Session SB64 (2026)

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Facilitative, Multilateral Consideration of Progress

A compilation of questions to – and answers by – **Germany**
Exported on 27-05-2026 by the UNFCCC secretariat

Title: Future policy directions for measures in the transport sector

Question From Party: Japan

Question raised on: 07.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: In the transport sector, regulations, infrastructure development, and financial support for EV promotion are cited as key policies. However, given recent developments such as the EU's decision to withdraw its plan to ban the sale of new internal combustion engine vehicles by 2035, what policies does Germany intend to prioritize to achieve its transport sector goals?

Answer:

Germany is pursuing a broad, integrated policy approach to achieving its transport sector climate targets. Rather than relying on a single regulatory instrument, the government prioritises a balanced policy mix combining infrastructure development, market based mechanisms, technological openness and social considerations.
A first key pillar is the strengthening of attractive and reliable sustainable mobility options. By reinforcing public transport and ensuring long term affordability and simplicity – for example through the implementation of the Deutschlandticket – climate friendly mobility becomes a viable everyday alternative, directly linking climate action with social balance and public acceptance.
Second, Germany places strong emphasis on infrastructure as an enabler of transformation. Instead of prescribing specific technologies, policy focuses on creating the physical and regulatory conditions for low and zero emission solutions to scale. This is reflected in the systematic rollout of charging and refuelling infrastructure for alternative drivetrains across urban areas, residential buildings and major transport corridors, treating infrastructure availability as a prerequisite for market uptake.
Third, Germany follows a technology open transition pathway, particularly in hard to abate segments such as aviation, shipping, road freight, buses and rail freight. Multiple climate neutral options are supported in parallel, for example through the tendering of fast charging infrastructure for heavy duty trucks along federal motorways and through renewable fuel quotas. Where technologies are not yet market ready, pilot and demonstration projects help bridge the gap from innovation to deployment, such as the promotion of power to liquid fuels with a focus on sustainable aviation fuels.
Fourth, market based and fiscal instruments play an increasing role. Emissions trading in road transport internalises external costs and provides a uniform carbon price signal in a cost efficient and technology neutral manner. Complementary financial relief measures, such as toll exemptions for climate friendly heavy duty vehicles, help establish a level playing field between emerging low emission technologies and conventional options.
Overall, Germany's transport policy focuses less on bans and more on a holistic, enabling strategy: expanding modern infrastructure, applying market based incentives, supporting innovation across maturity levels, maintaining technology openness and ensuring social fairness.

Title: Future policy directions for measures in the buildings sector

Question From Party: Japan

Question raised on: 07.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: According to pages 37–38 of BTR1, achieving the "With Further Measures Scenario" (WAMS) for the buildings sector relies on the widespread expansion of heat pumps. However, the current introduction of heat pumps is fluctuating significantly due to exceptional factors such as Russia’s war of aggression against Ukraine. What measures do you plan to prioritize to ensure the stable deployment of heat pumps moving forward?

Answer:

Germany has been supporting the stable deployment of heat pumps by combining regulatory law (65% renewable rule in the Building Energy Act, GEG) with mandatory communal heat planning (“Wärmeplanungsgesetz”, WPG) to guide investment in climate-friendly heating solutions on a large scale. Further key efforts focus on lowering upfronts costs through federal grants and subsidized loans and accelerating installation of heat pumps through training. Also, the increasing CO2-price can be an incentive to the installation of more heat pumps as it makes fossil fuel heating systems increasingly more expensive and heat pumps more economically attractive.

Title: Electric vehicles

Question From Party: Australia

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: To decarbonise Germany’s transport sector, the German Federal Government is aiming to place 15 million Battery Electric Vehicles (BEVs) on the roads by 2030 (2.D.10.2, p.87). Could Germany please provide further detail on the measures that have been implemented to support this goal and progress made so far?

Answer:

The German federal government intends to promote electromobility with purchasing incentives. To this end, we have, among other things, launched a funding program for electromobility amounting to 3 billion euros. However, no specific target figure for future years is established in the current coalition agreement.

Progress made so far:

In 2024, 19 per cent of all newly registered passenger cars were battery electric vehicles and almost 11 per cent were plug-in hybrids.

In 2026, the German Car Manufacturers Association expects that more than 1 million new electric passenger cars will be sold in Germany.

Currently, Germany is the second largest manufacturerer of electric vehicles world wide, with almost 1.7 million electric vehicles assembled in 2025. The German Car Manufacturers Association expects two fifths of all passenger cars produced in Germany in 2026 to be electric vehicles.

Title: Renewable heating requirement

Question From Party: Australia

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: Could Germany please elaborate on how compliance with the 65% renewable heating requirement (2.D.6.1, p.72) is monitored and enforced at scale?

Answer:

The monitoring and enforcement of the Building Energy Act (GEG) is ensured by a system consisting of verification requirements and regulatory deadlines defined in the GEG. The Building Energy Act regulates which documentation is required for the installation, operation and replacement of heating systems.

Furthermore, prior to the installation of a new gas or oil heating system, a mandatory consultation by a specialist company is required to clarify different options for the new heating systems.

The Building Energy Act (GEG) will be amended soon and will then be called “Building Modernization Act”.

Title: ETS, CTF table 5

Question From Party: Republic of Korea

Question raised on: 08.04.2026 CEST

Question Category: Mitigation actions, policies and measures supporting NDC implementation

Question: We appreciate the information provided in the CTF. The Emissions Trading System (ETS) is presented as a high-impact policy in terms of expected emission reductions through 2030. However, projections to 2050 show negative values, with considerable variability over time. Could the Party elaborate on the factors underlying this trend? In addition, could the Party outline its key policies for achieving carbon neutrality by 2050?

Answer:

For Policies and Measures of the Energy sector, each individual measure is evaluated against a model run that does not include that measure. To do this, each measure is deactivated individually by varying the relevant input data in the model for its period of effect. The resulting CO2 emissions from a model run with the measure disabled are compared with the CO2 emissions from the WEM to quantify the measure’s reduction effect. The electricity model used covers not only Germany but the entire European electricity market

The European Emissions Trading System (EU ETS) leads to significant emission reductions, particularly in the years 2025, 2030, and 2035. Until 2035, the most significant impact of the EU ETS is to improve natural gas’s position relative to lignite and hard coal in the merit order. Second, the expansion of renewable energy during these years cannot keep pace with the rise in electricity demand, and thus fossil fuel-based electricity generation continues to play a significant role.

A decline in the emission-reducing effect of the EU ETS as early as 2035 can be attributed to the expansion of renewables; if, in the MMS and the counterfactual scenario, up to 90% of electricity generation comes from renewable sources, the absence of a carbon price would have only a minor impact on emissions.

By 2040, there will be no hard coal or lignite-fired power plants left on the German electricity market. The EU ETS in 2040 and beyond will therefore primarily affect the position of German natural gas-fired power plants in the European merit order. Depending on all other parameters (demand, the development and efficiency of conventional and renewable power plants in all European countries, grid expansion, etc.), the effects of the EU ETS in 2040, 2045, and 2050 will be minor for Germany and result rather in slight changes in import and export flows than in domestic emission reduction. This explains the low values and fluctuation around zero in the years from 2040 and later.

Title: Question to Germany on their Federal Climate Action Act

Question From Party: United Kingdom of Great Britain and Northern Ireland

Question raised on: 08.04.2026 CEST

Question Category: Progress towards/achievement of the NDC

Question: Thank you Germany for the opportunity to comment on your first Biennial Transparency Report. Can you share what factors your considered when developing your Federal Climate Action Act to ensure that your ambition meets deliverability?

Answer:

The original Climate Action Act agreed in 2019 tranposed into law overall and sectoral targets that had been part of the German Climate Action Plan 2050. At its core was the target to achieve a climate neutrality by 2050. An overall reduction pathway with interim targets was derived from there. Sectoral targets between 2020 and 2030 were derived from the overall mitigation targets in 2030, and on based on a scientific paper that assessed the mitigation potential of each sector.
In 2021, targets were revised due to a ruling of the Federal Constitutional Court according to which necessary climate action must not be adjourned to the future, imposing a disproportionally high burden on future generations and thus restricting their freedom. As a result, the target year for climate neutrality was moved forward by 5 years, from 2050 to 2045. The mitigation pathway as well as the sector targets up to 2030 were adjusted accordingly, again taking into account relevant scenario studies to underpin this ambition level.

Title: F-gases data collection

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: Could you please share any best practices or lessons learned from your experience in collecting data from industry associations or industry members (e.g. companies involved in industrial processes, suppliers of F-gases or F-gas-containing products, equipment service providers, etc.) for preparing Industrial Processes and Product Use (IPPU) sector estimates, including voluntary data collection?

Answer:

First, it is important to gain an overview of all emission sources in the country. Potential emission sources can be identified using the methods described in the 2006 IPCC Guidelines and national F-gas inventories from comparable countries.

It makes sense to personally contact all distributors of fluorinated gases in the country and inquire about the customer groups and the quantities supplied to these groups.

It is also advisable to contact all relevant associations in the country (e.g., associations for refrigeration technology, manufacturers of refrigeration and air conditioning systems, passenger cars, pharmacies, the hotel industry, food production, insulation manufacturers, energy generation, etc.), asking whether they have data on F-gas quantities and national emission factors and whether they are willing to make this data available annually in the future (to be sent via email or published on the association’s website). If necessary, it may be advisable and necessary to assure the associations that their figures will only be published in aggregated form, thereby ensuring the confidentiality of the data—if required.

If industrial companies are known that potentially use F-gases and/or emit them in production processes (e.g., producers of F-gases, magnesium or aluminum foundries, semiconductor or chip manufacturers, manufacturers of photovoltaic modules or TFT screens, etc.), these should also be contacted personally and asked for data. Often, it is necessary to ensure the confidentiality of the data provided—possibly even through a contract.

To determine emission factors, data from comparable countries (with comparable state-of-the-art technology and legal regulations) can be used for comparison and, where appropriate, as a model. These should be discussed with users in the country, particularly if no Tier 3 measurements are available.

Title: Third-party quality assurance for Industrial Processes and Product Use Sector

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: Could you please share some examples of quality assurance (QA) or verification work conducted for Industrial Processes and Product Use (IPPU) categories with the support of third-parties not directly involved in the inventory compilation or development? Please indicate who was involved, why they were selected, how they contributed to the QA/verification process, and what outcomes were achieved.

Answer:

QA takes place for the whole inventory on the basis of a 4-eyes approach, where category specific experts are responsible for the making of the inventory and their results being checked by an independent second person. The tasks that need to be completed are specified via QCQA-checklists. These tasks are in line and completely fulfil given IPCC requirements for QCQA. Verification duties directed by the checklists are of a basic kind, like tasks to compare AD, EF used with those of other countries or publications different to those in use or against the recently discontinued green-house-gas locator-tool of the IPCC. The inventory is additionally checked by experts of responsible ministries on a yearly basis, meaning that this kind of external peer reviewing takes part before publication of the completed inventory. Additionally, as for all other EU states, the inventory is reviewed on a yearly basis by inventory experts commissioned by the EU.

Although not part of a formal verification process, we receive many questions and comments by industry associations, industry experts and other relevant institutions interested in our reporting. If they raise a valid point, we check if we need to make changes to our inventory. External expert peer reviews by industry experts take place only from time to time, if we consider it necessary.

Title: GHG Inventory methodologies and mitigation measures

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: What processes do you have in place to ensure inventory methodologies effectively reflect changes in activities/practices resulting from mitigation measures?

Answer:

There is no particular process to ensure that mitigation measures are reflected in the inventory. Our sector experts know which policies and measures have been implemented that might have an influence on the emissions of their sectors. Any effective measure has either an effect on the emission factor, the activity rate or both. Depending on the type policy or measure our sector experts check for example if emission factors need to be updated to incorporate changes or if different or additional data for determining the activity rate needs to be taken into account

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Title: New technologies in GHG Inventory development

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: How have you been able to leverage new technologies such as artificial intelligence to improve GHG inventory development?

Answer:

In the last few years, so-called top-down methods have experienced rapid developments. Top-down methods typically refer to approaches for independent monitoring of atmospheric information and emission data, based on earth observation or concentration-measuring tower networks and transport modelling.

We have participated in the evaluation, development, and capacity-building of top-down approaches in Europe across multiple research consortia. We have active roles as task or work package leaders, including within AVENGERS, ITMS, and formerly VERIFY, as well as stakeholder roles across additional projects and frameworks.

We already use results from top-down activities for comparison with and validation of existing inventory data. Within the research projects, we also focus on a fundamental scientific evaluation of the applicability of and user requirements for top-down capacities regarding emission information.

Regarding AI, we collaborate indirectly with a dedicated AI laboratory at the German Environmental Agency, which is researching the usability and constraints of AI for environmental information. However, this does not directly influence the emission reporting.

Title: Fluorinated gas production

Question From Party: Canada

Question raised on: 08.04.2026 CEST

Question Category: National inventory report

Question: With regards to CRT 2.B.9.b, how does your country identify F-gas producers, determine the types of F-gases being produced, and track their production?

Answer:

The producer was identified in 2003 as part of a research project (Emissions, Activity Data and Emissions Factors of Fluorinated Greenhouse Gases (F-Gases) in Germany 1995-2002 | German Federal Environment Agency). The company's division and partial sale of production were revealed through press reports and annual contacts.

In Germany, we have a different corporate culture than, for example, in the USA. Companies still communicate with the German Federal Environment Agency (UBA). Furthermore, these are usually installations requiring permits, meaning they are obligated to provide information to the permitting authority (not the UBA). These authorities report to the UBA, for example, via the E-PRTR (www.thru.de). The Federal Statistical Office also collects production data.

In addition, companies must report to the EU under Regulation (EU) 2024/573. But the UBA does not have this information.
