Germany

Germany submitted its final NECP on 29th August 2024.

1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the final updated NECP (2024).

AMBITION						
		ESR (MtCO2-eq)	**LULUCF (MtCO2-eq)**	**RES (%)**	**PEC (Mtoe)**	**FEC (Mtoe)**
2023 *draft* NECP (2030)	**Target/ Contribution**	**317**	**-18**	**40%**	**193.6**	**160.5**
2024 *final* NECP (2030)	**Target/ Contribution**	**242.4**	**-3.80**	**42.5%**	**193.64**	**155.55**
	WAM	**287**	**-2.00**	**38.2%**	**242.4**	**186.6**
EU targets/ benchmarks (2030)*		**242.4**	**-30.84**	**41%**	**191.06**	**154.75**

**The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula*

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The final German NECP is more ambitious than the 2023 draft and, except for the LULUCF sector, **targets** are aligned to the minimum 2030 EU benchmarks *on paper*. Germany respects its **renewable energy** contribution and meets minimum EED obligations for **energy consumption**, its national pledges fall between ambitious and unambitious benchmarks set by the EED formula.

For **climate**, the final NECP reports an ESR contribution compliant with the EU benchmark on paper, but according to projections Germany is expected to fall short on meeting several climate targets, especially in the ESR and LULUCF sectors. The reported **targets are mostly not backed up by credible trajectories supporting their achievement**. Even in projections following the WAM scenario, which is not sufficiently described, Germany is not on track to achieve most of the EU climate and energy targets. The target gap is particularly wide in the LULUCF sector, in which methodological improvements in emissions reporting lead to considerably more pessimistic projections.

The LULUCF sector is projected to not become a permanent sink by 2050. Regarding energy efficiency, even if the NECP provides a detailed trajectory for both primary and final energy consumption with a linear reduction of energy use, the WAM are resulting in higher FEC and PEC contributions. The NECP does not contain enough information on how Germany intends to close the

gaps in these sectors. Overall, the federal government is overly relying on price developments under the upcoming ETS II to close the ESR and energy efficiency target gaps, which poses questions regarding the social and political feasibility of the trajectories presented in the NECP.
Concerning issues also remains which could weaken the implementation of the planned measures:

- The recent budgetary cuts to the Federal Climate and Transformation Fund, which jeopardise the financing and thus the implementation of planned measures, make the achievement of trajectories included in the NECP uncertain.
- The plan overall remains vague on the financing needs and sources of planned measures and does not include phase out dates for fossil fuels subsidies.
- From a **social** point of view, the final NECP only partially addresses the aspects of a just transition as it does not adequately address the socio-economic aspects of the transition, overlooking the impacts on employment and skills, and fails to include estimations on energy poverty.

Quality of data in the final updated NECP (2024) – Data for different targets and indicators are available but the absence of a common framework for data reporting in terms of sector division may badly influence the accessibility and transparency of the information. Moreover, even if the 2022 information for WAM scenarios overlaps quite well amongst the different datasets, some discrepancies between the NECP historical data and the EEA and Eurostat dataset persists (e.g. for Energy sector, Primary Energy Consumption) These discrepancies mean that, when monitoring the ambition and the implementation of the NECP and its consistency with the EU targets it is not possible for all the sectors to do reliable comparisons as the scope or the source of the information is not the same and thus not compatible.

2. Implementation of the old (2019) NECP as of 2022

The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	**Net GHG emissions**	**LULUCF**	**ETS**	**non-ETS**

IMPLEMENTATION – sectoral climate indicators					
Agriculture	**Buildings**	**Energy**	**Industry**	**Transport**	**Waste**
N/M	**N/A**		**N/M**		**N/M**

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	**FINAL energy consumption**	**Renewables % in electricity generation**	**Renewables % in final energy consumption**
			N/A

Blue: on track / **Orange**: not on track / N/A = not available / N/M = not matching

As of 2022, Germany was not fully on track to implement its old 2019 NECP, whose ambitions are now obsolete.

Climate indicators (GHG emissions reductions): While Germany must accelerate climate action to achieve its new 2030 targets, it was, as of 2022, roughly on track with the greenhouse gas emission reduction trajectories projected in the 2019 NECP. The only notable and worrisome exception is the LULUCF sector, where implementation clearly seems to be lagging behind: in 2022, emissions from the LULUCF sections were at 4.38 MtCO2-eq, compared to the -10 MtCO2-eq projected in the 2019 NECP, though some of these developments may be due to methodological improvements in the emissions reporting.
It was not always possible to assess sectoral emission reduction trajectories, as 2019 NECP values seem not to match with the EEA dataset used for historical data for the agriculture, industry and waste sectors. In the energy and transport sectors, as of 2022 the implementation seemed to still be on track; however, after 2020 emissions have an upward trend in both sectors. On sectoral targets it is worth noting that the Federal Climate Action Law was recently amended to delete binding sectoral targets at national level in favour of a compliance with cross-sectoral GHG emissions reductions targets.

Energy indicators: Germany is roughly on the trajectory to meet its old NECP 2030 energy targets both for energy efficiency and renewables. Nonetheless, efforts must increase sharply if the new NECP targets are to be met.