Cour des comptes



NOTRE-DAME-DE PARIS CATHEDRAL CONSTRUCTION SITE

Restoration work following the fire, the reopening and the continuation of the work: Third assessment

Public thematic report

September 2025

Summary

This third audit report by the Court, following on from those of 2020 and 2022, focuses on the conservation and restoration work carried out at Notre-Dame de Paris Cathedral following the fire on 15 April 2019 and on the use of funds from the national fund-raising campaign set up by the law of 29 July 2019. It comes after the monument reopened to visitors and the worship on 8 December 2024, and as the restoration work directly linked to the fire is nearing completion.

A restoration successfully completed, within a short deadline and with tight control on costs

The reconstruction and restoration work carried out since 2022 to reopen the cathedral by the scheduled date of 2024 (after the work to safeguard the building, completed in 2021), has been completed on schedule and on budget.

Keeping to this very tight schedule was made possible by the mobilisation of the teams from the public establishment responsible for the conservation and restoration of Notre-Dame de Paris Cathedral (EP-RNDP)¹ and the enterprises, as well as the excellent coordination with the departments of the General management for Heritage and Architecture and the Île-de-France Regional management for Cultural Affairs in examining applications and issuing permits. The close coordination between the work carried out under the responsibility of the public agency and that carried out by the Diocese², as well as the responsiveness of the public establishment to the inevitable unexpected developments in a project of this scale, also played a key role.

The cost of this phase of the work was estimated in May 2022 at €552 million, including €125.4 million in provisions covering price increases (€66.5 million), risk and unforeseen (€38.63 million) and calendar risks (€20.22 million). This last provision would, if necessary, allow the 2024 deadline to be met. It was subject to an in-depth analysis by the Board of Directors' Audit Committee, with the presentation, as suggested by the Court in its 2022 report, of three scenarios to assess the difference between the cost of extending the work and the expenditure that would have been incurred with the sole aim of meeting the 2024 deadline. This analysis confirmed that "measures taken to ensure that the 2024 timetable is met will, in any event, cost less than the cost of extending the deadline".

The work undertaken includes upgrading the fire safety equipment inside the cathedral. Work carried out with the Paris fire brigade identified many shortcomings that existed before the disaster. Major safety investments have been made, including the installation of a water mist fire suppression system in the frame of the big roof timbers and the creation of a new fire safety central station, manned 24 hours a day by two permanent staff, backed up by two other staff when the cathedral is open.

¹ For ease of reference, the report will use the acronym EP-RNDP (*Établissement Public Rebâtir Notre-Dame de Paris*), which is the name usually used in its communications.

² For ease of reference, the report refers to the Diocese, which is an ecclesiastical district, but it is the diocesan association (association cultuelle) - the legal entity - that is the contracting authority for work relating to religious buildings.

While the work is continuing after the cathedral has been reopened for worship and to visitors, the appointment of the EP-RNDP chairman as sole safety officer during the work continuation phase and until the establishment is dissolved, instead of the *Bâtiments de France* architect, who usually holds these functions, reflects the specific nature of the situation in which the work site coexists with ordinary operations. At the end of this transitional phase, as recommended by the Court during the previous audit in 2022³, the State will appoint an operational security manager.

The upgrading of safety and security equipment to cope with the considerable flow of visitors has led to a significant increase in operating costs, which have doubled since before the fire. Over a full year, this should represent expenditure of €5.2 million, of which €3.2 million will be borne by the Diocese of Paris and €2 million by the State.

The two towers could not be reopened to visitors, under the responsibility of the *Centre des Monuments Nationaux* (CMN), at the same time as the cathedral. They are now scheduled to reopen in September 2025. This delay was due to the need to review the visitor route initially planned following requests from the safety commission and to the late discovery of flaws in the south belfry, requiring specific work. Contrary to the figures provided by the CMN in 2022, the new visitor route will not see an increase in the number of visitors compared to the level reached before the fire; instead visitor numbers will be limited to 400,000 per year (compared to around 450,000 before 2019).

An agreement signed between the CMN and the ecclesiastical appointee⁴ on 17 February 2025 finally resolves the situation at Notre-Dame with regard to no-workship activities in the cathedral. It formalises the division of activities and related revenue between the *Centre des Monuments Nationaux* (visits of the towers), the Maurice de Sully Association (shops) and the diocesan association (tours of the Treasury), and specifies which events require state authorisation.

After the reopening in December 2024, a new restoration phase financed by donations, in agreement with donors

As at 31 March 2024, the EP-RNDP estimated that donations to the national fund would total €843 million, slightly higher than the figure anticipated in 2020 on the basis of pledges (€825 million).

The budget for the restoration phase, enabling the reopening in 2024, has been set at €552 million, following a budget of €165 million for the safety and consolidation phase. From the outset of the restoration, the question of how to fund the third phase of work, aimed at treating issues that existed before the fire and ensuring the overall restoration of the building, through donations, was raised by both the foundations and the public agency.

The Ministry of Culture, the public establishment and the three fundraising foundations have approved the principle that amounts raised from individual donors will be used exclusively for the first and second phases of work. Only donations from major patrons and companies will be redirected to the third phase of work, with their explicit agreement, which has already been obtained. These agreements mean that the balance of the funds raised, at least €140 million depending on the closing of the last contracts for the second phase, can be allocated to financing the third phase of the project. This amount is higher than the €130 million estimated

³ Cour des comptes, The Notre-Dame de Paris Cathedral Construction Site. The completion of protection, the key considerations of the restoration and the challenges of the reopening. Second assessment.

⁴ The ecclesiastical appointee is the serving priest of Notre-Dame de Paris Cathedral, the archpriest and rector.

in the Court's 2022 report, and will be supplemented by a new fundraising operation already launched by the EP-RNDP.

As identified during the previous audit, exchanges between the EP-RNDP and the foundations allowed the foundations to monitor progress in the project and receive the information they needed to communicate regularly with their own donors, which is one of their statutory obligations.

Lessons to be learned from an exceptional project

Six years after the fire, the unanimously acclaimed success of the reconstruction of Notre-Dame de Paris Cathedral within the deadline set by the President of the Republic on the day of the fire is due to (i) the ambition of meeting a repeatedly reaffirmed timetable, (ii) a substantial budget thanks to the generosity of donors, and (iii) the creation of an *ad hoc* public agency, with a time-bound remit, led and embodied by General Georgelin, and then by his "right-hand man", Philippe Jost.

The management of historic monument restoration projects is usually the responsibility of the decentralised departments of the Ministry of Culture, in this case the Île-de-France Regional management of Cultural Affairs. However, the project impact study confirmed that the creation of the *Rebâtir Notre-Dame de Paris* public agency by the law of 29 July 2019 was justified by the need for "governance that fully reflects the diversity of those involved in the restoration of Notre-Dame".

The EP-RNDP's responsiveness and governance enabled constructive dialogue and consensus throughout the project. It was able to recruit people with the skills needed to organise and manage an extraordinary project, and to adjust them as required, while remaining within the staffing levels set from the outset by its supervisory authority. Finally, the choice of continuity in the governance of the EP-RNDP after the death of General Georgelin in August 2023 helped ensure that the initial timetable was met.

In February 2024, the mission statement of the new chairman of the public establishment confirmed that the establishment's mission would continue until 31 December 2028, by which time restoration work on the upper exterior parts of the cathedral should be complete. The Île-de-France Regional management of Cultural Affairs will resume its responsibility for the cathedral again from 2029.

The fact that the restoration phase after the fire was kept within budget should be emphasised. It was the result of thorough monitoring by the contracting authority and the contractor, with strong involvement from the Audit Committee and close attention from the foundations. Even though this was an exceptional project - also in terms of the commitment of the companies involved - the Ministry of Culture should draw lessons from it in terms of steering and financial management by contracting authorities for other major projects involving historic monuments.

The project also highlighted the continued absence of any regulations governing the presence and use of lead in the restoration of historic monuments. While the European Union has upheld the use of lead in restoration work, national regulations should take account of the health risk depending on the nature and use of the buildings. The Court reiterates the recommendation to this end made to the relevant ministries (Culture, Finance, Labour, Health) in its previous report. The absence of an appropriate legal framework is likely to significantly increase restoration and operating costs, without the real usefulness of the measures being demonstrated.

The Notre-Dame project, through its numerous excavations, has yielded exceptional discoveries; however, it has also highlighted the need for greater selectivity in the classification of artefacts over time, considering their cultural and scientific significance, and for the need to consider the capacity of the storage facilities, the cost of which must not be overlooked.

Lastly, the challenges of raising the profile of the site and attracting tourists call for a coordinated approach to the future development of the surrounding area, as well as the creation of a future museum on the work⁵. The City of Paris has earmarked the subsidy originally intended for the restoration of Notre-Dame for improvements to the surrounding area, in particular the Parvis (forecourt in front of the cathedral), which it owns⁶. The development project was approved in 2023, following consultation with the various stakeholders and a favourable opinion from the national heritage and architecture commission. The project is due to start in mid-2025 and be completed in 2028. It will enhance the cathedral and its surroundings and provide a better welcome for the millions of tourists who visit it every year.

However, despite the decision, announced by the President of the Republic in December 2023, to create a museum on the work at the Hôtel-Dieu and the report produced by Charles Personnaz, Director of the *Institut du Patrimoine*, in February 2024, this project has now been put on hold. While the CMN has already been rightly designated as the lead partner for the museum project, its implementation will require negotiations with several partners, first and foremost the *Assistance Publique-Hôpitaux de Paris* (AP-HP), which owns the Hôtel-Dieu building bordering the Parvis. The budgetary context does not allow for significant public funding for this new museum, either for the initial investment or for the running costs, so patrons must be sought. However, an urgent decision is needed on the size of the museum and its location within the Hôtel-Dieu, as its location and the attractiveness of its content are key factors in the project's success.

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⁵ The Ministry of Culture has also adopted the name "Musée Notre-Dame".

⁶ The development project covers the Parvis, rue du Cloître Notre-Dame, the banks of the Seine and the area to the east of the cathedral (Square Jean XXIII, Square de l'Ile de France and the Deportation Memorial). It is presented in Appendix 6.

Summary of recommendations

The five recommendations of the public thematic report on the conservation and restoration of Notre-Dame de Paris Cathedral in 2020⁷

By 2022, two recommendations had been implemented: the recommendation addressed to the Ministry of Culture concerning the inventory of the objects contained in the cathedral, and the recommendation addressed to the Ministry of Culture and the public agency in charge of the conservation and restoration of Notre-Dame requesting the implementation of analytical accounting to ensure the traceability of the use of funds resulting from the national fundraising initiative.

One recommendation made to the Ministry of Culture had been partially implemented. It concerns the appropriation from the budget of a subsidy for public service expenditure covering the entity's operating costs, as the subsidy was limited to covering the rent.

The recommendation to open an administrative enquiry into the circumstances surrounding the fire was rejected by the Ministry of Culture, to which it was addressed.

The final recommendation was as follows: "Begin, without waiting for the reopening of the cathedral, discussions between all the parties involved in the ownership and operation of the monument, in particular in order to implement the provisions of the agreement of 18 October 2019 concluded between the Ministry of Culture and the Centre des Monuments Nationaux."

This recommendation, which the *Cour* made to the Ministry of Culture and the *Centre des Monuments Nationaux*, had not been implemented by 2022. However, discussions have since begun. This recommendation addressed three issues: land ownership, which is shared between the State and the City of Paris; the implementation of the 2019 agreement, which essentially concerns income from non-workship; and the distribution of expenditure. At the date of publication of this report, these discussions had resulted in several agreements; the provisions of the agreement of 18 October 2019 between the Ministry of Culture and the *Centre des Monuments Nationaux* were not agreed until after the cathedral had been reopened, and the land issue with the City of Paris had not been addressed. Given the tangled nature of the land ownership, this matter has been discussed by the City and the State, and according to the Ministry, discussions are "set to continue in the future with a view to clarification and simplification".

The seven recommendations of the public thematic report on the Notre-Dame de Paris Cathedral construction site published in 2022₈

Of the seven recommendations made in 2022, three have been implemented:

- Two recommendations addressed to the Ministry of Culture: to determine the conditions for operating the cathedral once it is reopened for worship and visits; and to establish

⁷ Cour des comptes, public thematic report, *The Conservation and Restoration of the Cathedral of Notre-Dame in Paris, First assessment,* September 2020 (https://www.ccomptes.fr/fr/documents/53045).

- a framework for consultation between all stakeholders and designate a single operational security manager.
- The recommendation addressed to the Ministry of Culture and the *Centre des Monuments Nationaux*: to examine the possibilities of setting up a museum on the work and the methods of its management.

Three other recommendations have been partially implemented.

- The recommendation addressed to the EP-RNDP and the Ministry of Culture: to arbitrate the entire restoration programme for the cathedral and, to this end, before the 2024 deadline, conduct an inventory of all of the monument's issues, prioritise the urgent treatments and establish their costs and financing.
- Recommendation 5: Immediately draw up a development plan for the cathedral commensurate with the importance of this monument and the expected level of visitor numbers (*Ministry of Culture, CMN*).
- Recommendation 6: Integrate the development of the forecourt into an overall plan for the enhancement of the cathedral and ensure that the schedule of work is compatible with the restoration work (*Ministry of Culture, CMN*).

Only one recommendation, addressed to four ministries (the Ministry of Culture, the Ministry of the Economy, Finance and Industrial and Digital Sovereignty, the Ministry of Labour, Full Employment and Integration, and the Ministry of Health and Prevention), has not been followed: to define the legal framework applicable to heritage sites faced with the presence and use of lead.

New recommendations

The Court makes the following recommendations:

- 1. By 2026, draw up a policy on the protection of archaeological remains that takes greater account of their cultural, heritage and scientific interest and allows for the possibility of declassifying them after their inventory (*Ministry of Culture*).
- 2. From 2025, have the State cover the cost of storing the artefacts recovered during excavations and the debris from the Notre-Dame fire classified as archaeological remains, which must be sorted (*Ministry of Culture*).
- 3. By 2026, draw up a standard applicable to construction work at heritage sites where lead is present and used (Ministries of Culture, Economy, Finance, Industrial and Digital Sovereignty, and Labour, Health, Solidarity and Families).
- 4. Decide immediately on the location of the museum on the work, taking into account the economic and financial viability of the project (Ministry of Culture, Ministry of Labour, Health. Solidarity and Families).