish and implement measures to achieve these objectives.

The French implementation of Natura 2000 has the following strengths: (i) the network of facilitators; (ii) the high number of sites with management plans; (iii) the way the effectiveness of the network is assessed; (iv) financing efforts; (v) the bottom-up approach; (vi) the involvement of local authorities and representatives of different interest groups; and (vii) the stability and expertise of the different bodies working on biodiversity, which are based around the sites themselves. France received a Natura 2000 award in 2024 for the preservation of grazing areas in the Pyrenees ([38]).

However, the Natura 2000 network still faces the following gaps in France: (i) the lack of diversification of

([34]) SCIs are designated pursuant to the Habitats Directive, whereas SPAs are designated pursuant to the Birds Directive. Figures of coverage do not add up because some SCIs and SPAs overlap.

([35]) European Environment Agency (EEA), 'Number of habitats and species per Member State', Article 17 dashboard, Annex I total, 19 December 2019, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/general-information-on-habitats-and-species.

([36]) EEA, 'Number of bird species/populations per Member State', Article 12 dashboard, Annex I total, last updated 11 May 2023, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-12-national-summary-dashboards/general-information-on-bird-species-populations.

([37]) Eurostat dataset env_bio4, protected area percentage for 2022, accessed March 2025, https://ec.europa.eu/eurostat/databrowser/view/env_bio4/default/table?lang=en.

([38]) European Commission: https://environment.ec.europa.eu/news/grazing-preserve-natura-2000-habitats-and-species-pyrenees-example-france-and-spain-2024-03-14_en.

funding sources; (ii) the underuse of the financial instrument for the environment (LIFE) programme; and (iii) insufficient ecological connection between the sites. The implementation of the Natura 2000 network after the transfer in early 2024 of the management competences of terrestrial sites to the regions needs to be assessed.

France also does not do enough to prevent damage caused by agricultural, forestry and fishing practices (Article 6(2) of the Habitats Directive). The quality of the objectives and measures assigned to the sites is not always sufficient and tailored to the ecological needs of the designated habitats and species. This creates uncertainties when evaluating plans and projects under Article 6(3). Despite the setting up of a national working group on the cumulative effects of marine renewable energy projects, other projects of small dimension but that have a cumulated impact on Natura 2000 sites are at risk of infringing Article 6(3). Finally, some evidence suggests that compensation under Article 6(4) in France may not always be effective ([39]).

Considering the above explanation, there is still progress to be made despite efforts. In particular, the work underway on the Natura 2000 network at sea to strengthen the management of sites and develop fisheries risk analyses is too slow to complete the work by 2027.

2025 priority actions

- Complete the Natura 2000 site designation process.
- Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.

Recovery of species

One objective set by the BDS is that, by 2030, there should be no further deterioration in conservation trends or the status of any protected species. The BDS also states that Member States should ensure that at least 30 % of species not currently in favourable conservation status achieve that status or show progress towards doing so (e.g. by exhibiting positive population dynamics or stable or increasing range and habitat size), by 2030. According to the European Environment Agency (EEA), based on reporting required under Article 17 of the Habitats Directive, a quarter of species in the EU were of good conservation status as of 2018 ([40]).

One of the primary objectives of the Habitats Directive is the maintenance of or restoration to favourable conservation status of all species of community interest. Moreover, the Birds Directive also aims to ensure that all wild birds in the EU enjoy a secure status. In order to achieve these objectives, it will be necessary to address key pressures and threats. The Birds Directive and the Habitats Directive lay down a framework of species protection rules and rules on the conservation of habitats and species in order to combat these threats.

Under Article 17 of the Habitats Directive, Member States are required to report on the conservation status of habitats and species every six years. The current reporting cycle, covering the years 2019 to 2024, is due for submission in July 2025.

In this respect, France has established a species protection regime since 1976. It is characterized by a high number of protected species (more than 7,000 species are protected on all or part of the national territory), going far beyond the list of species protected by the “Birds” and “Habitats” directives. However, some species such as huntable species under the Bird Directive are not protected under the French national law.

In addition to this regulatory regime, France also establishes and implements more than 70 National Action Plans for the benefit of some species, for which conservation France has a particular responsibility.

However, France is one of the few Member States that still allow hunting birds with nets and, in this context, the Commission launched an infringement procedure in 2019 against France for its infringement of the Birds Directive ([41]) concerning several means of hunting. However, several means of hunting at issue in this infringement case are now prohibited in France, following judgments of the Court of Justice of the EU and the French supreme administrative court (Conseil d'Etat).

An infringement case was also launched in 2020 for France’s failure to correctly transpose and apply the Habitats Directive ([42]). France fails to protect marine species from becoming bycatch, that is, protected species such as dolphins, seals, birds or sea turtles being

([39]) See the annual reports of the Environmental Authority for 2022 and 2023 (https://www.igedd.developpement-durable.gouv.fr/le-rapport-annuel-2023-de-l-autorite-a3369.html); Weissgerber, M., Roturier, S., Julliard, R. et al., ‘Biodiversity offsetting: Certainty of the net loss but uncertainty of the net gain’, *Biological Conservation*, Vol. 237, 2019, pp. 200–208, https://doi.org/10.1016/j.biocon.2019.06.036; and Padilla, B., Gelot, S., Guette, A. et al., ‘La compensation écologique permet-elle vraiment de tendre vers l’absence de perte nette de biodiversité?’, *Cybergeo: European Journal of Geography*, 2024, online article, https://doi.org/10.4000/cybergeo.40826.

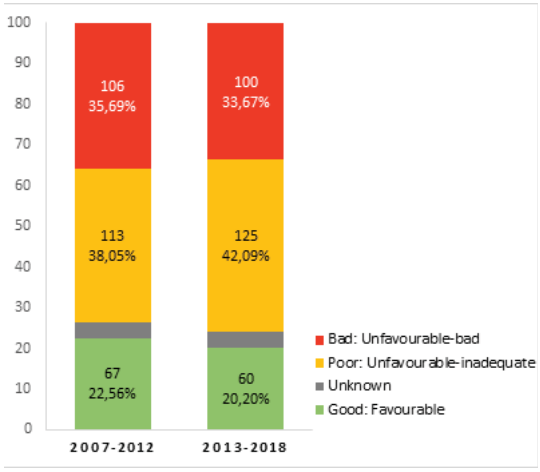
([40]) EEA, ‘Conservation status and trends of habitats and species’, Article 17 dashboard, last updated 22 August 2023 (19 December 2019), https://www.eea.europa.eu/en/analysis/maps-and-charts/conservation-status-and-trends-article-17-national-summary-dashboards-archived.

([41]) INFR(2019)2151; see the January 2023 infringements package (https://ec.europa.eu/commission/presscorner/detail/en/inf_23_142).

([42]) INFR(2020)4036.

incidentally captured in fishing gear. The case concerns the lack of bycatch monitoring and conservation measures but also the lack of provisions on Natura 2000 sites protection and on the surveillance of the conservation status of certain species. Finally, the procedure covers France's failure to correctly transpose some provisions of the Habitats Directive.

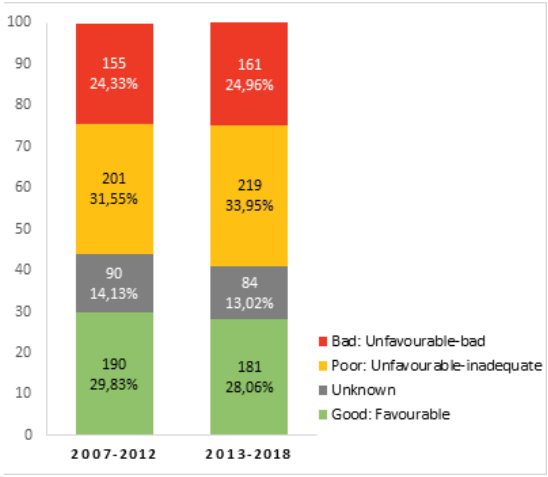
Figure 10: Assessments of conservation status of habitats for the 2007–2012 and 2013–2018 reporting periods



NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', Article 17 dashboard, 19 December 2019, https://www.eea.europa.eu/en/analysis/maps-and-charts/conservation-status-and-trends-article-17-national-summary-dashboards-archived.

Figure 11: Assessments of conservation status of species for the 2007–2012 and 2013–2018 reporting periods



NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', Article 17 dashboard, 19 December 2019, https://www.eea.europa.eu/en/analysis/maps-and-charts/conservation-status-and-trends-article-17-national-summary-dashboards-archived.

A priority action was mentioned in the 2022 EIR report relating to the protection of species, especially cetaceans, huntable birds and farmland birds, and large carnivores. Some implementation progress has been noticed.

2025 priority actions

- Strengthen the integration of biodiversity actions into other policies, e.g. energy, agriculture, fisheries, forestry, urban and infrastructure planning and sustainable tourism, and promote communication between stakeholders.
- Enhance efforts to collect reliable data on the conservation status of habitats and species as well as their occurrence at site level. In view of this, consider the creation of a body in charge of monitoring and reporting, to ensure that data are not provided only ad hoc on a contract basis.
- Reinforce action for habitats and species with unfavourable conservation status through, for example, restoration measures, increased connectivity, better policy coordination and integration and increased funding.

Recovery of ecosystems

Agricultural ecosystems

The BDS works alongside the common agricultural policy (CAP) to support the transition to sustainable agriculture.

The strategy has set five common agriculture-related targets for 2030, namely to:

— reduce by 50 % the overall use of – and risk from – chemical pesticides;
— reduce by 50 % the use of more hazardous pesticides;
— reduce by 50 % losses of nutrients from fertilisers (which will result in a 20 % reduction in the use of fertilisers) while ensuring that there is no deterioration of soil fertility;
— restore at least 10 % of agricultural area to have high-diversity landscape features; and
— increase the area under organic farming to at least 25 %.

The CAP and national CAP strategic plans that establish the framework for the transition to a sustainable agriculture are key instruments to facilitate and strengthen the efforts of European farmers to protect biodiversity and the environment at large. The Commission approved Member States' CAP strategic plans in 2022 for the programming period 2023-2027. The CAP is the largest source of funding

for the implementation of EU environment policy and strategic plans should lead to better protection of soil, water, air quality and biodiversity. The "Vision for agriculture and food", adopted by the European Commission in February 2025, sets a roadmap to an agri-food system that is attractive, competitive, sustainable and fair for current and future generations. To ensure a sustainable future for EU agriculture, it is crucial that these four priority areas are pursued together, and that public and private support are adequately targeted toward this objective([43]).

While certain CAP result indicators focus on interventions favouring sustainable agriculture practices that regenerate the ecosystems, the impact of these measures is difficult to assess. The uptake of the eco-schemes is voluntary for farmers.

The utilised agricultural area in France increased from 29 000 000 ha in 2012 to 29 101 000 ha in 2017 and decreased to 28 577 000 ha in 2023 ([44]).

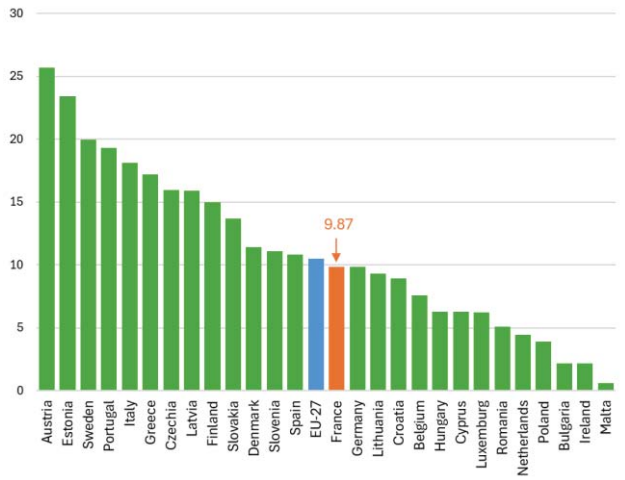
Landscape features are small fragments of non-productive and typically – but not exclusively – semi-natural vegetation present in or adjacent to agricultural land. They provide ecosystem services and support for biodiversity. The indicator 'share of agricultural land covered with landscape features' is the ratio between the area covered by landscape features and the area covered by agricultural land. Based on the Land Use/Cover Area Frame Survey landscape features estimates, the share of agricultural land covered by non-productive landscape features in France is 6.4 %, above the EU average of 5.6 %.

In 2024, the CAP basic regulations were amended ([45]) regarding, inter alia, the standards for good agricultural and environmental condition of land. These changes removed the obligation for farmers benefiting from CAP area-related support to have a minimum share of 3–4 % of non-productive area or landscape features in their farms. That said, the amended regulation does not remove the obligation under the GAEC 8 to maintain the existing landscape features and sets out an obligation for Member States to establish and provide support for eco-schemes covering practices for the maintenance of non-productive areas, such as land lying fallow, and for the establishment of new landscape features, on arable land.

The recently adopted Nature Restoration Regulation ([46]) focuses on the restoration of agricultural ecosystems and requires Member States to put in place measures that aim to achieve an increasing trend at the national level of at least two out of three indicators for agricultural ecosystems ([47]). One of these indicators is the 'share of agricultural land with high-diversity landscape features.

Organic farming practices are highly beneficial to biodiversity. As reported in Eurostats estimated data in figure 12, it is estimated that 9.87% of France's land area is under organic farming. The figure for 2023 reported by France is 10.4%([48]), close to the EU average of 10.50%([49]). France is not contributing enough to the target to have 25% of the EU's agricultural land under organic farming by 2030.

Figure 12: Share of total utilised agricultural area occupied by organic farming per Member State (%), 2022



Source: Eurostat, 'Area under organic farming', sdg_02_40, accessed 5 December 2024, https://ec.europa.eu/eurostat/databrowser/view/sdg_02_40/default/table?lang=en.

2025 priority actions

- Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of France.
- Implement and scale up the uptake of organic farming practices.

([43]) https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food_en

([44]) Eurostat, 'Area under organic farming', sdg_02_40, accessed 5 December 2024, Statistics | Eurostat

([45]) Regulation (EU) 2024/1468 of the European Parliament and of the Council of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendment of the CAP strategic plans, review of the CAP strategic plans and exemptions from controls and penalties (OJ L, 2024/1468, 24.5.2024), http://data.europa.eu/eli/reg/2024/1468/oj.

([46]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj.

([47]) The three indicators are 'grassland butterfly index', 'stock of organic carbon in cropland mineral soils' and 'share of agricultural land with high-diversity landscape features'.

([48]) Observatoire de la production bio - Agence Bio

([49]) Agriculture biologique au sein de l'union européenne (europa.eu)

Soil ecosystems

Soil is an essential, finite and extremely fragile resource. Its increasing degradation poses a threat to EU food security and climate resilience, adaptation and mitigation.

The EU soil strategy, adopted in November 2021, aims to support soil protection, sustainable soil management and the restoration of degraded soils to achieve the Green Deal objectives as well as land degradation neutrality by 2030.

This entails:
— preventing further soil degradation;
— making sustainable soil management the new normal;
— taking action for ecosystem restoration.

The proposed directive on soil monitoring and resilience ([50]) aims to introduce the first comprehensive legislation on the protection of all soils in the EU. Should the Directive be adopted, Member States will have to transpose it into national legislation and implement it, starting with putting in place the governance systems and a sound monitoring framework building on existing national soil monitoring frameworks. The objective of the proposed directive is to provide better and more comparable soil health data with the view of attaining healthy soils by 2050.

Degradation of soil ecosystems encompasses several aspects. The proposed directive requires Member States to assess soil health according to a set of common indicators and to define the necessary regeneration measures. The area of soil that is sealed is an important factor in monitoring land-use change and represents an important pressure on nature and biodiversity. Other soil issues related to land degradation are soil erosion, soil compaction, loss of soil organic carbon, soil contamination, soil salinisation and the presence in soil of nitrogen and phosphorus in excess. The impact assessment accompanying the proposal, which builds on the data available in the EU Soil Observatory, points to some soil degradation issues in France ([51]).

The greatest contributor to France's unhealthy soils is loss of soil organic carbon in mineral soils ([52]), which affects 18 % of the land. 16 % of the national territory experience unsustainable soil erosion by water, wind, tillage and harvest, representing 53 % of cropland area. A high concentration of nutrients in soils is also an important contributor, particularly in the northern and north-western regions, with 16 % of soils containing concentrations of nitrogen exceeding 50 kg/ha, and 10 % of soils containing concentrations of phosphorus exceeding 50 mg/kg.

Grasslands

Grasslands are among the most diverse ecosystems in the EU; they can contain as many as 80 different plant species per square metre and are home to a large variety of animals, ranging from small insects, birds and rodents to large herbivores. Grasslands are essential for agriculture and livestock herding. Natural grasslands also play an important role in storing carbon. However, changes in agricultural practices and land uses have caused grasslands to disappear at an alarming rate, making them one of Europe's most threatened ecosystems.

According to France's Article 17 reporting, 20.45 % of grassland habitats listed in Annex I of the Habitats Directive have a favourable conservation status. 59.60 % of habitats are reported to be affected by pressures from agriculture.

Wetlands/peatlands

Wetlands act as water sources and purifiers; they are the planet's greatest natural carbon stores and they are crucial to agriculture and fisheries. Peatlands are a special type of wetlands dominated by peat-forming plants such as *Sphagnum* mosses. Nearly all peatlands in the EU are habitat types listed in Annex I of the Habitats Directive. Drained peatlands under intensive agricultural use constitute only 3 % of the EU's utilised agricultural area. At the same time, they are responsible for 25 % of the GHG emissions from the EU's agricultural sector. Restoring peatlands brings multiple benefits, as peatlands improve water retention and quality, store carbon, reduce GHG emissions and increase biodiversity.

According to France's Article 17 reporting, only 3.57 % of the peatland habitat types listed in Annex I of the Habitats Directive have a favourable conservation status. France has set a target of restoring 50,000 hectares of wetlands by 2026, promoting protection of wetlands and creating two Ramsar sites a year[53].

([50]) Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), COM(2023) 416 final of 5 July 2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0416.

([51]) Commission staff working document – Impact assessment report: Annexes – Accompanying the proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), SWD(2023) 417 final of 5 July 2023, https://environment.ec.europa.eu/system/files/2023-07/IMPACT ASSESSMENT REPORT ANNEXES SWD 2023 417 part4.pdf.

([52]) De Rosa, D., Ballabio, C., Lugato, E. et al., 'Soil organic carbon stocks in European croplands and grasslands: How much have we lost in the past decade?', *Global Change Biology*, Vol. 30, No 1, 2023, e16992, https://doi.org/10.1111/gcb.16992.

([53]) https://www.ecologie.gouv.fr/sites/default/files/documents/plan_national_milieux_humides.pdf.

Forest ecosystems

Forests are important carbon sinks, and conserving them is vital if the EU is to achieve climate neutrality by 2050. The EU forest strategy for 2030, adopted in July 2021, is a plan of actions to promote the many services that forests provide. Its key objective is to ensure healthy, diverse and resilient EU forests that contribute significantly to the achievement of the EU's biodiversity and climate ambitions. About 27 % of the forest area in the EU is covered by habitat types listed in Annex I to the Habitats Directive. Moreover, forests host several species protected under the Birds and Habitats Directives, including those for which there is a requirement to designate Natura 2000 sites and to protect breeding sites and resting places.

Several Commission guidelines on forestry management were published in 2023. They cover biodiversity-friendly afforestation, reforestation and tree planting; closer-to-nature forest management; and defining, mapping, monitoring and strictly protecting primary and old-growth forests. Further guidance on payment schemes for ecosystems services has also been published.

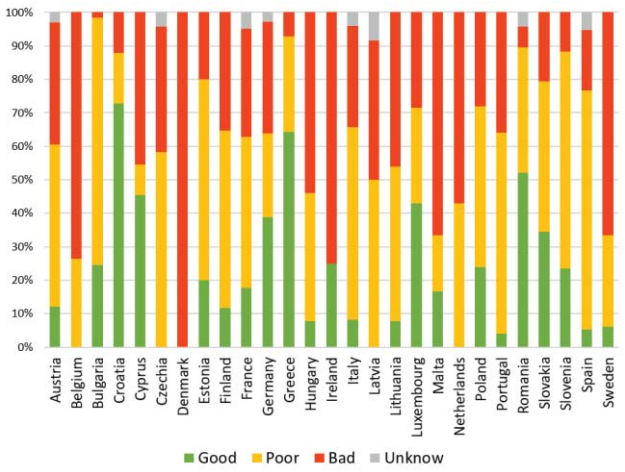
In 2023, the Commission proposed a new forest monitoring law ([54]) that aims to create a comprehensive forest knowledge base, address information gaps and enable a better response to growing pressures on forests.

Assessments show that, of the 27 % of EU forest area protected under the Habitats Directive, less than 15 % is of favourable conservation status. The share of forested areas in the EU with a bad conservation status increased from 27 % in 2015 to 31 % in 2018.

In 2020, forests covered 31.5 % of France's territory ([55]). According to France's Article 17 reporting, only 17.74 % of the forest habitat types listed in Annex I of the Habitats Directive have a favourable conservation status. 37 % of habitats assessed are being affected by pressures from forestry.

In December 2020, France launched a reforestation plan with the aim of planting 45 000 ha of trees, to increase carbon storage capacity and repopulate existing forests suffering from climate change impacts and biological degradation ([56]). The plan was supported by the EU Recovery and Resilience Facility (RRF). The French authorities eventually adapted the financial eligibility conditions of this plan to better integrate biodiversity provisions and limit the use of clear-cutting that were made in the initial stages of the plan. Furthermore, France adopted provisions to better articulate Habitats directive and forest fire protection system. Since 2021, France aims to plant 1 billion trees and renew 10% of its national forest area by 2032.

Figure 13: Conservation status of forests protected under the Habitats Directive per Member State (% of assessments), 2013–2018



Source: Commission staff working document – New EU forest strategy for 2030, SWD(2021) 652 final of 16 July 2021, p. 24, eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021SC0652.

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Among forest disturbances contributing to loss of forest integrity and related biodiversity loss, wildfires constitute a particular reason for concern. In 2022, the EU saw a record number (2 700) of wildfires affecting more than 30 ha, which led to the destruction of 785 605 ha of forest, the second highest annual figure recorded. Recent years have also witnessed the occurrence of widespread uncontrollable fires (so-called megafires), which are associated with loss of life and an enormous cost in terms of damage to the environment, businesses and society (over EUR 2 billion annually) and carbon dioxide (CO_2) emissions. Megafires are practically beyond suppression capacity and can be prevented only by an integrated risk management approach. Wildfires prevention is also essential to preserve resources for the bioeconomy.

The EU Timber Regulation (EUTR) ([57]) prohibits the placing on the EU market of illegally harvested timber.

([54]) Proposal for a Regulation of the European Parliament and of the Council on a monitoring framework for resilient European forests, COM(2023)728, 22 November 2023, https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2023)728&lang=en

([55]) EEA, forest information system for Europe, 'Countries – FISE country factsheets', forest information system for Europe website, https://forest.eea.europa.eu/countries.

([56]) https://agriculture.gouv.fr/francerelance-le-renouvellement-des-forets-francaises.

([57]) https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en.

On 29 June 2023, the Regulation on Deforestation-free Products (EUDR) entered into force ([58]). The regulation seeks to guarantee that products in the EU that are produced using any of a list of seven commodities have no links to deforestation. The EUDR repeals the EUTR.

Marine ecosystems

The Marine Strategy Framework Directive (MSFD) requires Member States to achieve good environmental status (GES) for their marine waters. To that end, Member States must draw up marine strategies for their marine waters and cooperate with other Member States sharing the same marine region or subregion. These marine strategies comprise different steps to be developed and implemented over six-year cycles.

Since the 2022 EIR report, no additional data regarding Member States' set of GES characteristics for each descriptor in the MSFD have become available. Nevertheless, Member States had to report updates by October 2024. These will be assessed by the Commission. In this context, in accordance with the MSFD and the Commission GES decision ([59]), Member States must include as part of their set of GES characteristics any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level ([60]).

The Commission assessed the updated monitoring programme reported by Member States in 2020. At that time their updates on the elements, features and parameters identified monitoring gaps. The Commission recommended that Member States should prioritise work to address those gaps at all levels of implementation of the MSFD.

Member States also reported their updated programmes of measures, which are required under Article 13 of the MSFD and which must be updated every six years. The Commission has assessed Member States' programmes of measures.

The adequacy of France's updated programme of measures is considered moderate or good for most descriptors, with D1 standing out as 'very good' in contrast to D5, which is rated 'poor'.

Additional measures for biodiversity (D1) are more targeted towards specific habitats and species, while for sea-floor integrity (D6), direct measures are proposed to tackle relevant pressures, including managing activities in specific habitats, regulating ship mooring and aiming for 'net zero artificialisation'.

Gaps remain, however, in particular for eutrophication (D5), for which no quantitative gap analysis is proposed, and underwater noise (D11), for which targeted measures addressing specific sources such as shipping and light are missing.

2025 priority action

- Report updates on the assessment of the state of France's marine waters, its targets and its determinations of GES ([61]), which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.

Prevention and management of invasive alien species

Invasive alien species (IAS) are a major cause of biodiversity loss in the EU. Besides inflicting direct and indirect damage on nature and the economy, some IAS also carry and spread infectious diseases, posing a threat to humans and wildlife. Regulation (EU) No 1143/2014 (the IAS Regulation) aims to prevent, minimise and mitigate the adverse impacts of IAS on biodiversity. It focuses action on a list of IAS of EU concern (the 'Union list'), which is regularly updated ([62]).

The third update of the Union list ([63]) entered into force on 2 August 2022. The fourth update is in preparation.

([58]) The law will apply to large and medium-sized companies starting on December 30, 2025, and to micro and small enterprises starting on June 30, 2026.

([59]) Commission Decision (EU) 2017/848 of 17 May 2017 laying down criteria and methodological standards on good environmental status of marine waters and specifications and standardised methods for monitoring and assessment, and repealing Decision 2010/477/EU (OJ L 125, 18.5.2017, p. 43), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017D0848.

([60]) Communication from the Commission of 11 March 2024 – Commission notice on the threshold values set under the Marine Strategy Framework Directive (Directive 2008/56/EC) and Commission Decision (EU) 2017/848 (OJ C, C/2024/2078, 11.3.2024), https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202402078.

([61]) In accordance with Article 17 of Directive 2008/56/EC.

([62]) Commission Implementing Regulation (EU) 2016/1141 of 13 July 2016 adopting a list of invasive alien species of Union concern pursuant to Regulation (EU) No 1143/2014 of the European Parliament and of the Council (OJ L 189, 14.7.2016, p. 4), as amended by Commission Implementing Regulations (EU) 2017/1263, (EU) 2019/1262 and (EU) 2022/1203, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R1141-20220802&from=EN.

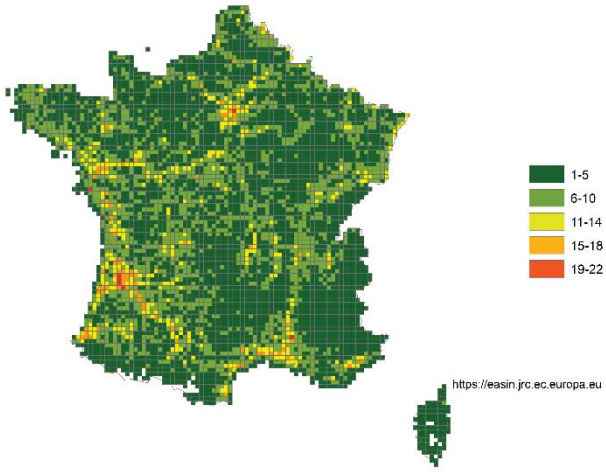
([63]) Commission Implementing Regulation (EU) 2022/1203 of 12 July 2022 amending Implementing Regulation (EU) 2016/1141 to update the list of invasive alien species of Union concern (OJ L 186, 13.7.2022, p. 10), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R1203.

The IAS Regulation ([64]) currently lists 88 species subject to restrictions on keeping, importing, selling, breeding, growing and releasing into the environment. Member States are required to take measures to (i) prevent the introduction of IAS, (ii) ensure early detection and rapid eradication of IAS and (iii) manage species that are already widespread on their territory. This aligns with target 6 of the GBF to reduce the introduction of IAS by at least 50 % by 2030 and minimise their impact.

Preventing the introduction and spread of IAS, and managing them, including through eradication and control, can result in a substantial cost saving. Studies estimate that the total cost of IAS in Europe (damages and management) amounted to EUR 116.61 billion between 1960 and 2020 ([65]). More recent studies have put this cost at USD 28 billion per year in the EU, increasing to USD 148.2 billion by 2040 ([66]), and at USD 423 billion annually at the global level ([67]).

The total number of IAS of EU concern in France is 60. This includes 44 species recorded in the previous EIR (2021) and 16 new additions. Of these new additions, 5 were already on the EU concern list in 2021, and 11 were added later under Commission Implementing Regulation (EU) 2022/1203.

Figure 14: Number of IAS of EU concern, based on available georeferenced information for France, 2024



Regarding the 2022 priority actions on IAS, France took the necessary steps to fully comply with the requirements specified in Article 13 of the IAS Regulation.

2025 priority action

- Step up implementation of the IAS Regulation, including with regard to enforcement and the capacity of inspection authorities.

Ecosystem assessment and accounting

The BDS calls on Member States to better integrate biodiversity considerations into public and business decision-making at all levels and to develop natural capital accounting.

Similarly, target 14 of the GBF ([68]) aims to ensure the full integration of biodiversity and its multiple values into policy and planning and, as appropriate, national accounting. This requires effective and coherent biodiversity observation and reporting on ecosystem condition in the EU ([69]).

([64]) Regulation (EU) No 1143/2014 of the European Parliament and of the Council of 22 October 2014 on the prevention and management of the introduction and spread of invasive alien species (OJ L 317, 4.11.2014, p. 35).

([65]) Haubrock, P. J., Turbelin, A. J., Cuthbert, R. N. et al., 'Economic costs of invasive alien species across Europe', *NeoBiota*, Vol. 63, 2021, pp. 153–190.

([66]) Henry, M., Leung, B., Cuthbert, R. N. et al., 'Unveiling the hidden economic toll of biological invasions in the European Union', *Environmental Sciences Europe*, Vol. 35, No 1, 2023, p. 43.

([67]) IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services), *Summary for Policymakers – Invasive alien species assessment*, 2023, https://www.ipbes.net/document-library-catalogue/summary-policymakers-invasive-alien-species-assessment.

([68]) Decision 15/4 adopted by the Conference of the Parties to the Convention on Biological Diversity: Kunming–Montreal global biodiversity framework (https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf).

([69]) European Commission: Joint Research Centre and EEA, *EU Ecosystem Assessment – Summary for policymakers*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/81ff1498-b91d-11eb-8aca-01aa75ed71a1/language-en.

The amended regulation (EU) No 691/2011 on European environmental economic accounts ([70]) introduces new requirements for Member States to report on the condition of ecosystems including urban ecosystems, croplands, grasslands, forest and woodlands, coastal beaches, dunes and wetlands. Data reported by the Member States will feed into the second European ecosystem assessment, due in 2027, and can also be used to support policy decisions.

An increasing number of platforms, networks and communities of practice involve businesses in protecting biodiversity, including the EU Business & Biodiversity Platform ([71]). These platforms and communities are key tools for promoting and facilitating natural capital assessments among businesses and financial services providers.

Natural capital assessments help private businesses to better understand both the negative and positive impacts that they have on nature, and to appreciate how nature contributes to their success. Such understanding contributes to the implementation of the EU's BDS.

Three French business networks are members of the EU Business & Biodiversity Platform. A specific business and biodiversity network was founded in October 2024 in the context of the Conference of the Parties of the Convention on Biological Diversity.

Due to the lack of data, the assessment of the 2022 priority actions related to the mapping and assessment of ecosystems and the development of business and biodiversity platforms is not possible.

([70]) Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) No 691/2011 as regards introducing new environmental economic accounts modules, COM(2022) 329 final of 11 July 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:329:FIN.

([71]) The EU Business & Biodiversity Platform (https://green-business.ec.europa.eu/business-and-biodiversity_en) aims to promote the business case for biodiversity to businesses and financial institutions through workshops, seminars, reports and a cross-media communication strategy.

3. Zero pollution

Clean air

EU clean air policies and legislation have successfully reduced emissions of key air pollutants and significantly improved air quality, which is now moving towards the levels recommended by the World Health Organization (WHO). This has resulted in clear health benefits and reduced adverse impacts on ecosystems and biodiversity. However, to achieve the WHO-recommended levels, more efforts are needed, including full compliance with EU legislation. To guide these efforts, the EU zero pollution action plan sets targets for 2030 relative to 2005. These are to reduce the health impacts of air pollution by 55 % and to reduce the EU ecosystems threatened by air pollution by 25 %.

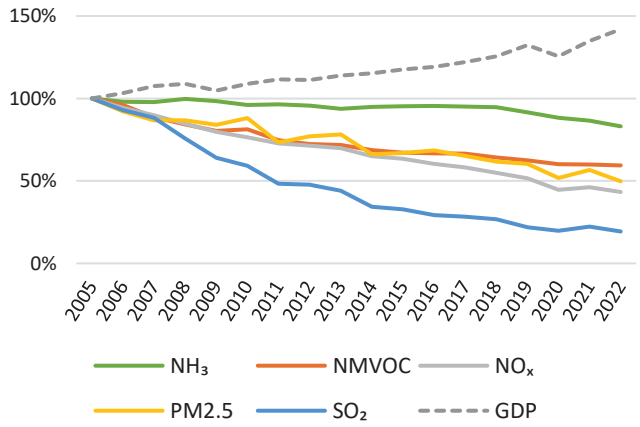
The EU has developed a comprehensive suite of air quality policies ([72]). These set health-based EU air quality standards ([73]) and stipulate Member States' national emission reduction commitments for several air pollutants ([74]).

The air quality in some parts of France continues to cause concern, as underlined by Santé Publique France[75].

The latest available annual estimates (for 2022) by the EEA ([76]) for France attribute 20 700 deaths each year (or 214 200 years of life lost (YLL)) to fine particulate matter ($PM_{2.5}$) ([77]); 5 000 deaths each year (or 51 300 YLL) to nitrogen dioxide (NO_2) ([78]); and 9 000 deaths each year (or 94 100 YLL) to ozone ([79]).

The emissions of several air pollutants have decreased significantly in France since 2005, while GDP growth has continued (see Figure 15). According to the inventories submitted under Article 10(2) of the National Emission Reduction Commitments Directive (NECD) ([80]) in 2024, France has met its emission reduction commitments for 2020–2029 for air pollutants nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOC), sulphur dioxide (SO_2), ammonia (NH_3) and $PM_{2.5}$. According to the latest projections submitted under Article 10(2) of the NECD, France is projected to meet its emission reduction commitments for 2030 onwards NO_x, NMVOC, SO_2, NH_3 and $PM_{2.5}$.

Figure 15: Emission trends of main pollutants / GDP in France (%), 2005–2022



Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

([72]) European Commission, 'Air', European Commission website, https://environment.ec.europa.eu/topics/air_en.

([73]) European Commission, 'EU air quality standards', European Commission website, https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en.

([74]) European Commission, 'Reducing emissions of air pollutants', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants_en.

75 https://www.statistiques.developpement-durable.gouv.fr/la-pollution-de-lair-exterieur-en-france-synthese-des-connaissances-en-2024.

([76]) EEA, *Harm to human health from air pollution in Europe: Burden of disease 2024*, briefing No 21/2024, Copenhagen, 2024, https://www.eea.europa.eu/en/analysis/publications/harm-to-human-health-from-air-pollution-2024.

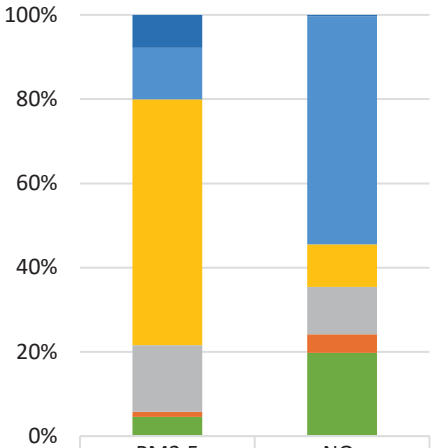
([77]) Particulate matter (PM) is a mixture of aerosol particles (solid and liquid) covering a wide range of sizes and chemical compositions. PM_{10} refers to particles with a diameter of 10 µm or less. $PM_{2.5}$ refers to particles with a diameter of 2.5 µm or less. PM is emitted from many human sources, including combustion

([78]) Nitrogen dioxide (NO_2) here pertains to a group of gases called NO_x, which also comprises nitrogen monoxide (NO). NO_x is emitted during fuel combustion – for example, from industrial facilities and the road transport sector.

([79]) Low-level ozone is produced by photochemical action on pollution. This year, for the first time, the impact of long-term exposure to ozone has also been taken into account. In previous analysis by the EEA, only the impact of short-term exposure was estimated.

([80]) Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (OJ L 344, 17.12.2016, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.344.01.0001.01.ENG.

Figure 16: $PM_{2.5}$ and NO_x emissions by sector in France (%), 2022



	PM2.5	NO_x
Waste	7,85%	0,38%
Transport	12,21%	54,10%
Residential, commercial & institutional	58,38%	10,13%
Manufacturing and extractive industry	15,81%	11,23%
Energy supply	1,15%	4,40%
Agriculture	4,60%	19,76%

Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

In 2023, exceedances above the limit values set by the Ambient Air Quality Directive (AAQD) ([81]) were registered for NO_2 in three air quality zones ([82]) and for PM_{10} in two air quality zones ([83]) in France. Furthermore, the target values for ozone concentrations have not been met for several air quality zones, and neither have the target values for nickel concentrations in one air quality zone ([84]).

Persistent breaches of air quality requirements, which have severe negative effects on health and the environment, are being followed up by the European Commission through infringement procedures covering all Member States concerned, including France. The CJEU has delivered two judgments confirming non-compliance with Directive 2008/50/EC, in 2019 for exceedances of NO_2 limit values and in 2022 for exceedances of PM_{10} limit values ([85]). Appropriate measures should be put in place to bring all air quality zones into compliance as soon as possible.

In the 2022 EIR, France received three priority actions in this area. The first priority action was to further reduce emissions in the context of national air pollution control programme (NAPCP), which was updated and submitted to the Commission in May 2023. France has made substantial progress on this, as the latest reported data show that the 2020–2029 emission reduction commitments have been met and that the emission reduction commitments for 2030 onwards are projected to be reached. The second priority action was to ensure full compliance with EU air quality standards and maintain downward emission trends. Based on the latest data, France has made some progress in this regard. S²ince 2019, downward emission trends have been reported for all main pollutants. However, exceedances above limit values and target values remain for NO_2, PM_{10}, ozone and nickel. The third priority action received by France was to ratify the amended Gothenburg Protocol, which was fulfilled in December 2021.

2025 priority actions

- As part of the NAPCP, take action to reduce emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.

Industrial emissions

The main objectives of EU policy on industrial emissions are to:

(i) protect air, water and soil and to prevent harmful effects on human health and the environment;
(ii) prevent and manage waste;
(iii) improve energy and resource efficiency, including water;
(iv) contribute to decarbonisation.

The cornerstone of the policy is the Industrial Emissions Directive (IED), which was revised in 2024 ([86]). The revision

([81]) Directive 2008/50/EU of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe (OJ L 152, 11.6.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050.
([82]) Paris, Montpellier, Lyon.
([83]) Mayotte and Marseille-Aix.
([84]) European Environment Agency, Eionet Central Data Repository (https://cdr.eionet.europa.eu/).
([85]) Judgment of 24 October 2019, *European Commission* v *French Republic*, C-636/18, EU:C:2019:900; Judgment of 28 April 2022, *European Commission* v *French Republic*, C-286/21, C:2022:319.
([86]) Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17), as amended by Directive (EU) 2024/1785 of the European Parliament and of the Council of 24 April 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20240804&qid=1725983863299.

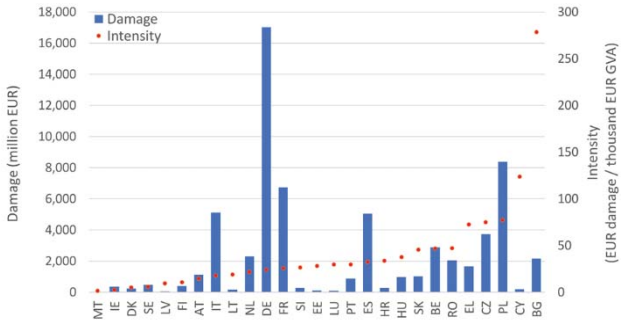
improves the directive's contribution to the zero pollution objective. It has a strong focus on innovation, and builds solid links between depollution, decarbonisation and circularity, making it a key regulatory tool to accompany the green transformation of EU industry by 2050.

The overview of industrial activities regulated by the IED below is based on data reported to the EU Registry in 2022 ([87]).

In France, there were about 7 000 installations covered by the IED in 2022, almost half of them (48 %) being installations for intensive rearing of poultry or pigs. The other main sectors are the waste management sector (16 %), the food and drink industry (12 %), the metals sector (9 %) and the chemicals sector (6 %).

Figure 17 shows the damage to health and the environment due to the main industrial air pollutants. As this depends on, among other factors, the size of the industrial sector in each Member State, the figure also shows the ratio between the damage and the industrial activity (expressed in gross value added (GVA)), which gives an indication of the emissions 'intensity'. Although France has the third highest damage in the EU, it comes 16th for emissions intensity, below the EU average of EUR 27.5/EUR 1 000 GVA. The main industrial contributors to emissions to air ([88]) are the energy sector and the mineral sector for nitric oxide (NO_X) emissions, the waste management and chemical industries for dust emissions, and the energy sector, the metals sector and the mineral sector for sulphur dioxide (SO_2) and heavy metals.

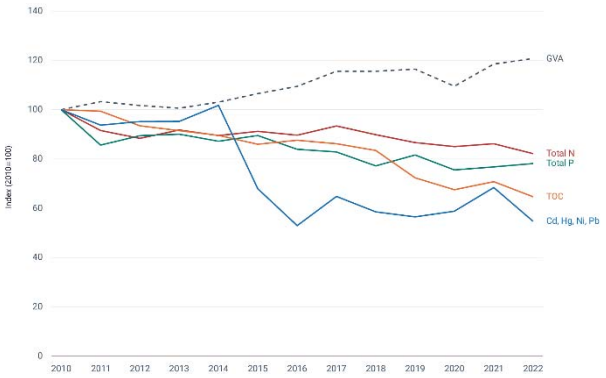
Figure 17: Industrial air pollution damage and intensity per Member State, 2021



Source: EEA, 'Industrial pollution intensity indicators – EU large industry air pollution damage costs intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

Overall, the industrial emissions to water in the EU have decreased over time for all the main pollutants. On average in the EU, they appear to be decoupled from the industrial activity, which has increased over the same period (expressed in GVA), as shown in Figure 18.

Figure 18: Industrial releases of pollutants to water and industrial activity in the EU-27



NB: Cd, cadmium; Hg, mercury; Ni, nickel; Pb, lead; total N, total nitrogen; total P, total phosphorous.

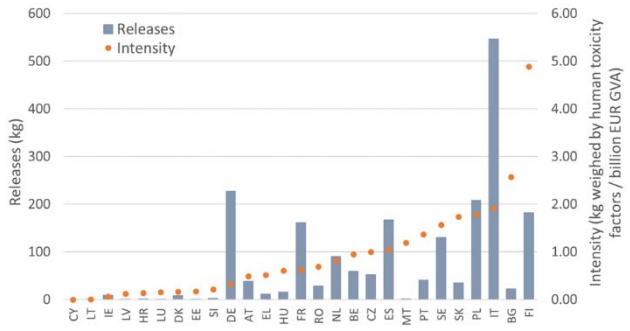
Source: EEA, 'Industrial pollutant releases to water in Europe', 30 May 2024, https://www.eea.europa.eu/en/analysis/indicators/industrial-pollutant-releases-to-water.

Concerning France in particular, Figure 19 shows the industrial emissions of heavy metals to water, taking into account the human toxicity of each metal, as well as the emissions intensity, based on its ratio with the industrial activity (expressed in GVA). France has the sixth highest amount of emissions of heavy metals to water, and is in 14th position for emissions intensity (below the EU average intensity of 0.864 kg/EUR 1 billion GVA). As shown in Figure 20, the main industrial contributors to emissions to water in France are the chemicals sector for heavy metals, nitrogen and total organic carbon, the pulp and paper industry for phosphorus, and the metal production and processing sector for polycyclic aromatic hydrocarbons.

([87]) EEA, European Industrial Emissions Portal, https://industry.eea.europa.eu/, 2022 being the baseline year for all reports.

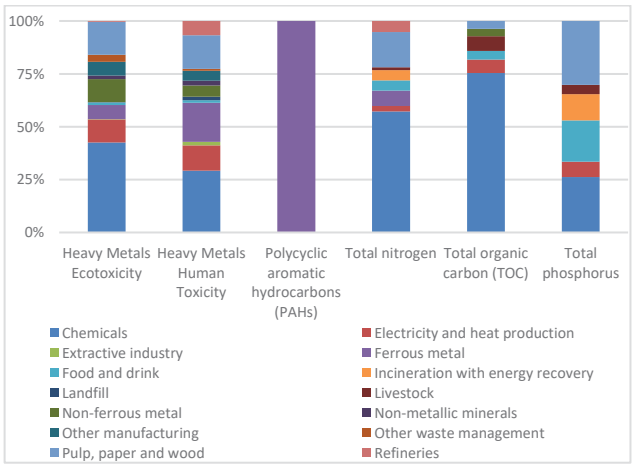
([88]) European Environment Agency, LRTAP, Air pollutant emissions data viewer (Gothenburg Protocol, LRTAP Convention) 1990-2022, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollutant-emissions-data-viewer-1990-2022.

Figure 19: Industrial releases and intensity of heavy metals to water per Member State, 2022



Source: EEA, 'Industrial pollution intensity indicators – EU large industry water pollution intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

Figure 20: Relative releases to water from industry in France (%), 2022



Source: EEA, 'Industrial reporting under the Industrial Emissions Directive 2010/75/EU and European Pollutant Release and Transfer Register Regulation (EC) No 166/2006 – ver. 12.0 Sep. 2024 (tabular data)', EEA Geospatial Data Catalogue, 13 September 2024, https://doi.org/10.2909/cf5e54c1-be99-4426-bcad-baa26c4f27a0.

France launched in 2023 a campaign measuring per- and polyfluoroalkyl substances (PFAS) in emissions to water from industrial installations, as part of a wider PFAS action plan ([89]).

IED provisions on public information and participation require Member States to adopt transposition legislation enabling members of the public to have access to relevant information and participate in the approval process for potentially polluting installations. Thus, the public and non-governmental organisations (NGOs), alongside competent authorities, play a role in ensuring compliance of these permits with EU legislation. The IED contains mandatory requirements on environmental inspections, requiring a site visit to take place at least every one to three years, using risk-based criteria. In addition, IED enforcement provisions require Member States to determine effective, proportionate, and dissuasive penalties applicable to infringements of IED-based national provisions. In the revised directive, the provisions set that worst infringements can be sanctioned by fines of at least 3% of the annual EU turnover of the legal person. The revised IED also introduces a right to compensation for people whose health has been harmed by such infringements.

The development of best available techniques (BATs), BAT reference documents and BAT conclusions ensures effective collaboration between stakeholders and enables better implementation of the IED.

Since the 2022 EIR, the Commission has adopted BAT conclusions on (i) ferrous metal processing, (ii) the textiles industry, (iii) common waste gas management and treatment systems in the chemical sector and (iv) smitheries and foundries.

The Commission relies on the efforts of national competent authorities to implement the legally binding BAT conclusions and associated BAT emission levels in environmental permits. This should result in considerable and continuous reductions in pollution.

In 2022, France received priority actions to address pollution from metal production and processing. Data are not yet available to assess progress on this priority action. Two installations in this sector in France were among the top 30 emitters of air pollutants in 2021 ([90]). The Commission adopted new BAT conclusions for ferrous metal processing in 2022 and will start the revision of the BAT conclusions for iron and steel production in 2026.

2025 priority actions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely updates to permits following the publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation to the IED.

([89]) https://presse.economie.gouv.fr/plan-dactions-interministeriel-sur-les-pfas/.

([90]) EEA, *The costs to health and the environment from industrial air pollution in Europe – 2024 update*, briefing No 24/2024, Copenhagen, 2024, https://www.eea.europa.eu/publications/the-cost-to-health-and-the.

Major industrial accidents prevention – Seveso

The main objectives of EU policy on the prevention of major industrial accidents are to:

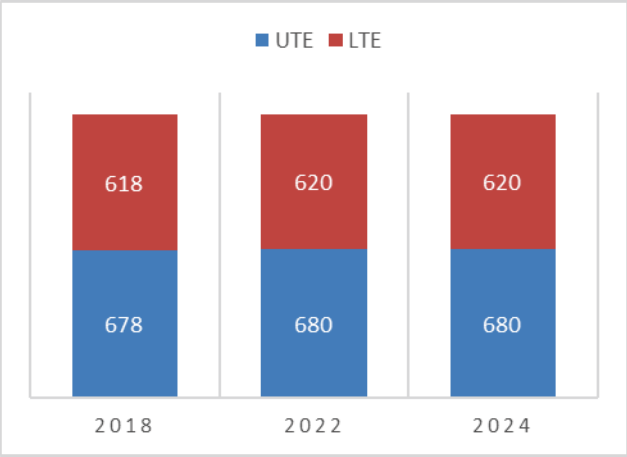
(i) control major-accident hazards involving dangerous substances, especially chemicals;
(ii) limit the consequences of such accidents for human health and the environment;
(iii) continuously improve the prevention of, preparedness for and response to major accidents.

The cornerstone of the policy is Directive 2012/18/EU (the Seveso III Directive ([91]).

The overview below of industrial plants regulated by the Seveso III Directive ('Seveso establishments') is based on data reported on eSPIRS (e-Seveso Plants Information Retrieval System) for 2022–2024 ([92]) and the report by France on the implementation of the Seveso III Directive for 2019–2022.

In France, in September 2024, of the 1 300 Seveso establishments, 620 were lower-tier establishments and 680 were upper-tier establishments (UTEs), with more stringent requirements proportionate to the risks they represent (e.g. the obligation to produce a safety report and emergency plans, and more frequent inspections).

Figure 21: Number of Seveso establishments in France, 2018, 2022 and 2024

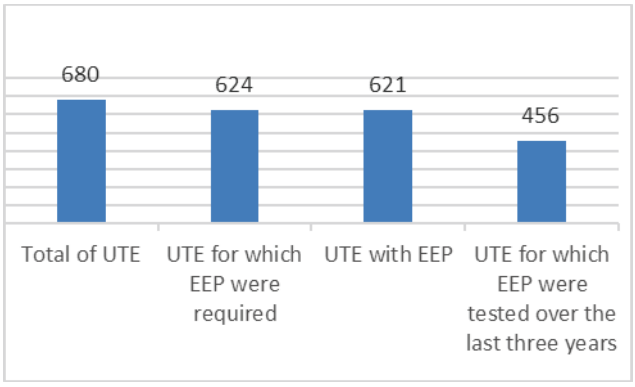


NB: LTE, lower-tier establishment.

Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en

Member States are required to draw up external emergency plans (EEPs) for UTEs. These EEPs are essential to allow proper preparation and effective implementation of the actions necessary to protect the environment and the population should a major industrial accident occur. According to France own figures, in 2022, an EEP was required for 630 UTEs, out of 686 in total.

Figure 22: Situation regarding EEPs in France, 2022



Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en

The following types of information are permanently available for all the Seveso UTEs in France: (i) information for the public referred to in Annex V to the Seveso III Directive, especially about how the public concerned will be warned if there is a major accident; (ii) information about appropriate behaviour in the event of a major accident; and (iii) the date of the last site visit.

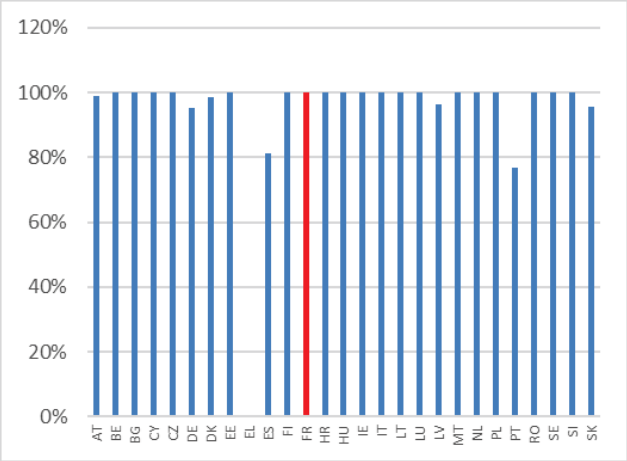
The shares of UTEs for which information on safety measures and requisite behaviours was actively made available to the public in 2022 in the EU-27 are presented in Figure 23. This provision on knowledge is an important provision of the Seveso III Directive, as awareness by the

([91]) Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (OJ L 197, 24.7.2012, p. 1), https://eur-lex.europa.eu/eli/dir/2012/18/oj.

([92]) https://espirs.jrc.ec.europa.eu/en/espirs/content; data extracted in September 2024.

public of this information may ameliorate the consequences of a major industrial accident.

Figure 23: Share of UTEs for which information on safety measures and requisite behaviours was actively made available to the public per Member State (%), 2022



NB: No data available for Greece.

Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en.

The conformity of how the Seveso III Directive was turned into national legislation in France has been assessed, and there is currently an ongoing infringement case on citizens' rights to access information and to participate in decision-making.

In 2022, France received a priority action to strengthen monitoring and enforcement to ensure compliance with Seveso III Directive rules, especially on EEPs and information to the public. Data reported on the implementation of the directive for 2019–2022 show an improvement in the number of EEPs established for UTEs in France.

2025 priority actions

- Ensure access to transparent and clear information for citizens on risks and behaviour in the event of an accident.
- Ensure full and correct transposition of the Seveso III Directive.

Mercury Regulation

The Mercury Regulation establishes measures and conditions concerning the use and storage of and trade in mercury, mercury compounds and mixtures of mercury, the manufacture and use of and trade in mercury-added products and the management of mercury waste, in order to ensure a high level of protection of human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds. The revision of the Mercury Regulation adopted in 2024 sets out rules to address the last intentional uses of mercury in the EU by phasing out the use of dental amalgam by 1 January 2025 except when deemed strictly necessary by the dental practitioner based on the specific medical needs of the patient, and prohibiting the manufacture and export of additional mercury-containing lamps from 1 January 2026 or 1 January 2027 (depending on the lamp category).

In France, French Guiana is the only territory where gold mining is a concern. An order prohibiting the use of mercury was issued on 8 June 2004, considering the risks of contamination of ecosystems by mercury and its consequences on the health of populations and workers. Consequently, the use of mercury for gold mining in French Guiana has been prohibited since 1 January 2006. However, illegal gold panning persists in French Guiana and mercury is frequently used in this process. The region set up a specific administrative and judicial police operation, called Harpie, dedicated to the fight against this activity in 2008. The main field of action of this operation consists of destroying the production tools of illegal gold miners. However, despite its effective implementation through interministerial cooperation and cooperation with the armed forces, Harpie makes it possible only to reduce the development of new sites, not to eradicate the activity as such. According to 2024 information, there were 600 illegal gold mining sites in 2010, and 300 in 2024, with the number staying relatively stable for the last three years ([93]).

To implement the Mercury Regulation, France has had to regulate all industries using large amounts of mercury. In mainland France, the main sector to address was the chloralkali industry, which used mercury catalysts but has now switched to a new process. Chloralkali facilities are all classified as Seveso establishments in French regulations and are regularly visited by environmental inspectors. Of the last three facilities using mercury, two changed their process and one closed in 2017. The three plants sent the

([93]) https://www.gendarmerie.interieur.gouv.fr/gendinfo/sur-le-terrain/immersion/2024/lutte-contre-l-orpaillage-illegal-en-guyane-quel-bilan.

remaining mercury to Batrec, Switzerland, in 2017, 2018 and 2019. The quantities in 2018 and 2019 totalled less than 50 t.

In 2019, 25 % of the dental treatments in France were still using dental amalgam. It is important to quicky put in place the necessary measures, such as an adequate reimbursement of the alternatives to dental amalgam through the health insurance scheme and the training of dental practitioners, to ensure a socially and economically sound phase-out. France also needs to ensure that the manufacture and export of mercury-containing lamps are prohibited by the deadlines set out in the Mercury Regulation.

2025 priority action

- Take effective action against illegal gold mining in French Guiana.

Noise

The Environmental Noise Directive ([94]) requires a common approach to avoid, prevent and reduce the harmful effects of noise. The designated authorities are responsible for making and approving noise maps and action plans for agglomerations, major roads, major railways and major airports. Member States decide on noise limits that are not set at the EU level. Nevertheless, the zero pollution action plan sets as a 2030 target a 30 % reduction compared with 2017 in the share of people chronically disturbed by transport noise.

Excessive noise from aircraft, railways and roads is one of the main causes of environmental health-related issues in the EU. It can cause ischaemic heart disease, stroke, interrupted sleep, cognitive impairment and stress ([95]).

In France, environmental noise is estimated to cause at least around 6 500 cases of ischaemic heart disease annually ([96]) and some 854 000 people to suffer from disturbed sleep([97]).

Based on the latest set of information analysed, France has completed its noise mapping of roads, railways and airports, but its noise mapping of agglomerations remains incomplete.

Action plans for noise management for agglomerations, roads, railways and airports must be updated and submitted to the Commission every five years. The deadline for reporting noise action plans under the most recent reporting cycle was 18 January 2025; these plans have not been assessed yet.

In July 2024, the Commission decided to refer France to the CJEU for failure to comply with the requirements of the Noise Directive, in particular with regard to missing action plans for agglomerations and major roads ([98]).

France received a priority action in the 2022 EIR to complete and/or implement action plans on noise management. Given that reporting under the most recent reporting cycle for noise action plans was due in early 2025, these plans have not yet been assessed. Therefore, this priority action has been repeated for the 2025 EIR and another one on noise mapping has been added.

2025 priority actions

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

EU legislation and policy requires that the impact of pressures on transitional waters, coastal waters and fresh water (including surface waters and groundwater) be significantly reduced. Achieving, maintaining or enhancing a good status of waterbodies as defined by the Water Framework Directive will ensure that EU citizens and the environment benefit from good-quality and safe drinking and bathing water. It will further ensure that the nutrient cycle (nitrogen and phosphorus) is managed in a more sustainable and resource-efficient way.

([94]) Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise – Declaration by the Commission in the Conciliation Committee on the directive relating to the assessment and management of environmental noise (OJ L 189, 18.7.2002, p. 12), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32002L0049.

([95]) WHO, *Environmental Noise Guidelines for the European Region*, Copenhagen, 2018, https://www.who.int/europe/publications/i/item/9789289053563.

([96]) These figures are an estimation by the EEA based on (i) the data reported by Member States on noise exposure covered by Directive 2002/49/EC for the round of noise mapping of 2022; (ii) European Topic Centre on Air Pollution, Transport, Noise and Industrial Pollution (ETC/ATNI), *Noise Indicators under the Environmental Noise Directive 2021: Methodology for estimating missing data*, Eionet report ETC/ATNI No 2021/06, Kjeller, 2021; and (iii) the methodology for health impact calculations in European Topic Centre on Air Pollution and Climate Change Mitigation (ETC/ACM), *Implications of environmental noise on health and wellbeing in Europe*, Eionet report ETC/ACM No 2018/10, Bilthoven, 2018, https://www.eionet.europa.eu/etcs/etc-atni/products/etc-atni-reports/eionet_rep_etcacm_2018_10_healthimplicationsnoise.

([97]) More information on the adverse health effects of noise pollution is available at: https://www.eea.europa.eu/themes/human/noise/noise-2

([98]) INFR(2013)2006; see also the press release about the decision (https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3741).

Water Framework Directive

The Water Framework Directive ([99]) is the cornerstone of EU water policy in the 21st century ([100]). The Water Framework Directive and other water-related directives ([101]) form the basis of sustainable and integrated water management in the EU. They aim to achieve a high level of protection of water resources, prevention of further deterioration and restoration to good status. These objectives are very important for the EU's competitiveness, strategic autonomy and security, yet have become even more challenging in the face of climate change affecting our precious water resources.

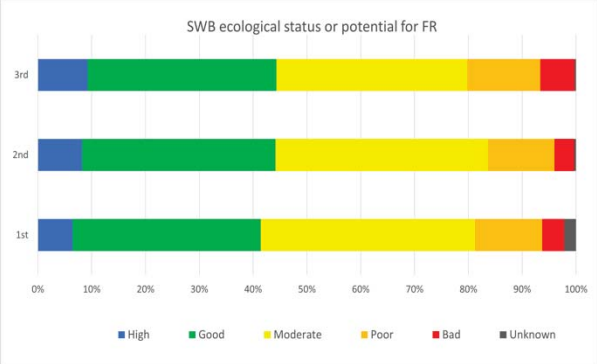
The Water Framework Directive establishes a procedural framework for reaching good surface water ecological and chemical status and good groundwater quantitative and chemical status. This implies monitoring and classification of all waterbodies, assessment of pressures and impacts and identification of the most cost-effective measures to achieve the objectives of the directive. The directive dates from 2000 and set an initial deadline of 2015 for achieving its objectives, with the option to extend the deadline to the end of 2027. Every six years, Member States must report their river basin management plans (RBMPs) to the Commission. They should cover river basin districts in their countries, some of which may be shared with other countries. The Commission has assessed the third cycle of RBMPs, which were to be submitted by March 2022, and reported its findings to the European Parliament and to the Council on 4th February 2025[102].

France's 14 river basin districts count 11 406 surface waterbodies plus 689 groundwater bodies. 7 % of all surface waterbodies are heavily modified, and for lakes this percentage is 68 %. 2 % of surface waterbodies are artificial, with lakes again having the biggest proportion (15 %).

Figures 24 to 27 show the change in ecological status/potential and chemical status of surface waters, and the quantitative and chemical status of groundwater in 2010, 2015 and 2021. Heavily modified and artificial waterbodies must reach good ecological potential rather than good ecological status, which means that all measures must be taken to mitigate the adverse impact of the sustainable human development activities causing the waterbody to be heavily modified / artificial, while not significantly affecting these activities.

It follows from the assessment of the third RBMPs that the ecological status/potential of surface waterbodies in France has slightly deteriorated since the second RBMPs, with 43.6 % in good or high ecological status/potential. This small decrease from 44.2 % in the second RBMPs is due to improved monitoring in French Guiana, which is home to 8 % of all surface waterbodies. 68 % of all surface waterbodies have good chemical status, when uPBT are included.

Figure 24: Ecological status/potential of surface waterbodies (SWB) in each RBMP cycle (%)



Hydromorphological pressures affect 65 % of French waterbodies and are therefore the most significant type of pressure. Pressures result from flood protection, hydropower, transport, urban development or other uses. Diffuse pollution affects 56% of surface water bodies, among which 41% relate to pesticides and nutrient diffuse pollution from agriculture.

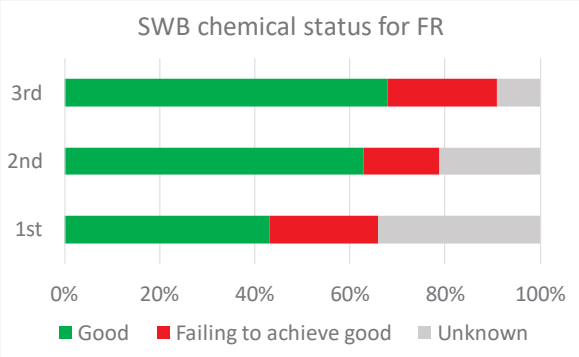
([99]) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060.

([100]) https://environment.ec.europa.eu/topics/water_en.

([101]) These include the Groundwater Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0118), the Environmental Quality Standards Directive (https://eur-lex.europa.eu/eli/dir/2008/105/oj), the Floods Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32007L0060), the Bathing Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0007), the Urban Wastewater Treatment Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31991L0271), the new Drinking Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020L2184), the Nitrates Directive (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A31991L0676), the Marine Strategy Framework Directive (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32008L0056) and the IED (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010L0075).

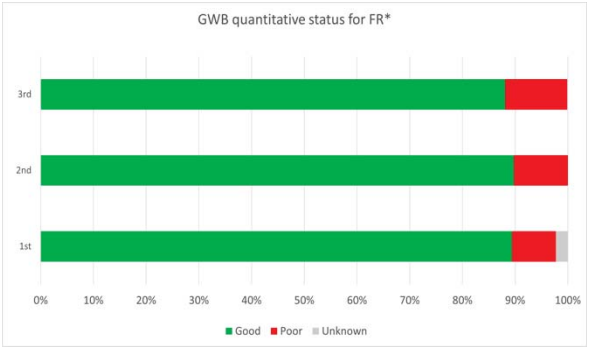
102 https://webgate.ec.europa.eu/circabc-ewpp/ui/group/c04f478b-d4dc-44f9-a211-087c01165b2c/library/faada4be-9fc3-4a48-b972-f71e356019d5?p=1&n=10&sort=modified_DESC.

Figure 25: Chemical status of surface waterbodies in each RBMP cycle (%)



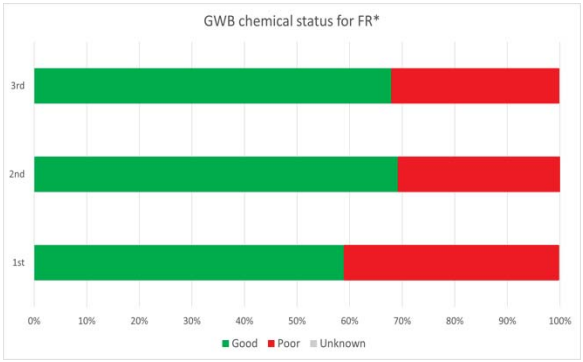
Failure to achieve good chemical status (in 32 % of surface waterbodies)[103] is mainly attributed to polycyclic aromatic hydrocarbons (PAHs), mercury and perfluorooctanesulfonic acid. PAHs are caused by various kinds of combustion processes and affect more than 70 % of the waterbodies. Two pesticides, namely isoproturon and cypermethrin, also cause failure to achieve good chemical status.

Figure 26: Quantitative status of groundwater bodies (GWB) in each RBMP cycle (%)



11.9 % of groundwater bodies have poor quantitative status. For at least 10.6 %, this is for reasons of abstractions exceeding the available groundwater resource. The situation has slightly deteriorated since the second RBMPs, partly because of improved monitoring and consideration of groundwater-dependent ecosystems. A recent increase (mainly for irrigation purposes) in the construction of off-stream reservoirs, which are filled with groundwater in the winter, may impact the quantitative status of groundwater, especially as the replenishment is structurally decreasing as a result of climate change.

Figure 27: Chemical status of groundwater bodies in each RBMP cycle (%)



The top five pollutants causing failure to achieve good chemical status are pesticides and their relevant metabolites, nitrates, chloride, ammonium, total trichloroethylene and tetrachloroethylene, and phosphate. Nitrates, pesticides and electrical conductivity show sustained upward trends. This shows that the pressures from agriculture are sustained.

Until the end of 2027, Member States can still apply time-related exemptions, subject to providing evidence of compliance with the strict criteria set out in the Water Framework Directive. After 2027, the possibilities for applying exemptions will be much more limited.

The 2022 EIR had identified the following priority actions.

- Assess new physical modifications to waterbodies in line with Article 4(7) of the Water Framework Directive.
- Improve the quality of water, in particular water that has been polluted by nitrates in groundwater from agriculture.

France has made some progress, and a positive note is that the third RBMPs provide both basic measures and supplementary measures. There are measures addressing a large number of individual substances to reduce pressures from industrial and wastewater discharges. 10 % of agricultural land is used for organic farming and France intends to double this to 18 % by 2027 with CAP support. After the extreme long drought of 2022, France adopted the water plan (the “Plan Eau”), with 53 measures to reduce water use in all sectors. In particular, measures to increase water efficiency were taken by the 50 biggest industrial sites. Intelligence is also being actively considered by the French authorities and debated with stakeholders on options to reduce water demand[104] over the 2050 horizon.

103 Surface waters chemical status | WISE Freshwater, corrected with Guiana

104 France Stratégie explore les futurs possibles de la demande en eau : La demande en eau - Prospective territorialisée à l’horizon 2050 | France stratégie

2025 priority actions

Without prejudice to the list of recommended actions in the Commission report to the European Parliament and to the Council on the assessment of the third RBMPs, the following priority actions can be highlighted:

- Improve river continuity and ecological flows, boosting efforts on nature-based solutions to reduce hydromorphological pressures
- Ensure periodic reviews of permits for discharges, abstractions and other water uses, including hydropower pressures
- Reduce pollution from nutrients, chemicals, metals and saline discharges
- Better justify exemptions to the achievement of good status
- Improve the classification of water bodies and strengthen monitoring systems
- Develop more robust programmes of measures, tackle obstacles identified in the implementation of measures and ensure adequate financing for implementation, including through better use of the cost recovery and polluter pays principle

Floods Directive

Every six years, following the same reporting cycle as the RBMPs, all Member States also report their flood risk management plans (FRMPs), based on the flood hazard and risk maps and the preliminary flood risk assessments drawn up during the second cycle (2016–2021).

The Commission assessed the FRMPs and reported its findings to the European Parliament and to the Council on 4th February 2025, together with the assessment of the RBMPs.

The second FRMPs have improved insofar as they clearly assess the impacts of flood risk management measures on the environment, including natural/protected areas. They also outline measures to address the expected effects of climate change on the likelihood and potential adverse consequences of flooding.

2025 priority actions

- FRMPs should provide details on how the FHRMs were used in the choice of measures and how to consider pluvial flooding
- Better explain the choice and implementation of flood prevention and protection measures (prioritisation, monitoring, costs of measures)
- Improve public consultation and stakeholder involvement.

Drinking Water Directive

The objectives of the directive are to protect human health by ensuring the quality intended for human consumption, and to improve access to drinking water.

The recast Drinking Water Directive is now applicable, and Member States were required to transpose its provisions into their national legal systems by 12 January 2023. France has communicated its transposition measures to the Commission within the deadlines set by the directive. Since the entry into force of the recast directive, the Commission has adopted several delegated and implementing acts establishing (i) a watch list of substances and compounds of concern for drinking water ([105]), (ii) a methodology for measuring microplastics in drinking water ([106]) and (iii) an EU system for testing and approving materials that will be allowed to be in contact with drinking water ([107]). Member States will have to take these various Commission acts into account when implementing the recast directive. The recast Drinking Water Directive also introduces a risk-based approach to water safety, which covers the entire supply chain, from the river basin to extraction, treatment, storage and distribution. Assessments based on this approach must be reviewed periodically, in particular to address threats posed by extreme weather phenomena linked to climate change, known variations in human activities in the extraction area, or accidents affecting the source.

Finally, the Commission has now received data from Member States on the quality of drinking water supplied by large water suppliers in 2017–2019. In summary, the compliance for all parameter groups in France was at least 99.63 % in 2017, 99.64 % in 2018 and 99.67 % in 2019.

([105]) https://environment.ec.europa.eu/publications/implementing-decision-drinking-water-directive-watch-list_en.

([106]) Commission Delegated Decision (EU) 2024/1441 of 11 March 2024 supplementing Directive (EU) 2020/2184 of the European Parliament and of the Council by laying down a methodology to measure microplastics in water intended for human consumption (notified under document C(2024) 1459) (OJ L, 2024/1441, 21.5.2024), http://data.europa.eu/eli/dec_del/2024/1441/oj.

([107]) OJ L, 2024/365, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/365/oj; OJ L, 2024/367, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/367/oj; OJ L, 2024/369, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/369/oj; OJ L, 2024/368, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/368/oj; OJ L, 2024/370, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/370/oj; OJ L, 2024/371, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/371/oj; see the Commission web page on all six delegated acts for more information (https://environment.ec.europa.eu/publications/delegated-acts-drinking-water-directive_en).

In July 2024, the Commission decided to refer France to the CJEU for failure to comply with the requirements of the Drinking Water Directive, in particular with regard to exceedances of nitrates in drinking water ([108]).

From January 2026, the European quality standards for per- and polyfluoroalkyl substances in drinking water will apply, ensuring harmonised Member States' reporting of per- and polyfluoroalkyl substances monitoring data in the future. On 12th February 2025, France adopted a national law aiming at protecting the population against these substances[109].

2025 priority action

- Take action to ensure full compliance with the Drinking Water Directive.

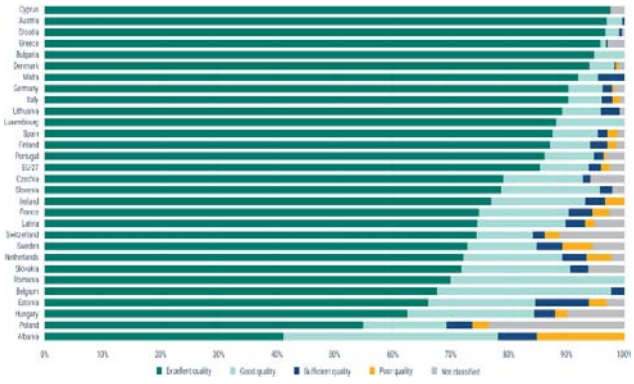
Bathing Water Directive

The Bathing Water Directive requires Member States to monitor and assess bathing water. It requires that, during the bathing season, Member States disseminate to the public information on bathing water quality actively and promptly. In particular, notices banning or advising against bathing should be rapidly and easily identifiable.

In 2023, out of the 3 361 French bathing waters, 2 517 (74.9 %) were of excellent quality, 521 (15.5 %) were of good quality and 137 (4.1 %) were of sufficient quality, while 99 (2.9 %) were of poor quality and 87 (2.6 %) were not classified.

Detailed information on bathing waters is available from a national portal ([110]) and through an interactive map of the EEA ([111]).

Figure 28: Bathing water quality per Member State, Albania and Switzerland (%), 2023



Source: EEA and European Topic Centre on Inland, Coastal and Marine Waters, 'European bathing water quality in 2020', 20 April 2023, https://discomap.eea.europa.eu/bathingwaterstory/.

Nitrates Directive

The Nitrates Directive ([112]) aims to protect water quality across Europe by preventing nitrates from agricultural sources that can pollute groundwater and surface waters and by promoting the use of good farming practices. The latest Commission report on the implementation of the Nitrates Directive ([113]), dating back to 2021, warns that nitrates are still causing harmful pollution to water in the EU. Excessive nitrates in water are harmful to both human health and ecosystems, causing oxygen depletion and eutrophication. Cleaning of waters by national authorities or farmers, where it has been undertaken, has had a positive impact on the drinking water supply and on biodiversity. It has also benefited the sectors – such as fisheries and tourism – that depend on biodiversity and on a good supply of drinking water. Nevertheless, excessive fertilisation remains a problem in many parts of the EU, including France.

The analysis of France's RBMPs has identified nutrients from agriculture as an important pressure on groundwater / surface waters that is affecting these waters' good status and as one of the main factors in not meeting the Water Framework Directive objectives.

Since the report on the implementation of the Nitrates Directive covering 2020–2023 will be available in 2025, the 2022 priority action cannot be assessed and has to be repeated.

2025 priority action

- Tackle nutrient pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive.

Urban Wastewater Treatment Directive

The Urban Wastewater Treatment Directive (UWWTD) aims to protect human health and the environment from the effects of untreated urban waste water. It therefore requires Member States to collect and treat (secondary or biological treatment) waste water in all urban areas of more than 2 000 people, and to apply a more stringent treatment than secondary, with nitrogen and/or phosphorus removal, to the waste water generated in urban areas, also known as agglomerations, of more than

([108]) INFR(2020)2273; see also the press release about the decision (https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3742).

109 Texte de la commission, n° 929-A0 - 17e législature - Assemblée nationale

([110]) https://baignades.sante.gouv.fr/baignades/homeMap.do.

([111]) EEA, 'State of bathing water', EEA website, 2024, https://www.eea.europa.eu/en/topics/in-depth/bathing-water/state-of-bathing-water.

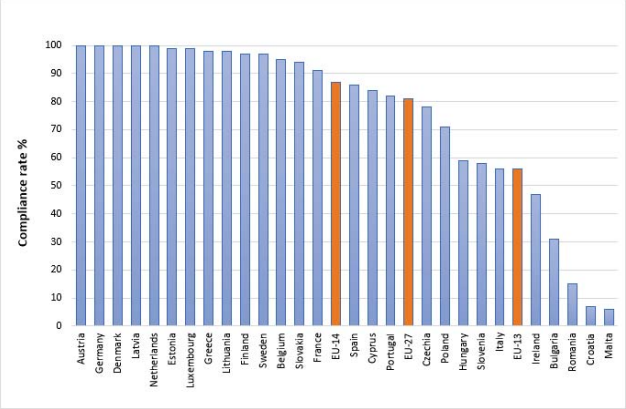
([112]) https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561542776070&uri=CELEX:01991L0676-20081211.

([113]) https://environment.ec.europa.eu/topics/water/nitrates_en.

10 000 people, before they are discharged into waters and their catchments, when they are sensitive to nitrogen and/or phosphorus (i.e. eutrophic or tending to become eutrophic).

Overall, in France, the compliance rate was 91 % in 2020; 498 agglomerations, generating 6 337,540 population equivalent of urban waste water, did not comply with the requirements of the directive.

Figure 29: Proportion of urban waste water that fully complies with the UWWTD (%), 2020



Source: European Commission: 12th technical assessment of UWWTD implementation - Publications Office of the EU

In October 2024, the CJEU criticised France for failure to correctly implement in 78 agglomerations the treatment and monitoring obligations of the UWWTD. It is essential that France take the necessary measures to fully comply with the requirements of the directive.

This is all the more important as the directive has been revised ([114]). The revised directive builds on the current *acquis*, strengthens existing treatment standards and establishes a new additional treatment of micropollutants in urban wastewater. Other new requirements relate to moving towards the energy neutrality of the sector, establishing an EPR system to ensure sustainable financing of micropollutant treatment by the most polluting industries and ensuring access to sanitation, especially for vulnerable and marginalised groups. France has until 31 July 2027 to transpose the new directive into its national legal system.

Despite some progress made, France has not fully implemented the UWWTD, and the 2022 priority action is repeated.

2025 priority action

- Take the necessary measures to ensure full implementation of the current UWWTD, taking into account the new requirements of the recast directive.

Chemicals

The EU seeks to ensure that chemicals are produced and used in a way that minimises any significant adverse effects on human health and the environment. In October 2020, the Commission published its chemicals strategy for sustainability towards a toxic-free environment ([115]), which led to some systemic changes in EU chemicals legislation. The strategy is part of the EU's zero pollution ambition – a key commitment of the European Green Deal.

The EU's chemicals legislation ([116]) provides a baseline protection for human health and the environment. It also ensures stability and predictability for businesses operating in the internal market.

Since 2007, the Commission has gathered information on the enforcement of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation and the Classification, Labelling and Packaging (CLP) Regulation. In December 2020, the Commission assessed the Member States' reports ([117]) on the

([114]) Directive (EU) 2024/3019 of the European Parliament and of the Council of 27 November 2024 concerning urban wastewater treatment (OJ L, 2024/3019, 12.12.2024), http://data.europa.eu/eli/dir/2024/3019/oj.

([115]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Chemicals strategy for sustainability: Towards a toxic-free environment, COM(2020) 667 final of 14 October 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A667%3AFIN; Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://publications.europa.eu/resource/cellar/c6b6a31d-8359-11ee-99ba-01aa75ed71a1.0004.02/DOC_2.

([116]) Namely, Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the registration, evaluation, authorisation and restriction of chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30/12/2006, p. 1), https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32006R1907; and Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1272-20221217.

([117]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

implementation and enforcement of these regulations ([118]). It is apparent from the Commission's report that there are still many disparities in the implementation of the REACH and CLP Regulations, notably in the area of law enforcement. Recorded compliance levels in Member States, generally quite stable over time, appear to be getting slightly worse. This may be because: (i) enforcement authorities are becoming more effective in detecting non-compliant products/companies; and (ii) more non-compliant products are being placed on the EU market.

In August 2021, the Commission published a measurable assessment of the enforcement ([119]) of the two main EU regulations on chemicals using a set of indicators on different aspects of enforcement. Since 2021, the list of chemicals subject to restrictions has been expanded as new entries have been added to Annex XVII to the REACH Regulation ([120]).

In 2023, new hazard classes were added to the CLP Regulation, and the revision of the regulation was tabled (published on 20 November 2024) ([121]). The new hazard classes cover endocrine disruptors and persistence-related hazards while the revision of the regulation encompasses new rules on online sales to better tackle non-compliances observed over the years. Also in 2023, the Conference of the Parties of the Stockholm Convention (COP) decided to include, in its Annex A (which lists banned substances), three new chemicals ([122]). The Commission is working on the delegated acts to include these substances in Annex I to the Persistent Organic Pollutants Regulation by 2025 at the latest.

Authorities responsible for checking compliance with the REACH and CLP Regulations have not changed since 2022.

France has devised and fully implemented enforcement strategies for both the REACH and CLP Regulations ([123]), with the following features, which have been overall stable since 2022:

- Each national enforcement authority develops its own strategy, but in a coordinated manner leading to the adoption of a shared yearly strategy for the enforcement of chemicals.
- Water Exploitation Index Plus strategies can be on REACH-EN-FORCE or pilot projects.
- Annual planning is utilised, and strategies are revised based on an annual evaluation.
- Since 2016, 5 % of inspections of classified industrial sites have included a chemical products check, and an objective of 200 specialised inspections has been consistently applied. These inspections cover all aspects of the supply chain (registration, authorisation, restrictions and information dissemination). The regional coordinators responsible for chemicals legislation meet three times a year to share good practices at the national level.

The Member States' reporting exercise set out in Article 117 of the REACH Regulation and Article 46 of the CLP Regulation is conducted every five years. The results of the coming one are expected in 2025, hence the absence of new country-specific data on enforcement since 2022.

In France, among the 1 568 inspectors ([124]) from the Ministry of Ecological Transition in charge of overseeing classified industrial sites, 20 specialised inspectors are allocated specifically to the enforcement of the REACH and CLP Regulations ([125]). Most REACH checks are proactive ones (i.e. conducted in the framework of planned inspections) rather than reactive/non-routine ones (i.e. investigations following complaints, accidents and referrals).

([118]) In line with Article 117(1) of the REACH Regulation and Article 46(2) of the CLP Regulation.

([119]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *REACH and CLP Enforcement: EU-level enforcement indicators*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/e5c3e461-0f85-11ec-9151-01aa75ed71a1/.

([120]) These are substances in tattoo inks and permanent make-up, N,N-dimethylformamide, formaldehyde (and formaldehyde releasers), lead in PVC (polyvinyl chloride), siloxanes (D4, D5, D6) and, finally, microplastics.

([121]) Regulation (EU) 2024/2865 of the European Parliament and of the Council of 23 October 2024 amending Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, OJ L, 2024/2865, 20.11.2024, p.1 (Regulation - EU - 2024/2865 - EN - EUR-Lex)

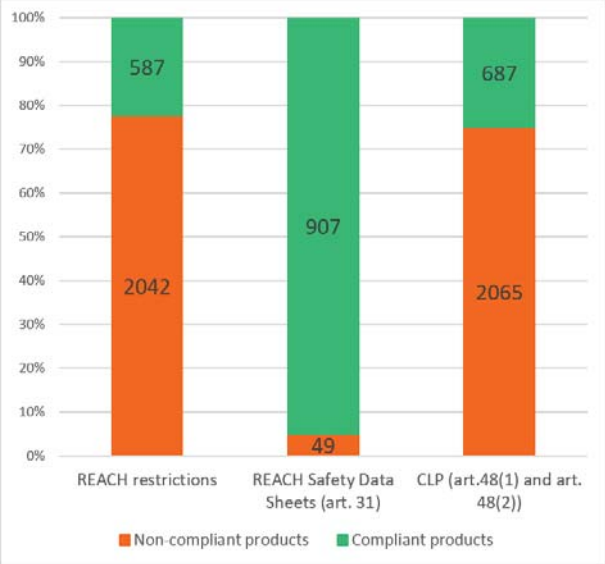
([122]) These are methoxychlor, dechlorane plus and UV-328. In the case of the pesticide methoxychlor, there are no exemptions from the ban. However, for the two plastic additives, dechlorane plus and UV-328, the COP decision lists some time-limited specific exemptions.

([123]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, p. 76, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

([124]) https://www.ecologie.gouv.fr/sites/default/files/documents/Bilan_ICPE_2023_perspectives_2024.pdf.

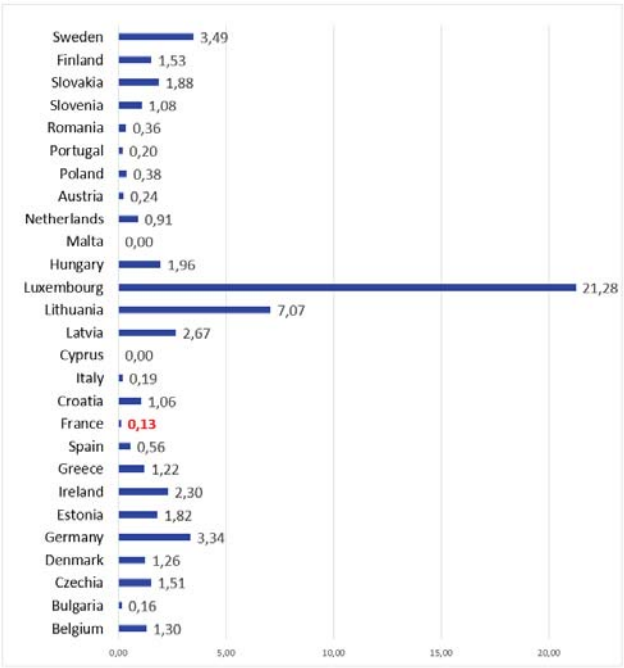
([125]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, p. 74, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

Figure 30: Compliance of imported products – results of the REF-8 project (%)



A risk approach was used for the targeting of control measures in order to maximise the chances of identifying non-compliance. Therefore, the non-compliance rates presented above cannot be considered the average non-compliance rates of products in the EU. However, the proportion of non-compliance cases found in the REF-8 project are of concern.

Figure 31: Number of REF-8 checks performed per 100 000 inhabitants (EU average = 1.24)



France participated to a small extent in the REF-8 coordinated enforcement project. Online sales have been proved to correspond consistently to higher non-compliance rates in checks performed across the EU, in particular when related to imported products.

In 2022, France received a priority action related to upgrading administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance. In the absence of reporting since 2022, no progress has been shown and this priority action remains valid in 2025, partly because of the experience with the REF-8 project.

2025 priority actions

- Upgrade the administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REF projects.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislation.

4. Climate action

The impacts of climate change have continued to increase in recent years, inflicting damage and suffering in the EU and around the world. Globally, 2023 was the hottest year on record, while Europe has been warming twice as quickly as the global average, and is now the fastest-warming continent. The frequency and severity of extreme climate events are also increasing. Against this backdrop, the EU has demonstrated its determination to implement the European Green Deal and to become climate neutral and resilient by 2050, ensuring sustainable competitiveness and supporting EU industry in the net-zero transition. The European Climate Law is the EU's response to the need for action. It sets the objective of achieving climate neutrality by 2050 and a midterm target of a reduction in GHG emissions of at least 55 % by 2030, and outlines the adaptation efforts necessary to adjust to climate change's present and future impacts. Almost all the 'Fit for 55' proposals set out in the European Green Deal have been agreed in law, and the European Commission recommended a new intermediate climate target of a 90 % reduction in emissions by 2040. In 2024, the Member States submitted updated national energy and climate plans for 2021–2030, reflecting the increased ambition of the revised EU legislation. In 2024, the European Commission also released, jointly with the EEA, the first-ever European climate risk assessment.

Over the last three decades, since 1990, the EU has achieved steady decreases in its emissions, reaching a running total in 2022 of – 32.5 % ([126]). However, the EU and its Member States need to step up their implementation efforts and accelerate emissions reduction to stay on track to reach their targets of a 55 % reduction in net GHG emissions by 2030 and climate neutrality by 2050. Between 1990 and 2022, net GHG emissions of France by 28%, making it one of the countries with below-average decrease.

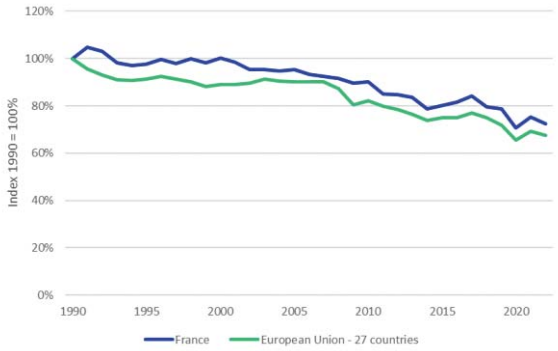
The 'Fit for 55' legislative package reflects the need to speed up the green transition. It includes (i) strengthening and expanding the EU emissions trading system (ETS), with the creation of a new, second, ETS for transport and buildings together with a dedicated Social Climate Fund to help citizens during the transition; (ii) increasing targets under the effort sharing regulation; and (iii) a revised regulation for Land Use, Land Use Change and Forestry ([127]). The package has been fully adopted, and the Member States have been implementing the legislation.

The key strategic document at country level is the National Energy and Climate Plan (NECP) ([128]). France submitted its updated plan in July 2024 after the deadline set by the regulation. The European Commission assessed the final plan and the extent to which France has followed the recommendations for the draft version. The findings from the assessment are:

- Emissions under the Effort Sharing Regulation will decrease by 46% in 2030 compared to 2005, and France will have to use flexibilities to meet its target of 48%.
- The latest projections show a gap to the LULUCF target, meaning that current levels of removals have been insufficient.
- France has a gap towards the target for the share of renewable energy.
- France is in line with its energy efficiency targets.

To minimise the impacts of climate policies on vulnerable people and sectors, France is using the Just Transition Fund and will use Social Climate Fund from 2026. (for more information, see Chapter 5 Finance).

Figure 32: Total GHG emissions (excluding international aviation) (%), 1990–2022



The EU emissions trading system

The EU ETS is the key tool for reducing GHG emissions cost-effectively across all Member States. It is the world's biggest carbon market, covering around 40% of the EU's total GHG emissions from electricity and heat generation, the manufacturing industry, aviation within Europe ([129]) and, from 2024, maritime transport also.

([126]) EU net domestic emissions, including the land use, land-use change and forestry (LULUCF) sector and excluding international aviation.

([127]) A full overview of the Fit for 55 package is available at https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/delivering-european-green-deal/fit-55-delivering-proposals_en.

([128]) More information about NECP is on the dedicated website https://energy.ec.europa.eu/topics/energy-strategy/national-energy-and-climate-plans-necps_en

([129]) Flights between the EU Member States including departing flights to Norway, Iceland, Switzerland and the United Kingdom.

The system sets a limit or cap on the total amount of GHGs that can be emitted at the EU level. Within this limit, companies buy emissions allowances (one allowance gives the right to emit 1 tonne of CO_2 eq (carbon dioxide equivalent)), in auctions or through trading allowances with others. The cap is reduced annually to ensure that overall emissions in the sectors covered decrease over time.

The emissions under the ETS decreased by 52% from 2005 to 2023.

In 2023, power generation in France caused 24 % of all ETS-covered emissions, less than half the EU average share (57 %). Of the total greenhouse gas emissions from all industry sectors, 26 % came from the metals industry, 20 % from cement and lime production, 19 % from the chemical industry, and 15 % from refineries. A diverse group of other industries accounted for 20 % of France's industry greenhouse gas emissions. Between 2019 and 2023, France reduced greenhouse gas emissions of its ETS installations by 27 %. This is composed by a 25 % greenhouse gas emissions reduction in the power sector and an 32 % reduction in the industry sectors. In the decade up until 2022, France's emissions reduction rate reached an early peak, with a 12 % reduction between 2013 and 2014.

From 2027, a new emissions trading system, called ETS2, for buildings, road transport and additional sectors, (mainly industry not covered by the current ETS) will become fully operational ([130]). Member States should have notified full transposition the provisions of the revised EU ETS directive related to the new ETS2 into national law by 30 June 2024. France did not communicate full transposition into national law by this deadline. The Commission therefore launched an infringement procedure against France on 25 July 2024, by sending a letter of formal notice for failing to fully transpose the provisions into national law.

The Commission launched infringement procedures against France on 25 January 2024, for failing to fully transpose previous revisions of ETS directive ([131]) into national law ([132]). France has since notified full transpositions of the abovementioned directives to the Commission.

Effort sharing

The Effort Sharing Regulation (ESR) ([133]) covers GHG emissions from domestic transport (excluding CO_2 emissions from aviation), buildings, agriculture, small industry and waste. Emissions from these sectors account for around 60 % of the EU's domestic emissions. The regulation sets the EU-wide target to reduce emissions from the effort sharing sectors by 40 % by 2030 compared to 2005 levels. This overall target for the EU translates to binding national emission reduction targets for each Member State. France's target is – 47.5%.

In addition to the 2030 targets, Member States have annual GHG emissions limits (annual emission allocations), reducing every year until 2030.

There is some flexibility to take account of annual fluctuations in emissions, by trading emissions and transfers from the ETS and LULUCF.

Based on historical emissions and the most updated projections France is on track to achieve its 2030 ESR target. Nevertheless, excess of emissions in the LULUCF sector automatically tightens ESR annual emission limits in 2021–2025 ([134]). Based on available data, France may struggle to stay within these limits each year in this period.

The projected gap is 1.1 percentage point to its 2030 target.

The largest contributor is the domestic transport sector, which accounted for 40 % of all effort sharing emissions in 2022. The shift to sustainable transport is starting to gain ground in France. Cars are used for 85 % of distances travelled, close to the EU average of 87.5 %. At 9 %, the share of rail passenger transport is the highest in the EU. For freight, however, road is the dominant form of transport at 85 %, with only 10 % of freight transported by rail (against the EU average share of 75 % to 16 %). 59 % of the rail network is electrified which is slightly above EU average (56 %). The share of battery electric cars in the passenger car fleet has been increasing rapidly, reaching 1.7 % in 2022 (EU average: 1.2 %). In 2023, France had 118 000 publicly accessible charging points, or one for every 10 electric vehicles, in line with the EU average.

The buildings sector is a significant concern for France. In 2022, buildings accounted for 21 % of total effort sharing emissions and France needs to step up its efforts in the residential sector to achieve a meaningful contribution to its 2030 reduction target for energy consumption by buildings. While total emissions of buildings decreased by 26 % between 2015 and 2022, final energy consumption in the residential sector increased by 2.8 % in the same period. The national long term renovation strategy envisages a 22 % reduction of buildings' energy consumption by 2030 compared to 2015.

([130]) Directive (EU) 2023/959 (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2023.130.01.0134.01.ENG)

([131]) Directive - 2023/959 - EN - EUR-Lex and Directive - 2023/958 - EN - EUR-Lex

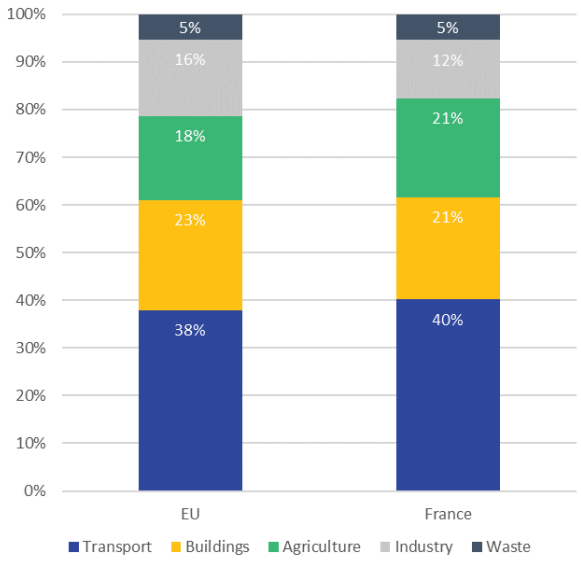
([132]) Case INFR(2024)0061.

([133]) Regulation (EU) 2018/842 (https://eur-lex.europa.eu/eli/reg/2018/842).

([134]) See article 9(2) of Effort Sharing Regulation Regulation - 2018/842 - EN - EUR-Lex

Emissions in agriculture decreased by 14 % from 2005 and the pace sped up in recent years. Now, France has to ensure that all measures are implemented and there are no policies that could compromise reaching the objectives set for 2030 (for example, long-standing tax refund for fuel used in agriculture).

Figure 33: Effort-sharing emissions by sector (%), 2022



Land use, land-use change and forestry

The LULUCF sector plays a significant role in achieving the EU's climate neutrality goal. In the EU, this sector absorbs more GHGs than it emits, removing significant volumes of carbon from the atmosphere. Thus, it is the only sector with negative emissions.

France increased its LULUCF net carbon sink between 1990 and 2008, after which it plateaued and then in 2013 it went into sharp decline in a worrying trend.

France's target for 2030 is to enhance land removals by additional – 6.7 Mt of CO_2 equivalent compared to the yearly average of the period 2016–2018. The latest available projections show a gap to target of 13.4 Mt of CO_2 equivalent in 2030. Therefore, France needs to apply additional measures to reach its 2030 target.

Adaptation to climate change

Halting all greenhouse gas emissions would still not prevent climate impacts that are already occurring. Therefore, adaptation to climate change is also a key component of climate policy.

France has all three regions identified as a hotspots of climate risks most affected by climate change – Southern Europe, low-lying coastal regions and outermost regions ([135]).

Water management is a key challenge regarding adaptation to climate change in France, also given the risk of electricity disruption to hydro- and nuclear energy provision as floods, heat and drought have an impact on energy production. France's climate protection gap remains low thanks to a high share of insurance coverage across risk categories, though half of France's forests are estimated to be at risk of wildfires. By 2050, France is estimated to face a water shortage of two billion m3. Water supply and sanitation are also particular concerns in France's outermost regions, due to the effects of climate change on rainfall.

France adopted its national adaptation strategy in 2006 and replaced it by the national adaptation plan in 2011. The plan was updated in 2018 and a second draft update was presented on 25 October 2024 and was subject to public consultation until the end of 2024. The aim is to prepare France to cope with a temperature increase of 4°C by 2100. There are no regional or sectoral adaptation plans. There is a significant progress in sustainability of transport, but freight transport is still dominated by road, the share of rails remains below the EU average.

The new law on renewable energy acceleration makes progress on granting permits and offshore planning, but more is needed to deliver the necessary acceleration. In fact, there is still a need for clear and accelerated deadlines for projects outside the acceleration zones introduced in the new law. In addition, France is still lagging behind on the introduction of a one-stop shop for renewable energy permitting.

Agriculture is on a good track to achieve 2030 national targets.

Priority action 2025

- In the next period France should focus on implementing all polices and measures that are needed to achieve targets defined by Effort Sharing Regulation and LULUCF regulation. More detailed priority actions are set out in the assessment of the final national energy and climate plan (NECP)[136].

([135]) European Climate Risk Assessment (EUCRA). 2024. Available at European Climate Risk Assessment (europa.eu)

([136]) National energy and climate plans

Part II: Enabling framework – implementation tools

5. Financing

The EU budget supports climate investment in France with significant amounts in the 2021–2027 period, with revenues from the ETS also feeding into the national budget. During 2020–2022, France's revenues from auctioning reached EUR 4 billion in total, with all of it spent on climate and energy.

In addition, the annual investment needed to meet its environmental objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems is estimated to be EUR 63.8 billion per year in France.

These four environmental areas currently receive total funding of around EUR 42.7 billion per year; thus, there is a gap of EUR 21.1 billion per year.

Of the annual environmental investment gap, EUR 8 billion concerns pollution prevention and control, EUR 4.5–4.6 billion biodiversity and ecosystems and circular economy (each) and EUR 3.9 billion the water objective.

Climate finance landmarks

EU funding for climate action

The EU budget supports climate action in the EU-27 with EUR 657.8 billion in the 2021–2027 budgetary period across the various programmes and funds, representing an overall 34.3 % contribution level. Of this, cohesion policy provides EUR 120 billion (over half of it through the European Regional Development Fund (ERDF)), the Recovery and Resilience Facility (RRF) EUR 275.7 billion and the CAP EUR 145.9 billion ([137]).

In France, the EU cohesion policy (considering EU contribution) provides EUR 4 billion for climate action in 2021–2027 (with around 60 % of this via the ERDF), with a further EUR 274 million from the European Maritime, Fisheries and Aquaculture Fund ([138]).

The RFF contributes to climate finance in France with EUR 19.9 billion up to 2026, representing 49.5 % of the RRP ([139]).

The European Investment Bank (EIB) provided EUR 109.9 billion financing across the EU-27 between 2021 and mid 2024 to support energy, transport and industry projects that are aligned with the EU's climate objectives. Of this amount, EUR 19.4 billion was assigned to France in the reference period ([140]).

National financing, including EU emissions trading system revenues

Revenues from the auctioning of emission allowances under the EU ETS, which feed directly into national budgets, amounted to EUR 728 million in 2020, EUR 1 469 million in 2021 and EUR 1 868 million in 2022 in France, totalling EUR 4 066 million in the three-year period. In France, the auctioning revenues co-fund energy efficiency improvements for low-income housing, up to a maximum of EUR 420 million per year. The remainder is not earmarked but goes to the general budget, which covers, among other things, climate and energy investments ([141]).

From the remaining part of the EU ETS revenues that feed into the Innovation Fund and the Modernisation Fund, further support is available to climate action at the EU level ([142]).

It should be noted that investment in climate action also supports the environment and, therefore, the environmental investments described in the following sections cannot be regarded as entirely additional to climate investment ([143]).

([137]) European Commission, *Statement of Estimates of the European Commission – For the financial year 2025*, Publications Office of the European Union, Luxembourg, 2024, pp. 94–96, https://commission.europa.eu/document/download/7a0420e1-599e-4246-9131-ccb7d505d6d9_en?filename=DB2025-Statement-of-Estimates_1.pdf.

([138]) See the Cohesion Open Data Platform (https://cohesiondata.ec.europa.eu/).

([139]) EU Commission datasets and the Recovery and Resilience Scoreboard (https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/index.html).

([140]) A list of financed projects is provided by the EIB (https://www.eib.org/en/projects/loans/index.htm).

([141]) European Commission: Directorate-General for Climate Action, *Progress Report 2023 – Climate action*, Publications Office of the European Union, Luxembourg, 2023, https://climate.ec.europa.eu/news-your-voice/news/climate-action-progress-report-2023-2023-10-24_en.

([142]) European Commission: Directorate-General for Climate Action, *Progress Report 2023 – Climate action*, Publications Office of the European Union, Luxembourg, 2023, https://climate.ec.europa.eu/news-your-voice/news/climate-action-progress-report-2023-2023-10-24_en.

([143]) NB: Indirect investments (from climate and other policies) in support of the environment are accounted for via the tracking.

Environmental financing and investments

This section describes France's investment needs, current financing and gaps as they relate to the four environmental objectives beyond climate objectives, namely tackling pollution, the circular economy and waste, water protection and management, and biodiversity and ecosystems ([144]).

The environment overall

Investment needs

The overall environmental investment needs to be sufficient to enable France to meet its objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems. The required investment is estimated to be EUR 63.8 billion per year (in 2022 prices).

A significant part of the estimated requirement, around EUR 26.4 billion per year, can be attributed to the need to support the circular economy. For pollution prevention and control, the annual investment needs are estimated to be EUR 13.2 billion; for water, they are EUR 15.3 billion and for biodiversity and ecosystems EUR 8.9 billion (in 2022 prices).

Current investments

To implement the environmental investments needed, the available financing is estimated to currently reach an annual EUR 42.7 billion in France from EU and national sources combined (in 2022 prices).

Total environmental funding from the multiannual financial framework (MFF) is estimated to reach around EUR 16.3 billion for France in total, during 2021–2027 (or EUR 2.3 billion per year).

Table 1: Key environmental allocations from EU funds to France (million EUR), 2021–2027

Instrument	Allocations
Cohesion policy	**2 685.5** ([a])
ERDF	2 438.9
Cohesion Fund	not applicable
Just Transition Fund	246.6
CAP	**10 306.3** ([b])
European Agricultural Guarantee Fund	7 243.7
European Agricultural Fund for Rural Development	3 062.6
European Maritime, Fisheries and Aquaculture Fund	**115.9**
Other MFF sources	3 170.7 ([c])
RRF ([d]) (2021–2026)	**10 390**

([a]) European Commission, 2021-2027 cohesion policy (planned) allocations in *EU amount* excluding national co-financing, based on the tracking in the Common Provisions Regulation (CPR, 2021) Annex I. Please note potential data changes that may have arisen between the EIR preparation cut-off date (31 October 2024) and its publication date. Note that France is not eligible for the Cohesion Fund. Source and further information: https://cohesiondata.ec.europa.eu/2021-2027-Categorisation/2021-2027-Planned-finances-detailed-categorisation/hgyj-gyin/about_data.

([b]) Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013 (OJ L 435 6.12.2021, p. 1), Annex XI, https://eur-lex.europa.eu/eli/reg/2021/2115. Note that 2021-2027 combines factual data for 2021 and 2022 and expenditure under the relevant specific objectives (SOs) of the CAP strategic plans from 2023, using the EU biodiversity tracking methodology (https://commission.europa.eu/system/files/2023-06/Biodiversity%20tracking%20methodology%20for%20each%20programme%202023.pdf). Source: European Commission.

([c]) Space Fund, Horizon Europe, financial instrument for the environment and the Connecting Europe Facility.

([d]) Outside the MFF. Note that the RRF applies a similar environmental tracking scheme (set in the RRF Regulation, Annex VI) as the EU's cohesion policy. RRF dataset version used: July 2024, prior to 2025 revisions. Data source: European Commission.

France, in addition to receiving EU funds earmarked specifically for it in 2021–2027, can also benefit from funding programmes that can be accessed at the EU level and which are open to all Member States. These include the financial instrument for the environment (LIFE) programme (EUR 5.4 billion) ([145]), Horizon Europe (EUR 95.5 billion) ([146]), the Connecting Europe Facility

([144]) Research, development and innovation is accounted for under each environmental objective. The financing needs, baselines and gap estimates are based on the Directorate-General for Environment's internal analysis (of 2024). Throughout this chapter, specific references are provided to the most important data sources used.

([145]) https://cinea.ec.europa.eu/programmes/life_en.

([146]) European Commission, Horizon Europe (https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en).

(EUR 33.7 billion) ([147]) and funds that can be mobilised through the InvestEU programme ([148]).

France's RRP supports climate objectives through funding of EUR 19.9 billion (49.5 % of total), with an additional EUR 0.71 billion (1.8 % of total) for the environment.

The EIB provided around EUR 8.3 billion in environment-related financial contributions to France in from 2021 to mid 2024, most of which, EUR 7.3 billion (89 %), was in the area of sustainable energy, transport and industrial projects, which provides significant co-benefits to reducing air pollution, environmental noise and other pollution.

The EU's total national expenditure on environmental protection (operating plus capital expenditure) was EUR 298 billion in 2020 and EUR 321 billion in 2021, representing around 2.2 % of EU-27 GDP. In France, the total national environmental protection expenditure was EUR 46.5 billion in 2020 and EUR 50.4 billion in 2021, representing 2 % of GDP in both years.

Of the total environmental expenditure, the national capital expenditure (investment) on environmental protection amounted to EUR 54.5 billion in 2020 and EUR 59.9 billion in 2021 in the EU-27, representing around 0.4 % of the EU's GDP. In France, the national environmental protection investment reached EUR 9.4 billion in 2020, rising to EUR 10.6 billion in 2021, representing around 0.4 % of GDP.

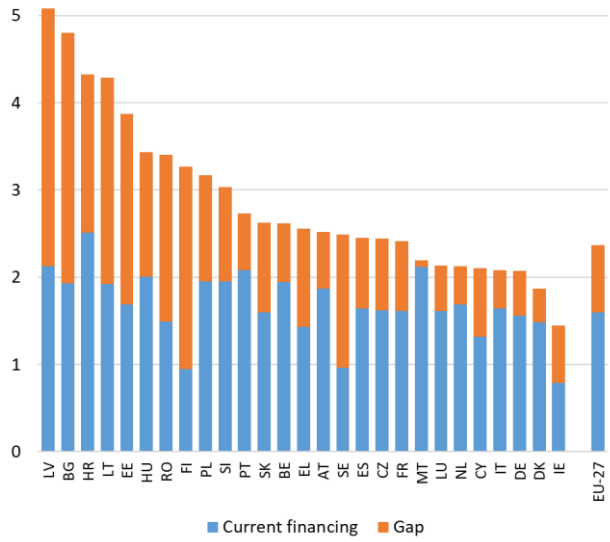
Splitting by institutional sector, 65 % of France's national environmental protection investment (capital expenditure) comes from the general government budget, with 14 % coming from specialist private-sector producers (of environmental protection services, such as waste and water companies) and 22 % from the general business sector, whose environmental activities are usually ancillary to its main activities. At the EU level, 38 % of environmental protection investment comes from governments, 40 % from specialist private-sector producers and 22 % from the general business sector ([149]).

France's total financing for environmental investment reaches an estimated EUR 42.7 billion per year (in 2022 prices), including EU funding and national public and national private expenditure. Of the total, the share of EU fund (including EIB funds) reaches 11 %, with around 89 % national financing. The total public financing (EU plus national public) represents 68 % of the total.

The gap

To meet its four environmental objectives beyond climate change, the additional investment need over the current levels (i.e. the gap) reaches an estimated EUR 21.1 billion per year in France, representing around 0.8 % of national GDP, close to the EU average (0.77 %).

Figure 34: Environmental financing, needs and gaps per Member State (% of GDP)



Source: Analysis of Directorate-General for Environment.

The following table provides the distributions of France's environmental investment gap (expressed in various forms) by environmental objective.

Table 2: Summary of environmental investment gaps in France per year, 2021–2027

Environmental objective	Investment gap per year		
	Million EUR (2022 prices)	% of total	% of GDP
Pollution prevention and control	8 034	38.1	0.30
Circular economy and waste	4 598	21.8	0.17
Water management and water industries	3 925	18.6	0.15

([147]) The Connecting Europe Facility (Transport) also includes EUR 11.3 billion transferred from the Cohesion Fund, of which 30 % will be made available, on a competitive basis, to all Member States eligible for the Cohesion Fund. The remaining 70 % will respect the national envelopes until 31 December 2023.

([148]) The InvestEU Fund is set to mobilise over EUR 372 billion of investment through an EU budget guarantee of EUR 26.2 billion to back the investment of financial partners such as the EIB group and others.

([149]) Eurostat, 'Environmental protection expenditure accounts', env_ac_epea.

Biodiversity and ecosystems	4 540	21.5	0.17
Total	**21 097**	**100.0**	**0.80**

Source: Directorate-General for Environment analysis.

Pollution prevention and control

Investment needs

In pollution prevention and control, France's investment needs are estimated to reach EUR 13.2 billion per year (including baseline investments) in 2021–2027. Most of this, EUR 9.8 billion, relates to air pollution control, to comply with the clean air requirements for the five main air pollutants under the NECD by 2030. The estimated needs to reduce environmental noise reach EUR 4 billion per year, most of which is delivered by the (same) sustainable energy and transport investments that also benefit clean air ([150]). Industrial site remediation requires an estimated EUR 0.5 billion per year. Microplastics pollution and the chemicals strategy require around EUR 300–400 million per year (each) ([151]).

Current investments

The current investment levels supporting pollution prevention and control reach an estimated EUR 5.2 billion per year in France in 2021–2027. Most of the financing concerns clean air (EUR 3 billion per year). Protection from environmental noise receives around EUR 1 billion per year, with a further EUR 528 million for site remediation.

In France, the EU MFF provides an estimated 6 % of the clean air financing (mostly via cohesion policy), with a further 23.5 % from the RRF, adding up to 29.5 % of the total. EIB financing contributes 19.3 % and national sources reach 51 % ([152]).

The gap

To meet its environmental objectives concerning pollution prevention and control (towards zero pollution), France needs to provide an additional EUR 8 billion per year (0.3 % of GDP), mostly related to clean air and noise. The adequate implementation of the NECP with the investments included for sustainable energy and transport would largely deliver this, while in many Member States additional measures and investments may be required to comply with the ammonia reduction requirements.

According to the latest (2023) NAPCP review report ([153]), France complied with ammonia reduction requirements in 2020 and 2021, while it is at high risk of non-compliance with ammonia concerning the NECD's 2030 emission reduction commitments (and at low risk concerning the other four pollutants), based on the policies and measures in its NAPCP that take into account climate, energy and CAP plans and financing baselines.

Circular economy and waste

Investment needs

France's investment needs in the circular economy and waste reach EUR 26.4 billion per year (including baseline investments). Most of this, around EUR 23.6 billion per year, relates to circular economy measures in the mobility, food and built environment systems, with a further EUR 2.9 billion necessary for waste management (municipal and packaging waste), covering waste collection, biowaste treatment, recycling reprocessors, waste-sorting facilities, and digitalisation of the waste registry. The amount for waste excludes the investments needed for the uptake of circularity and waste prevention across the economy ([154]).

Current investments

Circular economy investments across the economy reach around EUR 19.6 billion per year in France in 2021-2027, with a further EUR 2.2 billion provided for waste management that does not constitute circular economy.

([150]) 2021 Phenomena project assessment (https://op.europa.eu/en/publication-detail/-/publication/f4cd7465-a95d-11eb-9585-01aa75ed71a1) and the Commission's 2023 Environmental Noise Directive implementation report (https://environment.ec.europa.eu/system/files/2023-03/COM_2023_139_1_EN_ACT_part1_v3.pdf).

([151]) European Commission, *Third Clean Air Outlook*, Brussels, 2022, https://environment.ec.europa.eu/topics/air/clean-air-outlook_en. See also the impact assessment for the revision of the AAQD, available from the Commission web page on the proposed revision (https://environment.ec.europa.eu/publications/revision-eu-ambient-air-quality-legislation_en).

([152]) Through the tracking of EU funds, EIB projects and national expenditure (environmental protection expenditure accounts, Eurostat). Note that the bulk of clean air financing is provided as a contribution from climate (energy and transport) measures, as per the tracking schemes in the Common Provisions Regulation Annex I and the RRF Regulation Annex VI. Further information on clean air tracking: https://commission.europa.eu/document/download/0a80484e-2409-4749-94c6-3b23bc6bae8f_en?filename=Clean%20air%20methodology_0.pdf

([153]) European Commission, 'National air pollution control programmes and projections', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants/national-air-pollution-control-programmes-and-projections_en.

([154]) See Systemiq and Ellen MacArthur Foundation, *Achieving 'Growth Within'*, 2017; and European Commission: Directorate-General for Environment, *Study on investment needs in the waste sector and on the financing of municipal waste management in Member States*, Publications Office of the European Union, Luxembourg, 2019, https://op.europa.eu/en/publication-detail/-/publication/4d5f8355-bcad-11e9-9d01-01aa75ed71a1.

Around 0.4 % of this combined financing for circularity and waste comes from the EU MFF, with a further 0.3 % from the RRF, adding up to 0.7 % of the total. EIB loans identified in support of circularity and waste represent 0.3 % of the total. The share of national sources is absolutely overwhelming, reaching 99 % of the total financing ([155]).

The gap

To meet its environmental objectives concerning the circular economy and waste, France needs to increase circular economy investments by an estimated EUR 3.9 billion per year, with an additional EUR 661 million concerning waste management action, not belonging to circular economy. Combined, this amounts to EUR 4.6 billion per year, representing 0.17 % of France's GDP.

Of the circular economy gap, EUR 1 billion relates to recent initiatives, such as eco-design for sustainable products, packaging and packaging waste, labelling and digital tools, CRM recycling, and measures proposed under the amendment of the Waste Framework Directive, and EUR 2.9 billion constitutes further investment need to unlock France's circular economy potential.

Water protection and management

Investment needs

The annual water investment needs reach an estimated EUR 15.3 billion (in 2022 prices) in France. This comprises investment needs both for the water industry and for the protection and management of water. Of the total annual need, EUR 6.9 billion relates to the management of waste water (also including additional costs associated with the revised UWWTD), another EUR 6.9 billion to drinking-water-related investments and around EUR 1.5 billion to the protection and management of water ([156]).

Current investments

Water investments in France are estimated to be around EUR 11.4 billion per year (in 2022 prices) in 2021–2027. Of this, EUR 4.3 billion supports wastewater management, EUR 5.9 billion drinking water and around EUR 1.2 billion the other aspects of the Water Framework Directive (water management and protection).

Of the total financing, 0.8 % is provided by the EU MFF (mostly through cohesion policy), with further 0.1% contribution from the RRF. EIB financing is around 0.5 % of the total, and almost the entire financing comes from national sources (98.7 %) ([157]).

The gap

To meet the various environmental targets under the Water Framework Directive and the Floods Directive, France's water investment gap reaches EUR 3.9 billion per year (0.15 % of GDP), with over half related to waste water (EUR 2.6 billion per year). Drinking water measures require an additional EUR 1.1 billion per year and the other aspects of the Water Framework Directive EUR 292 million per year over the existing levels of financing.

Biodiversity and ecosystems

Investment needs

The investment needs for biodiversity and ecosystems are estimated to be EUR 8.9 billion per year (in 2022 prices) in France in 2021–2027. This includes the following financing needs:

- France's prioritised action framework ([158]), concerning the Natura 2000 areas: EUR 651 million per year, mostly running costs;
- additional BDS costs ([159]): EUR 5.9 billion per year on top of the framework;
- sustainable soil management costs ([160]): EUR 2.3 million per year.

([155]) Waste management and circular economy expenditure tracking in the EU funds, EIB projects and in the national expenditure (Eurostat). Datasets: environmental protection expenditure accounts (env_epi) and circular economy private investments (cei_cie012).

([156]) See European Commission, 'Estimating investment needs and financing capacities for water-related investment in EU Member States', 28 May 2020, https://commission.europa.eu/news/estimating-investment-needs-and-financing-capacities-water-related-investment-eu-member-states-2020-05-28_en; and OECD, *Financing Water Supply, Sanitation and flood Protection: Challenges in EU Member States and policy options*, OECD Publishing, Paris, 2020, https://www.oecd-ilibrary.org/environment/financing-water-supply-sanitation-and-flood-protection_6893cdac-en.

([157]) Water investment levels are estimated through tracking EU funds, EIB projects and national expenditure (environmental protection expenditure accounts, Eurostat).

([158]) European Commission, 'Financing Natura 2000 – Prioritised action frameworks', European Commission website, https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/financing-natura-2000_en.

([159]) See European Commission: Directorate-General for Environment, *Biodiversity Financing and Tracking – Final report*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/793eb6ec-dbd6-11ec-a534-01aa75ed71a1/language-en.

([160]) See Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law) COM(2023) 416 final of 5 July 2023, https://environment.ec.europa.eu/publications/proposal-directive-soil-monitoring-and-resilience_en.

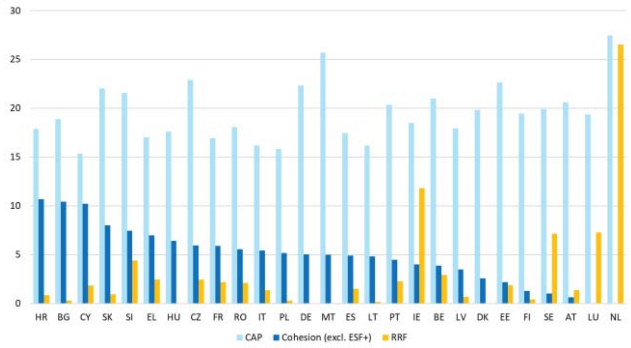
Current investments

The current level of biodiversity financing is estimated to be EUR 4.3 billion per year (in 2022 prices) in 2021–2027. 88.3 % of this is considered direct financing to biodiversity and ecosystems, with a 100 % coefficient in the tracking schemes.

1.7 % of the total financing is estimated to come from EU cohesion policy, 32 % from CAP, 3.6 % from Horizon Europe and around 1.4 % from LIFE. The EU MFF altogether accounts for 39.4 % of the financing and the RRF for 2.7 %, adding up to a total of 42 % from the EU budget. The rest, 58 %, comes from national sources ([161]).

At 2.2 %, France has a relatively high share of RRF funding dedicated to supporting measures for biodiversity compared with other Member States. France has also programmed 16.9 % of its CAP budget for 2021–2027 for biodiversity, which is below the EU average. Lastly, 5.9 % of France's cohesion policy EU contribution amount (disregarding ESF+) is estimated to contribute to biodiversity, which corresponds to the EU average.

Figure 35: 2021–2027 contributions to biodiversity from the main EU instruments per Member State (% of policy total)



NB: ESF+ :European Social Fund Plus, excluded.

The gap

To meet the environmental objectives concerning the protection and restoration of biodiversity and ecosystems and other relevant cross-cutting measures, France's investment gap is estimated to be around EUR 4.5 billion per year, corresponding to 0.17 % of its GDP.

Public financial management

Green budgeting practices

Green budgeting refers to the use of budgetary tools to achieve climate and environmental goals. Some Member States, including France, already use green budgeting tools for identifying and tracking green expenditures and/or revenues ([162]). Green budgeting practices provide increased transparency on the environmental implications of budgetary policies.

France is a frontrunner on green budgeting, identifying both environmentally favourable and unfavourable expenditures in its national budget at a highly granular level and continuously refining its tagging methodology ([163]).

The Commission has developed a non-mandatory green budgeting reference framework that brings together methodologies for assessing the impacts of budgets on climate and environmental goals ([164]).

To help Member States develop national green budgeting and thereby improve policy coherence and support the green transition, the Commission facilitated a technical support instrument (TSI) project on green budgeting from 2021 to 2024 ([165]). France informally participated in the training, providing expertise to other Member States.

France has been selected as a beneficiary of the 2025 TSI on green budgeting, requesting support on the roll-out of green budgeting practices to the subnational level. The legal basis has been introduced with the 2024 finance law, mandating 'green budgets' for local authorities with more than 3 500 inhabitants ([166]).

France has also benefitted from support at the subnational level in previous TSI cycles:

- Two French regions (Brittany and Occitania) participated in a workshop on best practices of green budgeting at the regional level ([167]).
- Beyond green budgeting, under a 2024 TSI project, the City of Bordeaux, jointly with other European

([161]) Based on biodiversity tracking in the EU budget (https://circabc.europa.eu/ui/group/3f466d71-92a7-49eb-9c63-6cb0fadf29dc/library/8e44293a-d97f-496d-8769-50365780acde), and national expenditure into biodiversity from the Classification of the Functions of Government accounts.

([162]) European Commission, *Green Budgeting in the EU. Key Insights from the 2023 European Commission Survey of Green Budgeting Practices*, 2023, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/national-fiscal-frameworks-eu-member-states/green-budgeting-eu_en#:~:text=European%20Commission%20Green%20Budgeting%20Survey%C2%A0.

([163]) The 4th edition of the French Green Budget – 2024

([164]) European Commission, 'European Union green budgeting reference framework', 2022, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/green-budgeting-eu_en.

([165]) https://reform-support.ec.europa.eu/what-we-do/revenue-administration-and-public-financial-management/supporting-implementation-green-budgeting-practices-eu_en.

([166]) https://www.collectivites-locales.gouv.fr/finances-locales/budget-vert-des-collectivites.

([167]) https://webgate.ec.europa.eu/TMSWebRestrict/resources/js/app/#/library/detail/85541.

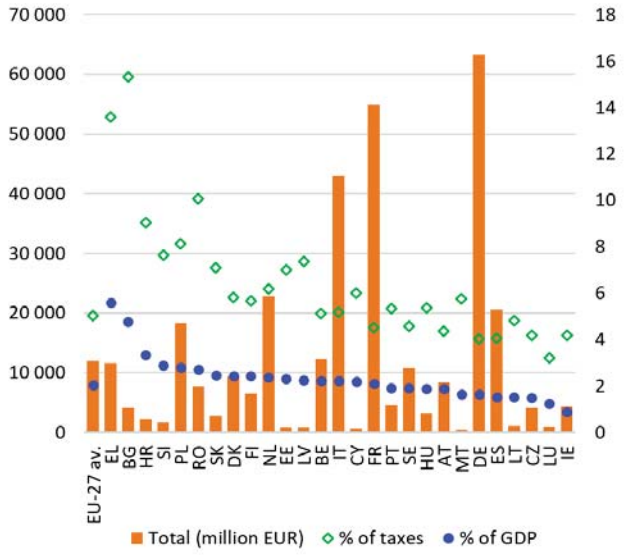
cities, has begun developing methodologies to align local budgeting processes with sustainable development goals ([168]).

The regional dimension of the EU Green Deal has been emphasised by the Committee of the Regions with the Green Deal going local initiative ([169]).
Beyond green budgeting, to improve policy outcomes, the Commission has also drawn up climate-proofing and sustainability-proofing guidance ([170]) as tools to assess project eligibility and compliance with environmental legislation and criteria.

Green taxation and tax reform

Total environmental taxes amounted to EUR 54.9 billion in France in 2022, representing 2.1 % of its GDP (EU average: 2.0 %). Energy taxes formed the largest component of environmental taxes, accounting for 1.7 % of GDP, which is slightly higher than the EU average of 1.6 %. Transport taxes, at 0.23 % of GDP, were under the EU average (0.4 %), while taxes on pollution and resources, at 0.13 %, were above the EU average (0.08 %). In 2022, environmental taxes in France accounted for 4.5 % of total revenues from taxes and social security contributions (under the EU average of 5.0 %) ([171]).

Figure 36: Environmental taxes per Member State, 2022



The EU Green Deal emphasises the role of well-designed tax reforms (e.g. shifts from taxing labour to taxing pollution) to boost economic growth and resilience, and to foster a fairer society and a just transition through the right price signals. The Green Deal promotes the 'polluter-pays principle', which makes polluters bear the costs to prevent, control and remedy pollution.

According to a 2024 study ([172]), France applies various charges on pollutant emissions to air, water and soil; volumetric charges on water abstraction and disposal; and a charge on waste producers based on quantity.

Green bonds and sustainable bonds

In 2023, the total value of green bonds issued by Member States was USD 245 billion (EUR 227 billion), up from USD 234 billion (EUR 198 billion) in 2021.

During 2021–2023 combined, France issued green bonds worth USD 96.5 billion (EUR 81.6 billion). Of this, the

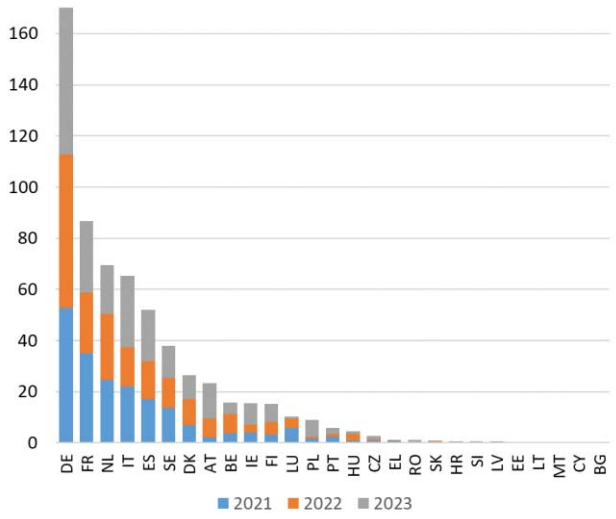
([168]) Technical support has been received under TSI project 24FR16.
([169]) Green Deal Going Local | European Committee of the Regions.
([170]) Commission notice – Technical guidance on the climate proofing of infrastructure in the period 2021–2027 (OJ C 373, 16.09.2021, p. 1), https://op.europa.eu/en/publication-detail/-/publication/23a24b21-16d0-11ec-b4fe-01aa75ed71a1/language-en.
([171]) Eurostat, 'Environmental taxes accounts', env_eta.
([172]) European Commission: Directorate-General for Environment, *Candidates for Taxing Environmental Bads at National Level*, Publications Office of the European Union, Luxembourg, 2024, Annex 1, https://op.europa.eu/en/publication-detail/-/publication/35c1bbdf-2931-11ef-9290-01aa75ed71a1/language-en.

issuance in 2023 amounted to USD 30 billion (EUR 27.7 billion) ([173]).

During 2014–2023, 83 % of the green bonds issued by European countries (excluding supranational entities) served objectives in energy, buildings or transport, while 5 % supported objectives in water, 5.1 % related to land use (with links to nature and ecosystems) and 3.8 % applied to waste management. By 2023, the combined share of energy, buildings and transport had decreased to 73 %, the share of waste management and land use had increased (to 5.9 % and 8.4 %, respectively) and the share of water had remained around 5 %.

In 2021–2023, 31.7 % of the European green bonds (excluding those issued by supranational entities) was issued by financial corporates, 29.1 % by sovereign governments and 23.1 % by non-financial corporates. 8.3 % of the issuances was linked to government-backed entities, 6.4 % to developments banks and 1.4 % to local governments.

Figure 37: Value of green bonds issued per Member State (billion EUR), 2021, 2022 and 2023



Data source: Climatebonds.net, with some additional data from national sources (e.g. Croatia, Slovenia).

Environmentally harmful subsidies

Addressing and phasing out environmentally harmful subsidies, in particular fossil fuel subsidies (FFS), is a further step towards achieving the eighth environment action programme objectives and the enabling conditions ([174]). FFS are costly for public budgets and make it difficult to achieve European Green Deal objectives.

The overall downward trend of FFS mentioned in past EIRs was disrupted from 2022 due to the European response to the 2021 energy crisis and subsequent increase in energy prices.

As a direct consequence, annual FFS in the EU have increased to EUR 109 billion in 2023 from EUR 57 billion in 2020. From 2021 to 2023, there was a marked increase in annual FFS of 72 % in the EU ([175]). These amounts of Fossil Fuel Subsidies are based on the work of the Commission (DG Energy) and have been used in past EIR reports as giving a view of foregone revenue to the state's budget across Member States[176].

For the majority of the Member States (16), the year 2022 saw a peak in the amount of overall FFS. A decline was then observed in 2023 ([177]). In particular, FFS for coal and lignite, natural gas and oil increased in 2022 and a strong increase was observed for natural gas subsidies.

In France, the energy subsidies showed some increases from 2015, plateauing in 2019–2021. Overall, they increased significantly in 2022 and started to decrease in 2023. FFS ranged between EUR 9.4 billion and EUR 13.4 billion in 2015–2021, and after a spike of EUR 30.5 billion in 2022, they returned to more normal values in 2023 (EUR 15.2 billion).

([173]) Climate bonds initiative (https://www.climatebonds.net/). NB. Additionally (and not included in this), national sources indicated EUR 544.8 million issuance for Croatia, in 2022-2023, and a slightly higher amount for Slovenia (+0.27 billion) during 2021-2023 in total.

([174]) Article 3(h) and 3(v) of the eighth environment action programme.

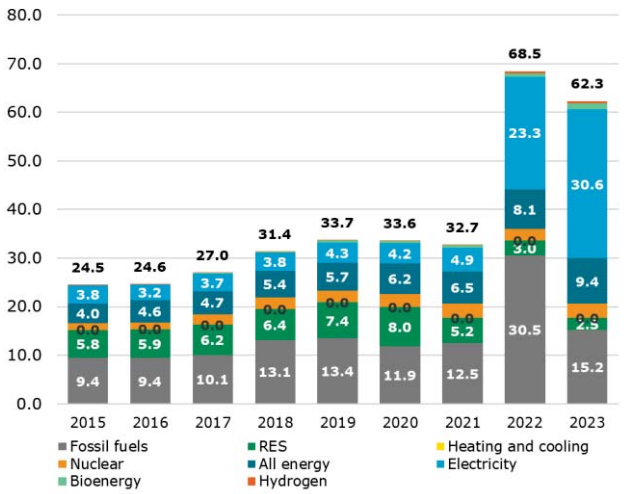
([175]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), Register of Commission Documents - COM(2025)17

176 *France mentioned to the Commission some complementary methodologies such as effective carbon rate indicators, developed by the OCDE (https://www.oecd.org/en/publications/effective-carbon-rates-2023_b84d5b36-en.html*

([177]) 16 Member States: BE, EE, IE, EL, ES, FR, HR, IT, CY, LT, HU, NL, AT, PT, RO and SE.

As a share of GDP, FFS in 2022 ranged from 1.8 % in Croatia to less than 0.1 % in Denmark and Sweden. France's value reached 1.1 %, above the EU average (0.8 %) ([178]).

Figure 38: Energy subsidies by energy carrier (billion EUR), 2015–2023



NB: RES, renewable energy source.

Source: analysis of Directorate-General Energy

The 2022 priority actions for France in the field of environmental finance included the following.

- Remove (direct or indirect) energy subsidies and other forms of support when they adversely affect reaching climate neutrality and the broader Green Deal objectives.
- Shift the tax burden to green taxes, provide incentives to change long-term behaviour in all sectors of the economy, and complete the green budgeting initiative, expanding the scope of budgetary fields covered in the budget bill.
- Address green funding needs in a more targeted way (e.g. based on budget tracking and sustainable private finance flows). Use EU mechanisms and green bonds to meet long-term investment needs.

France's efforts to reduce harmful subsidies has been hampered by the energy crisis, so in this respect, limited progress has been made. The same goes for fiscal reform. On the other hand, the government and some local authorities have developed expertise in green budgeting.

2025 priority action

In light of the assessment of previous actions and the observed gaps, the following recommendation is made.

- Use more national funding (for instance by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.

([178]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)17&lang=en

6. Environmental governance

Information, public participation and access to justice

Citizens can more effectively protect the environment if they rely on the three 'pillars' of the Aarhus Convention: (i) access to information, (ii) public participation in decision-making and (iii) access to justice in environmental matters. It is of crucial importance to public authorities, the public and businesses that environmental information is shared efficiently and effectively ([179]). Public participation allows authorities to make decisions that take public concerns into account. Access to justice is a set of guarantees that allows citizens and NGOs to use national courts to protect the environment, safeguard the rights of citizens and ensure accountability of authorities ([180]). It includes the right to bring legal challenges ('legal standing') ([181]).

Environmental information

This section focuses on the implementation of the Infrastructure for Spatial Information in the European Community (Inspire) Directive. The Inspire Directive aims to set up a European spatial-data infrastructure for sharing environmental spatial information between public authorities across Europe. It is expected that this will help policymaking across boundaries and facilitate public access to this information. Geographic information is needed for good governance at all levels and should be readily and transparently available.

Table 3: France dashboard on the implementation of the Inspire Directive, 2016–2023

	2016	2023
Effective coordination and data sharing		
Ensure effective coordination	■	■
Data sharing without obstacles	■	■
INSPIRE performance indicators		
i. Conformity of metadata	■	■
ii. Conformity of spatial data sets	■	■
iii. Accessibility of spatial data sets through view and download services	■	■
iv. Conformity of network services	■	■

Legend

■ Implementation of this provision is substantial or (nearly) fulfilled. Outstanding issues are minor and can be addressed easily. Percentage: >89%

■ Implementation of this provision has started and made some or substantial progress but is still not close to being completed. Percentage: = 31–89%

■ Implementation of this provision is falling significantly behind, with limited or no progress. Serious efforts are necessary to close the implementation gap. Percentage: <31%

Source: European Commission, 'France', Inspire Knowledge Base, https://knowledge-base.inspire.ec.europa.eu/france_en.

France's performance in implementing the INSPIRE Directive has been reviewed based on the reported monitoring data for 2023 ([182]). In 2022, the European Commission identified a priority action on the need to make spatial data more widely accessible and prioritise the environmental datasets ([183]). Despite steady progress on making spatial data accessible, more efforts are needed. Therefore, the priority action is repeated in 2025.

([179]) The Aarhus Convention (https://unece.org/environment-policy/public-participation/aarhus-convention/text), the Access to Environmental Information Directive (Directive 2003/4/EC) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003L0004) and the Inspire Directive (Directive 2007/2/EC) (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32007L0002) together create a legal foundation for the sharing of environmental information between public authorities and with the public.

([180]) These guarantees are explained in the European Commission's 2017 notice on access to justice in environmental matters (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52017XC0818(02)) and a related 2018 citizen's guide (https://op.europa.eu/en/publication-detail/-/publication/2b362f0a-bfe4-11e8-99ee-01aa75ed71a1/language-en/format-PDF).

([181]) This EIR focuses on the means used by Member States to guarantee rights of access to justice and legal standing and to overcome other major barriers to bringing cases on environmental protection.

([182]) European Commission, INSPIRE knowledge base France.

([183]) European Commission, List of high value spatial data sets.

More efforts are needed to make the data more widely accessible, and environmental datasets must be prioritised in implementation, especially those identified as high-value spatial datasets for implementing environmental legislation ([184]). Therefore, a priority action is specified in relation to this for 2025.

Public participation

Public involvement at both the planning and the project phase maximises transparency and social acceptance of programmes and projects. Consultation with the public (including NGOs) and environmental, local and regional authorities is a key feature of an effective impact assessment procedure. Such consultation also provides an opportunity for public authorities and project promoters to engage with the public actively and meaningfully by making information on the likely significant effects widely available. If carried out with due diligence and taking into consideration useful public input, this process leads to better-informed decision-making and can promote public acceptance. Making information available increases stakeholder involvement, thus lessening resistance and preventing (or minimising) litigation. On the other hand, it is paramount that the procedure is effective.

It is worth noting that the Green Industry Law ([185]) introduced some interesting provisions to increase public consultation, even if some reserve has been expressed with regard to the consultation timing and the replies by the investigating commissioner to the observations made by the public ([186]).

This section examines how public involvement and transparency are ensured under two instruments, namely the Environmental Impact Assessment (EIA) Directive ([187]) and the Strategic Environmental Assessment (SEA) Directive ([188]).

EU law provides for a flexible framework concerning EIAs. The aim of this framework is to ensure the application of the necessary environmental safeguards, while enabling speedy approval of projects. The Commission has contributed to simplifying and accelerating permitting for renewable energy projects and continues to support the Member States in this regard ([189]). France has already taken steps aiming to accelerate permit-issuing procedures taking advantage of the broad flexibilities offered by the EU legal framework, such as the establishment of one-stop shops and accelerated short deadlines for issuing permits for renewable energy projects.

The average speed in the EU for issuing permits involving an EIA procedure is 20.6 months, with a minimum duration of 11.4 months and a maximum duration of 75.7 months ([190]). The duration of each step in an EIA process (screening, scoping, EIA report, public consultation, reasoned conclusion, development consent) varies considerably between Member States and projects. There are no data reported for France. A priority action is included for 2025 to provide more detailed information on the average duration of the EIA process. Effective use of EU procedures can positively influence the timely approval of activities underpinning the decarbonisation of the economy on the way to net zero by 2050.

A new report is not yet available on the application and effectiveness of the SEA Directive in the EU. Nevertheless, a support study has been published with information by Member State ([191]).

While public participation is essential to the EIA process, it is also essential that the national, regional and local competent authorities tasked with the implementation of the EIA Directive do not find themselves in a situation giving rise to a conflict of interest, in particular when the competent authority is also the developer. In this context, the Commission has found that such a conflict may arise in certain situations and has therefore launched an infringement procedure to ensure that France puts an end to this practice.

([184]) https://github.com/INSPIRE-MIF/need-driven-data-prioritisation/blob/main/documents/eReporting_PriorityDataList_V2.1_final_20201008.xlsx.

([185]) Loi No 2023-973 du 23 octobre 2023 relative à l'industrie verte (1) (https://www.legifrance.gouv.fr/loda/id/LEGIARTI000048243190/2023-10-25/).

([186]) https://www.actu-environnement.com/ae/news/loi-industrie-verte-decret-application-democratie-environnementale-commissaire-enqueteur-44940.php4.

([187]) Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011L0092.

([188]) Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21.7.2001, p. 30), https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32001L0042.

([189]) Commission Staff Working Document (SWD/2022/0149 final), 18 May 2022, EUR-Lex - 52022SC0149 - EN - EUR-Lex.

([190]) European Commission: Directorate-General for Environment, *Collection of information and data on the implementation of the revised Environmental Impact Assessment (EIA) Directive (2011/92/EU) as amended by 2014/52/EU)*, Publications Office of the European Union, Luxembourg, 2024, Tables 5 and 6, https://op.europa.eu/en/publication-detail/-/publication/8349a857-2936-11ef-9290-01aa75ed71a1/.

([191]) European Commission: Directorate-General for Environment, Lundberg, P., McNeill, A., McGuinn, J., Cantarelli, A. et al., *Study supporting the preparation of the report on the application and effectiveness of the SEA Directive (Directive 2001/42/EC) – Final study*, Publications Office of the European Union, 2025, https://data.europa.eu/doi/10.2779/1615072

Access to justice

Access to justice, guaranteed by Article 19(1) of the Treaty on European Union and Article 47 of the EU Charter of Fundamental Rights, is a fundamental right and part of the democratic process. It is vital to ensure the full application of EU law in all Member States and the legal protection of the rights of individuals, including in environmental matters. Access to justice is essential to enable judicial review of the decisions of public authorities and to allow the correction of any wrongdoing committed by these authorities.

This section provides a snapshot of the state of play of access to courts by the public, particularly when it comes to challenging plans, or the non-adoption of plans, under EU law, in the areas of water, waste, air quality and noise, irrespective of the form of the legal act (i.e. regulatory act or administrative decision).

As stated in the 2022 EIR, France provides the possibility to access justice in environmental matters in the areas of water, waste, air quality and noise. Appeals by organisations in defence of their statutory purpose are admitted in a flexible manner by administrative judges. An appeal by an organisation is only admissible if the contested decision adversely affects the collective interest that the organisation defends.

The SEA screening decision for environmental plans and programmes can be challenged by the petitioner. However, under Article R 122-18 of the Environmental Code, such a judicial appeal against the screening decision must be preceded by an administrative appeal (*recours administratif préalable obligatoire*). The Conseil d'Etat ruled that a decision to exempt a plan from SEA cannot be challenged directly. However, such a decision can be contested when challenging the final plan.

Government decrees can be challenged directly before the Conseil d'Etat.

In the 2022 EIR, France received priority actions on publishing data on public participation, improving access to environmental information and access to justice, and missing ratification of international EIA protocols and SEA treaties.

Progress has been made to facilitate public access to environmental information related to projects and programmes. On the contrary, no evidence has been found related to access to justice rights; this should be assessed by the authorities. The first amendment on the UNECE ESPOO EIA convention and the SEA protocol have since been ratified on 16 January 2024.

2025 priority actions

- Make spatial data more widely accessible and prioritise environmental datasets in the implementation of the Inspire Directive, especially those identified as high-value spatial datasets for implementing environmental legislation.
- Provide information on the average duration of all steps in the EIA process.
- Ensure correct transposition of the revised EIA Directive.

Compliance assurance

Environmental compliance assurance covers all work undertaken by public authorities to ensure that industries, farmers and others fulfil their obligations to protect water, air and nature, to manage waste ([192]) and to remedy any environmental damage. It includes measures such as (i) compliance promotion, (ii) compliance monitoring (i.e. inspections and other checks), (iii) enforcement, that is, steps taken to stop breaches and impose sanctions, and (iv) ensuring damage prevention and remediation in line with the polluter-pays principle.

Compliance promotion, monitoring and enforcement

Non-compliance with environmental obligations may occur for different reasons, including poor understanding or lack of acceptance of the rules, opportunism or even criminality. Compliance promotion activities help duty-holders to comply by providing information, guidance and other support. This is particularly important in areas where new and complex legislation is put in place.

When inspections and other control activities identify problems, a range of responses may be appropriate, including the use of administrative and criminal enforcement tools.

Since the 2022 EIR, France has made further efforts to support specialisation and created in 2023 a new specialised police department on combating environmental crime (*Commandement pour l'environnement et la santé* ([193])). This body has functions related to training, coordination and development of practical tools for the investigation of environmental crime based on use of new technologies. The

([192]) The concept is explained in detail in the European Commission's 2018 communication on EU actions to improve environmental compliance and governance (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0010) and the related Commission staff working document (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0010).

([193]) https://www.gendarmerie.interieur.gouv.fr/notre-institution/notre-organisation/le-commandement-pour-l-environnement-et-la-sante-cesan.

establishment of such specialised departments facilitates effective enforcement and coordination and can be seen as good practice.

The 2022 EIR recommended that France (i) ensure that websites of national and regional authorities with environmental responsibilities include clear information on how the public can report breaches or file complaints; (ii) improve cooperation systems between professionals combating environmental crimes; and (iii) improve information for the public on the availability of financial securities to meet the costs of environmental damage. Concerning compliance promotion, monitoring and criminal and administrative enforcement, the 2022 priority actions are not assessed here due to lack of systematic information.

The new EU Environmental Crime Directive

The EU has recently strengthened its legal framework on tackling the most serious breaches of environmental obligations, notably by the adoption of the new Environmental Crime Directive (ECD) (Directive (EU) 2024/1203)[194] and new sectoral legislation with stronger provisions on compliance monitoring, enforcement and penalties. Issues important for the transposition and the implementation of the relevant new instruments are highlighted below. A detailed assessment of these topics will be included in the next EIR once the relevant implementation measures are put in place and more systematic information is available.

The new ECD replaced the 2008 ECD and introduced several new offence categories, such as unlawful ship recycling, unlawful water abstraction, and serious breaches of EU legislation on chemicals, mercury, fluorinated GHG and IAS of EU concern. It also covered the establishment of qualified offences, subject to more severe penalties where one of the offences defined in the directive leads to serious widespread and substantial damage or destruction of the environment. Concrete provisions on the types and levels of penalties that can be imposed for natural and legal persons who commit an offence were also introduced. Other provisions will help considerably to improve the effectiveness in combating environmental crime of all actors along the enforcement chain. These include obligations to ensure adequate resources and investigative tools, specialised regular training and the establishment of cooperation mechanisms within and between Member States as well as national strategies on combating environmental crime.

Member States are required to transpose the new ECD into national law by 21 May 2026 and to take additional measures to more effectively combat environmental crime, in particular through training, coordination, cooperation and strategic approaches. The Commission will provide support, including by facilitating the identification and sharing of good practices. Member States are expected to ensure the necessary resources and specialised skills and they are invited to encourage their authorities to support and cooperate with the recognised EU-level networks of environmental enforcement practitioners, such the EU Network for the Implementation and Enforcement of Environmental Law ([195]), EnviCrimeNet ([196]), the European Network of Prosecutors for the Environment ([197]) and the EU Forum of Judges for the Environment ([198]). The European Union Agency for Law Enforcement Cooperation and European Union Agency for Criminal Justice Cooperation mechanisms for cooperation on cross-border cases should be used more systematically for environmental offences.

Environmental Liability Directive

The Environmental Liability Directive (ELD)[199] aims to ensure that environmental damage is remediated in kind at the expense of those who have caused it, in line with the polluter-pays principle. It helps to halt the net loss in biodiversity, as well as reducing the number of contaminated sites and protecting the environmental quality of groundwater and surface waters. The ELD is a cross-cutting tool and a key enabler for better implementation of EU environmental law.

The ELD addresses cases of significant environmental damage to protected species and natural habitats, and, when caused by operators carrying out certain potentially hazardous activities, also damages to water and to soil. The Commission has the legal obligation to periodically evaluate the ELD. The ELD has undergone the second evaluation ([200]), which will be finalised in 2025, and which was supported by an external study ([201]), containing, among other things, evidence, views, reports and other

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[194] Directive 2024/1203/EU on the protection of the environment through criminal law (https://eur-lex.europa.eu/eli/dir/2024/1203/oj/eng),

([195]) https://www.impel.eu/en.

([196]) LIFE+SATEC project (https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE20-PRE-ES-000001/fight-against-environmental-crime-at-a-strategic-level-through-the-strengthening-of-envicrimenet-network-of-experts-in-environmental-criminal-investigations).

([197]) https://www.environmentalprosecutors.eu.

([198]) https://www.eufje.org/index.php?lang=en.

[199] [199] Directive 2004/35/EC on environmental liability with regard to the prevention and remedying of environmental damage (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02004L0035-20190626).

([200]) Commission staff working document - Evaluation of the Environmental Liability Directive, forthcoming 2025.

([201]) European Commission: Directorate-General for Environment and Fogleman, V., *Study in support of the evaluation of the*

relevant information gathered from different stakeholder groups, including Member States.

One of the most relevant indicators in assessing implementation and enforcement of the ELD is the number of environmental damage cases handled under the ELD, especially when this number is compared with the previous reporting period. Fewer ELD cases were reported in the second reporting period (2013–2022) than in with the first one (2007–2013). However, the downward tendency in the number of ELD occurrences and their overall low number do not necessarily mean that the ELD has achieved its objectives, as it needs to be compared with the overall number of environmental damage cases, some of which may have been handled under the other liability instruments.

The ELD has not always been effective in ensuring that the polluter pays, because the liable operators often lack financial capacity to carry out remediation measures. While the ELD does not provide for a mandatory financial security system, it explicitly calls for Member States to encourage the development of financial security instruments and markets, with the aim of enabling operators to use financial guarantees to cover their responsibilities under this directive.

From 1 May 2013 to 31 December 2021, France reported only one occurrence of environmental damage under the ELD (water and biodiversity damage). No environmental damage under the ELD was reported in the previous reporting period.

France has not imposed mandatory financial security for ELD liabilities, but there is strong demand for such instruments. Environmental insurance policies that provide cover for all liabilities under the ELD, including complementary and compensatory remediation for on-site and off-site damage, are widely available. Environmental extensions to general liability policies are commonly included in the body of the policies and typically provide coverage only for the remediation of off-site pollution from a sudden and accidental incident on an insured site. Some insurers offer extensions for ELD liabilities as well as liabilities related to ecological prejudice under the French Civil Code.

The 2022 EIR suggested that France improve public information on the availability of financial securities to meet the costs of environmental damage. There is no information available about the progress on this priority action. Therefore, efforts to implement it should continue along with the 2025 priority action.

2025 priority action

- Encourage the use of training programmes provided by the Commission (or developed at the national level) and covering the ELD and its interactions with the other national liability-related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.

EU-supported environmental capacity building

The Commission's 2023 Compact ([202]) initiative to enhance the administrative space identifies the capacity to lead the green transition as one of three key pillars, along with the public administration skills agenda and the capacity for Europe's Digital Decade. Compact also recognises the role of the EIR reporting tool in improving environmental governance. The two main capacity-building opportunities for the environment provided by the European Commission are the TSI ([203]) and the TAIEX-EIR PEER 2 PEER tool ([204]). The technical assistance available through the cohesion policy is subject to shared management and is not dealt with in this subsection.

The Commission's technical support instrument

The TSI provides Member States with tailor-made technical expertise on the design and implementation of reforms. The support is demand driven and does not require national co-financing. The TSI had annual calls in 2021, 2022, 2023, 2024 and 2025.

In 2023, the French Authority for Prudential Control (Autorité de Contrôle Prudentiel et de Résolution - ACPR) received support on ESG risk management framework for the financial sector.

In 2024, France benefited from the TSI to support for the preparation of the French national restoration plan, with the beneficiary authority being the Ministry of Ecological Transition.

Furthermore, the City of Bordeaux (together with Amsterdam, Hamburg, Barcelona) benefited from TSI support for integrating the Sustainable Development

Environmental Liability Directive and its implementation – Final report, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/006d90e5-980a-11ef-a130-01aa75ed71a1/language-en.

([202]) See the European Commission web page on Compact (https://reform-support.ec.europa.eu/public-administration-and-governance-coordination/enhancing-european-administrative-space-compact_en).

([203]) See the European Commission web page on the TSI (https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en).

([204]) See the European Commission web page on the TAIEX-EIR PEER 2 PEER tool (https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review/peer-2-peer_en). TAIEX: Technical Assistance and Information Exchange.

Goals (SDGs) into local frameworks and aligning them with local budgets (Sustainability in Local Public Finances project (2024).

The Commission's TAIEX-EIR PEER 2 PEER tool

The Commission launched the TAIEX-EIR PEER 2 PEER tool in 2017. It aims to facilitate peer-to-peer learning among Member States' environmental authorities through workshops (single or multi-country), expert missions (where a delegation of experts travels to the requesting institution) and study visits (where a delegation from the requesting institution travels to a host country). Multi-country workshops events are those requested by the Commission to present new and upcoming environmental legislation and policy in all Member States ([205]).

Workshops involving France are as follows:

- Climate adaptation and blue infrastructure (31 May–1 June 2022);
- Legal-regulatory frameworks for coastal land management in Mediterranean countries (15–16 June 2022);
- Circular economy (in the Irish Midlands) (4–6 October 2022);
- Future challenges for air protection (24 November 2022) with the EU Czech Presidency;
- Make space for biodiversity: Regional action to mainstream biodiversity and empower stakeholders (21–23 March 2023);
- Biowaste management in Italy (6–8 June 2023);
- Green budgeting at regional level (9 April 2024);
- Biodiversity, nature conservation and large predators: Examples across European regions (4–6 June 2024);
- Reducing air pollution from transport and residential energy (11–13 June 2024);
- Online platforms: EU batteries, packaging and packaging waste regulation (28–29 September 2024);
- New aspects in the cross-border cooperation against environmental crime (19–20 November 2024) ([206]).

France (Occitanie) hosted a study visit from the Västra region in Sweden on Integrating biodiversity in regional land-use planning: data, decision making and local action in Montpellier, 29 - 31 January 2025.

2025 priority action

- improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.

([205]) Flagship multi-country workshops in the reporting period are Recast Drinking Water Directive (3 April 2025); Environmental compliance and governance (18 March 2025); Planning of Renewable Energy Projects (20 February 2025); Air Quality: Implementation of the revised Air Quality Directive (16 January 2025); Industrial safety: awareness raising of emerging risks linked with climate change and decarbonation (12 December 2024); Air pollution: implementation of the NEC Directive to further mainstream air and broader pollution reduction in agricultural policy (25 September 2024); Industrial emissions transposition and implementation of the revised directive (12 September 2024); Noise: progress towards meeting Member States' noiselimit values and EU reduction targets (5 June 2024); Best practice use of environmental footprint methods on the EU market (30 May 2024); Sustainable finance (9 November 2023); Textile waste separate collection, treatment and markets (3 October 2023); EU environmental funding and support (13 June 2023); Advisory service for businesses to go circular (24 April 2023); Digital product passport implementation (6 December 2022); Public involvement in planning and approval of renewable energy projects (17 November 2022); Environmental compliance and governance (14 November 2022); Biowaste management (19–20 September 2022); and Renewable energy projects: permit granting procedures (13 June 2022). NB: The first flagship workshop on zero pollution for air, water and soil took place on 9 February 2022.

([206]) https://webgate.ec.europa.eu/TMSWebRestrict/resources/js/app/#/library/detail/90076?hasBackBtn=false.

Annex

2025 priority actions

Circular economy and waste management

Transitioning to a circular economy

- Speed up the transition to a circular economy by implementing an updated national strategy and the EU framework and recommendations, in particular to complement it with upstream circularity measures.

Waste management

- Improve separate collection at the source (e.g. through using economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness).
- Improve municipal waste preparation for reuse and recycling.
- Increase the collection and recycling rate of waste electrical and electronic equipment (WEEE).
- Invest in waste prevention measures to reduce the total amount of waste generated.
- Implement and expand the pay-as-you-throw system for businesses and households.
- Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the early warning reports where applicable.

Biodiversity and natural capital

Nature protection and restoration – Natura 2000

- Complete the Natura 2000 site designation process.
- Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.

Recovery of species

- Strengthen the integration of biodiversity actions into other policies, e.g. energy, agriculture, fisheries, forestry, urban and infrastructure planning and sustainable tourism, and promote communication between stakeholders.
- Enhance efforts to collect reliable data on the conservation status of habitats and species as well as their occurrence at site level. In view of this, consider the creation of a body in charge of monitoring and reporting, to ensure that data are not provided only ad hoc on a contract basis.
- Reinforce action for habitats and species with unfavourable conservation status through, for example, restoration measures, increased connectivity, better policy coordination and integration and increased funding.

Recovery of ecosystems

- Implement l eco-schemes and agri-environmental measures and practices to address the environmental needs of France.
- Implement and scale up the uptake of organic farming practices.
- Report updates on the assessment of the state of France’s marine waters, its targets and its determinations of GES (62), which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.

Prevention and management of invasive alien species

- Step up implementation of the IAS Regulation, including with regard to enforcement and the capacity of inspection authorities.

Zero pollution

Clean air

- As part of the NAPCP, take action to reduce emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.

Industrial emissions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely updates to permits following the publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation to the IED.

Major industrial accidents prevention – Seveso

- Ensure access to transparent and clear information for citizens on risks and behaviour in the event of an accident.
- Ensure full and correct transposition of the Seveso III Directive.

Mercury Regulation

- Take effective action against illegal gold mining in French Guiana.

Noise

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

- Improve river continuity and ecological flows, boosting efforts on nature-based solutions to reduce hydromorphological pressures
- Ensure periodic reviews of permits for discharges, abstractions and other water uses, including hydropower pressures
- Reduce pollution from nutrients, chemicals, metals and saline discharges
- Better justify exemptions to the achievement of good status
- Improve the classification of water bodies and strengthen monitoring systems
- Develop more robust programmes of measures, tackle obstacles identified in the implementation of measures and ensure adequate financing for implementation, including through better use of the cost recovery and polluter pays principle
- FRMPs should provide details on how the FHRMs were used in the choice of measures and how to consider pluvial flooding
- Better explain the choice and implementation of flood prevention and protection measures (prioritisation, monitoring, costs of measures)
- Improve public consultation and stakeholder involvement.
- Take action to ensure full compliance with the Drinking Water Directive
- Tackle nutrient pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive.
- Take the necessary measures to ensure full implementation of the current UWWTD, taking into account the new requirements of the recast directive.

Chemicals

- Upgrade the administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REF projects.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislation.

Climate action

- In the next period France should focus on implementing all polices and measures that are needed to achieve targets defined by Effort Sharing Regulation and LULUCF regulation. More detailed priority actions are identified in the assessment of the final national energy and climate plan (NECP).

Financing

- Use more national funding (for instance by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.

Environmental governance

- Make spatial data more widely accessible and prioritise environmental datasets in the implementation of the Inspire Directive, especially those identified as high-value spatial datasets for implementing environmental legislation.
- Provide information on the average duration of all steps in the EIA process.
- Ensure correct transposition of the revised EIA Directive.
- Encourage the use of training programmes provided by the Commission (or developed at the national level) and covering the ELD and its interactions with the other national liability-related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.
- Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.