

Press release

## Climate Action Program: reduced target gap, but inadequate data basis and missing overall concept

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**Berlin, 22.08.2023** – Today the German Council of Experts on Climate Change (ERK) has released its statement on the Federal Government's Climate Action Program 2023. In it, the Expert Council comments on the assumptions regarding the indicated greenhouse gas reductions and provides an overarching assessment of the program. According to the Federal Government, the measures included in the Climate Action Program for the building and transportation sectors are also considered as measures according to Section 8(1) of the Federal Climate Change Act (KSG) (Immediate Action Programs). In a separate report, the Expert Council has therefore conducted a more detailed examination of the proposed measures for the building and transportation sectors by the Federal Ministry for Economic Affairs and Climate Action (BMWK), the Federal Ministry of Housing, Urban Development, and Building (BMWSB), and the Federal Ministry for Digital and Transport (BMDV).

### Significant reduction of emissions possible, but large gap towards KSG goals remains

With the Climate Action Program, the German Government has proposed an extensive program of around 130 measures. If the program is consistently implemented, the cumulative gap towards the KSG target path for the years 2021 to 2030 is expected to decrease to around 200 Mt CO<sub>2</sub>-eq. Thus, the Climate Action Program has a high reduction ambition, but it falls short according to the Climate Change Act. The federal government does not explain how the remaining difference to the KSG targets will be closed.

The Expert Council has received comprehensive but overall inadequate data basis from the Federal Government. Therefore, they cannot confirm the reduction effect of the program as stated by the federal government. Nevertheless, the Expert Council expects a substantial contribution. "The measures in the Climate Action Program can enable significant greenhouse gas reductions, especially in the energy and industry sectors, but also in the building sector – depending on the implementation of the amended German Buildings Energy Act (GEG)," says Hans-Martin Henning, the chairman of the Expert Council.

A plausibility assessment based on the draft of the new projection report as well as on additional documents reveals significant inconsistencies and uncertainties. The Expert Council assumes that even after the complete implementation of the Climate Action Program, a larger gap will remain than what the federal government has indicated. Hans-Martin Henning explains: "For several measures, we are sceptical regarding the probability of implementation and the deviation between reality and the assumptions of the federal government in the documents. The expected overall reduction is likely to be overestimated." Furthermore, due to the lack of estimation of economic, social, and other ecological impacts, the Climate Action Program falls short of the legal requirement.

### Transport and Buildings: Insufficient as Immediate Action Programs

The separate examination of measures for buildings and transportation reveals that the greenhouse gas reductions indicated by the federal government for these two sectors would not be sufficient to compensate for the sectoral target shortfalls. According to the expert assessments reviewed by the Expert Council, a cumulative gap in the building sector of 35 Mt CO<sub>2</sub>-eq. remains until 2030. In the transportation sector, the gap by 2030 ranges from 117 to 191 Mt CO<sub>2</sub>-eq. The range results from the differing estimations by BMDV

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and BMWK. Thus, the Expert Council concludes that while the measures presented by the federal government do have a greenhouse gas reduction effect, they do not meet the requirements for an Immediate Action Program according to the Climate Change Act.

Furthermore, the deficiencies in the data base identified by the Expert Council also carry weight in these two sectors. Hans-Martin Henning explains: "We suspect that the assumed greenhouse gas reduction in the building sector is likely to be lower than calculated in the expert assessment. This is primarily due to the expected, significantly altered design of the German Buildings Energy Act (GEG). In the transportation sector, we see optimistic assumptions, for example, regarding the implementation speed and financing of measures, as well as in addressing implementation obstacles."

### **Great efforts and a coherent overall concept necessary**

The Climate Action Program contains important innovations, especially in the sectors of industry, buildings, and transportation. However, the measures primarily target the areas of greenhouse gas reduction that have already been addressed in the past. Brigitte Knopf, the deputy chair of the Expert Council, notes: "It would be necessary to address the reduction potentials of all available action fields, including, for example, the reduction of environmentally damaging subsidies, which is currently only vaguely formulated."

According to the Expert Council, there is a lack of a cohesive, internally coherent, and consistent overall concept and an overarching framework of measures. A consistent and early enforcement of the fixed emission cap in the national emissions trading system, including accompanying measures for social and economic security, would be a logical option for this. Brigitte Knopf adds: "We see a need for action on the part of the federal government, both in terms of improving the data basis for climate policy, closing the remaining target gap, and developing an overall concept. Special attention should be given to the sectors affected by the European Effort Sharing, which have not been separately considered in the context of the amendment to the Climate Change Act."

The Expert Council is aware that achieving the targets of the Climate Change Act requires great efforts and emphasizes that such an overall concept must address these challenges openly and transparently while weighing potential conflicting goals against each other. The Expert Council notes that this requires an active shaping of negotiation processes between conflicting political objectives and possible societal conflicts. The Expert Council believes that the elevated overall responsibility of the Federal Government for achieving climate goals, particularly highlighted in the context of the amendment to the Federal Climate Change Act, provides a solid foundation for this.

### **About the Expert Council on Climate Change**

The Expert Council on Climate Issues is an independent panel consisting of five experts from various disciplines. It was established in September 2020 and is mandated by Sections 11 and 12 of the Federal Climate Change Act (KSG). The panel includes the five members Prof. Dr. Hans-Martin Henning (Chairman), Dr. Brigitte Knopf (Deputy Chair), Prof. Dr. Marc Oliver Bettzüge, Prof. Dr. Thomas Heimer, and Dr. Barbara Schlomann. Alongside other statutory duties, the Expert Council assesses measures to be taken in case of target failure according to Section 12(2) KSG with regard to the underlying assumptions on greenhouse gas reduction and provides a statement before the decision on a Climate Action Program according to Section 12(3) KSG.

For more information about the Expert Council on Climate Change and their publications, please visit <https://expertenrat-klima.de>. Follow us on Twitter: @ERK\_Klima

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