

FRANCE

Case study on climate multi-level governance

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France

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Introduction

France, historically a highly centralized state, began devolving powers towards local authorities from the 1980s. The decentralization laws of 2014, the law modernizing territorial public action (MAPTAM), and the 2015 law on the new territorial organization of the Republic (NOTRE) stipulated new jurisdictions for French local authorities by reinforcing two levels : intermunicipalities, whereby several municipalities group into public establishments that levy their own taxes (établissements publics de coopération intercommunale - EPCI) with several mandatory jurisdictions transferred from the municipalities; and regions. Jurisdictions relating to the ecological transition are particularly concerned, and organized to jointly involve the regions and the intermunicipalities.

1. Distribution of competences between levels of governance

	34 968 MUNICIPALITIES ¹	101 DEPARTEMENTS ²	18 REGIONS	CENTRAL GOVERNMENT
ENERGY	<ul style="list-style-type: none"> - Energy Efficiency measures and produce renewable energy - Development of district heating - Infrastructure for electric mobility 	<ul style="list-style-type: none"> - energy savings actions and produce renewable energy - Development of district heating 	<ul style="list-style-type: none"> - <i>Regional Schemes for Connection to the Renewable Energy Network</i> - Energy Efficiency measures 	<ul style="list-style-type: none"> - <i>Multi-annual programming of energy production (PPE)</i>
TRANSPORT	<ul style="list-style-type: none"> - Urban transport and municipal roads - Organization of the public space 	<ul style="list-style-type: none"> - Management of: fishing ports, airfields of local interest, secondary roads, rural roadways 	<ul style="list-style-type: none"> - Interurban transport networks (regional express trains), school transportation - Civil airports and commercial ports 	<ul style="list-style-type: none"> - Multimodal collective transportation plans for passengers/goods - Ports and airfields of national interest, main inland waterways, motorways
HABITAT	<ul style="list-style-type: none"> - Definition of priorities and local habitat program - Joint funding of housing - Joint management of social housing 	<ul style="list-style-type: none"> - <i>Départemental habitat and housing plan for disadvantaged people</i> - Financing of the housing solidarity fund 	<ul style="list-style-type: none"> - Joint funding of housing 	<ul style="list-style-type: none"> - <i>Plan for energy retrofit and habitat</i> - Financial support for housing - Guarantee of the right to housing
WASTE, WATER AND SANITATION	<ul style="list-style-type: none"> - Waste collection and treatment - Water supply and sanitation management 	<ul style="list-style-type: none"> - Management of rivers, canals & lakes 	<ul style="list-style-type: none"> - Regional waste prevention and management plan 	<ul style="list-style-type: none"> - <i>National prevention and management plans and for circular economy</i> - Authorization of storage facilities
ECONOMIC INTERVENTION	<ul style="list-style-type: none"> - Support for business real estate investments and land rentals - Support to maintain necessary services in rural areas 	<ul style="list-style-type: none"> - Support for production of farm produce and fish - Support for companies providing necessary market services in rural areas 	<ul style="list-style-type: none"> - Development of the economic development and regional innovation plan (SRDEII) - Selection of companies meriting support in the region (creations, takeovers, businesses in difficulty) - Management of EU funding 	<ul style="list-style-type: none"> - Control and supervision of action by local authorities - Participation in the equity of major companies
URBAN AND RURAL PLANNING	<ul style="list-style-type: none"> - <i>Territorial coherence plan and local urban planning (SCOT)</i> - Building and land use permits, land management 	<ul style="list-style-type: none"> - Delimitation and protection of agricultural and natural peri-urban areas - Choice of state-region projects 	<ul style="list-style-type: none"> - Development of regional land use plans - Interregional management of coastlines and massifs - water protection 	<ul style="list-style-type: none"> - Urban renovation in priority neighborhoods - <i>Development plans for collective services at national level</i> - Funding of joint state-region projects
ENVIRONMENT AND CLIMATE PROTECTION	<ul style="list-style-type: none"> - Territorial Climate-Air-Energy Plan (PCAET) - Inventory of natural heritage - Green spaces 	<ul style="list-style-type: none"> - Inventory of natural heritage and threatened natural areas 	<ul style="list-style-type: none"> - Regional Schemes for land use, sustainable development and equality (SRADDET) - Regional plans for forest and wood - Protected areas and regional parks - Action to promote biodiversity 	<ul style="list-style-type: none"> - National Low-Carbon Strategy (SNBC) - National Climate Plan - National reserves and natural marine parks - Water police
2018 BUDGET (BILLIONS OF EUROS)	124,28	66,56	32,26	248 307

Source : www.vie-publique.fr, Global Observatory on Local Finance (UCLG), [Observatoire français des finances locales](#), [Tableau de répartition des compétences](#).

¹ Grouped into 1,258 intermunicipalities Jurisdictions vary according to the size of intermunicipalities, and depend on the level of delegation decided by the municipalities.

² The départements are French administrative levels in between municipalities and regions. They number 95 in metropolitan France, and five overseas départements.

Local authorities are the leading public investor. In 2015, they accounted for nearly 70% of civil public investment ([French Government](#), 2018). Yet, French local authorities have little fiscal autonomy, and their revenues come mostly from the general operating budget granted to municipalities by central government. This autonomy has been reduced even further in recent years with the state's decision to withdraw a significant source of municipal revenue, i.e. the residence tax (to be offset by other funds), coupled with a 1.2% annual limit on operating expenditure growth for the 322 biggest French municipalities. In addition, French local authorities devote 17.6% of their expenditure to investment, the third highest rate in the European Union, making them key economic actors, and potentially key players.

Every year, the French think tank 14CE, with the support of the ADEME environment agency, evaluates the extent to which the state budget impacts on the climate by identifying over 250 budgetary and tax measures that positively or negatively influence emissions in France. In 2019, the study concluded that 20 billion euros had a positive effect (e.g. research, renovation, renewables) compared to 17 billion euros with a negative effect (e.g. support for aviation and fuel).

In 2020, 14CE developed a method for local authorities to carry out a similar analysis of their expenditure on investment and operations. This evaluation should above all foster the local debate on the measures and changes to put in place at local authority level. A dozen pilot towns are concerned. Find out more at: https://www.i4ce.org/go_project/cadre-evaluation-climat-budget-collectivites/

BOX 1

2. Evolution of the national framework for local climate-energy planning

2.1 2000 – 2015: the emerging role of local authorities

In 2000, France adopted its first climate change action program (PNLCC), followed in 2004 by the first French climate plan with the key aim of “gaining support from the whole of society”. It included a section encouraging “local climate plans”, which were not obligatory at the time.

It was not until 2007, with the open, multi-party debate on the environment known as the “Grenelle”, that the role of the local areas took on a new emphasis. The “Grenelle 2” law enacted on 12 July 2010 went on to establish a regional climate-air-energy plan (SRCAE) jointly put together by the state and the regions and including: a review of greenhouse gas (GHG) emissions, energy consumption and air quality, and scenarios on the 2020 horizon detailing the “Europe 2020” 3 x 20 strategy (-20% GHG compared to 1990; 20% increase in the share of renewable energy; 20% improvement in energy efficiency). Since that date, the regions have to produce a GHG emissions balance every three years, covering the assets on their territory (public buildings, public transport, and concerning the region's jurisdiction).

The Grenelle 2 act also established the obligation to produce a territorial energy climate plan (PCET) for all local authorities with more than 50,000 inhabitants, i.e. 500 authorities. The PCET was required to closely follow the ambitions and deadlines defined during international negotiations,

and EU and national objectives, i.e. the Kyoto targets, the EU 3x20, and the French factor 4 objective adopted in 2005 in its energy program law. The question of establishing coherence between the different levels thus arose. *"The coherence of local authorities' actions will be facilitated by dialogue within a national consultative body featuring associations of elected representatives from different local authorities, combined with the production of a national strategy for sustainable development and its implementation. A similar body could be set up at regional level."* (Chapter V, article 44 in the Grenelle 2 Act) ([ADEME](#), 2009).

2.2 Since 2015: tighter regulations and the regions as "front runners"

Adopted on 17 August 2015, the energy transition for green growth act (LTECV) clarifies and simplifies the plan initiated by the two Grenelle acts. Preceded by a vast debate involving different actors (NGOs, local authorities, companies, etc.), it reduces the strategic action levels to two: the region, with the regional air-energy-climate plan (SRCAE), and the intermunicipality, with the territorial climate-air-energy plan (PCAET). These two plans are obligatory, with the exception of a few intermunicipalities with under 20,000 inhabitants.

At the same time, act No. 2015-991 of 7 August 2015 on the new territorial organization of the Republic (NOTRe) makes the regions the front runners on climate and energy, local land use, biodiversity and air quality. For these issues, the regions ensure the territorial application of national guidelines and coordinate the local authorities on their territory (Source: SNBC 2020).

"Art. L. 4251-1. The region, [...], shall produce a regional plan for territorial land use, sustainable development and equality (SRADDET)". "This plan defines the mid- and long-term targets for the region's territory in terms of balance and equality of territories, establishment of different infrastructures of regional interest, improved access to rural areas, habitat, efficient space management, intermodal connections and development of transport, energy saving and recovery, action to fight climate change and air pollution, protection and restoration of biodiversity, waste prevention and management."

The law also establishes quantitative targets for the regional plan for 2020 and 2050

Article l222-1: *"Guidelines aimed at mitigating the impacts of climate change and adapting to it, in compliance with the commitment made by France, in article L. 100-4 of the energy code, to quarter its greenhouse gas emissions from 1990 to 2050, and in compliance with its commitments made as part of the European Union. To this end, it defines regional targets in terms of energy management".*

The energy transition for green growth act (LTECV) also establishes the national low-carbon strategy (SNBC) which distributes planned carbon reduction efforts by sector through legally binding four-year "carbon budgets"³. The revision of the SNBC adopted in 2020 establishes the budgets for 2029-2033 but revises downwards the emissions reduction forecasts for transport and buildings by 2023 that featured in the previous strategy.

Municipalities and regions must consider SNBCs along with these budgets in their climate plans (fig. 4). This increases their responsibility in structural investments relating to energy (buildings, transport, etc.), and more particularly in planning and coordinating the energy transition for the regions; and in the interaction and coordination with local actors for intermunicipalities.

Lastly, the act LTECV redefines the territorial climate-air-energy plan (PCAET) by establishing quantitative targets in line with France's international commitments:

- *"I. The metropolis of Lyon and public groupings of local authorities that levy their own taxes [EPCIs] in existence on 1 January 2015 with over 50,000 inhabitants shall adopt a territorial climate-air-energy plan by 31 December 2016 at the latest. [...]. Public groupings of local authorities that levy their own taxes [EPCIs] in existence on 1 January 2017 with over 20,000 inhabitants shall adopt a territorial climate-air-energy plan by 31 December 2018 at the latest.*
- *"The territorial climate-air-energy plan may be established at the scale of the territory covered by a scheme for coherent territorial development [SCOT] provided that all concerned public groupings of local authorities that levy their own taxes [EPCIs] transfer their powers to draw up the plan in question to the public body responsible for the scheme for coherent territorial development [SCOT]."*
- *"II.- The territorial climate-air-energy plan defines, on the territory of the public body or of the metropolis:*
 - *"1° The strategic and operational objectives of this public authority to mitigate, effectively combat, and adapt to climate change, in line with France's international commitments;*
 - *"2° The program of action to be achieved, in particular to improve energy efficiency, develop electricity, gas and heat supply networks in a coordinated manner, increase the production of renewable energy, optimize the potential of energy recovery, develop storage and optimize the supply of energy, develop positive-energy territories, limit greenhouse gas emissions, and anticipate the impacts of climate change."*

Note that article 119 of this law has to date not been implemented by the state: *"The means for*

3. Carbon budgets are GHG emission ceilings, expressed for France in MMTcDE. They are established by sector of activity and by 4-5-year period: 2015-2018 (1st carbon budget), 2019-2023 (2nd carbon budget), 2024-2028 (3rd carbon budget).

calculating greenhouse gas emissions on the territory on which the territorial climate-air-energy plan is established shall be defined by the state. The calculating method shall be defined by regulation in a way that is easy to apply, verify and compare with other territories."

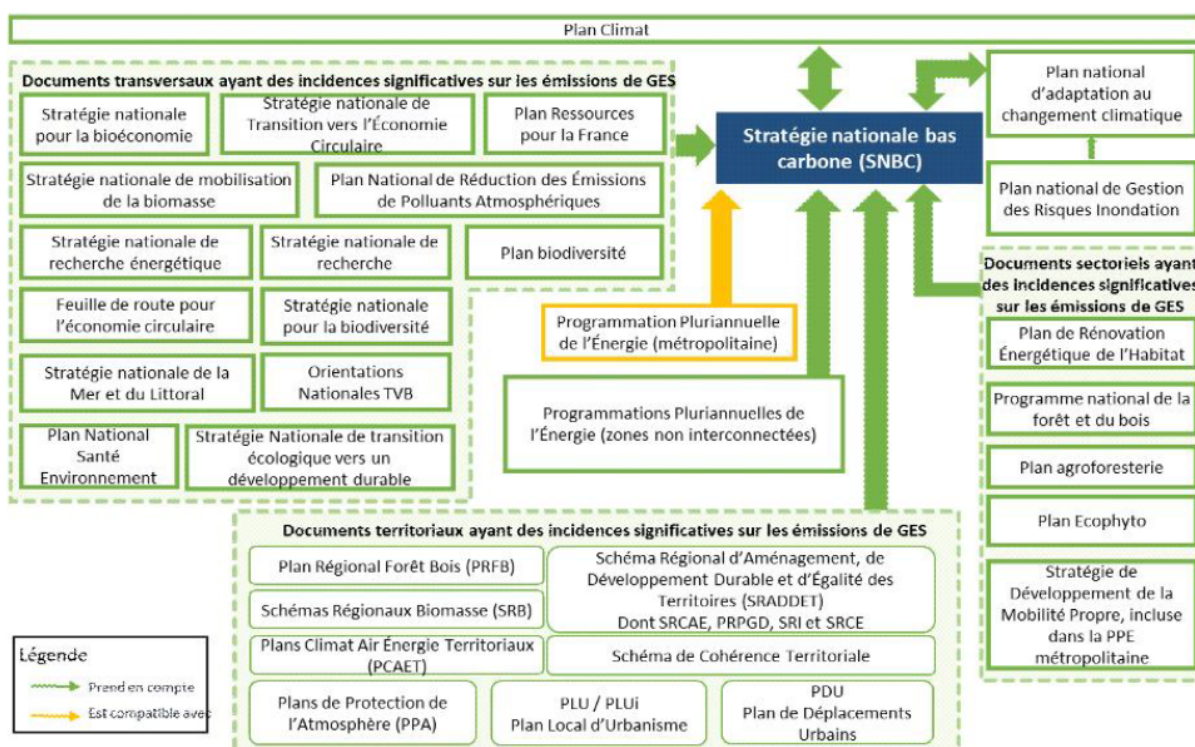
The decree of 28 June 2016 relating to the territorial climate-air-energy plan (PCAET) stipulates the interface between the different levels of authorities: "The territorial climate-air-energy plan describes the arrangements for interfacing its targets with those of the regional plan established in article L 222-1 and articles L4433-7 and L 4251-1 of the general local authorities code" and "the draft plan shall be transmitted for opinion to the regional prefect and the president of the regional council. These opinions shall be deemed to be favorable after a period of two months following the transmission of the request."

In summary, an evaluation by the National Low-carbon Strategy lists the national and local planning tools that have an impact on greenhouse gas emissions, and how they interconnect (fig.1). The different planning documents that have an incidence on GHG emissions also correspond to very precise requirements in terms of their accountability and their consideration of, or by, national plans.

FIGURE 1

SIMPLIFIED DIAGRAM SHOWING HOW THE MAIN STRATEGIES, PLANS AND PROGRAMS INTERFACE WITH THE SNBC. ONLY DOCUMENTS CLOSELY CONNECTED WITH THE SNBC ARE REPRESENTED

Source : [I Care & Consult](#), April 2019 (page 9)



Lastly, on the national level, a High Council on Climate (HCC) was created by decree in May 2019. This independent body produces opinions and recommendations regarding the implementation of public policies and measures to reduce GHG emissions in conformity with the Paris Agreement. In its second annual report published in July 2020, the HCC considers that government measures have not been sufficient to tackle the country's challenges and climate targets. It also recommends that the National Low-carbon Strategy should constitute the reference framework for all public action undertaken by the French state.

TABLEAU 1

SUMMARY OF OBLIGATIONS OF FRENCH LOCAL AUTHORITIES

	INTERMUNICIPALITIES	REGIONS
What	The territorial climate-air-energy plan (PCAET).	The regional plan for territorial land use, sustainable development and equality (SRADDET) merges four previous plans ⁴ .
Who	<ul style="list-style-type: none"> - Obligatory since 2015 for intermunicipalities with more than 20,000 inhabitants, i.e. a total of 734⁵. Deadlines: +50 000 inhab. -> 2017 +20 000 inhab. -> 2019 - Voluntary for intermunicipalities with under 20,000 inhabitants. 	<ul style="list-style-type: none"> - Obligatory since 2015 for 11 French regions. - The other regions have a special status and are not subject to this obligation.
When	To be renewed every 6 years, compared to 5 formerly, to improve coherency with regional plans.	Revised at each newly elected regional council every six years.
Reporting modalities	<p>Submission procedures established in the LTECV ensure minimum comparability of diagnoses established by PCAETs on data relating to GHG emissions, energy, carbon capture capacities, atmospheric pollution, vulnerabilities of the territory, and planned action.</p> <p>Submission is via a special "territories-climate" platform. Some regions monitor PCAETs implemented on their territory, e.g. Ile-de-France (DRIEE, 2019).</p>	<p>Establishes regional targets in line with national targets in 11 areas.</p> <p>Submission procedures for SRADDETs must meet with common requirements:</p> <ul style="list-style-type: none"> A report presenting the targets; A leaflet mentioning the plan's general rules of application, and monitoring-evaluation indicators; Appendices, such as: an evaluation of the environmental impacts of the actions planned, a territorial diagnosis taking into account the continuity of ecosystems, etc.
Carbon accounting	<p>GHG inventory obligatory for all regions and municipalities with over 50,000 inhabitants, to be renewed every three years at the latest⁶. The obligation relates to the emissions of the local authority's assets (of its services), not to the whole of its territory or its indirect emissions (scope 3).</p> <p>Accounting method imposed by the state in a way that is easy to apply, verify and compare with other territories (article R. 229-45 of the Environment Code). A specific guide on the method is available to local authorities.</p>	
Monitoring evaluation	Obligatory monitoring of the carrying-out of planned actions, governance and steering. The scale of monitoring indicators (transversal or sectoral) is established by the local body, making them harder to compare and combine ⁷ . Evaluation is not obligatory.	Revisions of the plan must be preceded by an evaluation of the targets of the previous plan. The monitoring indicators, evaluation and method are defined by each region, making them harder to compare and combine.

4 Regional climate-air-energy plan; regional infrastructure and transport plan (SRIT); regional intermodal transport plan (SRI); regional plan for waste prevention and management (PRPGD).

5 Decree No. 2016-849 of 28 June 2016 relating to the PCAET

6 <https://www.ecologique-solidaire.gouv.fr/actions-des-entreprises-et-des-collectivites-climat>

7 The decree for the LTCV Act (Article 1 - IV) gives instructions and describes "the indicators to employ to meet the established targets and actions to be carried out and how these indicators fit in with those of the plan [...]". Ademe, 2016 <https://www.ademe.fr/sites/default/files/assets/documents/guide-pcaet-comprendre-construire-et-mettre-en-oeuvre.pdf>

3. Monitoring of municipalities and regions engaged in a planning initiative

3.1 Municipalities and intermunicipalities

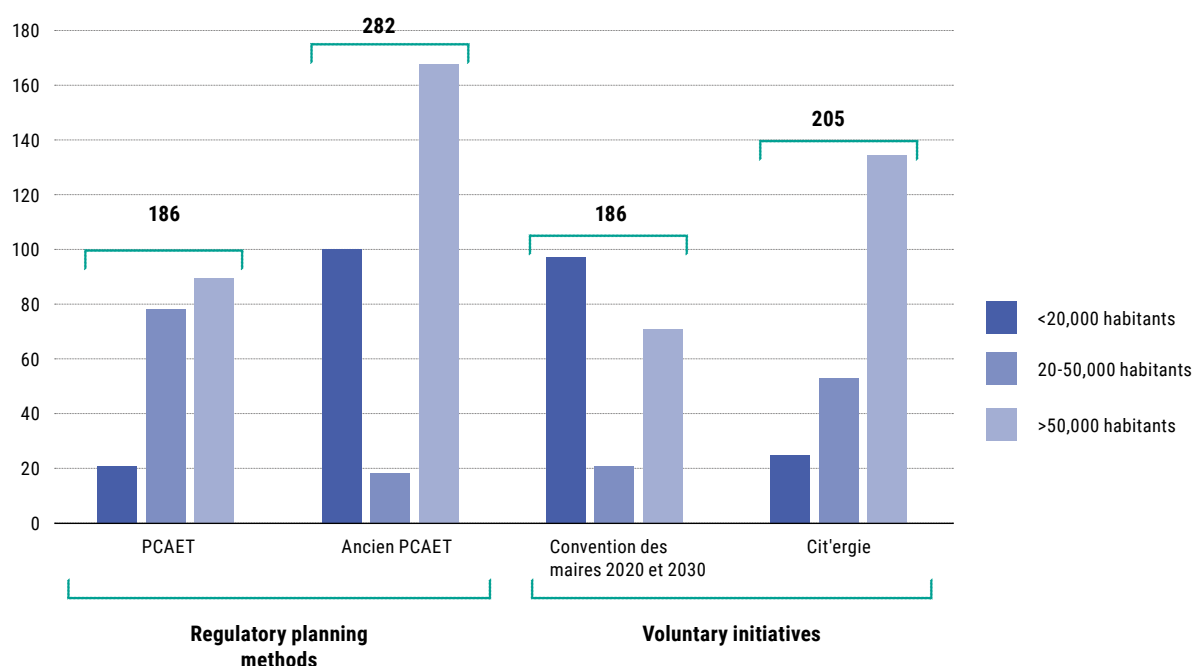
French local authorities are much more involved in implementing initiatives formulated at national level than they are in international voluntary schemes (fig. 2). The Cit'ergie initiative, the French equivalent of the European initiative "European Energy Awards" (eea), is also voluntary like the Covenant of Mayors, but its formulation and monitoring-evaluation process is more demanding and structuring. The Covenant of Mayors is more likely to be adopted by municipalities with less than 20,000 inhabitants that are not required to formulate a climate plan. All of these initiatives are described in our annual [Local Action Reports](#).

In the case of France, this shows the interest of improving compatibility between initiatives to reduce the additional cost of participating in voluntary European and international schemes. A first step in this direction is the alignment between the Covenant of Mayors in Europe and the European Energy Awards, whereby local authorities accredited by the Awards are considered to have met the criteria of the Covenant of Mayors⁸.

FIGURE 2

PLANNING INITIATIVES ENGAGED BY MUNICIPALITIES AND INTERMUNICIPALITIES

Source : Covenant of Mayors in Europe, ADEME, eea



The "Territoire-Climat" platform operated by ADEME catalogs the local climate plans (PCAETs) currently being validated or implemented, along with the old PCETs and other national initiatives. In February 2020, the site reported that 186 towns had filed their PCAET and that around one hundred of them were already being implemented. However, more than 750 municipalities and inter-municipal authorities are concerned by the obligation to adopt this type of plan.

⁸ <https://www.european-energy-award.org/cooperation-with-eu-initiatives/european-energy-award-covenant-of-mayors>

3.2 Region

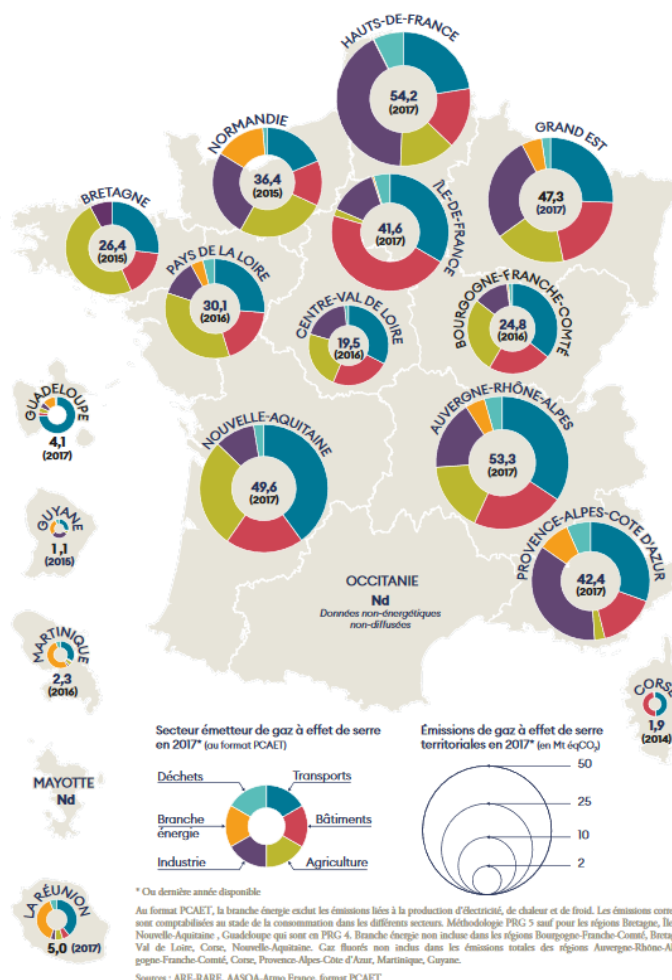
The 11 metropolitan regions that are subject to producing a regional plan for spatial planning, sustainable development and equality (SRADDET) have adopted their strategy in 2021⁹. However, all 18 French regions, on the mainland and overseas, have carried out this exercise in a format that predates the SRADDET and all of them possess GHG emissions data at the scale of their territory.

Few consolidated analyses of these documents and the data they contain are available. The latest annual report by the High Council on Climate (HCC) provides little information on the situation in the regions¹⁰: regional emissions were between 20 and 54 MtCO₂e in 2017 with a median of around 36 MtCO₂e (and from 1 to 5 MtCO₂e for the overseas regions and Corsica).

The sectorial distribution of emissions varies widely from one region to another, depending on the economic profile: in the Hauts-de-France region, industry is responsible for almost half of regional emissions (42%), while in Brittany, agriculture represents 49%, and in Ile-de-France, transport and building make up three-quarters of emissions. It is also worth noting that these emissions do not reflect regions' carbon footprint or imported emissions, which can be greater for very urban areas like Ile-de-France.

FIGURE 3

EMISSIONS FROM TOTAL FRENCH REGIONS AND BY SECTOR IN 2017 - Source : [Haut Conseil pour le Climat](https://www.hautconseilclimat.fr/wp-content/uploads/2020/07/hcc_rapport_annuel-2020.pdf), 2020



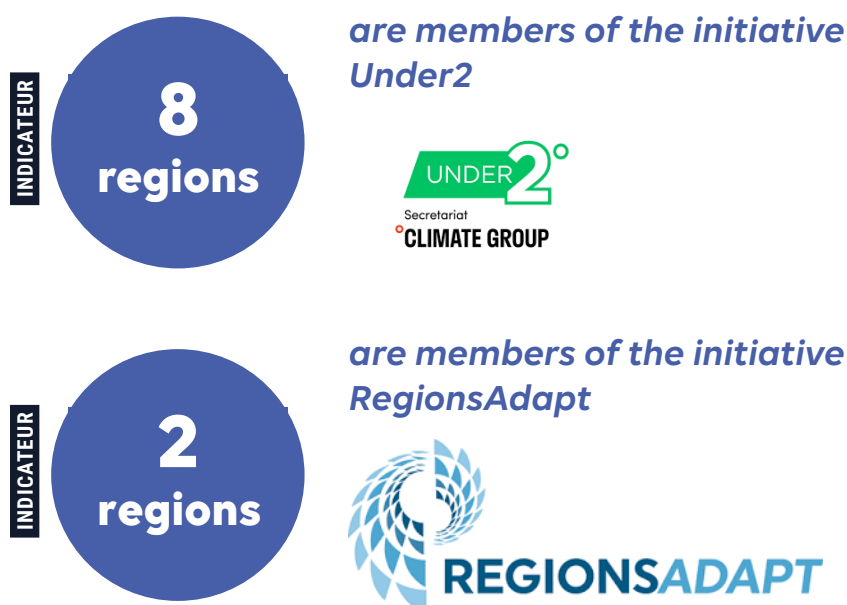
⁹ <https://www.cohesion-territoires.gouv.fr/sraddet-un-schema-strategique-prescriptif-et-integrateur-pour-les-regions>

¹⁰ https://www.hautconseilclimat.fr/wp-content/uploads/2020/07/hcc_rapport_annuel-2020.pdf

Emissions from the different sectors featuring in the National Low-carbon Strategy are unequally distributed between regions, and consequently national targets weigh more or less heavily on the regions depending on the extent to which their main emission sources are covered by national policies. For the HCC, a dialogue between the state and the regions is thus necessary to set out the efforts required by each party, and some territories will need to go beyond carbon neutrality.

The Grenelle 2 act of 2010 also requires that the regions provide a three-year inventory of GHG emissions concerning their assets and administrative jurisdictions. To date, only seven inventories are available on the relevant platform and most of these correspond to the regions as they existed prior to the 2015 merger ([GHG balance](#), 2020).

Lastly, the French regions are particularly dynamic internationally and take part in various initiatives that do not require specific planning measures but tend to support existing regional policies. Eight of them have signed the Under2MoU initiative, which aims at an 80% emissions reduction by 2050 (see the [2018 and 2019 Local Action Reports](#) for a description of the initiative). Concerning adaptation, two regions (Brittany and Réunion Island) are part of the RegionsAdapt initiative, which supports regional governments in putting together an adaptation plan, implementing concrete actions, and reporting on their actions.



4. Interface between the different levels of governance

3.1 Interface Regions/Cities

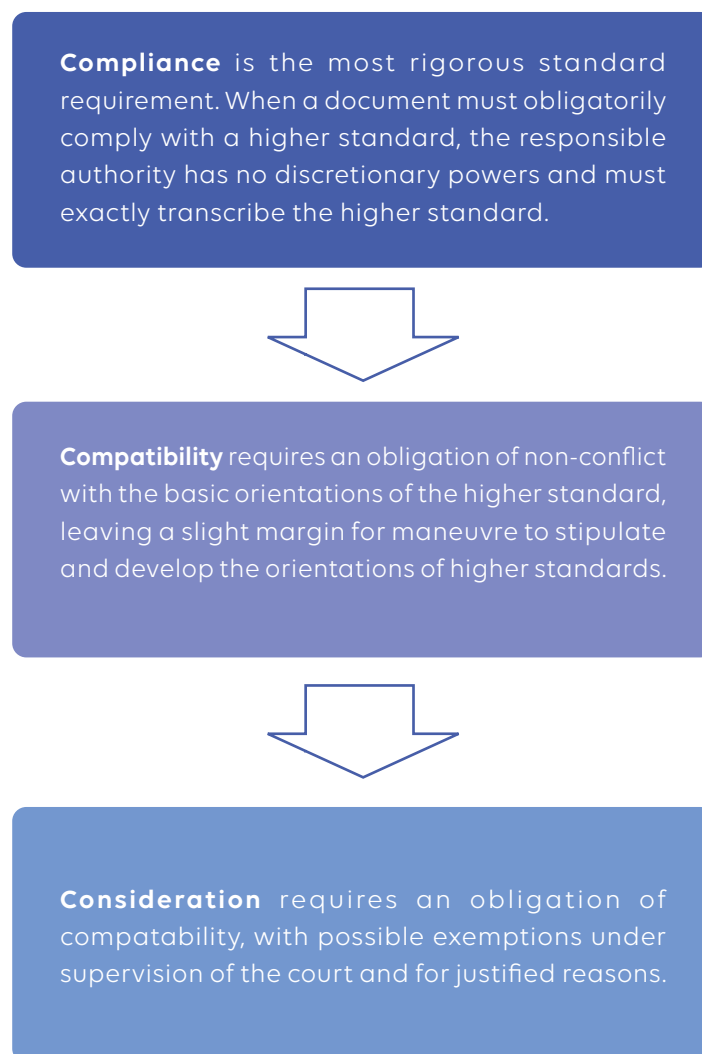
The law requires that local climate plans (PCAETs) *must be compatible* (fig. 4) with regional plans (SRADDETs): the PCAET's objectives and priorities must explicitly interface with the existing regional plan and its indicators must stipulate how they interface with regional indicators. However, the fact that regional and local submission procedures are different, as are their monitoring tools, provides no guarantee that local data will be integrated into the regional monitoring process.

For the High Council on Climate (HCC) *"the constitutional principle of non-supervision limits regions' capacity to organize actions concerning the jurisdictions of other local authorities and their*

groupings, and therefore to make concrete the climate strategies that they establish. However, as front runners on climate issues, regions must play an important role in coordinating actions between the different territorial levels and in territorial climate governance. In doing so, they could become a genuine discussion platform within the regional territory" (HCC, 2020). More dialogue at regional level on subjects related to the transition is recommended both to feed into regional strategy and to facilitate its acceptance by stakeholders and ensure their cooperation.

FIGURE 4

NATURE OF THE LINKS BETWEEN THE DIFFERENT PLANNING DOCUMENTS.



In this case, to ensure the “horizontal coherence” of local policies, those relating to the sectors of urban planning, mobility and habitat (respectively, local intermunicipal town planning PLUi, urban mobility plans PDUs, and local habitat program PLHs) must *consider* the PCAET and must *comply with* the SRADDET (fig. 5).

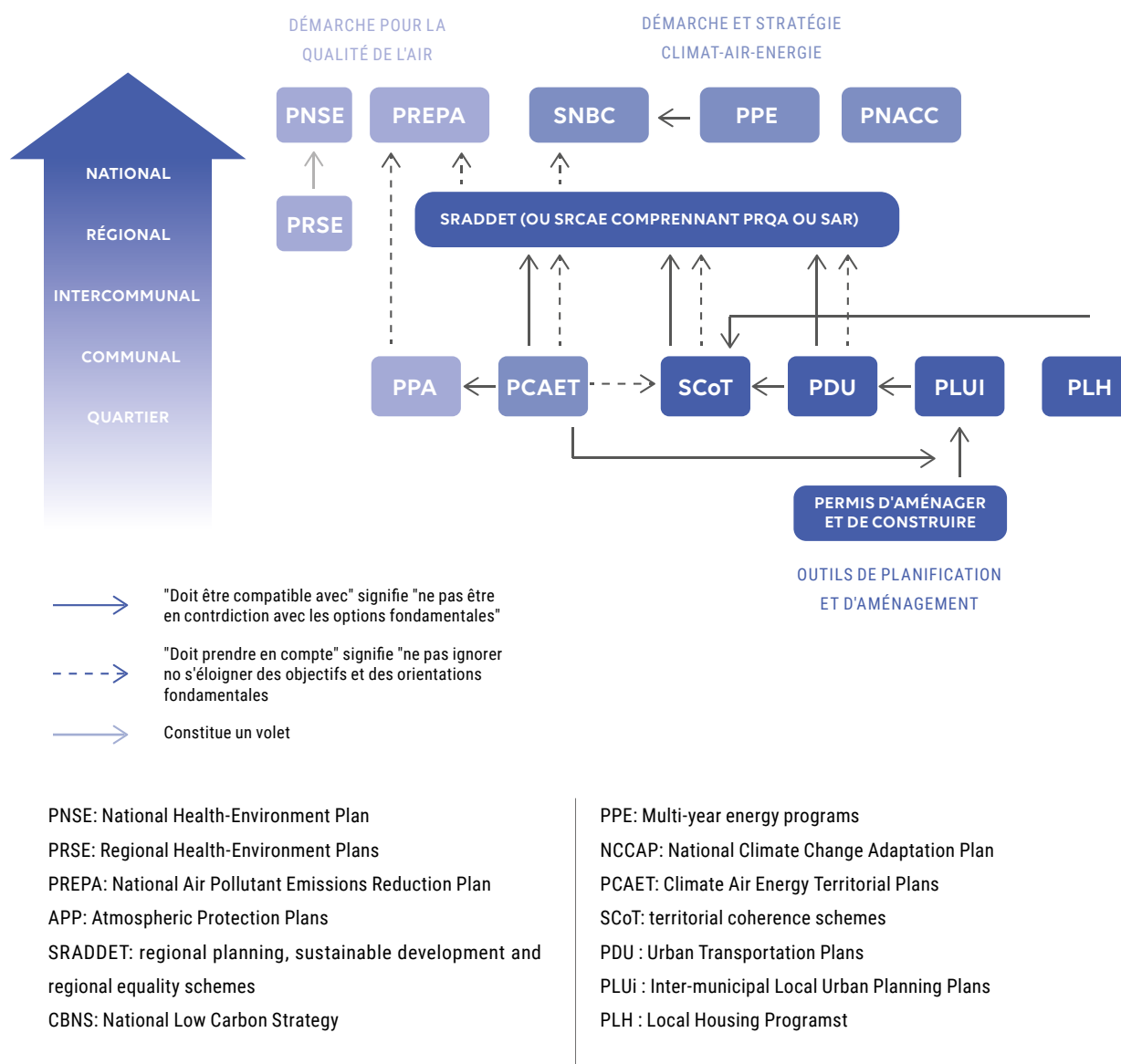
The nature of the links between the different documents can change. In June 2020, orders [2020-744](#) and [2020-745](#) brought about significant changes to the territorial coherence plans (SCoT) and to the hierarchy of spatial planning documents both compared to each other and to other territorial documents. SCoTs are long-term strategic planning documents designed to provide a reference framework for the different sectorial policies, in particular those centered on the issues of urban planning, the habitat, mobility, commercial planning, and the environment, including biodiversity,

energy and climate. They can now serve as a PCAET, thus reducing the number of plans and improving the cross-cutting dimension of climate-air-energy measures in all sectorial policies covered by SCoTs ([APCC, 2020](#)).

In addition, local development plans, which formerly had to take the PCEAT into account, now have to be compatible.

FIGURE 5

DIFFERENT PLANNING INITIATIVES FOR MUNICIPALITIES AND INTERMUNICIPALITIES AND HOW THEY INTERFACE WITH THE SRADDET - Source : Ademe.



4.2 Interface between National State and local authorities

Targets: regional and local plans must *consider* the SNBC. They are designated as "effective tools" to implement this strategy. The law *recommends* that regions formulate their climate-energy targets according to the following timetable ([MTES, 2020](#)):

- 2021 and 2026, which corresponds to the midpoint of the next PPE and the 2nd and 3rd carbon budgets, which are also regulatory references for the PCAETs;
- 2030, which is an EU and international reference year;
- 2050, which is an international reference year and the deadline for the SNBC.

However, the revised SNBC dating from January 2020 stipulates that the complete inferencing of regional and local objectives with those of the SNBC had not been possible due to the parallel development schedules. It also points out difficult comparison because of the varied methods used to define them. Consequently, there is currently no way of ensuring that the sum of territorial strategies are consistent with the national target.

Monitoring-evaluation: the SNBC results indicators are published annually. They do not include the results of regional and local plans, which are mostly in the process of implementation. At the same time, in 2015 the SNBC produced 67 recommendations to translate into concrete public policies to reduce GHG emissions in France. SNBC monitoring observes the level of integration of each recommendation into national public policies, but not regional and local policies. Nevertheless, three indicators of recommendations to integrate the SNBC into public policies concern local authorities ([MTES, 2020](#)):

- Improve, progressively and iteratively, the coherence of quantitative objectives between the different levels.
- Involve all territories in climate-air-energy plan (PCAET)-type initiatives, at intermunicipality level, and facilitate access to data required for establishing territorial carbon footprints and action plans.
- Multiply the territories covered by projects, support them in their efforts and promote them (labeling, endorsements).

The 2018 evaluation judged the integration of these three recommendations to be satisfactory with 3 stars out of 3 ([MTES, 2019](#)).

Practically all of the regions in France have set up regional energy and climate observatories (OREC), which produce consolidated balances of greenhouse gas emissions at regional level, as well as on energy consumption, carbon sinks, pollution, etc. About ten observatories exist in France, gathered within the network of regional energy and environment agencies (RARE), or the Atmo network.

In its 2020 annual report, the High Council on Climate regrets that the regional climate observatories have been constituted in different ways depending on the region, which is responsible for deciding. As a result, regional GHG emission balances are not standardized between regions, and feature different calculation methods and data sources, etc., which makes it *"difficult, on the one hand to compare regions with each other, and on the other hand to aggregate and compare with the national level"* ([HCC, 2020](#)). Moreover, the networks that coordinate the work of their member observatories complain of insufficient financing to organize their action at national scale

Finally, the issue of double-counting¹¹ GHG emissions is a growing issue as the number of inventories increases and their potential is brought into line with those at the regional and national levels. In France, ADEME and Citepa therefore offer a "spatialization" tool for the national GHG inventory, which disaggregates the national inventory at the level of municipalities and regions. If these data are less precise than inventories based on local data, this makes it possible to offer a default emission inventory to communities which avoids double counting between the different French territories ([ADEME, 2021](#)).

¹¹ Double counting of emissions is the fact of calculating twice the same GHG emission by the same entity, or by several entities. Emissions or their reduction are then taken into account twice or more. Article 6 of the Paris Agreement indicates the need to avoid double counting.

REGIONAL CLIMATE OBSERVATORIES – EXAMPLE OF THE HAUTS-DE-FRANCE REGION

Some local governments have created climate observatories to monitor changes in GHG emissions, energy consumption, carbon sinks, pollutants, etc. They number around a dozen in France, grouped together into the Regional Energy and Environment Agencies Network (RARE). The data collected and indicators produced by the Hauts-de-France Climate Observatory participate in the monitoring of PCAETs and the future SRADDET. They are also useful to improve the integration of climate-energy data at different levels.

The Climate Observatory created in 2012 for the Hauts-de-France region is run by the CERDD (Sustainable Development Resource Center), a “public interest grouping” coordinated by five institutions: the state, the Hauts-de-France region, and several local authorities, associations and private partners. It monitors several indicators and impacts informing municipalities and the region about pressures created by human activities (48), the current state of the climate and biodiversity (23), and mitigation and adaptation responses (7).

Source : [CERDD](#)

BOX 2

A “territorial ecology” working group is tasked by the State, in conjunction with associations of local elected representatives, with proposing a mechanism for integrating the guidelines of the regional plans into the future revision of the national low-carbon strategy and, conversely, ensuring that national indicators are taken into account in the monitoring of regional plans. To make this integration possible between regional data, the latter must be harmonised, as well as the methods, indicators and monitoring mechanisms between regions. Regional climate observatories can thus enable the production of regular, comparable and sumable territorial data.

5. Financing systems for local authorities

5.1 Local authorities employ own funding to implement climate

jurisdictions

State funding of new jurisdictions for implementing climate plans has not been the object of new funding, despite the demands of local authority networks (which suggested allocating territories with a share of the carbon-energy contribution¹²). As a result, local authorities must finance their own action from their general budget. Note that following the adoption of the energy transition act in 2015, the state did not opt to directly support local climate plan (PCAETs), but preferred to launch a call for projects with a relatively large budget (700 million euros), and cover up to 80% of the cost of concrete projects proposed by municipalities and intermunicipalities.

The ambiguity of state support for PCAETs has been confirmed by the present government, which has begun working on a new measure, the ecological transition contract (CTE), whose interface with the PCAET is not clearly apparent.

¹² The Climate-Energy Contribution (CCE) or carbon tax was introduced in France in 2014. It includes Domestic Consumption Tax (TIC) levied on oil products, natural gas, coal and coal derivatives. From its initial rate of €7/tCO₂ in 2014, it rose to €44.6 tCO₂ in 2018, and has since been frozen at that rate following strong opposition by the share of the population most strongly impacted by the tax.

5.2 Funding from outside France

Nevertheless, several types of funding are subject to contract, by the EU, central government, and the French energy agency ADEME. This is the case for example with ERDF (European Regional Development Fund), which includes an energy transition component, the amount of which must cover at least 25% of the funds managed by the region, with climate conditionalities.

5.3 State funding for investment or coordination

The state also supports major structural investment programs for which local authorities are eligible, in particular the “Investment for the Future Program” (PIA): a total of 47 billion euros to finance innovative, promising investments on the territory, and a declared ambition of carbon neutrality, with a principle of joint funding for: teaching, R&D, strategic industries, sustainable development, digital economy, health and biotechnology.

Central government’s major investment policies are implemented by intermediaries, e.g. on transport with financing from the French Agency for Transport Infrastructures Funding (AFIT) for large projects led by local authorities with high carbon impacts (railways, urban public transport, etc.). The Banque des Territoires, a department of the Caisse des Dépôts (the principal public financial institution in France), also offers local authorities numerous loans and manages the “Fonds Ville de Demain” (fund for tomorrow’s cities) to support investment in effective, innovative projects that contribute to transforming cities for: transport and mobility; energy and resources; urban organization and habitat. From 10% to 35% of investment costs are eligible for funding, for a total of 665 million euros.

- **Interest-free Green Growth Loan:** a 15-20-year loan for renovation work on local authority buildings, public hospitals and universities.
- **Green Growth Loan:** for energy-saving renovations, construction of positive-energy buildings, clean transport, and the production of renewable energy (rate ~ 1.5% for 20 to 40 years).
- **Eco-Loan:** loans for social housing operators at very low rates for thermal rehabilitation of housing, with the obligation of minimum energy savings (rate ~ 0.5% for 5 to 15 years).

A more recent measure dating from 2019 is the SARE (energy renovation support service) with a budget of 200 million euros. Based on a contract with the regions, this program is designed to improve information and support for individuals rehabilitating their housing (and in doing so, making it easier for individuals to access direct state aid, such as tax credits). It is based on an innovative financial mechanism, by allocating the income from energy economy certificates (CEEs)¹³ paid by companies to information platforms. Despite the fact that local authorities, regions and inter-municipalities – the scale on which these one-stop-shop energy information spaces are generally found – are required to provide a significant share of the funding, the measure is the first example of financial cooperation between the state and local authorities.

Lastly, France is unusual in that it has its own environment and energy management agency (ADEME), under the supervision of the state. The agency generates, leads, coordinates, facilitates

13 CEEs were created in 2006 and are based on an obligation to save energy imposed by public authorities on energy vendors. The latter must justify that they have fulfilled their obligations by holding a CEE worth an amount equivalent to these obligations. They can also buy CEEs from other parties that have performed energy-saving action by financing these actions.

and carries out operations to protect the environment and manage energy, with an annual budget of over 600 million euros.

Its funding and calls for tender are divided into five groups:

Implementation support:

- Diagnoses and studies to support projects carried out by external providers.
- Environmental projects, mainly in the form of investments: exemplary operations or operations to disseminate tested technologies ([heating fund14](#), circular economy [fund15](#), [support for anaerobic digestion](#)).

Knowledge support:

- Research, development and innovation projects.
- Projects "of a general nature": benchmarking, forecasting, development of tools, methods, evaluations, etc.
- Territorial climate-energy observatories.

Behavioral change support:

- Communication, training and coordination programs.
- Teaching equipment.
- Action programs to encourage mobilization.
- Support as part of a performance agreement: 3-year local projects based on achieving targets.

Source: [ADEME](#) (2020)

14 Soutient la production de chaleur renouvelable (biomasse, solaire thermique, géothermie, biogaz, énergies de récupération) et les réseaux de chaleur utilisant ces énergies. Durant la période 2009-2016, le Fonds Chaleur a été doté de 1,6 milliard d'euros pour soutenir près de 4 000 réalisations et une production totale de 2 millions tep.

15 Soutien aux projets en matière de prévention des déchets, collecte pour valorisation, recyclage, valorisation organique, matière et organique. Il consacre environ 200 M€ par an (80 % destiné au financement des opérations locales).

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