

Spotlight on transport and energy infrastructure

Party positions in the 2025 federal election and the background

"The biggest problem Germany has is its crumbling infrastructure. ... Public-private investment in new technologies and infrastructure must be incentivised. They are the key for Germany."

Nobel prize winner in economics Daron Acemoğlu in an interview with Frankfurter Allgemeine Zeitung, 10 December 2024

Infrastructure, energy prices and the limits of fiscal space are among the key economic policy issues in the current parliamentary election campaign. For this Client Briefing, we have analysed the relevant positions of those parties which, according to current polls, have (more or less) realistic prospects of participating in the next federal government, i.e. CDU/CSU, SPD, Green party and FDP. To facilitate categorisation of the relevant issues and respective positions, we compare the different strategies with the current legal and market situation that will form the starting point for the need for action and the policy options of the next federal government.

As it is foreseeable that none of the parties will win an absolute majority, the commentary focuses on overlaps and incompatibilities. Despite all campaign rhetoric and ideological differences, there are many parallels not only in the description of the problem, but also in the proposed solutions. This may partly reflect hesitation to spell out priorities as between infrastructure, defence and social spending during the election campaign. In addition, the fact that the CDU/CSU will inevitably be part of the next government has probably already nudged the SPD and the Green party to formulate their policies in a consensus-oriented manner. On the other hand, the foreseeable necessity of a coalition implies that a flexible handling of the positions represented in the CDU/CSU election programme can probably be justified without reputational damage. This applies particularly to any reform of the debt brake.

Regardless of the brevity of the election campaign, some party positions appeared to be moving targets. The final client briefing is based on the versions of the election manifestos available on the following websites on 29 January 2025:

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| CDU/CSU | https://www.cdu.de/themen/wahlprogramm-von-cdu-und-csu/ |
| SPD | https://www.spd.de/fileadmin/Dokumente/Beschluesse/Programm/SPD_Programm_bf.pdf |
| B90/Green party | https://cms.gruene.de/uploads/assets/20250205_Regierungsprogramm_DIGITAL_DINA5.pdf |
| FDP | https://www.fdp.de/das-wahlprogramm-der-freien-demokraten-zur-bundestagswahl-2025 |

In our analysis, we have focussed on topics and aspects that are directly related to our consulting practice. In this respect (as in all others) the manifestos do not follow a uniform pattern. Nevertheless, we felt it made sense to organise the positions thematically. Even if this does not do justice to every aspect, we hope that the presentation will prove useful in preparing for the coming legislative period.

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Financing

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| <p>CDU/CSU</p> | <p><i>Solid financing for infrastructure.</i> We ensure long-term financing stability that is independent of fluctuating budget funds. We also need to mobilise more capital in the short term to solve the investment backlog. To this end, we are relying on strong incentives for private investors. (p. 72)</p> <p><i>Adhere to the constitutional debt brake.</i> It ensures that burdens are not imposed on our children and grandchildren. It obliges politicians to make do with the revenue available for the fulfilment of state tasks and thus ensures the long-term sustainability of the federal budget. It has proven its functionality and flexibility even in times of crisis. (p. 75)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ The 'debt brake' (<i>Schuldenbremse</i>) enshrined in Articles 109 and 115 of the Constitution in 2010 - i.e. the limitation of net borrowing to 0.35% of nominal gross domestic product for the federal government and the ban on further net borrowing for the federal states - forms the constitutional framework for government investment in energy and infrastructure.¹ The questions to which extent the generally stated investment backlog is attributable to the debt brake and how this should be dealt with in future are among the central issues of the Bundestag election campaign. ▶ Naturally, all parties assume that the room for manoeuvre with respect to the budget for investments will increase through the implementation of the various fiscal policy measures proposed by them. Irrespective of this, however, there appears to be a consensus that infrastructure investments should no longer be postponed in the coming legislative period because of a lack of budgetary room for manoeuvre. ▶ As every infrastructure investment must sooner or later be refinanced through user charges or with budget funds, the commitment to acceleration implies that the burden on citizens will be spread over time irrespective of how funds are raised: In any case, this requires the utilisation of private capital, which must be repaid later. Whether this takes the form of government bonds, corporate bonds, project bonds or bank loans makes no difference in terms of 'intergenerational equity'. |
| <p>SPD</p> | <p>We are creating a national fund (<i>Deutschlandfonds</i>) that mobilises public and private capital in order to meet important investment needs - for example in electricity and heating grids, the hydrogen network, e-charging stations and housing construction. With the <i>Deutschlandfonds</i>, the state and private investors will be able to invest in Germany's future together and with minimal bureaucracy. The <i>Deutschlandfonds</i> will initially be endowed with EUR 100 billion. It will be structured in such a way that it also functions within the existing framework of the debt rule of our Constitution - via so-called financial transactions. The seed capital provided by the federal government for the <i>Deutschlandfonds</i> creates value for the federal government through the associated investments or loans. The <i>Deutschlandfonds</i> then uses this capital to provide companies and organisations with the necessary financial resources for important investments in the future - in the form of loans or equity investments.</p> | |

¹ How it works: https://www.bundesfinanzministerium.de/Content/DE/Standardartikel/Themen/Oeffentliche_Finanzen/Schuldenbremse/kompodium-zur-schuldenbremse-des-bundes.pdf?__blob=publicationFile&v=3

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| | <p>State money is only one aspect. At the same time, private capital is to be mobilised. Large institutional investors such as insurance companies or pension funds can also invest in these companies and facilities. This places future investments on broad shoulders and mobilises private capital.</p> <p>We ensure that there is no privatisation of public services of general interest. (p. 6)</p> <p>It makes sense to take out loans to finance long-term investments. In this way, the financing costs are spread fairly over many years. Future generations also take on an appropriate share of the repayments, as these investments are intended to secure and increase both current and future prosperity.</p> <p>The possibility of promoting both public and private investments through financial transactions should be utilised more, both by the federal government and the federal states. The Constitution already allows this today. This type of financing creates long-term planning security and enables the expansion of necessary future investments, while at the same time distributing the financing burden among the benefiting generations. In this way, we can, among other things, strengthen the equity base of public companies and increase their public investments.</p> <p>We also want to adapt the outdated criteria of the economic component of the debt rule to the current economic realities so that our community can ensure a steady and high level of investment, especially in difficult economic times.</p> <p>The current debt rule is not designed to meet the challenges of our time and the future. That is why we want to reform the debt rule in the Constitution so that it does not hinder investment in the future</p> | <ul style="list-style-type: none"> ▶ This means that the debate on infrastructure financing is primarily concerned with three questions: firstly, what influence private investors should have on the implementation of the measures. In practice, this influence is likely to be minimal in the case of financing via the <i>Deutschlandfonds</i> proposed by the SPD and the Green party, as it is practically an infrastructure investment fund managed by the public sector. In contrast, the emphasis on private capital in the CDU/CSU and FDP manifestos points to the increased use of public-private partnerships (<i>PPPs</i>). For the purposes of the debt brake, implementation as a PPP means that the construction costs plus interest only have to be included in the budget when and to the extent that the public authority has to pay usage fees.² ▶ It is not clear from the manifestos what specific measures are to be taken to mobilise private capital. In the past, the extent of the risk assumption required from private investors and the complexity of the tender procedures have proved to be the main limiting factors (see also pages 14, 15 below). The Federal Audit Office's lack of understanding (at least in the past) of the function of financing costs as risk compensation and the life cycle approach turned out to be an additional obstacle.³ ▶ The second fundamental question concerns the relationship between user financing and refinancing from budget funds. For investments that are not implemented as PPPs but by state-controlled companies, this decision also influences the booking of investment expenditure for the purposes of the debt brake: according to current understanding, an increase in |
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² https://www.bundesfinanzministerium.de/Content/DE/Standardartikel/Themen/Oeffentliche_Finzen/Schuldenbremse/kompendium-zur-schuldenbremse-des-bundes.pdf?__blob=publicationFile&v=9

³ https://www.bauindustrie.de/fileadmin/bauindustrie.de/Themen/Wirtschaft_Recht/Stellungnahme_zum_Bundesrechnungshofbericht_vom_04._Juni_2014.pdf

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| | <p>viability of our country and in prosperity. It should make productive spending and full employment possible. This is the only way to ensure a good life for future generations. In addition, the outdated credit ceilings need to be reformed: In addition to the introduction of exemptions for important future investments, we are in favour of a more flexible design of the deficit rule itself. The countries should be given borrowing options. This is in line with the European fiscal rules. (pp. 13-14)</p> | <p>net debt through financial transactions, as favoured by the SPD and the Green party through the <i>Deutschlandfonds</i>, can only be avoided if there is a prospect of repayment of the loans granted from the borrower's own income.⁴ In practice, this would regularly amount to user financing. So far, only the FDP, which is in favour of allocating the proceeds from the truck toll to Autobahn GmbH in future, is open to this.</p> |
| <p>B90/Green party</p> | <p>In order to finance the necessary investments in infrastructure, in the decarbonisation of our country and in a strong, sustainable economy, we want to reform the debt brake in line with European rules. To this end, government borrowing should be permitted to the extent that investments are made by the state. ... We are thus creating new financial room for manoeuvre, which we will distribute appropriately between the federal and state governments. At the same time, we will ensure that overall debt remains sustainable in the long term</p> <p>...</p> <p>Until a reform of the debt brake is implemented, we want to use the <i>Deutschlandfonds</i> to guarantee the younger generation a modern, functioning and climate-neutral country and a competitive economy instead of leaving them with deferred burdens and dilapidated infrastructures, thereby also strengthening confidence in a functioning state and liberal democracy. We want to enable citizens to participate in these investments for the state at low cost.</p> <p>The <i>Deutschlandfonds</i> helps to increase the scope for urgently needed future investments at federal, state and local level. However, it is no substitute for the task of prioritising the budget</p> | <p>▶ In the event of a reform of the debt brake, the question arises how investment costs should be spread over time: contrary to what the distinction between investment and consumption expenditure suggests, investments are also subject to medium and long-term depreciation. In order to adequately take this depreciation into account in a reform of the debt brake, the legislator would have to specify realistic depreciation rules for public investments. This approach, based on the version of Article 115 of the German Constitution that was in force until 2010, is advocated by the BMWK's Scientific Advisory Board under the heading 'Golden Rule plus'.⁵ Linked to this is the question of the extent to which subsidies for private investments - in particular the assumption of EEG remuneration to stabilise grid fees or CO2 contracts for difference - should be treated in the same way as public investments for the purposes of the debt brake.</p> <p>▶ Two aspects that play only a subordinate role in the public debate and in the election manifestos are likely to be even more important in practice than the discussion about the best form of financing: firstly, the unavoidable prioritisation of individual sectors, programmes and projects; and secondly, the relaxation of the debt brake for the federal states, which</p> |

⁴ <https://www.bundestag.de/resource/blob/1023206/0ab1de3308f9c21ca7a21746cec7da41/WD-4-055-24-WD-4-062-24-pdf.pdf>

⁵ https://www.bmwk.de/Redaktion/DE/Publikationen/Ministerium/Veroeffentlichung-Wissenschaftlicher-Beirat/gutachten-wissenschaftlicher-beirat-finanzierung-von-staatsaufgaben.pdf?__blob=publicationFile&v=16

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| | <p>more strongly and using the available revenue more efficiently. (pp. 36/37)</p> | <p>has also been called for by the CDU state premiers. The latter would also have an impact on the investment activities of municipalities via the financial allocations by the federal states.</p> |
| <p>FDP</p> | <p>In view of the increasing need for investment, we need a sustainable solution within the framework of the debt brake for the maintenance and expansion of infrastructure in Germany.</p> <p>We want to strengthen the road financing cycle, generate our own revenue for Autobahn GmbH through the lorry toll and open up to private capital to enable adequate and long-term planning and financing. (p. 43)</p> | |

Public procurement law

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| <p>CDU/CSU</p> | <p><i>Opening up more opportunities. We want to make life easier for SMEs, particularly when it comes to awarding contracts. That is why we want the European definition of small and medium-sized enterprises to be adapted. We are raising the thresholds for public contracts. (p. 52)</i></p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ As public procurement law is largely shaped by European directives, some of the proposals contained in the programmes would have to be initiated and implemented at European level. For example, the EUR 5,538,000.00 threshold for the application of procurement law for construction contracts⁶ under the German Competition Act (<i>GWB</i>) results directly from EU law. ▶ The public debate on sustainable procurement is particularly lively in the construction industry. As a public contracting authority, the state would have the opportunity to economically incentivise 'green' tenders by introducing a CO2 shadow price, for example - as is already practised in the context of private procurement.⁷ ▶ The relevant European directive is broadly defined in this respect. According to general principles, Member States are obliged to take measures to comply with environmental obligations when awarding contracts⁸ and to formulate technical specifications for works, services or supplies in the form of performance or functional requirements, including environmental characteristics.⁹ ▶ According to Section 127 (1) sentence 3 <i>GWB</i>, the objective of sustainable procurement can be pursued with so-called qualitative award criteria in individual tenders, which |
| <p>SPD</p> | | |
| <p>B90/Green party</p> | <p>To reduce administrative costs of over one billion euros for the awarding authorities, especially in local authorities, and the economy, we are comprehensively modernising public procurement law to simplify sustainable procurement and make it the rule. ... In order relieve the burden on contracting authorities, especially in local authorities, we will significantly raise the direct order limits. We will make sustainable procurement easier for all contracting authorities by providing suitable tools. ... (pp. 27/28)</p> | |
| <p>FDP</p> | <p>We Free Democrats want to drastically simplify public procurement law. The complexity of public procurement procedures has become a major burden for authorities and companies. Small and medium-sized enterprises and family businesses in particular suffer from the many bureaucratic hurdles. This is why public procurement law needs to be streamlined. We are calling for the value limit for direct contracts to be raised to EUR 100,000.00. (p. 14)</p> | |

⁶ Commission Delegated Regulations (EU) 2023/2495 of 15 November 2023.

⁷ <https://www.bppp.de/stellungnahmen-und-veroeffentlichungen/details/bericht-zur-sitzung-des-arbeitskreis-infrastruktur>

⁸ Art. 30 para. 3 Directive 2014/23/EU; Art. 36 para. 2 Directive 2014/25/EU.

⁹ Art. 36(1) and (2) Directive 2014/23/EU; Art. 42(3)(a) Directive 2014/24/EU; Art. 60(3)(a) Directive 2014/25/EU.

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| | | <p>assess the service offered rather than the price. Similar qualitative criteria can also be found in tenders outside of public procurement law, for example in the tender design for centrally pre-inspected areas for offshore wind energy in under Section 53 of the Offshore Wind Energy Act (<i>WindSeeG</i>). The bid level is designed in such a way that it considers the contribution to decarbonisation. The bidder with the highest proportion of unsubsidised electricity from renewable energies in the production process receives the maximum number of points.</p> <ul style="list-style-type: none"> ▶ A further basis for sustainable procurement can be found in the general requirement to take account of emissions in accordance with Section 13 of the Federal Climate Protection Act (<i>KSG</i>). According to this, a CO2 price must be applied to procurement at federal level to assess the avoidance or causation of greenhouse gas emissions. This fiscal consideration requirement has an impact on the application of public procurement law.¹⁰ ▶ In September 2024, the BMWK presented a draft of the Public Procurement Law Transformation Act, which contains specific regulations on the consideration of environmental criteria. The draft bill provides for at least one social or environmental criterion to be considered when awarding contracts. Sustainability aspects such as environmental, social and innovation aspects are to be included as early as the market exploration stage.¹¹ |
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¹⁰ Klinski, in: BeckOK Klimarecht Hofman/Heß, 1st edition 1 October 2024, Section 13 KSG para. 151.

¹¹ https://www.bmwk.de/Redaktion/DE/Downloads/Gesetz/20241018-refe-vergrtransfg-download.pdf?__blob=publicationFile&v=4.

Planning and authorisation procedure

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| <p>CDU/CSU</p> | <p><i>Speed up planning, authorisation and implementation.</i> Regulations that help to speed up procedures in one area must also be transferred to other areas such as transport, construction and digital infrastructures. With a fictitious authorisation, we ensure that applications to offices and authorities are processed more quickly. Preclusion should also play a greater role.</p> <p><i>Reduce legal action and instances, remove blockades.</i> We are in favour of abolishing the right to sue associations for infrastructure projects. We are in favour of this at European level. In the short term, we are examining where the implementation of the relevant directive goes significantly beyond the necessary level of European regulation. Where possible and sensible, we envisage reducing the appeal process to two instances in the interests of faster legal certainty. (p. 78)</p> <p><i>Accelerate and simplify infrastructure projects.</i> New replacements, minor modifications or extensions can be authorised by means of a notification procedure instead of the planning approval procedure. The authorisation authorities must ensure that the documents submitted are examined quickly. (p. 72)</p> <p><i>Priority for major projects.</i> The planning approval procedure remains the most suitable instrument for the construction of new major infrastructure. However, it must be made more efficient through a mandatory procedural master plan, a deadline regulation, an obligation to cooperate and digitalisation. (p. 73)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ The need for faster and simpler implementation of planning approval procedures - particularly for the expansion of renewable energies and the corresponding electricity grids - was already a dominant theme in the election campaign for the last federal election. In fact, the outgoing government has adopted three planning acceleration packages for this purpose.¹² ▶ As part of a first package, the WindSeeG was amended in 2022 with the aim of significantly accelerating the expansion of offshore wind energy.¹³ ▶ The second acceleration package contains significant changes to the German Building Code (BauGB) to drive forward the expansion of onshore wind energy. The federal states were obliged to designate sufficient areas within specified deadlines to accommodate the forecast number of wind turbines.¹⁴ In 2023, adjustments were also made to the Spatial Planning Act (<i>ROG</i>) in order to avoid duplication of procedures in environmental impact assessments and reduce delays in spatial planning procedures.¹⁵ For example, the |
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¹² <https://www.bmwsb.bund.de/SharedDocs/kurzmeldungen/Webs/BMWSB/DE/2023/03/newspaper-planungsbeschleunigung.html>.

¹³ BT-Drs. 20/1634, 3ff, 97.

¹⁴ <https://www.bundesregierung.de/breg-de/aktuelles/planungen-und-genehmigungen-beschleunigen-transformation-voranbringen-2053076>.

¹⁵ BT-Drs. 20/5830, 44.

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| <p>SPD</p> | <p>Many planning and approval procedures in Germany take too long. Last year, the German government agreed a pact with the federal states to speed up planning, authorisation and implementation: The goal is greater speed and less bureaucracy for more economic growth. We will continue to consistently pursue this path. We will also drive forward the reduction of bureaucracy at national and EU level, for example by consolidating, simplifying and digitalising documentation and reporting obligations. (p. 7)</p> | <p>deadline for comments in the planning procedure was limited to three months.¹⁶</p> <ul style="list-style-type: none"> ▶ In addition, the amendment to the Energy Industry Act (EnWG) has made it possible since 2023 to dispense with environmental impact assessments and species conservation assessments for electricity grid projects that are necessary to integrate renewable energies into the electricity system.¹⁷ |
| <p>B90/Green party</p> | <p>We need a fundamental overhaul of our transport infrastructure. We have greatly accelerated planning and approval procedures. Now we need to use the Germany Fund to create a sufficient and long-term financing basis for the maintenance of roads and bridges, for the expansion of our rail infrastructure and our local public transport system. (p. 46)</p> | <ul style="list-style-type: none"> ▶ The third acceleration package focuses on the digitalisation of planning procedures by making the digital publication of draft plans the rule. In addition, redundant public participation following changes or additions to a plan in the preparation process has been abolished. |
| <p>FDP</p> | <p>We have simplified road traffic law and accelerated the planning and approval process. We are continuing along this path. The aim is to at least halve the planning times for all infrastructure projects to expand roads, railways, waterways and digital networks more quickly.</p> <p>We are committed to ensuring that both mobile communications and fibre optic expansion become overriding public interests in the Federal Telecommunications Network Expansion Acceleration Act.</p> <p>In a next step, we want to exempt the construction of replacement infrastructure from authorisation, even if it must be expanded and adapted to growing demand. (pp. 40-41)</p> | <ul style="list-style-type: none"> ▶ Finally, the Act to Accelerate Approval Procedures in the Transport Sector was passed in 2023. The key measures include the digitalisation of the planning approval process, the waiver of environmental impact assessments for the construction of cycle paths along federal roads and the legal clarification that transport projects in the rail and road sectors enjoy an overriding public interest.¹⁸ ▶ Whether the measures already taken have been effective can hardly be assessed at present due to the long planning and realisation periods, regardless of the applicable procedural law. Irrespective of this, further simplifications would certainly facilitate investment activity. |

¹⁶ BT-Drs. 20/5830, 44.

¹⁷ BT-Drs. 20/5830, 47

¹⁸ <https://bmdv.bund.de/SharedDocs/DE/Artikel/G/planungs-und-genehmigungsbeschleunigung.html>.

Critical infrastructure protection

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| <p>CDU/CSU</p> | <p><i>More realism instead of naivety.</i> We protect security-relevant technologies, critical infrastructures and companies from takeovers by systemic rivals. (p. 17)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ To date, the focus of specific legal measures in critical infrastructure protection has been on IT security and has otherwise been limited to political declarations of intent and strategies. The KRITIS Umbrella Act¹⁹, which was already announced in the coalition treaty of the outgoing government²⁰ and is based on European legal requirements, was intended to establish cross-sector and cross-industry requirements for the physical protection of critical infrastructure. ▶ A consolidated government draft was discussed at first reading in the Bundestag on 5 December 2024 and referred to the committees for further consultation.²¹ ▶ The bill is not expected to be passed before the parliamentary elections, particularly because the CDU/CSU will not support the draft. The CDU/CSU criticises the draft above all for the fact that specific regulatory consequences are not foreseeable because a large part of the relevant decisions, such as the definition of application thresholds and the determination of critical infrastructures, will be shifted to the secondary legislation. Responsibilities are also not clearly delineated, which could result in further bureaucratic burdens for companies in the affected sectors.²² |
| <p>SPD</p> | <p>We are also strengthening civil defence to be better prepared for geopolitical threats such as hybrid attacks or military conflicts. We want to arm our country even better against (hybrid) attacks on our critical infrastructure and against disinformation campaigns. To this end, we will better interlink local authorities, federal states, the federal government, municipal utilities and operators of critical infrastructure and update and adapt the precautionary and security laws to this end. We also want to strengthen the powers of the security authorities for cyber defence. A key step here is the KRITIS Umbrella Act, which introduces standardised and cross-sectoral requirements for the physical protection of critical infrastructures (<i>KRITIS</i>). This law is primarily aimed at the resilience of companies to guarantee the security of supply of vital services to our society. (p. 40)</p> | |
| <p>B90/Green party</p> | <p>To ensure that our country remains secure and that our power grids, mobile phone services and servers are protected - our critical infrastructure (<i>KRITIS</i>), which is crucial to our prosperity - we need to think more intensely about internal and external security.</p> <p>With the KRITIS Umbrella Act, which formulates concrete security standards, we have laid a foundation. However, we need to further</p> | |

¹⁹Federal Government draft bill for a law to implement Directive (EU) 2022/2557 and to strengthen the resilience of critical facilities, BT-Drs. 20/13961; based on Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical facilities and repealing Council Directive 2008/114/EC, OJ L 333, 27 December 2022, p. 164 (CER Directive

²⁰Coalition agreement "Mehr Fortschritt Wagen" 2021-2025, p.

²¹Plenary protocol 20/203, p. 26270 ff

²²Detlef Seif, MdB CDU/CSU parliamentary group, plenary protocol 20/203, p.

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| | strengthen our infrastructure and, at the same time, a resilient economy. We want our infrastructures to be secure, control over them to remain here and our key technologies to be protected. With an investment protection law, we want to close loopholes in the acquisition of KRITIS by foreign investors. (p. 139) | |
| FDP | Critical infrastructure must be effectively protected from Chinese influence. (p. 50) | |

Road, rail, ports

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| <p>CDU/CSU</p> | <p>Germany's transport infrastructure is aging. This affects all modes of transport equally. There are also structural problems, especially at Deutsche Bahn. We must take decisive countermeasures to bring the infrastructure back up to date. (p. 72)</p> <p><i>Strengthening the competitiveness of ports and waterways.</i> If you want to expand your trade relations, you must think about your ports as gateways to the world and make ambitious progress. The maritime economy - including its marine connections - is an important economic sector for us. We are further developing the National Ports Strategy and strengthening the waterways. (p. 73)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ The need for investment in transport infrastructure is being discussed in public, particularly regarding dilapidated bridges and the railway network. Although the need for renovation and expansion is recognised by all parties, the programmes remain vague about the prioritisation and financing of projects. ▶ Even though investment in the rail network was higher in 2023 than ever before, Germany ranks at the bottom of the European league table with expenditure of EUR 115.00 per capita.²³ ▶ In road transport, investments by the federal government are generally at a stable level.²⁴ The picture is different around privately financed projects. PPP projects have been postponed in some cases and completed award procedures have been cancelled due to a lack of economically viable bids.²⁵ ▶ Postponements of PPP projects were particularly noticeable from the beginning of the coronavirus pandemic, and the government only tendered few of the originally planned projects after the end of the pandemic. ▶ In addition, the high order volume in the construction industry meant that contracts for conventional construction projects were often more attractive for potential bidders than |
| <p>SPD</p> | <p>However, the German motorway network urgently needs to be renovated, especially the bridges. We are launching a new federal mobility plan. Bottlenecks on the roads should also be eliminated in the future. (pp. 32-32)</p> <p>We will upgrade the waterway infrastructure, swiftly implement the National Ports Strategy and support the modernisation of the shipping fleets. (p. 32)</p> | |
| <p>B90/Green party</p> | <p>We now need to use the Germany Fund to create a sufficient and long-term financing basis for the maintenance of roads and bridges, for the expansion of our rail infrastructure and our local public transport system. To do this, we need new financing models in the long term that also have a modal shifting and ecological</p> | |

²³ <https://www.allianz-pro-schiene.de/themen/infrastruktur/investitionen/>

²⁴ <https://de.statista.com/statistik/daten/studie/7118/umfrage/investitionen-des-bundes-in-den-strassenverkehr/>

²⁵ <https://www.bundestag.de/presse/hib/kurzmeldungen-1024428>

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| | <p>impact. In this way, we want to put the financing of our infrastructure on a secure and long-term footing.</p> <p>While our rail network needs an efficient expansion throughout Germany, the road network is already well developed across the country and therefore requires renovation instead of new construction. To this end, we want to develop an integrated federal mobility plan that forms the basis for climate-neutral, environmentally friendly and socially just mobility by 2045. (pp. 46/47)</p> | <p>the realisation of PPP projects with the assumption of higher risks</p> <ul style="list-style-type: none"> ▶ As a result of these developments, PPPs are not currently present in road construction. However, the industry expects this to change in the short term, particularly in view of the high investment requirements.²⁶ In view of the obvious renovation backlog for bridges, there are plans to tender these projects as a package. |
| <p>FDP</p> | <p>We Free Democrats want less congestion thanks to the construction site turbo. To achieve this, the tendering modalities must be adapted so that fast and timely construction is rewarded through incentives.</p> <p>In view of the increasing need for investment, we need a sustainable solution within the framework of the debt brake for the maintenance and expansion of infrastructure in Germany. We want to strengthen the road financing cycle, generate our own revenue for Autobahn GmbH through the lorry toll and open up to private capital in order to enable adequate and long-term planning and financing. (p. 43)</p> | <ul style="list-style-type: none"> ▶ The Federal Cabinet has adopted the National Ports Strategy 2024. The aim is to strengthen the competitiveness of sea and inland ports facing challenges such as changes in global trade, digitalisation and climate change.²⁷ In this context, it has been criticised that the federal government has not yet committed to funding the implementation of the intended measures.²⁸ |

²⁶ <https://www.bppp.de/stellungnahmen-und-veroeffentlichungen/details/bericht-zur-sitzung-des-arbeitskreis-infrastruktur>

²⁷ <https://bmdv.bund.de/DE/Themen/Mobilitaet/Wasser/Hafenstrategie/hafenstrategie.html>

²⁸ <https://www.dvz.de/politik/detail/news/nationale-hafenstrategie-experten-kritisieren-fehlende-finanzierungszusagen.html>

Electromobility

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| <p>CDU/CSU</p> | <p>The charging infrastructure must be adequately expanded for e-mobility. (p. 72)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ With the Charging Infrastructure Masterplan II, the outgoing government has developed an interdepartmental overall strategy. The aim is to simplify the installation and operation of charging points. At the same time, charging infrastructure is to become more attractive as a business model to mobilise greater investment from the private sector. ▶ To this end, funding guidelines such as the Local Charging Infrastructure (2021-2024)²⁹ and Public Charging Infrastructure for Electric Vehicles in Germany (2021-2025)³⁰ were adopted. As a result, the number of publicly accessible charging points has more than doubled since the beginning of the legislative period according to the federal government's data and currently stands at around 140,000 charging points nationwide.³¹ ▶ Nevertheless, the Federal Network Agency is observing challenges, particularly when it comes to integrating new charging points into the electricity grid, which has recently slowed down further expansion.³² |
| <p>SPD</p> | <p>We are continuing to drive the nationwide expansion of the charging infrastructure for cars and lorries in a targeted manner. In addition to the new funding for e-cars, we want to strengthen the driving experience with electric cars all round: our goal is to have fast-charging stations in every supermarket car park and at every petrol station. We want a contactless and standardised payment system at all charging stations and to enable people to use their own car to store electricity at home. (p. 31)</p> | |
| <p>B90/Green party</p> | <p>We are accelerating the ramp-up of electromobility through targeted funding for the charging infrastructure and socially balanced purchase and leasing incentives for low-consumption e-cars. (p. 25)</p> | |
| <p>FDP</p> | <p>For a technology-neutral, sustainable mobility policy, we want electromobility, climate-neutral fuels and hydrogen to be treated equally in terms of regulation, taxation and funding. Only by being truly open to different technologies can we shape the mobility of the future. This must promote climate protection and at the same time strengthen economic stability. (p. 43)</p> | |

²⁹ Announcement of the guideline on the use of federal funds under the BMVI programme "Local Charging Infrastructure" of 24 March 2021

³⁰ Announcement of the funding guideline "Publicly accessible charging infrastructure for electric vehicles in Germany" of 13 July 2021

³¹ <https://www.bundesregierung.de/breg-de/aktuelles/ausbau-der-elektro-ladeinfrastruktur-2302864#:~:text=Was%20hat%20die%20Bundesregierung%20bisher,zug%C3%A4ngliche%20E%20%2DLadepunkte%20in%20Betrieb>

³² <https://regionalheute.de/ladesaeulen-betreiber-beklagen-engpaesse-bei-netzanschlussen-1720220524/>

Grid expansion

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| <p>CDU/CSU</p> | <p><i>A holistic approach to infrastructure.</i> We are paying particular attention to the integrated and cross-border expansion of the grid and the efficient linking of the expansion of renewable energies, grids and storage. We want to attract more private capital for this. We are making greater use of overhead lines for the rapid and favourable expansion of electricity grids. For electricity, heat, gas, hydrogen and CO2 infrastructure, we are focusing on standardisation and joint expansion.</p> <p><i>Smart energy.</i> Consumers should be able to react more flexibly to the price of electricity. To achieve this, electricity use must become more intelligent through smart meters and digitalisation. This will enable us to achieve better load distribution. This will reduce consumption and costs.</p> <p><i>Re-regulate grid fees.</i> We are in favour of retaining an electricity bidding zone and resolute grid expansion. Instead of different electricity price zones, electricity must become cheaper for everyone in Germany. A reform of the grid fees will reduce the burden and increase acceptance. We reject an additional grid fee burden for large industrial consumers that cannot produce flexibly. (pp. 19-20)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ It is also clear from the party programmes that grid expansion is a key challenge of the energy transition. Lengthy planning procedures, problems in the supply chains and a clash of different, sometimes conflicting vested interests mean that grid expansion is not progressing at the necessary speed. The consequences are clearly noticeable for grid users. Plant operators are finding it increasingly difficult to obtain grid connection capacity at the desired grid connection point at an early stage. There is also a need for action in the integration of wind and solar plants to fully utilise their potential and keep the costs of redispatch measures - a key driver of grid fees - to a minimum. ▶ At the European level, the revised Directive (EU) 2023/2413 RED III came into force, which provides for measures for accelerated approval procedures in the field of renewable energies. To implement the requirements of this directive regarding offshore wind energy, the outgoing government has launched the law to implement the EU Renewable Energy Directive around offshore wind energy and electricity grids,³³ which provides that approval procedures for projects on certain areas designated in the area development plan are to be accelerated. For example, there will only be a simplified planning approval procedure, and the scope of the review process will be reduced by generally eliminating certain review steps (including the environmental impact assessment). In addition, the draft law contains specific |
| <p>SPD</p> | <p>The switch to low-cost renewable energies is associated with a massive expansion of the electricity grids. This costs a lot of money, which is added to the electricity price in the form of grid fees. This is a challenge, particularly for the internationally competitive economy and consumers. We will initially stabilise the fees for the transmission grid, which is expanded to connect the</p> | |

³³ <https://dip.bundestag.de/vorgang/gesetz-zur-umsetzung-der-eu-erneuerbaren-richtlinie-in-den-bereichen-windenergie-auf/310640>

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| | <p>regions in Germany, and then cap them at 3 cents per kilowatt hour as quickly as possible to support the grid expansion. This is necessary due to the billions being invested in this grid. The aim is to halve the current burden on households and companies on average and create long-term planning security - for industrial investments, but also for the switch to climate-friendly technologies such as electric cars or heat pumps. We are also committed to ensuring that a larger group of particularly electricity-intensive companies can benefit from the existing rules on reduced grid fees. This also includes relieving the burden on large energy-intensive consumers without the potential for flexibilisation, as has been the case to date. (p. 45)</p> | <p>requirements for reviewing and confirming the completeness of submitted documents for all installations covered by the Offshore Wind Energy Act. This should lead to an overall acceleration of the procedure. However, the law is still in the legislative process, and it is unclear whether it will be passed before the general election.</p> |
| <p>B90/Green party</p> | <p>We are committed to an efficient European internal electricity market and are expanding the electricity grids to our European neighbours. We are also committed to the consistent digitalisation of the energy sector. Digital and flexible electricity grids and dynamic electricity tariffs will enable citizens to store electricity using batteries or heat pumps or to charge their electric cars in times of high wind and sunshine. This will enable everyone to save money and benefit directly from the advantages of the renewable electricity world. At the same time, the costs in the overall system are reduced.</p> <p>This also requires new rules on how our electricity market works.</p> <p>In terms of technology and regulation, we are gearing the distribution grids towards the efficient and effective integration of renewable energies into regional heating and mobility markets. We ensure that grid fees remain within reasonable limits and are borne fairly. (p. 42)</p> | <ul style="list-style-type: none"> ▶ The Ampel coalition also introduced the Infrastructure Acceleration Act³⁴, which aims to make administrative procedures more efficient and administrative court decisions more flexible. In particular, this law provides for structural adjustments to the Administrative Court Code, such as the extension of the first instance jurisdiction of the Higher Administrative Court and the Federal Administrative Court to offshore wind energy and hydrogen imports in order to speed up the relevant proceedings. In addition, it provides for a tightening of timeframes for appeals against planning approval decisions and planning authorisations under the Energy Industry Act. ▶ Regulations to accelerate grid expansion by cancelling or relaxing the requirement for underground lines have not been adopted by the outgoing government. In this respect, the corresponding regulations in the Federal Requirements Plan Act continue to apply, according to which the large extra-high-voltage direct current transmission lines in particular - and thus essentially the large power lines that are to transport offshore electricity produced in northern Germany to the consumption centres in southern Germany - are to be constructed primarily as underground cables. |

³⁴ <https://www.recht.bund.de/bgbl/1/2023/71/VO.html>

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| <p>FDP</p> | <p>We also want to comprehensively reform the grid fees. Grid fees are one of the major drivers of electricity costs. To reduce grid costs, we want to make the grids more flexible through digitalisation and demand through dynamic grid fees. This will reflect grid bottlenecks in the price so that demand shifts to where capacity is available and the need for grid expansion is reduced. We want to remove regulatory hurdles to rapid grid expansion and ensure that only the grids that are actually needed are built. This saves costs and lowers prices overall. At the same time, we are calling for better synchronisation of grid expansion with the expansion of renewable energies, power plants, storage facilities and the hydrogen economy to increase the efficiency of the overall system. (p. 18)</p> | <p>▶ The issue of splitting the electricity price zone applicable to Germany remains controversial. The EU Agency for the Cooperation of Energy Regulators (<i>ACER</i>) has already recommended splitting the electricity price zones in Germany in 2022.³⁵ Within Germany, the northern federal states were in favour of this, while the southern federal states were strictly against splitting the electricity price zone.³⁶ The outgoing government has not taken any measures in this regard and even if the federal government changes, a division of the electricity price zone for Germany seems unlikely in view of the considerable resistance from the southern federal states.</p> |
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³⁵ <https://www.agora-energiewende.de/aktuelles/strompreis-zonen-fuer-deutschland-vorbild-skandinavien>

³⁶ <https://www.stmwi.bayern.de/presse/pressemeldungen/375-2024/>

Capacity reserves and capacity markets

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| <p>CDU/CSU</p> | <p><i>Secure supply.</i> We are increasing the security of supply through a pragmatic power plant strategy that establishes a capacity market open to all technologies and thus ensures that the secured capacity is secured through competition.</p> <p><i>Structural change, but reliable.</i> We stand by the coal compromise and the agreed coal phase-out. There must be no further final shutdown of coal-fired power plants as long as no new gas-fired power plants and combined heat and power plants have been built to replace them. (p. 19)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ The capacity reserve is integrated into the energy-only market model pursued by the German government, according to which only the energy actually generated is remunerated and is intended to ensure security of supply during the so-called 'dark doldrums'. The legal framework is based on a clear separation from the regular electricity market. It ensures that the reserve is only activated in an emergency, while minimising market distortions. | |
| <p>SPD</p> | | | <ul style="list-style-type: none"> ▶ At EU level, the regulatory framework for capacity markets and mechanisms has evolved during the current legislative period. According to the EU Internal Electricity Market Regulation (2019/943), capacity mechanisms must be compatible with EU competition rules and the climate protection goals of the Energy Union and may only be established if security of supply would otherwise be jeopardised. In addition, the Climate, Environmental and Energy Aid Guidelines (KUEBLL) formulate binding requirements for capacity reserves and capacity markets. |
| <p>B90/Green party</p> | <p>Renewable energies supply electricity extremely cheaply, but not evenly. We must therefore coordinate supply and demand optimally and as decentral as possible. We can achieve this through cost-efficient grid expansion and better grid utilisation, decentralised price signals without splitting the bidding zone, storage of all kinds, the efficient use of the enormous flexibility potential of industry, commerce, transport and private consumers and a new generation of power plants running on green hydrogen as soon as possible, as well as the upgrading of biogas power plants that will primarily run on waste and residual materials in the future.</p> <p>Long-term security for investments in power plants, for example within the framework of capacity markets, must go hand in hand with intelligent short-term incentives for efficient electricity consumption</p> | | <ul style="list-style-type: none"> ▶ Nationally, the capacity reserve is regulated in the Energy Industry Act (Sections 13e and 13h EnWG) and the Capacity Reserve Ordinance (KapResV). According to these regulations, the operators of transmission grids are obliged to provide additional reserve capacity. The principles for tendering and operation are also regulated. |

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| | <p>In this way, we are enabling an increasingly self-sustaining expansion of solar, wind, storage and other infrastructure and easing the burden on electricity prices and the federal budget. (pp. 22/24)</p> | <ul style="list-style-type: none"> ▶ The aim of the outgoing government to adapt the regulations and create a reliable investment framework for controllable capacities has not yet been realised. Neither the agreed power plant strategy nor the preferred model for a capacity mechanism have been adopted. |
| <p>FDP</p> | <p>At the same time, we are calling for better synchronisation of grid expansion with the expansion of renewable energies, power plants, storage facilities and the hydrogen economy to increase the efficiency of the overall system. (p. 16)</p> <p>Regulations and requirements that hamper efficiency and modernisation must be completely dismantled. We want to create the necessary incentives for the construction of new gas-fired power plants through a capacity market that we design to be as simple, lean and unbureaucratic as possible. (p. 19)</p> | <ul style="list-style-type: none"> ▶ The expansion of battery storage systems also plays a key role in the discussion about reserve capacities. The government considers battery storage systems to be an essential part of the transformation of the energy system and is promoting their expansion and integration through various measures. A central element is the BMWK's electricity storage strategy, which includes regulatory adjustments and incentives to support energy storage systems.³⁷ ▶ To date, large-scale storage facilities with a capacity of approx. 1.5 gigawatts have been connected to the grid in Germany,³⁸ and the current connection requests to the transmission system operators total approx. 161 gigawatts.³⁹ This includes several large-scale projects. In Lower Saxony, for example, a battery storage facility with a capacity of 275 MWh and an output of 137.5 MW has been approved.⁴⁰ However, many of the planned projects can either not be realised at all or only after a long delay due to the slow progress in the construction of grid connections. |

³⁷<https://www.bmwk.de/Redaktion/DE/Artikel/Energie/Energiespeicher/stromspeicher-strategie.html>

³⁸ <https://www.spiegel.de/wissenschaft/mensch/energie-wende-riesige-speicher-fuers-stromnetz-ein-batteriatsunami-rolle-heran-a-59e79edc-91a7-421b-a1b8-8c3b5e39645b>

³⁹ <https://montelnews.com/de/news/8458570b-24b0-46c0-9fb4-e9c881de5660/umb-verzeichnen-161-gw-an-batterie-anschlussanfragen>

⁴⁰ <https://www.kyon-energy.de/pressemitteilung/kyon-energy-erhalt-grunes-licht-fur-neues-275-megawattstunden-batterie-grossspeicherprojekt-in-niedersachsen>

Hydrogen

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| <p>CDU/CSU</p> | <p><i>hydrogen to success.</i> To this end, we are creating planning security and the necessary infrastructure. One thing is clear: all economic regions must be reached by the hydrogen core network; there must be no discrimination against individual regions. We also need a large dose of pragmatism when it comes to domestic production and international hydrogen partnerships. The hydrogen ramp-up will only be successful in a European context. (p. 21)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ According to the party manifestos, there is widespread agreement that hydrogen is an essential building block for a successful energy transition. ▶ In summer 2023, the German government decided to update the National Hydrogen Strategy, which provides for measures to accelerate the expansion of the infrastructure and considers the entire value chain from the production of green hydrogen to transport and storage infrastructure and its use in industry. ▶ The EnWG contains detailed specifications for the expansion and financing the hydrogen core network: Investments are to be secured by state guarantees. At the same time, an intertemporal cost allocation mechanism ensures that grid fees are capped in the initial phase. In October 2024, the Federal Network Agency approved the hydrogen core network with a total pipeline length of 9,040 km, 60 per cent of which will be used to convert existing gas pipelines to hydrogen pipelines.⁴¹ There are also plans to financially support the expansion of the Europe-wide network at national level through 'IPCEI' (Important Projects of Common European Interest).⁴² ▶ The current high production costs are a key challenge: the price of green hydrogen is inhibiting demand, and without demand there are insufficient incentives to invest in production capacities. To overcome this problem, the |
| <p>SPD</p> | <p>But hydrogen will also play a very important role for our industry, especially in energy-intensive industries. For hydrogen to really gain a foothold in Germany, we need to create lead markets for green steel made in Germany - in other words, fixed proportions of green steel, for example in the railway or in transformer platforms. We also need a cleverly designed hydrogen network. At the same time, sufficient storage capacities must be built up, for example as part of a national hydrogen reserve. (p. 8)</p> | |
| <p>B90/Green party</p> | <p>We will develop the hydrogen core network quickly and in line with demand, promote the production of green hydrogen in Germany and secure new import sources. (p. 17)</p> | |
| <p>FDP</p> | <p>For a technology-neutral, sustainable mobility policy, we want electromobility, climate-neutral fuels and hydrogen to be treated equally in terms of regulation, taxation and funding. (p. 43)</p> | |

⁴¹ <https://www.bundesnetzagentur.de/DE/Fachthemen/ElektrizitaetundGas/Wasserstoff/Kernnetz/start.html>

⁴² <https://www.bmwk.de/Redaktion/DE/Pressemitteilungen/2024/07/20240715-ipcei-wasserstoff-projekte.html>

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| | | <p>European Commission has created an auction platform to promote European production capacities as part of the European Hydrogen Bank. In 2024, it promised seven large-scale hydrogen projects in the EU fixed subsidies for hydrogen volumes produced over a period of ten years in Portugal, Spain, Finland and Norway. The auction platform is also open to the member states. They can use the platform to award funding for national projects.⁴³</p> <ul style="list-style-type: none">▶ With the H2Global mechanism, the outgoing government has already created an instrument to establish production capacities for the manufacture of green hydrogen derivatives and secure them for the German (or European) market through subsidies and purchase guarantees. So far, two tenders for hydrogen derivatives have been successfully completed, further tenders have been announced,⁴⁴ and cooperation agreements have been concluded with Canada and Australia, among others. However, no further concrete measures have been taken since then, which may be due to the judgement of the Federal Constitutional Court on the Climate and Transformation Fund. |
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⁴³ https://germany.representation.ec.europa.eu/news/erste-auktion-der-europaischen-wasserstoffbank-sieben-projekte-erhalten-720-millionen-euro-2024-04-30_de

⁴⁴ <https://www.bmwk.de/Redaktion/DE/Pressemitteilungen/2024/07/20240711-h2global.html>

Heat and district heating

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| <p>CDU/CSU</p> | <p><i>Withdraw the traffic light heating law.</i> People need freedom of choice. They know best which type of heating suits their home and their wallet. Our aim is to promote and utilise low-emission heating solutions that are open to all technologies. For us, this also includes heating with the renewable raw material wood. We are abolishing the traffic light heating law.</p> <p><i>Reliable decarbonisation in the building sector.</i> We focus on CO2 pricing with social compensation, reliable funding and technology-neutral solutions. In this way, we consider different circumstances in existing buildings. (p. 20)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ The passionately debated 'Heating Act', which was passed in 2023, amends the Building Energy Act (<i>GEG</i>). It stipulates that every newly installed heating system must be powered by 65% renewable energy or waste heat. The regulations initially only apply to new buildings in new development areas. For other buildings, the requirements will apply by mid-2028 at the latest, when the deadlines for preparing municipal heating plans expire. The GEG stipulates that permissible types of heating include connection to a heating network, a heat pump, heating with solar thermal energy, biomass or green or blue hydrogen.⁴⁵ ▶ The Heat Planning Act, which is closely linked to the GEG and will also be passed in 2023, aims to expand the heating network through appropriate municipal planning and to increase the proportion of renewable energies and unavoidable waste heat in the heating networks.⁴⁶ ▶ The possibility for local authorities to stipulate an obligation to connect to and use a district heating network is based on federal and state regulations. This right is limited in particular by proportionality. For example, a corresponding statute must provide for exceptions in the event that the property is heated with a system that fulfils the requirements of the GEG.⁴⁷ ▶ The legal relationships between municipal suppliers and customers are essentially determined by the general terms and |
| <p>SPD</p> | <p>District heating will become very important, especially in urban areas, and will heat millions of people's homes. To ensure that it remains affordable, we want to introduce nationwide price controls for district heating. (p. 29)</p> | |
| <p>B90/Green party</p> | <p>We want to secure the expansion and conversion of heating networks towards renewable heat by extending and strengthening the funding for efficient heating networks (BEW), optimising approval processes and strengthening the provision climate-friendly heat by local energy producers by reducing electricity costs.</p> <p>Strong consumer protection is a prerequisite for this. By introducing price supervision in the short term and price regulation in the long term, we want to further strengthen consumer protection for district heating, which is primarily used by rented households. We will also mobilise private capital for the expansion of heating networks and</p> | |

⁴⁵ Act on the Conservation of Energy and the Use of Renewable Energies for Heating and Cooling in Buildings of 8 August 2020, last amended by Art. 1 G of 16 September 2023

⁴⁶ Act on heat planning and the decarbonisation of heating networks of 20 December 2023

⁴⁷ Approximately § 11 para. 3 of the Baden-Württemberg municipal code

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| | <p>reduce financing costs through public guarantees. To advance the heating transition in the hands of citizens, we want to promote the establishment of heating network cooperatives in which citizens jointly finance and organise the heating supply. We do not see any prospects in the use of hydrogen for heat supply. We also support processes to facilitate third-party access to district heating to facilitate investment and drive forward decarbonisation. The heating transition can be based on a variety of technologies. (pp. 44/45)</p> | <p>conditions of the AVB District Heating Ordinance. An amendment to the ordinance was to be passed by the outgoing government, but no agreement was reached. Conflicts exist particularly between the interests of consumer protection and the utilities' need for secure purchase and financing of costs in light of the upcoming expansion and transformation.⁴⁸</p> |
| <p>FDP</p> | <p>The Heating Act with its excessive requirements must be completely phased out. To cushion the social costs of climate protection, we Free Democrats want to introduce a climate dividend and drastically reduce energy taxation. We reject any obligation to connect to district heating networks. Heating with wood will remain possible with us, and we want to reduce the requirements for fireplaces and stoves. (p. 46)</p> | <p>▶ Private investors are already entering the field of district heating, particularly in the geothermal sector. This is supported by various subsidy programmes.</p> <p>▶ The German government has also already adopted measures to support the expansion of geothermal energy. In September 2024, for example, the cabinet passed a draft for the so-called 'Geothermal Acceleration Act'.⁴⁹ However, the industry is calling for the creation of additional foundations to facilitate investment in geothermal energy and to utilise the technology's potential for the heat transition.⁵⁰</p> |

⁴⁸ <https://www.zfk.de/politik/deutschland/habeck-fernwaermeverordnung-aus>

⁴⁹ <https://www.bmwk.de/Redaktion/DE/Artikel/Service/Gesetzesvorhaben/20240628-entwurf-beschleunigung-genehmigungsverfahren-geowg.html>

⁵⁰ <https://background.tagesspiegel.de/energie-und-klima/briefing/wir-brauchen-einen-bundesweiten-geothermie-gipfel>

CO2 utilisation and storage

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| <p>CDU/CSU</p> | <p><i>Establish a circular CO2 economy.</i> We are committed to a comprehensive CO2 circular economy with natural and technical CO2 utilisation and storage. We are creating the necessary framework conditions to enable Carbon Capture and Utilisation (CCU), Carbon Capture and Storage (CCS) and Direct Air Capture (DACCS) as well as the necessary transport infrastructure. (p. 22)</p> | <p>Background and commentary</p> <ul style="list-style-type: none"> ▶ All parties agree that Carbon Capture and Storage (CCS) and Carbon Capture and Utilisation (CCU) should be permitted as technologies in addition to the measures already taken and planned on the way to CO2 neutrality. Accordingly, the current law needs to be adapted. ▶ So far, there is only a theoretical possibility of capturing CO2 in Germany and transporting it abroad for storage purposes. According to the Carbon Dioxide Storage Act, the construction of CO2 storage facilities is only permitted for test purposes but cannot be authorised anyway due to an expired deadline.⁵¹ ▶ The London Protocol prohibits the storage of CO2 abroad under the seabed.⁵² ▶ This means that CO2 can currently only be exported to foreign onshore storage facilities, which are being planned in Denmark, for example. A pipeline infrastructure for the transport of large quantities of CO2 does not yet exist in Germany.⁵³ ▶ In August 2024, the German government adopted the Carbon Management Strategy, according to which CCS and CCU can be used as technologies for the transport and storage of CO2 in the future. The existing obstacles to the transport and storage of CO2 are to be removed. Storage is then planned on |
| <p>SPD</p> | <p>The goals of our climate protection policy are to avoid greenhouse gas emissions by accelerating the expansion of renewable energies, efficient energy management, decarbonisation of industry and a more comprehensive circular economy. We therefore follow the principle of "CO2 avoidance before CO2 capture". (p. 46)</p> | |
| <p>B90/Green party</p> | <p>Due to emissions that are difficult to avoid in certain production processes, complete climate neutrality in industry will only be possible with the capture, storage and utilisation of CO2 (CCS/CCU). We are therefore enabling the use of these technologies. The prerequisite for this is that the captured CO2 is stored in a safe and stable form or utilised as part of closed carbon cycles. Where technically unavoidable emissions arise, this can be supported. In principle, the polluter pays principle applies to financing. We want to develop a standardised Europe-wide regulatory framework, including a binding liability law. To this end, we are creating an integrated European infrastructure, including joint European CO2 storage facilities. We consider existing uses, especially at sea, binding ecological criteria and the exclusion of</p> | |

⁵¹ Act on the Demonstration of the Permanent Storage of Carbon Dioxide of 17 August 2012, last amended by Art. 22 G of 10 August 2021

⁵² Protocol of 7 November 1996 to the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972

⁵³ https://www.bmwk.de/Redaktion/DE/Downloads/F/faq-ccs-ccu.pdf?__blob=publicationFile&v=40

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| | <p>protected areas and their immediate surroundings. We are also researching and developing negative emissions - i.e. natural and technical processes that remove CO₂ from the atmosphere - and setting clear targets for achieving negative emissions without counting them against the reduction targets of emissions trading. (p. 25)</p> | <p>the high seas outside marine protected areas if the site is proven to be suitable.⁵⁴</p> <p>► In September, the amendment to the Carbon Dioxide Storage Act had its first reading in the Bundestag and could be passed before the election - with the votes of the CDU.⁵⁵</p> |
| <p>FDP</p> | <p>We Free Democrats are in favour of technological openness when it comes to climate protection. After all, if politicians and civil servants dictate which technologies are used and which are banned, the innovative strength of companies will be curbed, and climate protection will only become unnecessarily expensive. That is why we are in favour of an immediate lifting of the de facto ban on combustion engines from 2035 and want to enable the capture and storage of CO₂ (CCS) as a non-discriminatory climate protection option. (p. 41)</p> | |

⁵⁴ <https://www.bundesregierung.de/breg-de/aktuelles/carbon-management-strategie-2289146>

⁵⁵ <https://www.faz.net/aktuell/wirtschaft/kanzlerkandidat-merz-zweifelt-an-gruenem-stahl-110231002.html>