

Press release

Compliance with emissions budget by 2030 not confirmed – Expert Council sees continued need for action under Federal Climate Action Act

Berlin, May 18, 2026 – The Council of Experts on Climate Change today published its review report of the German greenhouse gas emissions for the year 2025 and the projection data of 2026.

Expert Council finds emissions budget through 2030 exceeded, contrary to projection data

The Expert Council was able to broadly verify the emissions data calculations for the year 2025 and confirms the results presented by the Federal Environment Agency. With a decrease of only 0.1 per cent compared to the previous year, greenhouse gas emissions remained virtually stable. A reduction in emissions from the industry and energy sectors was largely offset by an increase in the buildings and transport sectors.

According to the projection data of 2026, the total annual emissions budget for the years 2021 to 2030 permitted under the Federal Climate Action Act would be met with a narrow buffer of 4.5 Mt CO₂-eq. The national 65-per-cent reduction target for 2030, the 88-per-cent target for 2040, the obligations under the European Effort Sharing Regulation (ESR), the targets for the land use, land use change, and forestry (LULUCF) sector, as well as the goal of greenhouse gas neutrality in 2045 and of achieving negative greenhouse gas emissions would, according to the data, be increasingly and significantly missed over time.

In its review, the Expert Council concludes that the 2026 projection data underestimate the expected emission levels through 2030. It estimates that a median emissions pathway calculated on the basis of current knowledge would exceed the permissible total annual emissions budget through 2030 by approximately 60 to 100 Mt CO₂-eq. The Expert Council therefore cannot confirm the very narrow target compliance through 2030 indicated by the 2026 projection data; on the contrary, it expects a target breach. The shortfalls already reported in the projection data for the further targets, including the ESR target, are likely to be even greater.

"The assumptions underlying the calculations in particular for the energy and buildings sectors need to be updated," explains Chair Barbara Schlomann. "For both sectors, we assume that actual emissions are likely to be higher than reported." The Expert Council also points out that regulatory adjustments, such as the Building Modernisation Act currently under parliamentary consideration, have not yet been incorporated into the projection data. Taken together, such adjustments could give rise to additional risks for the projected emissions pathway. With regard to the political significance of the review findings, the Expert Council rates the identified budget overshoot through 2030 as marginal, but warns of a growing discrepancy between projection data and targets from 2030 onwards.

Climate Action Programme 2026 fails to close target gaps – revision recommended

The Expert Council has also revisited the Climate Action Programme 2026. The results of the review of the 2026 projection data, as well as a detailed review of eleven selected measures contained in the Climate Action Programme, confirm and reinforce the Expert Council's assessment as set forth in its statement of 25 March. "In our assessment, the actual mitigation effect of the programme is likely to be considerably lower than

assumed by the Federal Government," emphasises Barbara Schlomann. The Expert Council therefore concludes that even if the programme were fully implemented, none of the statutory targets through 2040 would be achieved.

If the Expert Council finds once again next year that the emissions budget has been exceeded, the Federal Government would be required to adopt additional measures pursuant to the Federal Climate Action Act. In the Expert Council's view, the caveat provision contained in the Act would not apply, as the Climate Action Programme 2026 in its current form is, in the Council's assessment, not suited to avert the statutory obligation to take corrective action. Furthermore, the Expert Council expects that the Federal Government may face additional lawsuits over its climate policy.

Overall, the Expert Council recommends that the Federal Government revise the Climate Action Programme. In doing so, it could take into account the Expert Council's relevant recommendations from its most recent reports. "Embedding climate action policy within a coherent overall political strategy remains, in the Expert Council's view, a necessary precondition for achieving the climate targets. This includes considering social distributional effects as well as economic prerequisites and consequences from the outset, and explicitly taking into account relevant interactions, for example with the emissions trading systems," states Deputy Chair Marc Oliver Bettzüge.

LULUCF sector targets missed by a wide margin

Instead of becoming an increasing carbon sink, as required by law, the LULUCF sector is projected to remain a source of greenhouse gas emissions throughout the period up to 2050. The statutory targets for the LULUCF sector would thus be significantly missed across all time periods considered.

"The projection data show that the need for action in the LULUCF sector is substantial and cannot be met with the existing set of instruments," states Council member Julia Pongratz. Actual emissions in the sector are, in the Expert Council's assessment, likely to exceed the reported figures. "The new approaches introduced in the Climate Action Programme, such as the support for paludiculture, point in the right direction; however, they are far from sufficient. We see an urgent need here to expand the instrument mix in a concerted manner and to embed the sector more fully within the climate action strategy."

The Council of Experts on Climate Change (ERK) is an independent panel of five experts from different disciplines. It was appointed in September 2020 and is mandated by Sections 11 and 12 of the Federal Climate Action Act (KSG). Since September 1, 2025, the panel consists of the five members Dr. Barbara Schlomann (Chair), Prof. Dr. Marc Oliver Bettzüge (Deputy Chair), Prof. Dr. Dr. Tanja Kneiske, Prof. Dr. Allister Loder and Prof. Dr. Julia Pongratz.

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