

13 March 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the third payment request submitted by Germany on 11 November, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 16 February 2026, Germany submitted a request for payment for the fourth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Germany provided due justification of the satisfactory fulfilment of the 22 milestones and targets of the fourth instalment of the non-repayable support of the Council Implementing Decision of 20 January 2026 on the approval of the assessment of the recovery and resilience plan for Germany¹.

For 8 targets covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Germany, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60 which corresponds to a confidence level of 95% or above in all cases.

In its payment request, Germany has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Germany the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 22 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Germany's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, the roll-out of digital services in different Länder as well as digitalisation of public health offices and the use of the eID card. Furthermore, it covers milestones and targets related to the investments supporting the green transition such as investments in hydrogen, efficient heat networks and 155 000 building renovations as well as support of 399 450 electric cars, zero emission transport and public accessible charging points. It covers further investments the education platform. Furthermore, milestones and targets for consultation programmes for school IT concepts and for funding programmes for municipalities are included.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

¹ 17026/25 and 17026/25 ADD 1, not yet published.

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Number and name of the Target: 8 Issuance of grant decisions

Related Measure: 1.1.2 Funding programme for decarbonisation in industry

Quantitative Indicator: Number

Baseline: 0

Target: 19

Time: Q4 2024

1. Context:

The objective of the measure is to help industry shift from highly emission-intensive production processes to low GHG processes. More precisely, it consists of support for research and development, testing in experimental or pilot plants, and investments in installations covered by the EU ETS.

Target 8 relates to the issuance of grant decisions to recipients/applicants, enabling the start of the selected projects.

Target 8 is the second target of the investment, and it follows the completion of milestone 7. It will be followed by target 9, related to the disbursement to the supported projects.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Copy of the Federal Funding Guideline to Support Decarbonisation in Industry (<i>Förderrichtlinie zur Dekarbonisierung in der Industrie</i> , hereinafter referred to as 'DDI' Funding Guideline), published on 15 January 2021 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 1 January 2021.	Legal basis of the funding scheme, laying out the conditions of the scheme, including eligibility criteria.
3	Group of 19 project descriptions	Group of documents showing descriptions of the approved investment or R&D projects handed in by each project applicant as part of the funding application. The descriptions include, for example, a technical/substantive and economic presentation of the project.
4	Group of 19 copies of Grant decisions	These documents show grant decisions issued by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, or depending on the date of the decision, by the German Federal Ministry for Economic Affairs and Climate Action. The grant decisions

		were issued between 29 October 2021 and 9 July 2024.
5	Template for an annex as an attachment to the grant decision	This document shows a template for an annex to the grant decisions laying out additional provisions that every recipient has received together with the grant decision.
6	Spreadsheet on 19 projects	This spreadsheet shows the official reference number (funding code), recipient name, type of project, short description, link to the project brief, reference to the grant decision, information on the ETS EU Transaction Log, indication of the ETS sector and abstract of the projected emissions of each project.
7	Copies of 4 Press Releases	These documents show a press release on the website of the Ministry for Economic Affairs, Labour, Energy and Climate Action of the Land Brandenburg, a press release published in a local daily newspaper and a press release on the website of the involved company to indicate the start of the project.
8	Group of 15 copies of Payment Requests	These documents show signed payment requests for 15 projects to indicate the start of projects.
9	Document on emission savings in the DDI investment projects	This document provides an explanation of estimated emission savings underlying each project.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

Grant decisions have been issued to recipients/applicants

The Council Implementing Decision requires the issuance of 19 grant decisions. The German authorities submitted copies of 19 grant decisions (Evidence No. 4 and Evidence No. 5), along with their corresponding project descriptions (Evidence No. 3), confirming that the requirements of the target have been met. The grant decisions were issued between October 2021 and July 2024 in the context of the DDI National Funding Programme. The projects have been approved under the DDI Funding Guideline, published on 15 January 2021 in the Federal Gazette (*Bundesanzeiger*) and entered into force on 1 January 2021 (Evidence No. 2).

Each grant decision can be linked to the DDI Funding Programme covered by the funding guideline via the reference to the federal budget – of the respective year 2021, 2022, 2023 or 2024 in which the decision was issued – at the top of each grant decision.

Section 1 of the DDI Funding Guideline sets out the objective to support projects that aim to reduce greenhouse gas emissions in energy-intensive industries as far as possible and permanently (Evidence No. 2, p. 1, section 1 “*Förderziel und Zwecksetzung*”). The programme covers the funding of investment projects and research and development (R&D) projects. More specifically, it covers research and development, testing in experimental or pilot plans and investments in plants for the

application and implementation of measures on an industrial scale (Evidence No. 2, p. 1, section 4 “*Gegenstand der Förderung*”). Each of the grant decisions indicates a date of issuance and was issued by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (*Bundesministerium für Umwelt, Naturschutz und nukleare Sicherheit*) or by the Federal Ministry for Economic Affairs and Climate Action (*Bundesministerium für Wirtschaft und Klimaschutz*) depending on the date of the grant decision given a change in government in Fall 2021, which caused the responsible ministry for the programme to change. The grant decisions are issued to the recipients.

enabling the start of the implementation of the selected projects.

Each grant decision contains an indication of the runtime for the project, and a preliminary schedule based on the application (Evidence No. 4, section “1. *Höhe der Zuwendung/Finanzierungsform und –art/Zweckbindung/Bewilligungszeitraum/Zahlungsplan*”). From the moment the grant decision becomes definitive – when it is not appealed within one month – recipients can begin to apply for payment/reimbursement for project-related expenditures as set out in the grant decision (Evidence No. 3, section 2 “*Nebenbestimmungen und Hinweise*”, subsection “*Voraussetzungen zur Auszahlung der Zuwendung*” and section 3 “*Rechtsbehelfsbelehrung*”), thereby enabling the start of the implementation of selected projects. Furthermore, payment requests (Evidence No. 8) or press releases (Evidence No. 7) were provided as proof of the project start.

Only projects resulting in emissions substantially below the EU Emissions Trading System benchmarks shall be eligible for support under the measure.

Out of 19 projects, three are investment projects. The eligibility assessment for these projects is based on estimates of the expected performance of the aided installations compared to the relevant EU ETS product and fallback benchmarks established under the EU Regulation 2021/447 (Evidence No. 6). To be considered substantially below the benchmark, (expected) emission intensity must go below both, the specific benchmark defined for the allocation of free allowances and the value of emission intensity of the average 10% best installations (Evidence No. 3-6).

The investment project with funding code 67DDI003-0, concerning the production of coloured container glass, is covered by the product benchmark for bottles and jars of coloured glass under the ETS regulation. The project fulfils both emission intensity criteria described above. For the other two cases, covering the processing of steel, no product benchmark applies, and as a replacement the heat benchmark is applied. This concerns the investment projects with funding codes 67DDI021-0 and 67DDI052-0. Due to full electrification in both projects, both emissions intensity criteria are also fulfilled (Evidence No. 3-6).

The eligibility assessment for investment projects is not applicable to R&D projects, since R&D activities do not generate direct emissions savings. However, the German authorities provided an indication of the ETS sector to which each R&D project belongs, including:

- Glass (67DDI0001, 67DDI002-1),
- Steam cracking (67DDI008-0),
- Tissue (67DDI016-1, 67DDI016-2),
- Grey cement clinker (67DDI022-0, 67DDI025-1, 67DDI025-2, 67DDI025-3, 67DDI025-4, 67DDI028-1, 67DDI028-2),
- Carbon black (67DDI024-1),
- Float glass (67DDI042-0),
- Ceramic (67DDI054-0), and

- Aluminium (67DDI057-0).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 21 Commitment for flagship research and innovation projects

Related Measure: 1.1.5 Flagship projects for research and innovation in the context of the National Hydrogen Strategy

Quantitative Indicator: EUR million

Baseline: 0

Target: 665

Time: Q1 2025

1. Context:

The objective of the measure is to contribute to decarbonising the economy and specifically to addressing key issues related to the provision of green hydrogen in the future energy system. It consists of support for flagship projects for hydrogen research and innovation.

Target 21 requires the commitment of at least EUR 665 000 000 of the EUR 700 000 000 allocated to the flagship projects.

Target 21 is the third target of the investment and it follows milestone 17 related to the publishing of the competition and target 18 related to the issuance of 150 grant decisions to beneficiaries/applicants, whereby implementation of selected projects is started. It will be followed by target 19 related to the availability of hydrogen research project reports.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Spreadsheet containing 354 projects	Spreadsheet with the official reference numbers, date of grant decision, amount granted and recipient of the grant decision, compiled by the Ministry of Finance.
3	Evidence on a sample of 60 service bundles selected by the Commission, including copies of the project applications, copies of the detailed descriptions of the project, copies of the grant decisions and, in some cases, copies of additional decisions increasing/decreasing the funding	For each sampled service bundle, the following documentary evidence was provided: <ul style="list-style-type: none">• The project application form (<i>Antrag auf Gewährung einer Bundeszuwendung i) auf Ausgabenbasis; ii) Aufgabenbasis [-Personal]; iii) auf Kostenbasis; iv) - Vorhaben, Verbund</i>, hereinafter referred to as 'AZA/AZAP/AZK/AZV'), detailing the applicant name, the project topic and the project start and end date• A detailed description of the individual project (<i>Teilvorhabenbeschreibung, TVB</i>), containing the addressed flagship, the applicant name, the project name

		<p>and project start and end date. On the level of the aggregated project (consortium), an additional overall project description (<i>Gesamtvorhabenbeschreibung, GVB</i>) is provided.</p> <ul style="list-style-type: none"> • The grant decisions containing the applicant name, the project code, the project title and the funding sum. In some sampled items, the funding sum was increased or decreased after the issuance of the grant decision. In these cases, a corrective decision is provided (in the form of an additional grant decision in the case of an increased amount, or reduction notice, in the case of a reduced amount). The grant decisions have been issued between 10 June 2021 and 20 September 2024.
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3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

Of the EUR 700 000 000 allocated to the flagship projects, at least EUR 665 000 000 have been committed.

The German authorities provided a spreadsheet of 354 flagship projects for research and innovation in the context of the National Hydrogen Strategy for which funding had been issued (Evidence No. 2), from which a sample was drawn. This spreadsheet details that for the 354 projects listed, EUR 716 313 539 have been committed, surpassing the EUR 665 000 000 required in the description of target 21.

Following the selection of a random sample of 60 units (Evidence No. 3), Germany submitted grant decisions along with project description to demonstrate that at least EUR 665 million have been committed. To prove that funding was allocated to hydrogen flag ship projects, project descriptions demonstrated that the support was in the field of hydrogen research and innovation. For instance, one project consisted of exploring overarching aspects of integrated offshore hydrogen and power to production facilities operating as insular solutions (03HY303C). To demonstrate the fulfilment of the commitment of at least EUR 665 000 000, each of the grant decisions details the funding provided for the corresponding project. These matched the amounts indicated in the spreadsheet (Evidence No. 2). Differences in the decimal digits between the spreadsheet (Evidence No. 2) and grant decisions (Evidence No. 3) result from the rounding of the granted sums to full euros in the spreadsheet.

In thirteen cases, the funding amount stated on the grant decision was later reduced, as indicated by an accompanying reduction notice (*Kürzungsbescheid*, Evidence No. 3). This was the case for sampling items 4, 19, 33, 93, 171, 176, 178, 179, 186, 215, 252, 253, 317. The amount stated in the spreadsheet (Evidence No. 2) corresponds to the final amount after reduction as stated by the reduction notice.

In ten cases, the funding amount stated on the grant decision was later increased, as indicated by an accompanying additional grant decision (*Aufstockung*, Evidence No. 3). This was the case for sampling items 6, 13, 15, 50, 66, 95, 137, 143, 154, 244. The amount stated in the spreadsheet (Evidence

No. 2) corresponds to the final amount after the increase as stated by the additional grant decision. Where applicants had requested an increase of funding, they were required to submit an additional project application form (AZA/AZAP/AZK/AZV, Evidence No. 3) and an additional detailed description of the individual project (*Teilvorhabenbeschreibung, TVB*, Evidence No. 3). In those cases, these documents were provided as part of the sample.

In addition to the amounts listed on the grant decisions and, if applicable, the reduction notice or additional grant decisions, it was checked that the name of the recipient and the official reference of the funding code matched the name stated in the spreadsheet (Evidence No. 2), as well as the project application form and the detailed project descriptions. Although no unique identifier had been set at the time of application, grant decisions and application documents are unambiguously attributable via the name of applicant and the name of the project. It was further checked that the date in the grant decision corresponded to the date listed in the excel spreadsheet (Evidence No. 2) and no grant decision was issued before 1 February 2020. Both checks confirmed the correctness of the provided documentation.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met. The project descriptions detailed that the funding was for projects in the field of hydrogen research and innovation, and the grant decisions showed that EUR 716 313 539 have been committed – thus exceeding the goal of Target 21 by EUR 51 313 539.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 21B Submission of feasibility studies and/or transformation plans

Related Measure: 1.1.6 Federal support for efficient heat networks

Quantitative Indicator: Feasibility studies and/or transformation plans

Baseline: 0

Target: 50

Time: Q4 2024

1. Context:

The measure consists of financial support to transformation plans, feasibility studies and investment projects for heating networks.

Target 21B requires that at least 50 feasibility studies and/or transformation plans have been submitted to the implementing authority, BAFA (Bundesamt für Wirtschaft und Ausfuhrkontrolle).

Target 21B is the second target of the investment and follows the completion of target 21A. It will be followed by target 21C, related to the disbursement of at least EUR 541 500 000 for the supported projects.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Copy of the funding guideline Federal Support for Efficient Heat Networks (<i>Bundesförderung für effiziente Wärmenetze</i> , hereinafter referred to as 'BEW'), published on 18 August 2022 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 15 September 2022.	Legal basis of the funding scheme, laying out the conditions of the scheme, including eligibility criteria.
3	Copy of confirmation on the submission of feasibility studies and transformation plans by the Federal Office for Economic Affairs and Export Control (<i>Bundesamt für Wirtschaft und Ausfuhrkontrolle</i> , hereinafter referred to as 'BAFA')	This document shows the confirmation of the implementing authority, BAFA, that 50 feasibility studies and/or transformation plans were submitted to and received by the BAFA via online upload. The document is dated 29 July 2025 and signed by BAFA.
4-53	50 feasibility studies and/or transformation plans.	25 feasibility studies and 25 transformation plans from between December 2022 and November 2024,

		<p>if applicable, including annexes. Transformation plans serve the purpose of presenting the temporal, technical and economic restructuring of pre-existing heat network systems with the aim of fully supplying the networks with eligible renewable heat sources. Feasibility studies are intended to enable market participants to examine the feasibility and economic viability of the concept of a new heat network system with predominantly renewable heat generation.</p>
54-103	Copies of 50 grant decisions.	<p>These documents show the decisions on a grant for the corresponding transformation plans or feasibility studies (Evidence No.4-53) by BAFA. The two documents can be linked via the unique reference number of each project. The grant decisions were issued between 21 October 2022 and 10 November 2023.</p>
104-153	Technical review notes (<i>technische Prüfberichte</i>).	<p>These notes document the technical review of the feasibility studies and transformation plans by BAFA officers. The technical review notes were checked to have been concluded with a positive result. In two cases, for the feasibility studies with funding code 70000139 and 70000126, additional checks were conducted and are listed as Evidence No. 154-155.</p>
154-155	Processing notes (<i>Bearbeitungsvermerke</i>).	<p>These documents, issued also by BAFA, are complementary to two of the technical review notes (reference numbers 70000139 and 70000126), where additional documents were requested from the beneficiaries, and confirm the positive result of the technical review process.</p>

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

At least 50 feasibility studies and/or transformation plans have been submitted to the implementing authority, BAFA (*Bundesamt für Wirtschaft und Ausführung*).

The authority responsible for implementing the investment “1.1.6: Federal support for efficient heat networks” is the BAFA, as set by the legally binding BEW funding guideline, published on 18 August 2022 in the Federal Gazette (*Bundesanzeiger*) and entered into force on 15 September 2022 (Evidence No. 2, p. 13, section “8.1 Antragstellung, Vorhabenbeginn”).

In line with the description of the measure, financial support covers grants for the preparation of feasibility studies and transformation plans, as well as investment grants including support for operating costs for systems for renewable heat generation (Evidence No. 2, section “7.1 Art und Umfang der Förderung”). The support to feasibility studies and transformation plans is covered in module 1 of the BEW funding guideline (Evidence No. 2, section “4.1 Modul 1: Transformationspläne, Machbarkeitsstudien”). Module 2 covers systemic support for investment and operating expenditures (Evidence No. 2, section “4.2 Modul 2: Systemische Förderung [Investitions- und Betriebskostenförderung]”). Module 3 covers individual investment measures (Evidence No. 2, section “4.3 Modul: Einzelmaßnahmen”). Grant decisions for projects from modules 2 or 3 were previously assessed under target 21A.

BAFA has confirmed in a letter that 50 feasibility studies and/or transformation plans, identifiable via their unique reference number, have been submitted to it (Evidence No. 3), confirming that the requirements of the target have been met. The German authorities have submitted to the Commission Services these 25 feasibility studies and 25 transformation plans (Evidence No. 4-53), along with their corresponding grant decisions (Evidence No. 54-103), technical review notes (Evidence No. 104-153), and, if applicable, processing notes (Evidence No. 154-155).

The financing of the feasibility studies and/or transformation plans according to the funding guideline is confirmed through the grant decisions (Evidence No. 53-103). Each grant decision can be linked to the BEW funding guideline (Evidence No. 2) via a reference to the funding guideline in the subject line of the grant decisions. 43 feasibility studies and transformation plans (Evidence No. 4-53) can be linked to the grant decision (Evidence No. 53-103) and the corresponding technical review note (Evidence No. 104-153) via the unique name of the grant recipient (*Antragsteller*) and/or implementing partner (*Bevollmächtigter*) for the creation of the plans or studies. For the seven remaining feasibility studies, in which the same grant recipient exists for several projects – for example, a municipality – the grant decision can be uniquely linked to the technical review note via an official project reference number. The technical review note in turn can then be uniquely linked to the feasibility study or transformation plan via the name of the grant recipient and the project title and/or geographic location of the heat network (i.e., a town/district within a municipality).

All feasibility studies and transformation plans fulfil the requirements of the BEW funding guideline (Evidence No. 2), which was previously assessed under target 21A. The technical review notes (Evidence No. 104-153) and, if applicable, processing notes (Evidence No. 154-155) are also provided by BAFA and confirm the positive result of the technical review of the feasibility studies and transformation plans by BAFA. An internal manual of the BAFA requires the technical review notes. The legal basis comprises Section 44 (1) of the Federal Budget Code (*Bundeshaushaltsordnung, BHO*) and the General Administrative Regulations to Section 44 (10, 11) of the BHO.

The 25 transformation plans cover, in particular, solar thermal energy, geothermal energy, sustainable biomass, and different types of waste heat. Different types of heat pumps allowing greater use of renewable energy sources are foreseen. The 25 feasibility studies also favour energy sources such as sustainable biomass, solar thermal energy, geothermal energy, and different types of waste heat.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 23 Support for publicly accessible recharging points

Related Measure: 1.2.1 Support for the construction of charging infrastructure

Quantitative Indicator: Number of publicly accessible recharging points

Baseline: 0

Target: 2 500

Time: Q3 2025

1. Context:

The objective of the measure is to develop clean mobility solutions to decarbonise the transport sector. The measure consists of support for recharging points.

Target 23 relates to the issuance of commissioning notifications (*Inbetriebnahmemeldungen*) for 2 500 publicly accessible recharging points.

Target 23 is the second and last target of the investment. It follows the completion of milestone 22, related to the publication of funding guidelines, and target 24, related to the disbursement of financial support for 689 000 recharging points in residential buildings.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the requirements of the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Spreadsheet of publicly accessible recharging points	This document shows a spreadsheet listing 2 568 publicly accessible recharging points with their corresponding funding ID.
3	A sample of 60 recharging points selected by the Commission	On the basis of a sample, the Commission has reviewed the commissioning notifications for 60 recharging points. The commissioning notifications were issued between 25 July 2023 and 11 December 2025. In addition, the Commission located the 60 sampled charging points on the publicly accessible TENtec platform: https://webgate.ec.europa.eu/tentec-maps/web/public/screen/home

3. Analysis:

The justification and substantiating evidence provided by the Germany authorities cover all constitutive elements of the target.

Commissioning notifications (*Inbetriebnahmemeldungen*) have been issued for 2 500 publicly accessible recharging points. Furthermore, in line with the description of the measure, **the measure consists of support for recharging points.**

The spreadsheet of publicly accessible recharging points (Evidence No. 2) contains a list of 2 568 publicly accessible recharging points, including their official funding ID.

Following the selection of a random sample of 60 units, Germany submitted supporting documentation in the form of commissioning notifications (*Inbetriebnahmemeldungen*) (Evidence No. 3). The commissioning notifications are generated confirmations from the online platform Online reporting Charging infrastructure 'Online-Berichterstattung Ladeinfrastruktur' (hereinafter referred to as "OBELIS") of the National Centre for Charging Infrastructure - the online platform for reporting on all subsidised charging stations of the Federal Charging Infrastructure Funding Programme - documenting the reported commissioning of subsidised charging facilities. Under Section 8 of the first funding call for the funding programme 'publicly accessible charging infrastructure for electric vehicles (2021 to 2025) (*Öffentlich zugängliche Ladeinfrastruktur für Elektrofahrzeuge (2021 bis 2025)*), grant recipients had to upload these commissioning notifications to OBELIS. Furthermore, the Commission services verified the date of issuance of the commissioning notifications, confirming that the recharging points were commissioned after February 2020 and that the funding ID corresponded to the funding ID found in the list of publicly accessible recharging points (Evidence No. 2).

The Commission services verified that the commissioning notifications contained a reference to the funding programme 'publicly accessible charging infrastructure for electric vehicles (2021 to 2025) (*Öffentlich zugängliche Ladeinfrastruktur für Elektrofahrzeuge (2021 bis 2025)*). To verify the accessibility of the recharging points, the European Commission cross-checked the information using the TENtec map. TENtec is the Commission's geospatial platform designed to support the planning, monitoring, and analysis of the Trans-European Transport Network (TEN-T). It provides interactive maps and data layers that allow users to visualise transport infrastructure and related facilities across the EU. Each recharging point was therefore located on the TENtec map using the address indicated in the commissioning certificates. This step confirmed that the recharging points were effectively publicly accessible (Evidence No. 3)

The evidence provided for the 60 sampled units confirmed that the requirements of the target have been met and that commissioning notifications have been issued for 2 568 publicly accessible recharging points, thus exceeding the goal of Target 23 by 68.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 30A Support for the purchase of 399 450 electric vehicles

Related Measure: 1.2.3 Support for the replacement of the private vehicle fleet

Quantitative Indicator: Number of electric vehicles purchased

Baseline: 0

Target: 399 450

Time: Q1 2025

1. Context:

The objective of this measure is to lower emissions in the transport sector. The measure consists of financial support to promote the purchase or lease of zero-emission electric vehicles and plug-in hybrid vehicles emitting less than 50g CO₂/km.

Target 30A relates to the support for the purchase (which includes the purchase or leasing) of 399 450 electric vehicles.

Target 30A is the third and last target of the investment. It follows the completion of target 29, related to the support for the purchase of 240 000 electric vehicles, and target 30, related to the support for the purchase of another 320 000 electric vehicles.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the requirements of the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Spreadsheet of vehicles with dates	This document shows a spreadsheet listing 540 600 vehicles purchased with the support of measure 1.2.3, with their corresponding transaction number, status description, manufacturer, model of the vehicle, type of vehicle, CO ₂ emissions, vehicle identification number, registration certificate date, notification date, and type of acquisition.
3	Copy of the publication of the funding guideline on the Directive for the promotion of electrically powered vehicles (environmental bonus) of 29 April 2020 in the Federal Gazette (<i>Bundesanzeiger</i>), published by the Ministry for Economy and Energy on 7 May 2020 (BAnz AT 7.5.2020 B1), entering into force on 8 May 2020	The document shows the funding guideline to promote the sale of electrically powered vehicles (environment bonus). This incentive to promote e-mobility was extended as part of the German Recovery and Resilience Plan by adding an innovation premium. Evidence No. 3 contains the last version of the funding guideline to promote the sale of electrically powered vehicles (environment bonus) before the innovation premium was added. It was published on 7 May 2020 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force the day after publication, on 8 May 2020.

4	Amendments to the guideline on the promotion of electrically powered vehicles, based on the version as of May 2020 compared to the version of July 2020, published by the Ministry for Economy and Energy	The document shows the funding guideline to promote the sale of electrically powered vehicles (environment bonus) which was amended in July 2020 mainly to add an innovation premium as provided for under measure 1.2.3 of the German Recovery and Resilience Plan. Amendments made in July to the funding guideline as of May 2020 are shown in track changes in this document for convenience only.
5	Copy of the amendments to the funding guideline of 29 April 2020, promotion of electrically powered vehicles (environmental bonus), published in the Federal Gazette (<i>Bundesanzeiger</i>) by the Ministry for Economy and Energy on 7 July 2020 (<i>BAnz AT 7.7.2020 B2</i>), entering into force on 8 July 2020	The document shows the funding guideline to promote the sale of electrically powered vehicles (environment bonus) which was amended by way of replacing the former version with an amended version. This funding guideline was published on 7 July 2020 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force the day after publication, on 8 July 2020. Simultaneously, the previous version of the funding guideline expired.
6	Amendments to the guidelines on the promotion of electrically powered vehicles, based on the version as of July 2020 compared to the version of November 2020	The document shows the funding guidelines to promote the sale of electrically powered vehicles (environment bonus), which was amended again in November 2020. This did not affect the innovation premium, which remained unchanged. Amendments made in November 2020 to the funding guideline are shown in track changes in this document for convenience only
7	Copy of the amendments to the funding guidelines of 7 July 2020 on the promotion of electrically powered vehicles (environmental bonus) in the Federal Gazette (<i>Bundesanzeiger</i>), published by the Ministry for Economy and Energy on 5 November 2020 (<i>BAnz AT 5.11.2020 B1</i>), entering into force on 16 November 2020	The document shows the funding guideline to promote the sale of electrically powered vehicles, which, however, essentially only staggered the subsidy rates in the case of leasing and lifted the ban on cumulation, provided that the subsidy provider concludes an administrative agreement with the Ministry of Economy and Energy. This funding guideline was published on 5 November 2020 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 16 November 2020. Simultaneously, the previous version of the funding guideline expired.
8	Copy of the amendments to the funding guideline of 24 November 2020 on the promotion of electrically powered vehicles (environmental bonus) in the Federal Gazette (<i>Bundesanzeiger</i>), published by the Ministry for Economy and Energy on 30 December 2021 (<i>BAnz AT 30.12.2021 B1</i>) and coming into force on 1 January 2022	The document shows the amendment to the funding guideline to promote the sale of electrically powered vehicles (environment bonus), which was amended again. This amendment includes only minor changes and the one-year extension of the innovation premium. It was published on 30 December 2021 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 1 January 2022.

9	Amendments to the guidelines on the promotion of electrically powered vehicles, based on the version as of November 2021 compared to the version as of December 2022	The document shows the amendment to the funding guideline to promote the sale of electrically powered vehicles (environment bonus), which was amended again in December 2022. This did not affect the structure of the innovation premium. However, the environment bonus and the innovation premium were extended for a maximum of two years. Amendments made in December 2022 to the funding guideline are shown in track changes in this document for convenience only.
10	Copy of the funding guidelines on the promotion of electrically powered vehicles (environmental bonus) of 17 November 2022 Federal Gazette (<i>Bundesanzeiger</i>), published by the Ministry for economy and energy on 9 December 2022 (<i>BAnz AT 9.12.2022 B1</i>), entering into force on 1 January 2023	The document shows the funding guideline to promote the sale of electrically powered vehicles (environment bonus), which was amended again by way of replacing the former version with an amended version. This last amendment comprehensively updates the guideline to address several issues. It was published on 9 December 2022 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 1 January 2023. Simultaneously, the previous version of the funding guideline expired.
11	Law on Administrative Procedure (<i>VwVfG</i>) Article 41 of the Notification of the administration act	This article outlines the rules for notifying individuals or parties about administrative acts. It specifies how and when such acts are considered officially delivered, whether by post, electronically, or through public notice. It also addresses procedures for delivery to authorised representatives, conditions for electronic access, and what happens if notifications are not retrieved. Additionally, it clarifies that existing legal methods of service remain unaffected.
12	A sample of 60 vehicles selected by the Commission	On the basis of a sample, the Commission has reviewed the following supporting documents: <ul style="list-style-type: none"> a) Truthful declaration of the applicant b) Grant decision. The grant decisions were issued between 28 July 2021 and 21 May 2024. c) Purchase invoice or leasing contract d) Vehicle registration certificate e) Payment confirmation <p style="text-align: center;">Where applicable:</p> <ul style="list-style-type: none"> f) Lease cost calculation g) Authorisation document h) Contract and vehicle model data

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

Additionally to the purchases supported under targets 29 and 30, grant support has been disbursed to recipients for the purchase (which includes the legal purchase or leasing) of 399 450 electric vehicles (PHEV, BEV and FCEV)

The document entitled “Spreadsheet Vehicles with dates” (Evidence No. 2) shows a spreadsheet containing a list of 540 600 vehicles purchased or leased, including official references to grant decisions, and the dates of disclosure in accordance with the Administrative Procedure Act (Evidence No. 11). These 540 600 vehicles are additional to the 240 000 vehicles funded under target 29, and the 320 000 funded under target 30. Furthermore, by submitting a list of 540 600 electric vehicles, Germany exceeded the target of 399 450 vehicles by 141 150.

Following the selection of a random sample of 60 units, Germany submitted supporting documentation including the grant decisions, purchase or leasing contracts, registration data from the Federal Motor Transport Authority (*Kraftfahrt-Bundesamt, KBA*), and payment confirmations. These documents were used to verify applicant identity, consistency of vehicle identification numbers (VINs) and proof of disbursements. The zero-emission status of the vehicles was confirmed through registration data, which matched the engine type (BEV, PHEV, or FCEV) and showed CO₂ emissions below 50g/km according to WLTP standards. Disbursement of the grant support was confirmed by cross-checking the payment confirmations (*Anordnungsunterlagen*), which matched the recipient names, amounts and dates in the spreadsheet (Evidence No. 2). The evidence provided for the 60 sampled units confirmed that the requirements of the target have been met.

on the basis of the funding guidelines (BAnz 07.07.2020 B2) that entered into force on 8 July 2020 as well as any subsequent guidelines and amendments to those guidelines.

The grant support is based on the amended funding guidelines, which are explicitly referenced in the grant decisions themselves (Evidence No. 12). These guidelines entered into force on 8 July 2020 (Evidence No. 5) and have since been applied in their revised and updated versions where applicable.

The funding guidelines have been revised and updated multiple times in July 2020, November 2020, January 2021 and January 2022 (Evidence No. 5-10). These amendments have no impact on the implementation of target 30A, as the core elements for the grant support remained unchanged. However, for transparency reasons the German authorities provided the subsequent amendments to the funding guidelines and the changes done to them. The final version of the funding guidelines was published in the Federal Gazette (*Bundesanzeiger*) on 9 December 2022 and came into force on 1 January 2023 (Evidence No. 10).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 40 Projects for hydrogen and fuel cell applications in transport

Related Measure: Promotion of the industries involved in hydrogen and fuel cell applications in transport

Quantitative Indicator: Number of projects

Baseline: 0

Target: 268

Time: Q3 2025

1. Context:

The objective of this measure is to support a supply industry for hydrogen and fuel cell technology to facilitate the decarbonisation of the transport industry. The measure consists of financial support to projects and Technology and Innovation Centre(s).

Target 40 relates to the issuance of grant decisions for at least 268 R&D and market activation projects for hydrogen and fuel cell applications in transport.

Target 40 is the first target of the investment. It follows the completion of milestone 39, related to the publication of amended funding guidelines, and precedes milestone 41 related to the provision of services via Technology and Innovation Centre(s).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the requirements of the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	List of funding guidelines and calls	This document shows an Excel spreadsheet providing an overview of State aid measures and related funding calls under the National Innovation Programme for Hydrogen and Fuel Cell Technology (Phase II). The first section lists the approved State aid schemes, identified by their State aid numbers, and describes their scope (research, development and innovation or market activation), implementation periods, and official European Commission case links. The second section links these State aid schemes to specific funding calls, detailing the name of each call, the corresponding State aid numbers under which it was launched, the month of publication, and links to both the funding call webpages and the official call documents.
3	List of funded projects	This document is an excel spreadsheet containing the list of funded projects with their unique identifiers (column B), recipients' names (column C), number of State aid decision (column D), the call (column E), the project description (column F) and the date of the issuance of the grant decision (column G).
4	A sample of 60 grant decisions	On the basis of a sample, the Commission has reviewed the

and corresponding project descriptions selected by the Commission	grant decisions and corresponding project descriptions for 60 projects. The grant decisions were issued between 10 March 2021 to 26 February 2024.
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3. Analysis:

The justification and substantiating evidence provided by the Germany authorities cover all constitutive elements of the target.

Grant decisions have been issued for at least 268 R&D and market activation projects (...)

Following the selection of a random sample of 60 units, Germany submitted supporting documentation in the form of grant decisions and project descriptions (Evidence No. 4) for each project. For the sampled projects, Commission services verified that each grant decision contained a date that follows February 2020, and a reference to the relevant funding programme, State aid case, or national budget line linked to the funding call. The unique project identifiers were cross-checked against the list of funded projects (Evidence No. 2), and the names of the recipients were verified against the corresponding project descriptions. Furthermore, the project descriptions and reference to the funding programmes on the grant decisions enabled the identification of projects as either research and development (Hereinafter referred to as 'R&D') or market activation projects.

Out of these 293 projects, 200 projects were approved in the field of research and development, and 93 projects were approved under market activation (Evidence No. 3). The projects in the field of R&D include, for instance, studies examining future minimum test sizes, inspection scopes, and interoperability requirements for hydrogen refuelling stations (unique identifier 03B10205A) or the design and optimisation of fuel cell stacks, the development of balance-of-plant components, investigation of innovative powertrain configurations, and the analysis and simulation of hybrid fuel cell–battery systems to define optimal future system architectures (unique identifier 03B10304A). On the other hand, the projects for market activation include investment and deployment measures, such as the installation of 350-bar refuelling infrastructure, the construction and operation of Proton Exchange Membrane electrolyzer (PEM) electrolyzers, and integration with wind and photovoltaic power generation (unique identifier 03B20947) (Evidence No. 4).

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met. The list of funded projects (Evidence No. 3) showed that Germany issued grant decisions for 293 projects, while the Commission's examination of a random sample of 60 projects confirmed that each sampled project was supported by an individual grant decision and project description (Evidence No. 4), which also classified the projects as eligible research and development or market activation activities. Germany issued grant decisions for 293 projects from 19 February 2021 to 26 February 2024, thus exceeding the goal of Target 40 by 25 projects.

(...) for hydrogen and fuel cell applications in transport.

Taken together, the grant decisions and project descriptions demonstrate how the supported measures collectively contribute to the development and deployment of hydrogen and fuel cell applications in transport by covering the entire pathway from technological groundwork to market uptake. The R&D projects generate new knowledge, methodologies, and concepts that address key barriers to deployment thus providing technical and regulatory foundations. For example, the R&D study on interoperability and minimum test scopes for hydrogen refuelling stations develops analytical frameworks, risk assessments, and recommendations for future standards (Evidence No. 4). Market activation projects then implement operational infrastructure, such as the construction and operation of publicly accessible hydrogen refuelling stations supplied with renewable hydrogen produced on-site via PEM electrolyzers, and by directly serving commercial vehicle fleets along major transport corridors (Evidence No. 4).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 47 Confirmation after execution of energy-efficient renovations of 10 000 housing units.

Related Measure: 1.3.3 Building renovation: federal funding for energy-efficient buildings

Quantitative Indicator: Number of housing units renovated

Baseline: 0

Target: 10 000

Time: Q4 2024

1. Context:

The objective of this measure is to support the energy-efficient renovation of residential buildings. The measure consists of renovation programmes with at least a medium-depth level renovation as defined in Commission Recommendation (EU) 2019/786 on Building Renovation and in individual measures also including a 10% funding bonus for exchanging functioning oil/coal-based heating and gas boilers that are older than 20 years.

Target 47 consists of confirmation after execution of energy-efficient renovations of 10 000 housing units.

Target 47 is the second target of the investment, it follows the completion of milestone 46, related to the publication of funding guidelines in the Federal Gazette, and will be followed by target 48, related to the confirmation after execution of energy-efficient renovations of a further 30 000 housing units. It is accompanied by target 48B, related to the completion of individual renovation measures for energy-efficient buildings.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Description methodology	A detailed description of the method used to calculate the primary energy savings per residential building, issued jointly by the Institute for Energy and Environmental Research ('Institut für Energie- und Umweltforschung', hereinafter referred to as 'ifeu'), the Research Institute for Thermal Insulation ('Forschungsinstitut für Wärmeschutz e.V.', hereinafter referred to as 'fiw'), the Institute for Technical Building Equipment Dresden ('Institut für Technische Gebäudeausrüstung Dresden', hereinafter referred to as 'ITG') and Prognos.
3	List of 12 001 renovated housing units	This document contains a list of 12 001 renovated housing units including the respective primary energy savings.
4	Funding guideline published on 1 February 2021 in the Federal Gazette (<i>Bundesanzeiger</i>), which entered into	The basic funding guideline to support energy-efficient renovations of residential buildings

	force on 1 July 2021	
5	German Building Energy Act (<i>Gebäudeenergiegesetz</i>), entered into force on 1 November 2020.	The German Buildings Energy Act sets out requirements for the energy performance of buildings, the issuing and use of energy performance certificates, and the use of renewable energy in buildings.
6	Evidence on a sample of 60 confirmations after execution selected by the Commission	For each 60 units, the following documentary evidence was provided: approvals of the application (<i>Bewilligung</i>), issued by the implementing institution Credit Institute for Reconstruction (<i>Kreditanstalt für Wiederaufbau</i> , hereinafter referred to as 'KfW'), certificates of application of renovation actions (<i>Bestätigung zum Antrag - BzA</i>) and certifications of confirmation after execution of energy efficiency works (<i>Bestätigung nach Durchführung - BnD</i>), both issued by energy experts and standardised by the KfW.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

Confirmation after execution (*Bestätigung nach Durchführung*) of energy-efficient renovations of 10 000 housing units. Furthermore, in line with the measure description, **the measure consists of renovation programmes with at least a medium-depth level renovation as defined in Commission Recommendation (EU) 2019/786 on Building Renovation.**

The relevant funding guideline to support energy-efficient renovations of residential buildings entered into force on 1 July 2021 (Evidence No. 4). The guideline specifies in section 5.2 (Evidence No. 4, page 4-5) that in order to be eligible for funding the renovated building has to achieve at least energy efficiency class 100 (with an exception for heritage buildings). Efficiency classes are based on the specifications of the German Building Energy Act (*Gebäudeenergiegesetz*, Evidence No. 5). The approval of the application and the amount of the subsidy for renovations is based on the achievement of efficiency class levels (100 up to 40 - lower numbers indicate a higher degree of energy efficiency).

Germany submitted a list of buildings containing 12 001 renovated housing units (Evidence No. 3).

Following the selection of a random sample of 60 units by the Commission, Germany submitted for each sampled unit, certificates of application of renovation actions (*Bestätigung zum Antrag - BzA*), approvals of the application (*Bewilligung*) and certificates of confirmation after execution of energy efficiency works (*Bestätigung nach Durchführung - BnD*) (Evidence No. 6). The Commission verified that the housing units and applicants were matching across all documents and that the confirmation after execution had been issued. The presence of these documents demonstrated that each sampled unit had completed renovation measures and that it increased its energy efficiency class at least to the level of 100.

The fulfillment of a minimum 30% primary energy demand reduction on average corresponding to a medium-depth level renovation according to the Commission Recommendation (EU) 2019/786 (see 2.3.1.1. Overview of the national building stock, footnote 4, where medium renovation depth is defined as obtaining primary energy savings between 30% and 60%) was confirmed by the 60 sampled interventions (Evidence No. 6), as laid out by Evidence No. 3. The ex-post energy savings of each individual housing unit were calculated following a methodology elaborated by several scientific

institutions, including Prognos, ifeu, fiw and ITG Dresden (Evidence No.2). Main cornerstones of this methodology are:

- The primary energy emissions ex ante (before implementation of the measure) are determined for a selected sample using the building model from the fiw. Each individual case from the survey of the funding recipients (sample from the funding data) was modelled in the building model for the evaluation serving as the basis for further calculations.
- Savings for each case are derived from the consumption of the building before the refurbishment minus the consumption after refurbishment.

Following this methodology, the average result of primary energy demand savings on average exceeds 60% (Evidence No. 2), thereby overachieving the 30% primary energy demand reduction.

The evidence provided for a sample of 60 units confirmed that the requirements of the milestone have been met. The confirmations after execution demonstrated that housing units have been renovated and that the 30% primary energy demand reduction has been achieved. According to the evidence provided, Germany completed 12 001 energy-efficiency renovation, thus exceeding the goal of Target 47 by 2 001.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 48B Interim target for completed individual renovation measures for energy-efficient buildings

Related Measure: 1.3.3 Building renovation: federal funding for energy-efficient buildings

Quantitative Indicator: Completed individual renovation measures

Baseline: 0

Target: 145000

Time: Q4 2024

1. Context:

This investment measure focuses on support to the energy-efficient renovation of residential buildings. It consists of two strands focused on i) full renovation programmes and ii) individual measures. The second strand, which is concerned by this target, shall support individual measures. This strand focuses on support to the energy-efficient renovation of residential buildings for individual measures. Moreover, support extends to a 10% funding bonus for exchanging functioning oil/coal-based heating and gas boilers that are older than 20 years.

Target 48B requires that at least 145 000 individual renovation measures have been completed in total.

Target 48B follows the completion of milestone 46 and target 47. It will be followed by target 130 under related to the upscaled Investment 7.1.1: Building renovation: federal funding for energy-efficient buildings in the REPowerEU chapter. The investment has a final expected date for implementation in Q2/2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2 - 6	Funding guideline published on 30 December 2020 in the Federal Gazette (<i>Bundesanzeiger</i>), which entered into force on 1 January 2021, and its subsequent revisions	The basic funding guideline to support individual measures for a step-by-step energy-efficient renovation First revision: May 2021. The revised guideline was published on 7 June 2021 in the Federal Gazette (<i>Bundesanzeiger</i>) and has entered into force on 1 July 2021. Second revision: September 2021. It was published on 18 October 2021 in the Federal Gazette (<i>Bundesanzeiger</i>) and has entered into force on 21 October 2021. Third revision: July 2022. The third revision was published on 27 July 2022 in the Federal Gazette (<i>Bundesanzeiger</i>) and has entered into force on 28 July 2022.

		Fourth revision: September 2022. The fourth revision was published on 21 September 2022 in the Federal Gazette (<i>Bundesanzeiger</i>) and has entered into force on 21 September 2022.
7	List of 145 000 individual measures	This document shows a list of 145 000 completed individual renovation measures, indicating the type of measure and the amount paid by the implementing institution (BAFA).
8	Sample	For each 62 units, certificates of renovation actions (<i>Zuwendungsbescheid</i> and <i>Festsetzungsbescheid</i>), approvals of the application (<i>Bewilligung</i>), and confirmations of the payment transfers were provided.

3. Analysis:

The justification and substantiating evidence provided by the Germany authorities cover all constitutive elements of the target.

At least 145 000 individual renovation measures have been completed in total. Furthermore, in line with the measure description, **the second strand of the measure supporting individual measures shall focus on support to the energy-efficient renovation of residential buildings for individual measures also including a 10% funding bonus for exchanging functioning oil/coal-based heating and gas boilers that are older than 20 years.**

The implementing institution (Federal Office for Economic Affairs and Export Control, hereinafter referred to as 'BAFA') is in charge of monitoring and reporting the number of completed individual measures. A list of 145 000 completed measures applied for by private individuals for the renovation of residential buildings is included as an annex (Evidence No. 7).

The Federal funding for efficient buildings' (*Bundesförderung für effiziente Gebäude*) sub-programme individual measures targets renovations of existing buildings with "step-by-step" measures and started on 1 January 2021. Key elements of the support are, for example, installation of a renewable heating system or specific measures on the building envelope (Evidence No. 2). With measure 1.3.3., the categories building envelopes, systems technology (without heating), solar collectors, biomass heating systems, and electric heat pumps can receive funding, which are all covered in section 5 of the funding guideline (Evidence No. 2-6).

The evidence provided for a sample of 60 units (Evidence No. 8) confirmed that the requirements of the milestone have been met. For each sampled unit, certificates of completion of renovation actions (*Festsetzungsbescheid*) were provided, confirming the completion of individual renovation measures, such as the installation of new biomass heating systems, solar collectors, and electric heat pumps, as well as the renovation of building envelopes and the installation of new ventilation systems. Additionally, for each sampled unit, confirmations of payment transfers issued by BAFA were provided, further verifying the completion of the measures and the corresponding payments. The presence of these documents, including the certificate of application of renovation actions (*Zuwendungsbescheid*) and the confirmation of payment transfer, demonstrated that each sampled unit had completed renovation measures and had received the corresponding funding. Furthermore, to promote a faster substitution of fossil-fuel powered heating systems, an incentive was implemented

to invest in efficient systems based on renewables, consisting in the exchange of a still-functioning fossil-fuel powered system. This resulted in a bonus of 10 percentage points extra subsidy funding. From 1 January 2021 to 31 December 2022 this bonus was granted for exchanging oil-based heating systems (Section 5.3, Evidence No. 2-6). Starting from 1 January 2023 this bonus was also granted for exchanging coal-and oil-based heating systems (Section 8.4.2 Heizungs-Tausch-Bonus, Evidence No. 2-6). A total of sixteen units within the sample were subject to the 10-percentage-point bonus.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 64 Involvement or contribution of CET networks to 60 new or revised training measures or sub-modules

Related Measure: 2.2.2 Federal programme ‘Building continuing education and training networks (CET-networks)’

Quantitative Indicator: Number of new or revised measures or sub-measures

Baseline: 0

Target: 60

Time: Q4 2024

1. Context:

The objective of the measure is to support CET (continuing education and training) networks, which are involved in the organisation of training activities. The investment consists of supporting CET networks selected under the federal programme ‘Building CET networks’.

Target 64 sets out that the CET networks were involved in or contribute to 60 revised or newly created sub-modules or training measures.

Target 64 is the third and last target of the reform, and it follows the completion of milestone 62 and target 63, related to the publication of the relevant funding guidelines and the active participation of enterprises in the networks, respectively.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled, with appropriate links to the underlying evidence.
2	Evidence overview (issued on 19/12/2025)	Excel sheet, issued by the Ministry of Labour and Social Affairs hereinafter referred to as BMAS, that contains a description of each training measure, including: <ul style="list-style-type: none"> • a brief description of the training measure or sub-module • an indication of whether the training measure was new or revised; • a reference (or a weblink) to relevant evidence of the training measure • a reference (or a weblink) to relevant evidence of the involvement of the CET network in organising or giving the training

		<ul style="list-style-type: none"> the name of the relevant network (partner)
3	Proof of training measure or sub-module (<i>Beleg D</i>) (issued between January 2022 and December 2024)	A copy of or a working weblink, issued by a CET network or affiliated training partner for public material of the training measure or sub-module or other available primary evidence reflecting the content of the training
4	Further evidence of the involvement of the CET network (<i>Beleg E</i>) (issued between January 2022 and December 2024)	Copies of documents, issued by a CET network or affiliated training partner, reflecting the involvement of the CET networks in or their contribution to the creation of new or the revision of existing training measures / sub-modules.

3. Analysis:

The justification and substantiating evidence provided by the Germany authorities cover all constitutive elements of the target.

The CET networks were involved in or contributed to 60 revised or new sub-modules or training measures (as evidenced for example by training materials, needs assessments or other documents proving CET-involvement).

According to the evidence provided, German CET networks were involved in or contributed to 76 revised or new sub-modules (which is a part of a series of trainings) or training measures. These 76 sub-modules or training measures were either revised based on the participants' needs or newly created. Furthermore, a CET network contributed to the training or sub-module (such as by organising it) or was involved in them (for example by giving the training). It thus exceeded the goal of Target 64 by 16 training measures.

The authorities provided an overview list (Evidence No. 2), which for each training measure or sub-module contains i) information on the subject of the training, ii) an indication whether the training measure was new or revised, iii) a description of which other pieces of evidence show the content of the training and iv) a description of the evidence of the involvement of or contributions by the relevant CET network.

For each training measure or sub-module, primary evidence was provided to prove that the training had been organised (Evidence No. 3). Primary evidence included duplicates of training materials, training videos and an application for mobile devices with training videos, or weblinks to online trainings.

The authorities indicated in their overview list (Evidence No. 2) that all training measures were either newly created or revised. This was substantiated by the proofs of the training measure or sub-module (Evidence No.3), for example through the training content, the training description or documentation of lessons learnt from needs assessments or previous trainings. The dates of these pieces of evidence were also checked to confirm that the trainings were indeed new or revised, and not unchanged pre-existing trainings. Out of the 76 trainings or sub-modules, eight were revised from older trainings while the remainder were newly created.

Where this was not already evident from the training materials (Evidence No. 3), the authorities provided further evidence of the involvement of the CET network (Evidence No. 4). This evidence shows that these trainings were carried out or facilitated by the networks (e.g. delivered by a research institute upon request of a network). It includes invitations or other materials from training platforms showing the name of the network or institutes directly associated to the network.

To check that a CET network was involved in or contributed to the revised or new trainings, the names of the CET networks (or their relevant members) from the evidence were cross-checked against a pre-existing list of CET networks supported through this measure (evidence No. 2 from Milestone 62). All the names of the networks in the Evidence Nos. 3 and 4 corresponded to the names from that pre-existing list.

In addition, the Commission services conducted a virtual on-the-spot check on 28 June 2025 to verify that the trainings for projects 41-52 were made available via a phone application called "One Hour". This check was completed successfully, confirming that that the trainings were indeed available, and the content matches the training descriptions.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 78 Evaluation on the education platform

Related Measure: 3.1.2 Education platform

Qualitative Indicator: Publication of the evaluation report in the Federal Gazette (Bundesanzeiger)

Time: Q3 2024

1. Context:

The objective of this measure is to develop a network infrastructure that, with digital means, supports the development of competences by learners. It consists of a digital infrastructure to connect learners and educational institutions.

Milestone 78 stipulates that the evaluation report of the education platform has been published, with an assessment confirming that the project was successful. The project should be successful if the continuation of the education platform is recommended or if key components, for example “digital certificates”, “wallet”, “digital identities”, “data space” or “display/workbench”, are technically usable as demonstrated by tests or by their use by other stakeholders.

Milestone 78 is the third and last milestone of the reform, and it follows the completion of milestone 76, related to the entry into force of the funding guidelines for the education platform prototypes and the launch of the procurement process for its development, as well as milestone 77, related to the launch of a beta-version of this education platform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the milestone (including all the constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) has been satisfactorily fulfilled.
2	Evaluationsbericht inkl. Evaluationsupdate	Evaluation report as of 30.07.2024 including an update as of 30.06.2025 on the education platform together with an assessment of its success prepared by Kienbaum Consultants International GmbH, ifib consult GmbH and mmb Institut GmbH published in the federal gazette (“ <i>Bundesanzeiger</i> ”) on 28.11.2025: https://www.bundesanzeiger.de/pub/publication/GPsAr9qSQAMQzX3Uyk4/content/251011000003M001/BAanzAT28112025B100.pdf (link verified on 23.02.2026)
3	RP-NRW-BaWü-Testbestätigung	Confirmation letter of 20.05.2025 by the Ministry for culture, youth and sport of Baden-Württemberg (“ <i>Ministerium für Kultus, Jugend und Sport Baden-Württemberg</i> ”) regarding running tests for issuing digital high school diplomas
4	Abschlussbericht Pilotierung RP	Summary report by the Ministry for education of Rhineland Palatinate (“ <i>Ministerium für Bildung Rheinland-Pfalz</i> ”) with reference date 18.11.2025 regarding test runs for issuing digital high school diplomas

5	Feldtestdoku NRW	Process documentation and flowcharts dated 31.03.2025 by the Ministry for schooling and education of North Rhine-Westphalia (“Ministerium für Schule und Bildung des Landes Nordrhein-Westfalen”) regarding test runs for issuing digital high school diplomas
6	SPRIND Dokumentation	Summary report dated 15.12.2025 by the federal agency for breakthrough innovation (“Bundesagentur für Sprunginnovationen”) (hereinafter referred to as ‘SPRIND’) for running tests of issuing digital high school diplomas in the three federal states Baden-Württemberg, Rhineland Palatinate, North Rhine-Westphalia during July 2024 to December 2025
7	HIS Pressemitteilung	Press release dated 21.07.2025 by HIS Hochschul-Informationen-System eG (hereinafter referred to as ‘HIS’) on possibility to apply to universities using a digital high school diploma
8	HIS Vertrag	Cooperation contract signed on 04.07.2025 by SPRIND and on 07.07.2025 by HIS for testing digital high school diplomas
9	HIS Technische Dokumentation	Technical documentation dated 20.11.2025 by HIS regarding the use of digital high school diploma
10	FH Wildau Vertrag	Cooperation contract signed on 24.09.2025 by SPRIND and on 14.10.2025 by the University of Applied Sciences in Wildau for using components of the education platform
11	Datenraum Bayern	Confirmation letter dated 25.11.2025 by edu-sharing.net e.V. of usage of the component data space in Bavaria
12	Datenraum Rheinland-Pfalz	Confirmation letter dated 02.12.2025 by edu-sharing.net e.V. of usage of the component data space in Rhineland Palatinate
13	NRW Bestätigung	Confirmation letter and documentation dated 19.12.2025 by the Ministry for schooling and education of North Rhine-Westphalia on test of digital high school diplomas and implementation of the education platform
14	BaWu Interne Anleitung Zeugniserstellung	Technical manual for participating schools with reference date June 2025 by Institut für Bildungsanalysen Baden-Württemberg for testing the issuance of digital high school diplomas
15	SPRIND Landerbeteiligung Flowcharts	Process documentation and flowcharts by SPRIND dated July 2025 on participation in testing digital high school diplomas by Baden-Württemberg, Rhineland Palatinate, North Rhine-Westphalia and HIS
16	RWTH Aachen Zeugniseinsatz	Confirmation letter dated 28.01.2026 by RWTH Aachen University of having used digital high school diplomas of the testing phase for real university applications
17	UDE Zeugniseinsatz	Confirmation letter dated 09.02.2026 by University of Duisburg-Essen of having used digital high school diplomas of the testing phase for real university applications

18	Uni Ulm Zeugniseinsatz	Confirmation letter dated 09.02.2026 by University of Ulm of having used digital high school diplomas of the testing phase for real university applications
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3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the milestone.

The evaluation report of the education platform has been published, (...)

According to the evaluation report on page 1 [Evidence No. 2], the education platform was first developed by VDI/VDE Innovation + Technik GmbH and Capgemini and its further development was then transferred to the federal agency for breakthrough innovation ("*Bundesagentur für Sprunginnovationen*") (hereinafter referred to as 'SPRIND'), in July 2024. The evaluation report regarding the education platform was drafted in a first version as on 30 July 2024 and later updated with an addendum to reflect the situation as on 30 June 2025 [Evidence No. 2]. The authors of this report are made up of an independent consortium comprising Kienbaum Consultants International GmbH, ifib consult GmbH and mmb Institut GmbH. This evaluation report including its update was published in its entirety in the federal gazette ('Bundesanzeiger') on 28.11.2025 (Banz AT 28.11.2025 B1) [Evidence No. 2]. <https://www.bundesanzeiger.de/pub/publication/GPsAr9qSQAMQzX3Uyk4/content/251011000003M001/BAanzAT28112025B100.pdf>

The Commission services accessed the link provided by the authorities on 23.02.2026 to verify that the evaluation report of the education platform has been published in the federal gazette ('Bundesanzeiger'). This check was completed successfully, confirming that the evaluation report of the education platform has been published.

(...) with an assessment confirming that the project was successful. (...)

The assessment of the evaluation report [Evidence No. 2] can be found on pages 5-16 under the chapter "2. Bestandsaufnahme der Aktivitäten mit Blick auf die fünf Komponenten" of the addendum to the evaluation report as well as on pages 20-29 "Zentrale Ergebnisse der Evaluation" and pages 162-175 "Zusammenfassende Analyse" of the main evaluation report.

The assessment includes a recommendation for the continuation of the development of the education platform (first alternative of success) as well as an analysis confirming the technical useability of the five key components (second alternative of success) and thus confirming that the project was successful.

(...) The project shall be successful if the continuation of the education platform is recommended (...)

Concerning the first alternative indicator of success (recommendation to continue the education platform), page 16 of the addendum to the evaluation report [Evidence No. 2] refers to the recommendation regarding the education platform ("*Bezugnahme auf zentrale Empfehlungen aus dem 1. Evaluationsbericht*"). The main conclusion of the evaluation report is that it recommends to continue the development of the education platform given that the education platform has not yet entered its full implementation or application phase. The update of the evaluation report confirms that this recommendation is still valid ("*Der erste Evaluationsbericht schließt mit einer Empfehlung zur Weiterführung der Aufbauphase sowie Handlungsempfehlungen für die weitere Umsetzung des Projektes MBR ab (vgl. Kapitel 6.4 des Evaluationsberichtes 2024). Diese gelten weiterhin.*").

(...) or if key components, for example “digital certificates”, “wallet”, “digital identities”, “data space” or “display/workbench”, are technically usable as demonstrated by tests or by their use by other stakeholders.

Concerning the second alternative indicator of success (key components being technically usable), the update of the evaluation report [Evidence No. 2] dedicates a specific chapter to the key components, namely on pages 5-11 (*“2. Bestandsaufnahme der Aktivitäten mit Blick auf die fünf Komponenten“, „2.1. Entwicklung von Komponenten“*). On page 5 all five components are assessed to be technically usable (*“Alle fünf Komponenten sind gemäß Definition lauffähig.“*).

The following five key components are listed:

- Digital certificates (*“Digitale Nachweise“*): for digitally signing, verifying and revoking of diplomas and certificates
- Wallet (*“Ablage“*): for exchanging personal data and saving documents like diplomas and certificates
- Digital identities (*“Digitale Identitäten“*): for storing, managing and protecting personal data
- Data space (*“Datenraum“*): space for storing and managing learning content
- Display/Workbench (*“Schaufenster“*): interface for using the education platform

On pages 2-3 (*“Fokus der vorliegenden Ergänzung zum Evaluationsbericht“*) and on pages 15-16 (*“Bewertung der Lauffähigkeit und der Weiterentwicklung“*) the evaluation report explains and confirms that, while at different stages of development, the five components listed are all technically and individually usable. For their technical useability the five components do not require to be fully developed. The components “digital certificates” and “wallet” are the furthest developed with “digital identities” taking a middle position and “data space” along with “display/workbench” being the least developed.

This technical usability already confirmed in the assessment of the evaluation report is in the following further evidenced in practice by tests and use by other stakeholders.

In the period July 2024 to December 2025 tests were performed in the three federal states Baden-Württemberg, Rhineland Palatinate and North Rhine-Westphalia for issuing digital high school diplomas and using them for applying to universities as documented by SPRIND [Evidence No. 6] along with some flowcharts of the actors and processes involved [Evidence No. 15]. A confirmation of this test for Baden-Württemberg and information for students how to apply for a digital high school diploma can be found in evidence No. 3, while technical instructions for participating schools are included in evidence No. 14. A summary of the tests in Rhineland Palatinate can be found in evidence No. 4. A summary of the test in North Rhine-Westphalia can be found in evidence No. 13, along with a description of the different process steps in evidence No. 5. These tests involved the usage of the components “Digital certificates” and “Wallet” in all three federal states as well as additionally “Digital identities” in Rhineland Palatinate.

In cooperation with the external stakeholder HIS Hochschul-Informationen-System eG (hereinafter referred to as ‘HIS’), which manages the application process for more than 220 universities in Germany, the issued digital high school diplomas could be used to apply to study at selected universities. To implement this possibility, SPRIND and HIS concluded a cooperation contract [Evidence No. 8] as also announced in a press release by HIS [Evidence No. 7]. This cooperation contract refers in its two annexes explicitly to the usage of the key components “Digital identities”, “Wallet” and “Digital certificates”. A technical documentation by HIS regarding the validation process of digital high school diplomas for the application at universities can be found in evidence No. 9.

In a number of cases these digital high school diplomas supported by key components of the education platform were used in the actual application processes at the universities in Ulm, Mannheim,

Mainz, Aachen and Duisburg-Essen, thus representing not just tests but real-life cases. Corresponding confirmation can be found for RWTH Aachen [Evidence No. 16], the University of Duisburg-Essen [Evidence No. 17] and the University of Ulm [Evidence No. 18].

With another external stakeholder, the University for Applied Sciences in Wildau, SPRIND has concluded a cooperation agreement for the usage of the three components “Digital identities”, “Wallet” and “Digital certificates” as specified in the contract and its two annexes [Evidence No. 10].

With another external stakeholder, edu-sharing.net e.V., the key component “data space” was used in a cooperation for the project “ITsJOINTLY” and the results were taken over by Bavaria [Evidence No. 11] and Rhineland Palatinate [Evidence No. 12].

The Commission services conducted a virtual on-the-spot check on 23 January 2026 to verify that the five components “Digital certificates”, “Wallet”, “Digital identities”, “Data space” and “Display/Workbench” are technically usable and were actually used in field tests and with other external stakeholders. In a live presentation the functioning of the key components “Digital certificates”, “Wallet” and “Digital identities” was demonstrated by replicating the process of issuing a digitally signed high school diploma that can then be downloaded and used to apply to universities including a verification of its validity. The functioning of the key components “data space” and “display/workbench” was demonstrated by showing how it is possible to use the education platform to search for training courses and participate in them. This check was completed successfully, confirming that the five key components are indeed technically usable and were actually used in tests and by other external stakeholders.

Overall, regarding the satisfactory fulfilment of the milestone it can be concluded that the five key components “digital certificates”, “wallet”, “digital identities”, “data space” and “display/workbench” are all technically usable. This was demonstrated in tests and also in real-life cases involving other external stakeholders confirming the assessment of the evaluation report that the project was successful.

Furthermore, in line with the description of the measure, the education platform shall provide a digital infrastructure for connecting learners and educational institutions (“It consists of a digital infrastructure to connect learners and educational institutions.”)

The process of issuing digital high school diplomas [Evidence No. 3, 4, 5, 6, 13, 14 and 15] that can then be downloaded and used to apply at universities [Evidence 7, 8, 9 and 10] shows that the education platform with its key components provides a digital infrastructure to connect learners, in this case students, with educational institutions, here schools and universities [Evidence 16, 17 and 18].

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 97 Entry into force of a legal act containing a legal requirement for pension providers to provide information to the pension portal

Related Measure: 4.1.5. Digital Pension Overview

Qualitative Indicator: Provision in the legal act indicating its entry into force

Time: Q2 2025

1. Context:

The measure aims to create an online portal called “Digital Pension Overview” (*Digitale Rentenübersicht*) providing citizens information about their individual pension provision. For this purpose, the German Pension Fund (*Deutsche Rentenversicherung Bund*) establishes a pension information portal to which pension providers are legally required to provide information.

Milestone 97 consists of the entry into force of a legal act containing a legal requirement for pension providers to provide information to the pension portal.

Milestone 97 is the last step of the reform that has altogether three milestones. It follows the completion of milestone 95, which required the publication of the law on the Digital Pension Overview (*Rentenübersichtsgesetz - RentÜG*), and milestone 96 related to the provision of an evaluation report by the coordination body responsible for the digital pension overview.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled, with appropriate links to the underlying evidence.
2	A copy of the legal act containing a legal requirement for pension providers to provide information to the pension portal (<i>Rentenübersichtsanbindungsverordnung - RentÜAV</i>)	A copy of the <i>Rentenübersichtsanbindungsverordnung - RentÜAV</i> published 5 February 2024 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2024 Teil I Nr. 30, pp. 1-2), with reference to the relevant provisions entering into force on 6 February 2024 (as per Section 4 on page 2). The Regulation is available at https://www.recht.bund.de/bgbl/1/2024/30/VO.html
3	A copy of statistical documentation on pension providers	A copy of statistical documentation from the Federal Financial Supervisory Authority (<i>BaFin</i>) of pension providers, also available at BaFin’s website at https://www.bafin.de/SharedDocs/Downloads/DE/Statistik/Erstversicherer/neu/dl_st_24_erstvu_pk_va.html for Pensionskassen and at https://www.bafin.de/SharedDocs/Downloads/DE/Statistik/Erstversicherer/neu/dl_st_24_erstvu_pf_va.html for Pensionsfonds, which were verified as operational on 27 February 2026.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the milestone.

The legal act containing a legal requirement for pension providers to provide information to the pension portal has entered into force.

Pension providers must transmit data on pension entitlements to the Digital Pension Overview, according to subsection 1 of section 7, of the law on the Digital Pension Overview (*Rentenübersichtsgesetz*), published in the Federal Law Gazette (Bundesgesetzblatt, Jahrgang 2021 Teil I Nr. 6) on 17 February 2021, already submitted as evidence for milestone 95.

Based on the legal requirement for pension providers to provide information to the pension information portal, enshrined in the Digital Pension Overview, a Regulation on Connecting to the Digital Pension Overview (*Rentenübersichtsverbindungsverordnung, RentÜAV*, hereinafter referred to as “*Regulation*”) (Evidence no. 2) was published on 5 February 2024 in the Federal Law Gazette (Bundesgesetzblatt, Jahrgang 2024 Teil I Nr. 30, pp. 1-2). According to its Article 4, the Regulation entered into force on 6 February 2024.

The Council Implementing Decision required pension providers to provide information to the pension portal. The Regulation established the legal requirement to connect to the pension portal by 31 December 2024 for pension providers with at least 1000 pension contracts (Article 1 of the RentÜAV). Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, which speaks about pension providers in general, this deviation can be explained by the objective to contain the administrative burden for smaller pension providers. As Germany demonstrated in evidence No. 3, the exemption is statistically grounded on coverage of *Pensionskassen* and *Pensionsfonds*, where 9,880,797 contracts were covered in 2024 by the obligation to connect to the pension portal, out of a total 9,890,854 pension contracts, as published by the Federal Financial Supervisory Authority (BaFin)s. This ensured coverage for 99.9% of such pension contracts. The Regulation still ensures that the pension information portal has comprehensive coverage of pension products and provides citizens information about their expected individual pension. Therefore, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the milestone description and has undertaken the assessment on a revised basis. In the milestone description it is stated that: “*The legal act containing a legal requirement for pension providers to provide information to the pension has entered into force.*”, where the word “portal” is missing after “pension”. However, the milestone is referring not to pensions but to the pension portal, which is clear from the milestone name: “*Entry into force of a legal act containing a legal requirement for pension providers to provide information to the pension portal.*” Therefore, the milestone description was assessed as “*The legal act containing a legal requirement for pension providers to provide information to the pension portal has entered into force.*”

Against this background, the justification and substantiating evidence provided by the German authorities cover all constitutive elements of the milestone.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 100 Progress of public health offices towards digital maturity

Related Measure: 5.1.1 Strengthening of the digital and technical resources of the public health service

Quantitative Indicator: Percentage

Baseline: 35

Target: 70

Time: Q3 2025

1. Context:

The objective of this reform is to modernise the public health offices. The measure consists of increasing the overall level of digital maturity in the public health offices.

Target 100 concerns the improvement of the digital maturity of public health offices. At least 70% of public health offices have improved their digital maturity by at least two levels by the end of Q3 2026 in at least three categories in the employed digital maturity system as compared to their digital maturity level of 2021.

Target 100 is the final target of the reform, and it follows the completion of targets 98 and 99. Under target 98, the competent authorities were charged to use a software product called DEMIS to register persons in the context of SARS-CoV-2 and to discharge the reporting requirements under § 8 (1) (2) of the Infection Protection Law. It was followed by target 99, related to the share of public health offices that have improved their digital maturity.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the requirements of the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	List of all funded public health offices	This list, issued by the Health Ministry, comprises public health offices receiving funding by the Federal Ministry of Health for individual projects ("Modellprojekte") or joint projects under participation of several public health offices ("Verbundprojekte") under the first, second and third funding call
3	List of funded and digitally matured public health offices	This list, issued by the Health Ministry, comprises all public health offices which have improved their digital maturity by at least two levels by the end of Q4 2024 in at least three categories in the employed digital maturity system, as compared to their digital maturity level of 2021. The list contains the digital maturity levels of all the relevant public health offices for all categories in both Q4 2021 and Q4 2024. The list includes only those public health offices (hereinafter referred to as "PHOs" where the total number of categories with an at least two-level improvement is equal to or higher than three.
4	List of all funded pro-	This list, issued by the Health Ministry, contains all funded projects

	jects	with their assigned project numbers, recipient/PHOs name, ID within the maturity model and amount of approved funding. This allows the allocation of all associated data and documents. This list is slightly longer than the list under Evidence No. 3, as some PHOs took part to the funding call with more than 1 type of project.
5	Copy of the digital maturity measurement (issued in Q4 2021)	60 copies of the certificates of the digital maturity measurement as part of the sample, issued by the Fraunhofer Institute of Applied Information Technology (hereinafter referred to as 'FIT'), the Technical University of Dresden (hereinafter referred to as 'TUD') and the Free University of Berlin (hereinafter referred to as 'FUB', and together hereinafter referred to as 'the research consortium'), in Q4 2021.
6	Copy of the digital maturity measurement (issued in Q4 2024)	60 copies of the certificates of the digital maturity measurement as part of the sample, issued by the research consortium, in Q4 2024.
7	Copy of the application for funding (signed between 26/08/2022 and 26/03/2024)	60 copies as part of the sample of the application for funding, with the application form issued by the Kreditanstalt für Wiederaufbau (hereinafter referred to as KfW) bank, filled in by the funding recipient and addressed to the project partners (VDI/VDE-Innovation and Technik, a public consultancy firm, hereinafter referred to as 'VDI/VDE').
8	Copy of the disbursement decision (signed between 29/07/2022 and 26/07/2024)	60 copies as part of the sample of the disbursement decision, with the application form issued by KfW, and addressed to the funding recipient.
9	Scientific Publication Maturity Model (published on 15/06/2023)	The research paper "A Maturity Model for Assessing the Digitalisation of Public Health Agencies" published in Nature Magazine on 15/06/2023 (https://link.springer.com/article/10.1007/s12599-023-00813-y , last accessed on 19/02/2026) highlights the development process for the model and the scientific methods applied in this context.
10	First interim report maturity measurement	The first interim report, written by the research consortium and published by the Digitales Gesundheitsamt (hereinafter referred to as 'DG') on 24 April 2023 via their website (https://digitales-gesundheit-samt.de/fileadmin/Reifegradmodell/Erster_Zwischenbericht_EvalDiGe_bf.pdf) (accessed on 19/02/2026), explains the methodology used for the digital maturity classification and results of the first digital maturity measurement emphasising the measurement process.
11	General funding guideline (published on 22/04/2022)	A copy of the funding guidelines, published by the Health Ministry, "General funding guidelines to promote measures to increase and develop the digital maturity of the public health service", published on 22 April 2022 by the Federal Ministry of Health: https://digitales-gesundheit-

	samt.de/fileadmin/Downloads/Foerderaufwurf_2022/FoerderAufwurf/FoerderleitfadenOEGD.pdf (accessed on 19/02/2026).
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3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

At least 70% of public health offices have increased their digital maturity by at least two levels by Q3 2026 in at least three categories in the employed digital maturity system, as compared to their digital maturity level of 2021.

In total, 238 Public Health Offices (hereinafter referred to as “PHO”) received funding under measure 5.1.1. In accordance with the requirement that at least 70% of PHOs increase their digital maturity by a minimum of two levels in at least three categories (compared to their 2021 baseline), which corresponds to at least 167 PHOs that must achieve this target (Evidence No. 2).

To assess the level of digital maturity, a framework developed by the research consortium was applied. The framework is based on a research paper published in the *Journal of Business & Information Systems Engineering* (Evidence No. 9). For classification within the digital maturity system, PHOs carry out a self-assessment for each category, indicating whether the respective criteria have already been implemented (“applies”), are currently being implemented (“being implemented”), or have not yet been implemented (“does not apply”). This assessment is done in accordance with the approach of the Scientific Publication Maturity Model (Evidence No. 9) and as explained in the first interim report on the first maturity measurements published by the Health Ministry (Evidence No. 10). In line with the procedure set out in the funding guidelines (Evidence No. 11), these assessments should be submitted by the PHOs to the project partner (VDI/VDE-IT) every year, together with a status report on the improvements made by the PHO. Following verification by the project partner, certificates of the digital maturity measurement (Evidence No. 6) were issued by the research consortium. The exact methodology for the baseline maturity level measurements and the related further details were already assessed previously, in the framework of the preliminary assessment of target 99.

To enable easier identification and cross-checks of individual PHOs, Germany provided a list of all funded PHOs that sufficiently improved their maturity (Evidence No. 3) and another list of all funded PHO-related projects (Evidence No. 4).

Following the selection of a random sample of 60 units, Germany submitted the certificates issued by the research consortium, attesting the digital maturity levels of the 60 PHOs in Q4 2021 and Q4 2024 (Evidence No. 5 and No. 6). Additionally, Germany also provided the applications for funding submitted by the sampled 60 PHOs (Evidence No. 7) and the confirmations of disbursement of funding to those PHOs (Evidence No. 8). The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met, and 70% of PHOs have increased their digital maturity by at least two levels in at least three categories in the employed digital maturity system.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 109 Additional application cases

Related Measure: 6.1.1 European identity ecosystem

Quantitative Indicator: Number of application cases

Baseline: 1

Target: 5

Time: Q4 2024

1. Context:

The objective of the measure is to create a digital ecosystem that verifies identities and personal documents online. The measure consists of making application cases for the identity ecosystem available online.

Target 109 requires the completion of four additional government-supported application cases with at least 10 000 users in addition to the pilot hotel check-in.

It is the second step of the measure, following target 108, which required putting a pilot project for digital hotel check-ins into operation. Target 109 will be followed by the final target of the measure, target 110, related to the implementation of five additional application cases available online, bringing the total number of application cases to ten.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target was satisfactorily fulfilled
2	List of application cases	List of four application cases, each with a description of the provider, a description of the application and the functionalities and links to the online service (all verified as functioning on 24 February 2026) (i) online portal of the Federal Office of Justice (<i>Online-Portal des Bundesamt für Justiz</i> : https://www.fuehrungszeugnis.bund.de) (ii) digital pension overview of the German Federal Pension Insurance Fund (<i>Deutsche Rentenversicherung</i>): https://kundenportal.deutsche-rentenversicherung.de (iii) online portal of the German savings banks association (DSGV, <i>Sparkassen</i>): https://online-ident.s-markt-mehrwert.de/home (iv) TK App by the large health insurance fund Techniker Krankenkasse: https://tk.de/tk-ident
3	User manuals	A copy of the user manual or the Software Development Kit (SDK) for each of the four application cases:

		<p>(i) User Manual on the application case of the online portal of the Federal Office of Justice from the Federal Government (<i>User Manual zum Anwendungsfall Online-Portal des Bundesamts für Justiz (Bund)</i>) issued on 28 January 2026;</p> <p>(ii) User Manual on the application case of e-ID check of the German Federal Pension Insurance (<i>User Manual zum Anwendungsfall ID Check der Deutschen Rentenversicherung (Bund)</i>) issued on 31 December 2024;</p> <p>(iii) User Manual on the application case of the German savings banks association (<i>User Manual zum Anwendungsfall eID-Service der S-Markt & Mehrwert o. Einrichtung</i>) issued on 5 February 2025;</p> <p>(iv) User Manual on the application case health insurance fund Techniker Krankenkasse (<i>User Manual zum Anwendungsfall TK-GesundheitsID der Techniker Krankenkasse</i>) issued in March 2025.</p>
4	Certificates	<p>Certificate for each application case issued by the service provider confirming the number of users:</p> <p>(i) Certificate on the minimum number of 10 000 users for the application Online portal of the Federal Office of Justice (OLAF) (<i>Zertifikat über die Mindestanzahl von 10 000 Nutzern für die Anwendng "Online-Portal des Bundesamts für Justiz (OLAF)</i>) issued on 28 January 2026;</p> <p>(ii) Certificate on the minimum number of 10 000 users for the application of the ID checks (<i>Zertifikat über die Mindestanzahl von 10 000 Nutzern für die Anwendung des ID checks</i>) issued on 21 February 2025;</p> <p>(iii) Certificate on the minimum number of 10 000 users for the application eID service of the S-Markt and added value (<i>Zertifikat über die Mindestanzahl von 10 000 Nutzern für die Anwendung eID-Service der S-Markt und Mehrwert</i>) issued on 6 February 2026;</p> <p>(iv) Certificate on the minimum number of 10 000 users for the application TK-GesundheitsID (<i>Zertifikat über die Mindestanzahl von 10 000 Nutzern für die Anwendung TK-GesundheitsID</i>) issued on 17 March 2026.</p>
5	eID documentation	<p>Document including a description of the technical interface documentation and an open-source reference implementation including links to the corresponding websites and further information and packages issued on 21 February 2025</p>

3. Analysis:

The justification and substantiating evidence provided by the German authorities covers all constitutive elements of the target.

Following the first pilot application case, at least four additional application cases for the identity ecosystem are available online, each with at least 10 000 users.

Under target 108 the first pilot application case of an electronic identification system had been assessed as satisfactorily fulfilled. The pilot application case, which enabled the digital check-in into three large German hotel chains, entailed the development of first technical components to facilitate digital identification. These technical components were assessed ex-post to guide their further development. On this basis, the following four additional application cases of the electronic identification function (hereinafter referred to as *eID function*) have been implemented:

- i) At the **online portal of the Federal Office of Justice** (*Online-Portal des Bundesamt für Justiz, hereinafter "online portal"*) users can request a certificate of good conduct (*Führungszeugnis*) (see evidence No. 2. The Commission services accessed the link provided by the authorities on 24 February 2026 to verify the existence of the online portal for requesting a certificate of good conduct. This check was completed successfully, confirming that the requirement of an additional online application case was satisfactorily fulfilled. The users can request those documents while identifying themselves with the eID or the electronic residence certificate (*elektronischer Aufenthaltstitel* (eAT)) with eID function (see Evidence No. 2). The online request is only possible with the use of the eID function, and the fee can be paid online via a credit card (Evidence No. 3, p. 5ff.). To attest the number of eID authentications undertaken to request a certificate of good conduct, the German Ministry for Digitalisation and States Modernisation issued a corresponding certificate. (Evidence No. 4, p.1). The Commission services conducted an on-the-spot check on 23 February 2026 to verify that over 10 000 users of the online portal of the Federal Office of Justice authenticated themselves through the eID functionality in order to obtain the certificate of good conduct. This check was completed successfully, confirming that an additional application case for the identity ecosystem with at least 10 000 users is available online.
- ii) The **digital pension overview** of the German Federal Pension Insurance Fund (*Deutsche Rentenversicherung*) allows registered users to access their personal data and download individual pension information (see Evidence No. 2.). The Commission services accessed the link provided by the authorities on 24 February 2026 to verify the existence of the online portal for the digital pension overview of the German Federal Pension Insurance Fund. This check was completed successfully, confirming that the requirement of an additional online application case was satisfactorily fulfilled. The authentication service of the pension insurance fund, ID Check, carries out identity checks for accessing the personalised pages of the digital pension overview. The eID function is one of the available authentication methods. To attest to the number of eID authentications undertaken to register to the digital pension overview and online portal, the German Federal Pension Insurance Fund issued a corresponding certificate (Evidence No. 4, p. 2). The Commission services conducted an on-the-spot check on 1 July 2025 to verify over 10 000 users of the online portal authenticated themselves through the eID functionality. This check was completed successfully, confirming that an additional application case for the identity ecosystem with at least 10 000 users is available online.
- iii) The **online portal of the German savings banks association** (DSGV, *Sparkassen*) offers digital services to customers, such as opening deposits, taking out loans, and assigning

power of attorney (see Evidence No. 2,). The Commission services accessed the link provided by the authorities on 24 February 2026 to verify the existence of the online portal of the German savings bank association. This check was completed successfully, confirming that the requirement of an additional online application was satisfactorily fulfilled. The provider of the underlying digital solutions, S-Markt & Mehrwert, integrated the eID function into the existing technical infrastructure (see Evidence No. 3). It also issued a certificate attesting to the number of eID authentications undertaken in the application (Evidence No. 4, p. 3). The Commission services conducted an on-the-spot check on 9 July 2025, to verify that over 10 000 users of the online portal authenticated themselves through the eID functionality. This check was completed successfully, confirming that an additional application case for the identity ecosystem with at least 10 000 users is available online.

- iv) The TK App by the large **health insurance fund** Techniker Krankenkasse grants insurance holders access to digital prescriptions, their electronic patient records (*elektronische Patientenakte – ePA*) and a digital safe (see Evidence No. 2). As a provider of statutory health insurance, Techniker Krankenkasse is required to offer insurance holders a secure and accessible digital identity for health services upon request, as a complement to the new electronic patient record. This digital health identity is offered in form of the TK-Ident application with which insurance holders can access the electronic patient record or electronic prescriptions. To register with the TK-Ident application and generate the digital health identity, clients can use the eID function, among others (see Evidence No. 3, p. 127ff.). To attest to the number of eID authentications undertaken to register with the TK-Ident application, the Techniker Krankenkasse issued a corresponding certificate (Evidence No. 4, p. 4). The Commission services conducted an on-the-spot check on 11 July 2025 to verify that over 10 000 users of the TK App authenticated themselves through the eID functionality. This check was completed successfully, confirming that an additional application case for the identity ecosystem with at least 10 000 users is available online.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 113A Services of the Länder available for submitting applications digitally

Related Measure: 6.1.2 Digitalisation of the administration – implementation of the Online Access Act

Quantitative Indicator: Number of services

Baseline: 0

Target: 40

Time: Q2 2025

1. Context:

The objective of the measure is to make public services digitally available. The measure consists of digitalising service bundles that fall within the implementing competency of the Länder and the Federal Government as well as the publication of quality requirements and definition of architectural specifications and the entry into force of the Ordinance on Standards for Online Access to Administrative Services.

Target 113A requires that at least 40 administrative services of the Länder are available for submitting applications digitally in at least 8 Länder as one-for-all services.

Target 113A is the fourth target of the reform. It follows the completion of target 111, target 112 and target 113, related to the conclusion of agreements to implement the Online Access Act between the federal government and regions (“Länder”), the go-live of at least 70 public service bundles, and the digital implementation of at least 100 of the most important administrative service bundles of the Länder as one-for-all services and of 115 Federal Government service bundles, respectively. It is accompanied by milestones 113B and 113C, related to the publication of quality requirements and definition of architectural specifications and the entry into force of the Ordinance on Standards for Online Access to Administrative Services, respectively.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the requirements of the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Spreadsheet detailing 40 Länder services available for submitting applications online in at least 8 Länder	The spreadsheet compiled by the German authorities contains 40 administrative services of the Länder and their details, including information on whether the services were assessed under previous targets, the lead region for implementation and the list of regions where the service is available for submitting applications online.

3	Spreadsheet including weblinks to 40 Länder services available for submitting applications online in at least 8 Länder	The spreadsheet compiled by the German authorities contains 40 administrative services of the Länder and the weblinks to the websites where applications can be submitted digitally in at least 8 Länder per service. These functionalities may not be accessible for non-users as the German authorities require authentication to access them. Non-users can access the landing page with a description of the service process and a link to the first step. In addition, the spreadsheet contains clarifications/explanations for some services, for example instructions on which geographical region to test an application process for, the scope of the service or the availability of the service in the Länder.
4	Copy of the Online Access Act implementation catalogue with service objects (<i>OZG Umsetzungskatalog mit Leistungsobjekten</i>) in the version of 19 January 2026 as curated by the Federal Ministry of the Interior and Community	Latest available version of the Online Access Act implementation catalogue with service objects, compiled by the implementing authorities of the Federal Government and the Länder. It specifies the service bundles of the Federal Government and of the Länder to be digitalised. It includes information on, amongst others, the importance of digitalising each of the service bundles, their state of implementation, and the responsible authority.
5	Link to the OZG information platform	Via the provided link, the availability of the service as one-for-all can be traced via the dedicated tab of the service. The website is available at: https://informationsplattform.ozg-umsetzung.de/iNG/app/intro . The link was verified as operational on 23 February 2026.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

At least 40 administrative services of the Länder are available for submitting applications digitally in at least 8 Länder

The spreadsheet containing weblinks representing eight different Länder for each of the 40 administrative services of the Länder (Evidence No. 3) confirmed that the requirements of the target have been met. The following elements were assessed:

- I. Unique identifier ('OZG ID', column A). This identifier has been verified by Commission services as being identical to the identifiers included in the latest available Online Access Act implementation catalogue with service objects (*OZG-Umsetzungskatalog mit Leistungsobjekten*, Evidence No. 4, column J). They

all identify administrative services. Germany provided at least eight weblinks representing eight different Länder each for a total of 40 administrative services.

- II. The fact that all 40 services fall under the authority of the Länder, as indicated in Evidence No. 4 (responsibility code “2/3”, “3a/3b”, “4” and “5”, column D). In cases where, in addition to the regional responsibility code, a federal responsibility code “1” was indicated (Mixed services), it was ensured via the regional identifiers on the webpage and the development as a one-for-all service (below) that the service in question was provided at regional level.
- III. Links to websites showing that all services are available for submitting an application digitally (Evidence No. 3 ‘active links’). For these websites, Commission services verified that the online service name and description on the relevant website(s) matched the service-identifying information (service name) provided in the spreadsheet (Evidence No. 2). Commission services also checked that the online application could be launched on the website. These functionalities may not be accessible for non-users as the German authorities require authentication to access them. Non-users can access the landing page with a description of the service process and a link to the first step. In cases where a registration via national ID was required, Commission services verified the landing page with a description of the service process and the link to the first step of the application process. The Commission services accessed the weblinks provided by the authorities on 20 February 2026 to verify applications for services could be submitted digitally. This check was completed successfully, confirming that applications for services can be submitted digitally.
- IV. The regional availability. Commission services verified that the region in which the service was available was either stated on the website (before or after logging in) or verifiable on a central website. For four services where availability in a specific region could only be confirmed after logging in with a business or advanced account (IDs 10297, 10300, 10501, 10509), Commission services conducted on-the-spot checks on 25 September 2025 and 30 September 2025 to verify the indicated regional availability of the services. These checks were completed successfully, confirming the availability in the indicated eight or more regions.

as one-for-all services.

In order to verify that the services were one-for-all services, meaning that they were developed by one region (Land) or a group of regions and then made available for reuse by other regions (Länder), Commission services cross-checked that the services are marked as one-for all service on the OZG information platform (Evidence No. 5) in the category ‘Applied reuse model’ (*‘Angewandtes Nachnutzungsmodell’*).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 113B Publication of quality requirements and definition of architectural specifications

Related Measure: 6.1.2 Digitalisation of the administration – implementation of the Online Access Act

Qualitative Indicator: Quality requirements have been published and architectural specifications have been defined

Time: Q2 2025

1. Context:

The objective of the measure is to make public services digitally available. The measure consists of digitalising service bundles that fall within the implementing competency of the Länder and the Federal Government as well as the publication of quality requirements and definition of architectural specifications and the entry into force of the Ordinance on Standards for Online Access to Administrative Services.

Milestone 113B requires publication of quality requirements (DIN SPEC 663366) and definition of architectural specifications (IT Architecture Directive V1.9) that address the standardisation for IT components of the services of the Länder.

Milestone 113B is the first milestone of the reform. It follows the completion of target 111, target 112 and target 113, related to the conclusion of agreements to implement the Online Access Act between the federal government and regions (hereinafter referred to as “Länder”), the go-live of at least 70 public service bundles, and the digital implementation of at least 100 of the most important administrative service bundles of the Länder as one-for-all services and of 115 Federal Government service bundles, respectively. It is accompanied by target 113A related to the availability of 40 administrative services of the Länder for submitting applications digitally in at least 8 Länder as one-for-all services and milestone 113C related to the entry into force of the Ordinance on Standards for Online Access to Administrative Services.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the requirements of the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Copy of DIN SPEC 66336, published by the German Institute for Standardisation DIN on 7 March 2025 under https://servicestandard.gov.de/din-spec-66336/ . Entry into force on 1 April 2025.	The document sets out and defines specifications and quality requirements for the development, provision, maintenance and operation of public administration online services and portals. The

		link was verified as operational on 23 February 2026.
3	Copy of the resolution of 26 March 2025 by the IT Planning Council (<i>IT Planungsrat</i>) on Federal IT architectural guideline	This document sets out the resolution by the IT Planning Council, as an amendment to Resolution 2021/37, to replace the previous Federal IT architectural guideline 1.0 with the new Federal IT architectural guideline 1.9. It also contains the recommendation by the IT Planning Council to use the new guideline consistently and to update it in line with technical developments.
4	Copy of the Federal IT architectural guideline version 1.9.0 (<i>Föderale IT-Architekturrichtlinie Version 1.9.0</i>), adopted on 26 March 2025 by the IT Planning Council (<i>IT Planungsrat</i>)	This document sets out the guiding principles for federal IT infrastructure and digitalisation.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the milestone.

Publication of quality requirements (DIN SPEC 66336) and definition of architectural specifications (IT Architecture Directive V1.9) [...].

Adopted in April 2025, the DIN SPEC 66336 was published by the German Institute for Standardisation (hereinafter referred to as “DIN”) on a dedicated website in the same month (Evidence No. 2, page 1). The Commission services accessed the link provided by the authorities on 02 March 2026 to verify that the DIN SPEC 66336 was published and is publicly available. This check was completed successfully, confirming that the requirement related to the publication of the DIN SPEC 66336 has been satisfactorily fulfilled.

The Federal IT Architecture Directive V1.9 (*Föderale IT-Architekturrichtlinie*, Evidence No. 4), which was adopted by the IT Planning Council (*IT Planungsrat*) on 26 March 2025 (Evidence No. 3) defines the specifications for federal IT infrastructure and digitalisation. It replaces the previous Federal IT Architecture Directive V1.0 for new projects.

The resolution by the IT Planning Council (Evidence No. 3) recommends that the Federal IT Architecture Directive be applied to all IT projects and products of the German public administration. It also recommends that the Federal IT Architecture Directive be used as a basis for the creation of regional or sector-specific IT architecture guidelines. Furthermore, it instructs the Federal IT Architecture Board to update the Federal IT Architecture Directive on a permanent basis and, in particular, to adapt it to the current state of art.

that address the standardisation for IT components of the services of the Länder.

The DIN SPEC 66336 (Evidence No. 2) develops and defines quality requirements for online services and portals in public administration, including the Länder.

The introductory part of the document states that: '[t]his document specifies the quality requirements for information technology systems in digital public administration. This document is applicable to information technology systems that are used for comprehensive information technology access to the administrative services of the federal, state and local governments.' (page 8).

Furthermore, chapter 5 of the DIN SPEC 66336 (Evidence No. 2) defines requirements along a development process that covers the entire life cycle of a digital product. This entails: an analysis of users (chapter 5.1), an analysis of needs and processes (chapter 5.2), the division of responsibilities and roles (chapter 5.3), cooperation and procedure (chapter 5.4), synergies and re-use (chapter 5.5), user-friendliness, digital accessibility and inclusion (chapter 5.6), the use of open standards (chapter 5.7), data protection (chapter 5.8), security and reliability (chapter 5.9), open source (chapter 5.10), operation and support (chapter 5.11), evaluation and further development (chapter 5.12) and need for legal changes (chapter 5.13).

Therefore, in line with the description of the milestone, the standardisation for IT components as set out in DIN SPEC 66336 of digital services at Länder (and municipal) level addresses the standardisation of the IT components of the services that will be developed and implemented by the Länder.

The Federal IT Architecture Directive V1.9 (Evidence No. 4) defines various models and standards for IT components of the services of the Länder. Four central regulatory areas are derived and detailed in chapter 2 of the architectural requirements (*Architekturvorgaben*):

- General specifications (*Allgemeine Vorgaben - AV*, chapter 2.1): Framework principles and characteristics
- Business guidelines (*Geschäftliche Vorgaben GV*, chapter 2.2): Motivation, organization and skills
- Functional requirements (*Funktionale Vorgaben FV*, chapter 2.3): Design of information systems
- Technical specifications (*Technische Vorgaben TV*, chapter 2.4): Technique, technology and implementation

General specifications are primarily aimed at strategic IT specialists and decision-makers, business specifications at clients and authorities, functional specifications at project and programme managers and technical specifications at technicians and service providers. By laying out the general requirements for information technology and digitalisation along the lines of conformity, interoperability, sustainability, data-driven action, usability and accessibility, collaboration, open source, sovereignty and scalability, the architectural specifications also address the IT components used for the services of the Länder, in line with the milestone description.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 113C Entry into force of the Ordinance on Standards for Online Access to Administrative Services

Related Measure: 6.1.2 Digitalisation of the administration – implementation of the Online Access Act

Qualitative Indicator: Provision in the law indicating the entry into force of the Ordinance on Standards for Online Access to Administrative Services

Time: Q3 2025

1. Context:

The objective of the measure is to make public services digitally available. The measure consists of digitalising service bundles that fall within the implementing competency of the Länder and the Federal Government as well as the publication of quality requirements and definition of architectural specifications and the entry into force of the Ordinance on Standards for Online Access to Administrative Services.

Milestone 113C requires the entry into force of the Ordinance on Standards for Online Access to Administrative Services.

Milestone 113C is the last milestone of the reform. It follows the completion of target 111, target 112 and target 113, related to the conclusion of agreements to implement the Online Access Act between the federal government and regions (hereinafter referred to as “Länder”), the go-live of at least 70 public service bundles, and the digital implementation of at least 100 of the most important administrative service bundles of the Länder as one-for-all services and of 115 Federal Government service bundles, respectively. It is accompanied by target 113A related to the availability of 40 administrative services of the Länder for submitting applications digitally in at least 8 Länder as one-for-all services and milestone 113 B related to the publication of quality requirements and definition of architectural specifications.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the requirements of the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Copy of the Ordinance on Standards for Online Access to Administrative Services (<i>Verordnung über Standards für den Onlinezugang zu Verwaltungsleistungen (OZSV)</i>), published in the State Gazette (part I) Nr 221 of 22 September 2025 (<i>BGBI. 2025 I Nr. 221 vom 25.09.2025</i>). Also available un-	The Ordinance mandates the use of the architectural specifications as set out in the IT Architecture Directive and the compliance

	<p>der https://www.recht.bund.de/bgbl/1/2025/221/VO.html. The link was verified as operational on 23 February 2026.</p>	<p>with quality requirements as set out in DIN SPEC 663366. In line with paragraph 4 of the ordinance, it entered into force on the first day of the next quarter following its promulgation (1 October 2025).</p>
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3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the milestone.

Entry into force of the Ordinance on Standards for Online Access to Administrative Services.

The Ordinance on Standards for Online Access to Administrative Services (*Verordnung über Standards für den Onlinezugang zu Verwaltungsleistungen (OZSV)*) (Evidence No. 2) was published in the State Gazette (*Bundgesetzblatt*) (part I) No. 221 on 22 September 2025 and entered into force on 1 October 2025, in accordance with its paragraph 4. The Ordinance mandates the architectural requirements as specified in the Federal IT Architecture Directive V1.9 (*Föderale IT-Architekturrichtlinie*) in paragraph 1 and the quality requirements for online services as defined in the DIN SPEC 66336 in paragraph 2.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 119 Completion of measures in the progress report

Related Measure: 6.2.1 Joint programme of the federal government and the Länder for an efficient administration that benefits citizens and businesses

Quantitative Indicator: Percentage of measures completed

Baseline: 0

Target: 80

Time: Q1 2025

1. Context:

The objectives of the measure include to accelerate planning and approval procedures, to increase the outflow of grants, to accelerate housing construction, and to increase the number of successful transfers of business ownership to the next generation. It consists of establishing a working group comprised of the federal level and the Länder to adopt proposals to simplify public administration procedures.

Target 119 consists of the completion of the implementation of at least 80% of the measures identified in the second progress report.

Target 119 is the third and last target of the reform, and it follows the completion of milestone 117 and milestone 118, related to a first report for the conference of Minister-Presidents (MPK) identifying the measures from the Federal/Länder programme to be further examined, and a second progress report identifying the measures to be implemented under the leadership of the Federal Government and/or the Länder. The measure has a final expected date for implementation in March 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document	Summary document duly justifying how the requirements of the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID annex) have been satisfactorily fulfilled.
2	Copy of the final report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid (<i>Abschlussbericht der Bund-Länder-Arbeitsgruppe im Maßnahmenprogramm für Bürokratieabbau und Verwaltungsmodernisierung</i>)	The final progress report of the working group evaluates existing funding and respective regulation. It further identifies areas with potential for improvement and lists concrete proposals on how digitalisation, targeted standardisation and flexibilization as well as simplification can be promoted to reduce access barriers to financing.

	<i>im Bereich der Finanzhilfen)</i>	
3	Email of transmittal of Evidence No. 2, from the Federal Ministry of Finance (<i>Bundesfinanzministerium</i>) to the federal ministries concerned	In the email the Report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid was sent from the Federal Ministry of Finance to the Federal Ministry of Research, Technology and Space (<i>Bundesministerium für Forschung, Technologie und Raumfahrt</i>), Federal Ministry for Education, Family, Senior Citizens, Women and Youth (<i>Bundesministerium für Bildung, Familie, Senioren, Frauen und Jugend</i>), the Federal Ministry of Housing, Urban Development and Building (<i>Bundesministerium für Wohnen, Stadtentwicklung und Bauwesen</i>), the Federal Ministry for Economic Affairs and Energy (<i>Bundesministerium für Wirtschaft und Energie</i>), the Federal Court of Audit (<i>Bundesrechnungshof</i>) and the Federal Ministry of Justice and Consumer Protection (<i>Bundesministerium der Justiz und für Verbraucherschutz</i>)., from 22 November 2024 sent by Dr. Asmusen
4	Printout of the website Fund Data Base (<i>Förderfinder</i>)	The website grants centralized access to funding programmes and funding opportunities. The corresponding link https://foerderfinder.digital/ was verified as operational on 23 February 2026.
5	Bundesministerium für Wirtschaft und Energie (BMWi): First report of the Federal Government on the German national funding system for structurally weak regions (<i>Erster Bericht der Bundesregierung zum Gesamtdeutschen Fördersystem für strukturschwache Regionen</i>), April 2021	The report describes the aims of the German national funding system and its implementation as well as additional support measures for structurally weak regions by April 2021.
6	Federal Ministry for Economic Affairs and Climate Action (BMWK): Equivalence Report 2024 – for Strong and Liveable Regions in Germany, July 2024	The report shows the status and developments until July 2024 in relation to the Federal Government's goal of strengthening the equivalence of living conditions throughout Germany and follows up on the report of the Federal Government on the German national funding system for structurally weak regions (Evidence No. 5).
7	SPRINT-Wissenschaftliche Politikberatung PartG: Better Promote – for a stonger service focus in regional aid programmes (<i>Better Promote – Für eine</i>	The report outlines approaches to making regional funding more service-oriented, reflecting the September 2022 state-of-play.

	<i>stärkere Serviceorientierung in der Regionalförderung), September 2022</i>	
8	Bundesministerium des Inneren und für Heimat: Better promote 2.0 – a common approach to funding consultation (<i>Besser fördern. Besser beraten. Die Teilhabe strukturschwacher Regionen an Zukunftsentwicklungen stärken</i>), November 2023	This report follows up on the Better Promote report (Evidence No. 7). It presents the research and consultation project Better Promote 2.0 and its results and recommendations for action, reflecting the November 2023 state-of-play.
9	Copy of the legal opinion on legal simplification for succession law, on the universal succession of public law positions (Luther Law Firm (Luther Rechtsanwalts-gesellschaft mBH): (<i>Rechtsvereinfachung bei Unternehmensnachfolgen – Potentiale und Umsetzungsmöglichkeiten einer Gesamtrechtsnachfolge für öffentlich-rechtliche Berechtigungen</i>), 30 November 2022)	The copy of the legal opinion from 30 November 2022 by the attorney company Luther assesses potentials and possibilities of realisation to universal succession of public law to overcome impediments to the transfer of public law authorizations from the transferring (legal) entity to the acquiring (legal) entity.
10	Copy of the protocol from the meeting of the 140th Conference of Building Ministers (<i>140. Bauministerkonferenz</i> , Minutes of the meeting of the 140th Conference of Ministers for Construction on 22/23 September 2022 in Stuttgart, Germany (<i>Protokoll ueber die Sitzung der 140/ Bauministerkonferenz am 22./23. September 2022 in Stuttgart, Germany</i>))	The protocol, under item 8 of the agenda, states that the attendees passed the resolution to adopt the changes to the Model Building Code (<i>Musterbauordnung – MBO</i>) as proposed by the committee for urban development, building and housing sector (<i>Ausschuss für Stadtentwicklung, Bau- und Wohnungswesen</i>).
11	Copy of the annex to the protocol from the meeting of the 140th Conference of Building Ministers (Annex Item 9.1 of the 140th Conference of Ministers for Construction on Sep-	The annex lists the concrete legal changes agreed at the meeting as well as their justification.

	<p>tember 22/23, 2022 in Stuttgart) <i>(Anlage Top 9.1 der 140. Bauministerkonferenz am 22./23. September 2022 in Stuttgart)</i></p>	
12	<p>Copy of the protocol from the meeting of the 142th Conference of Building Ministers Minutes of the meeting of the 142nd Conference of Ministers for Construction on 23-24 November 2023 in Baden-Baden) <i>(Protokoll über die Sitzung der 142. Bauministerkonferenz am 23.-24. November 2023 in Baden-Baden).</i></p>	<p>The protocol, under items 5, 9 and 11 of the agenda, states that the attendees passed the resolution to adopt the changes to the Model Building Code.</p>
13	<p>Copy of the annex to the protocol from the meeting of the 142th Conference of Building Ministers Project group Building regulations, model building code update, evaluation of the association consultation, model building code as of September 22/23, 2023) <i>(Projektgruppe Bauordnungsrecht, Musterbauordnung Fortschreibung, Auswertung der Verbaendeanhoerung, Musterbauordnung Stand 22./23.09. 2023</i></p>	<p>The annex to item 9 on the agenda of the conference lists a legal change to the Model Building Code.</p>
14	<p>Copy of the protocol from the meeting of the 145th Conference of Building Ministers <i>(Protokoll über die Sitzung der 145. Buaministerkonferenz am 26./27. September 2024 in Passau).</i></p>	<p>The protocol, under item 18b and 18d of the agenda, states that the attendees passed the resolution to adopt the changes to three paragraphs of the Model Building Code as proposed by the committee for urban development, building and housing sector. 145th Conference of Construction Ministers on 26 to 27. September 2024 in Passau, Germany</p>
15	<p>Excerpt of agenda item 18b of the annex from the meeting of the 145. Conference of Building Ministers Committee on Urban Development, Construction and Housing of the</p>	<p>The annex to item 18b of the agenda lists the changes to paragraphs 61(1) Nr. 3 and 62(1) of the Model Building Code. 145th Conference of Ministers for Construction on 26 to 27. September 2024 in Passau, Germany</p>

	<p>Conference of Ministers for Construction, Item 18b: Exemption from Procedural Requirements and Approval for Solar Installations, Conference of Ministers for Construction on 26/27 September 2024 in Passau, Germany <i>(Ausschuss fuer Stadtentwicklung, Bau-und Wohnungswesen der Bauministerkonferenz, Top Top 18b: Verfahrensfreiheit und Genehmigungsfreistellung von Solaranlagen, Bauministerkonferenz am 26./27. September 2024 in Passau, Germany</i></p>	
16	<p>Excerpt of agenda item 18d of the annex from the meeting of the 145th Conference of Building Ministers: Committee on Urban Development, Construction and Housing of the Conference of Ministers for Construction, Item 18d of the 145th Conference of Ministers for Construction on 26/27 September 2024 in Passau, Germany) <i>(Ausschuss für Stadtentwicklung, Bau-und Wohnungswesen der Bauministerkonferenz, Top 18d der 145. Bauministerkonferenz am 26./27. September 2024 in Passau, Deutschland)</i></p>	<p>The annex to item 18d of the agenda lists the changes to paragraph 61(1) Nr. 15 of the Model Building Code., 145th Conference of Ministers for Construction s on 26/2. September 2024 in Passau, Germany</p>
17	<p>Copy of the current Model Building Code (Model Building Code (MBO) version November 2022, last amended by resolution of the Conference of Ministers for Construction on 26/27 September 2024, <i>(Musterbauordnung - MBO- Fassung November</i></p>	<p>The copy shows the current version of the Model Building Code as last amended by the 145. Conference of Building Ministers of 26/27 September 2024, which includes the above-mentioned amendments (Evidence No. 10-16).</p>

	2022 zuletzt geändert durch Beschluss der Bauminsterkonferenz vom 26./27. September 2024)	
18	Excerpt of agenda item 4 of the protocol of the meeting between the Federal Chancellor and the heads of government of the Länder (<i>Besprechung des Bundeskanzlers mit den Regierungschefinnen und Regierungschefs der Länder am 6. November 2023, Ergebnisprotokoll</i>)	The protocol of the meeting of the Federal Chancellor with the heads of government of the Länder on 6 November 2023 states that a decision on a pact to speed up planning and approval procedures (<i>Pakt für Planungs-, Genehmigungs- und Umsetzungsbeschleunigung zwischen Bund und Ländern</i>) was agreed.
19	Copy of the meeting minutes of agenda item 4 of the meeting between the Federal Chancellor and the heads of government of the Länder, regarding Evidence No. 18.	The copy of the meeting minutes of a motivation of the pact to speed up planning and approval procedures, targeted, planned changes to relevant acts and procedures as well as reforms regarding human resources.
20	Copy of the first monitoring report of the federal government and the Länder (<i>Erster Monitoring-Bericht der Bundesregierung und der Länder: Stand der Umsetzung des Pakts für die PLANungs-, Genehmigungs- und Umsetzungsbeschleunigung zwischen Bund und Ländern</i>).	The first monitoring report describes the status of implementation of the Federal-Länder-Pact to speed up planning and approval procedures. It reflects the state-of-play from 18 June 2024.
21	Printout of the website Building Information Modeling (BIM) portal	The portal supports public clients in the BIM-compliant definition of their information requirements and other contractors in the quality-assured transmission of corresponding information models: https://via.bund.de/bim/infrastruktur/landing . The link was verified as operational on 23 February 2026.
22	Copy of the Law on the Acceleration of Administrative Court Proceedings in the Infrastructure Sector (<i>Gesetz zur Beschleunigung von verwaltungsgerichtlichen Verfahren im Infrastrukturbereich</i>)	A copy of the Law on the Acceleration of Administrative Court Proceedings in the Infrastructure Sector (<i>Gesetz zur Beschleunigung von verwaltungsgerichtlichen Verfahren im Infrastrukturbereich</i>) published on 20 March 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2023 Teil I Nr. 71), with reference to the relevant provisions entering into force on 21 March 2023.

23	Key issue paper by the Federal Government on the key issues paper by the Federal Government on the personnel and further training offensive (<i>Eckpunktepapier der Bundesregierung zur Personal- und Weiterbildungsoffensive</i>)	The key issues paper describes the pressing challenges and demands with respect to personnel in the public administration and proposes approaches to counter the identified challenges.
24	Copy of the Act to Improve Climate Protection in Immission Control, to Accelerate Immission Control Licensing Procedures and to Implement EU Law (<i>Gesetz zur Verbesserung des Klimaschutzes beim Immissionsschutz zur Beschleunigung immissionsschutzrechtlicher Genehmigungsverfahren und zur Umsetzung von EU-Recht</i>)	A copy of the Act to Improve Climate Protection in Immission Control, to Accelerate Immission Control Licensing Procedures and to Implement EU Law (<i>Gesetz zur Verbesserung des Klimaschutzes beim Immissionsschutz zur Beschleunigung immissionsschutzrechtlicher Genehmigungsverfahren und zur Umsetzung von EU-Recht</i>) published on 8 July 2024 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2024 Teil I Nr. 225</i>), with reference to the relevant provisions entering into force on 9 July 2024.
25	Report on the enhancement of the Federal Digital Academy (<i>Digitalakademie Bund. Autor Digitalakademie Bund. Dr. Sebastian Gradinger und Leif Püchler, Bundesministerium für Inneres und Bundesakademie für öffentliche Verwaltung, Digitalakademie, issued in April 2025</i>)	The report describes the process of institutionalisation of the new qualification format “digital journey” for executives in public administration as well as information about the follow-up project.
26	Printout of the website Federal Digital Academy (<i>Digitalakademie</i>)	The platform supports the promotion of digital skills of employees in the federal public administration. The weblink pointing to https://www.digitalakademie.bund.de/ was verified as operational on 23 February 2026.
27	Copy of the Act to ensure proper planning and approval procedures during the COVID-19 Pandemic (<i>Gesetz zur Sicherstellung ordnungsgemäßer Planungs- und Genehmigungsverfahren während der COVID-19-Pandemie – PlanSiG; Planungssicherungsgesetz</i>)	A copy of the Act to ensure proper planning and approval procedures during the COVID-19 Pandemic (<i>Gesetz zur Sicherstellung ordnungsgemäßer Planungs- und Genehmigungsverfahren während der COVID-19-Pandemie – PlanSiG; Planungssicherungsgesetz</i>) published on 28 May 2020 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2020 Teil I Nr. 24</i>), with reference to the relevant provisions entering into force on 29 May 2020.
28	Copy of the Law Amending	A copy of the Law Amending the Planning Secu-

	the Planning Security Act (<i>Gesetz zur Änderung des Planungssicherungsgesetzes</i>)	rity Act (<i>Gesetz zur Änderung des Planungssicherungsgesetzes</i>) published on 13 December 2022 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2022 Teil I Nr. 49), with reference to the relevant provisions entering into force on 14 December 2022.
29	Copy of the 5 th Administrative Procedure Amendment Act (<i>Fünftes Gesetz zur Änderung verwaltungsverfahrensrechtlicher Vorschriften sowie zur Änderung des Sechsten Buches Sozialgesetzbuchs – 5. VwVfÄndG</i>)	A copy of the 5 th Administrative Procedure Amendment Act (<i>Fünftes Gesetz zur Änderung verwaltungsverfahrensrechtlicher Vorschriften sowie zur Änderung des Sechsten Buches Sozialgesetzbuchs – 5. VwVfÄndG</i>) published on 8 December 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2023 Teil I Nr. 344), with reference to the relevant provisions entering into force on 9 December 2023.
30	Copy of the Act to Strengthen Digitisation in the Urban Land Use Plan Procedure and to amend other provisions (<i>Gesetz zur Stärkung der Digitalisierung im Bauleitplanverfahren und zur Änderung weiterer Vorschriften</i>)	A copy of the Act to Strengthen Digitisation in the Urban Land Use Plan Procedure and to amend other provisions (<i>Gesetz zur Stärkung der Digitalisierung im Bauleitplanverfahren und zur Änderung weiterer Vorschriften</i>) published on 6 July 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2023 Teil I Nr. 176), with reference to the relevant provisions entering into force on 7 July 2023.
31	Copy of the Act on the acceleration of authorisation procedures in the transport sector and the implementation of Directive (EU) 2021/1187 on streamlining measures for advancing the realisation of the trans-European transport network (TEN-T) (<i>Gesetz zur Beschleunigung von Genehmigungsverfahren im Verkehrsbereich und zur Umsetzung der Richtlinie (EU) 2021/1187 über die Straffung von Maßnahmen zur rascheren Verwirklichung des transeuropäischen Verkehrsnetzes</i>)	A copy of the Act on the acceleration of authorisation procedures in the transport sector and the implementation of Directive (EU) 2021/1187 on streamlining measures for advancing the realisation of the trans-European transport network (TEN-T) (<i>Gesetz zur Beschleunigung von Genehmigungsverfahren im Verkehrsbereich und zur Umsetzung der Richtlinie (EU) 2021/1187 über die Straffung von Maßnahmen zur rascheren Verwirklichung des transeuropäischen Verkehrsnetzes</i>) published on 28 December 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2023 Teil I Nr. 409), with reference to the relevant provisions entering into force on 29 December 2023.
32	Copy of the Act on Immediate Measures for the Accelerated Expansion of Renewable Energies and Further Measures in the Electricity Sector of 20 July	A copy of the Act on Immediate Measures for the Accelerated Expansion of Renewable Energies and Further Measures in the Electricity Sector of 20 July 2022 (<i>Gesetz zu Sofortmaßnahmen für einen beschleunigten Ausbau der erneu-</i>

	2022 (<i>Gesetz zu Sofortmaßnahmen für einen beschleunigten Ausbau der erneuerbaren Energien und weiteren Maßnahmen im Stromsektor</i>)	<i>erbaren Energien und weiteren Maßnahmen im Stromsektor</i>) published on 20 July 2022 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2022 Teil I Nr. 28</i>), with reference to the relevant provisions entering into force on 1 September 2022 and 1 January 2023.
33	Copy of the Correction of the Act on Immediate Measures for the Accelerated Expansion of Renewable Energies and Further Measures in the Electricity Sector of 20 July 2022 (<i>Berichtigung des Gesetzes zu Sofortmaßnahmen für einen beschleunigten Ausbau der erneuerbaren Energien und weiteren Maßnahmen im Stromsektor</i>)	A copy of the Correction of the Act on Immediate Measures for the Accelerated Expansion of Renewable Energies and Further Measures in the Electricity Sector of 20 July 2022 (<i>Berichtigung des Gesetzes zu Sofortmaßnahmen für einen beschleunigten Ausbau der erneuerbaren Energien und weiteren Maßnahmen im Stromsektor</i>) published on 24 March 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2023 Teil I Nr. 87</i>), with reference to the relevant provisions entering into force on 24 March 2023.
34	Copy of the Act amending the Spatial Planning Act and other regulations of 22 March 2023 (<i>Gesetz zur Änderung des Raumordnungsgesetzes und anderer Vorschriften – ROGÄndG</i>)	A copy of the Act amending the Spatial Planning Act and other regulations of 22 March 2023 (<i>Gesetz zur Änderung des Raumordnungsgesetzes und anderer Vorschriften – ROGÄndG</i>) published on 28 March 2023 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2023 Teil I Nr. 88</i>), with reference to the relevant provisions entering into force on 29 March 2023.
35	Copy of the Act on the Amendment of Energy Industry Law in Connection with the Immediate Climate Protection Programme and on Adjustments in the Law on End-Customer Supply of 19 July 2022 (<i>Gesetz zur Änderung des Energiewirtschaftsrechts im Zusammenhang mit dem Klimaschutz-Sofortprogramm und zu Anpassungen im Recht der Endkundenbelieferung</i>)	A copy of the Act on the Amendment of Energy Industry Law in Connection with the Immediate Climate Protection Programme and on Adjustments in the Law on End-Customer Supply of 19 July 2022 (<i>Gesetz zur Änderung des Energiewirtschaftsrechts im Zusammenhang mit dem Klimaschutz-Sofortprogramm und zu Anpassungen im Recht der Endkundenbelieferung</i>) published on 28 July 2022 in the Federal Law Gazette (<i>Bundesgesetzblatt, Jahrgang 2022 Teil I Nr. 28</i>), with reference to the relevant provisions entering into force on 29 July 2022.
36	Copy of the Act amending the Energy Security Act and other energy industry regulations dated 8 October 2022 (<i>Gesetz zur</i>	A copy of the Act amending the Energy Security Act and other energy industry regulations dated 8 October 2022 (<i>Gesetz zur Änderung des Energiesicherungsgesetzes und anderer energiewirtschaftlicher Vorschriften</i>) published on 12

	<i>Änderung des Energiesicherungsgesetzes und anderer energiewirtschaftlicher Vorschriften)</i>	October 2022 in the Federal Law Gazette (<i>Bundesgesetzblatt</i> , Jahrgang 2022 Teil I Nr. 37), with reference to the relevant provisions entering into force on 13 October 2022.
37	Weblink to the final report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid	The weblink to download the report pointing to https://www.bmjv.de/SharedDocs/Downloads/DE/BessereRechtsetzung/63_Abschlussbericht_Bund_Laender_Buerokratieabbau_Finanzhilfen.pdf?__blob=publicationFile&v=2 was verified as operational on 23 February 2026.
38	Second progress report	The second progress report prepared by the head of the Federal Chancellery and the heads of Länder Chancelleries and submitted to the Conference of Minister-Presidents (<i>Ministerpräsidentenkonferenz – MPK</i>) who took note of it, published in 2022 describing the progress made in relation to those measures of the first progress report. The report was published at the website of the Federal Government at https://www.bundesregierung.de/resource/blob/974430/2047470/7213d84a6c6b074187f35c80476daa63/2022-06-03-mpk-beschluss3-top102-data.pdf , verified on 23 February 2026
39	Specifications to the second progress report	A formal letter issued by the Federal Ministry of Justice (<i>Bundesministerium der Justiz – BMJ</i>), the Federal Ministry of Finance (<i>Bundesministerium der Finanzen - BMF</i>) and the Ministry of State (<i>Staatsministerium</i>) Baden-Württemberg that represented the Länder, specifying detailed deliverables, amending the second progress report. The letter was also published at the website of the Federal Ministry of Finance on 4 August 2023, verified at https://www.bundesfinanzministerium.de/Content/DE/Downloads/Europa/deutscher-aufbau-und-resilienzplan-measure-6-2-1.pdf on 23 February 2026.

3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

Completion of the implementation of at least 80% of the measures identified in the second progress report.

In the second progress report (Evidence No 38) for the Conference of Minister-Presidents, nine measures had been identified for implementation under the leadership of the Federal Government and/or the Länder. The deliverables for the measures have been specified in the specifications to the second progress report (Evidence No. 39), which is a formal letter issued by the Federal Ministry of Finance (*Bundesministerium der Finanzen - BMF*) and the Ministry of State (*Staatsministerium*) Baden-Württemberg that represented the Länder, specifying detailed deliverables, amending the sec-

ond progress report. The nine measures (along with their recital in the second progress report) are listed in the table below, together with their respective deliverables and implementation status.

Table: The measures and the related deliverables

#	Measure identifier in the second report	Area of action	Deliverables	Responsibility	Milestone due	Implementation status
1	Measure comprising action for accelerating the outflow of funds, identifying obstacles, supporting municipalities [20]	Accelerating the outflow of grants	Publication of the final Report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid	Federal and Länder	Q1 2025	Completed
		Identifying obstacles to the outflow of grants and reporting them to the Federal Ministry of Finance				
		Improving the financial support of municipalities	Relaunch of the Fund Database, with extended scope	Federal	Q1 2025	Completed
2	Setting up federal grants in a uniform way [35]	Streamlining and making grants from the Federal Government to the Länder and municipalities as uniform as possible	Publication of the First Report of the Federal Government on the All-German Funding System for Structurally Weak Regions	Federal	Q2 2021	Completed
			Publication of the report "Better Promote 2.0 - a common approach to funding consultation"	Federal	Q4 2023	Completed
3	Task force company succession [46]	Improving transfer of business ownership through a dedicated task force	Legal opinion on the universal succession of public law positions	Federal and Länder	Q4 2024	Completed
4	Revising the <i>Musterbauordnung</i> [79]	Revising the Model Building Code (<i>Musterbauordnung</i>)	Publication of the Amendment of the Model Building Code	Federal and Länder	Q4 2022	Completed
5	Strengthening planning and approval authorities [184]	Strengthening planning and approval authorities	Adoption of the Federal-Länder-Pact to speed up planning and approval procedures	Federal and Länder	Q1 2025	Completed
			Go-live of the Building Information Modeling (BIM) portal	Federal	Q4 2022	Completed
			Entry into force of the Law on the Acceleration of Administrative Court Proceedings in the Infrastructure Sector of 14 March 2023	Federal and Länder	Q1 2023	Completed
6	Determining the need for skilled staff, timely improvement of recruitment and staff availability [189]	Improving recruitment of skilled staff and ensuring an improved staffing situation	Adoption of the Federal-Länder-Pact to speed up planning and approval procedures	Federal and Länder	Q1 2025	Completed
			Entry into force of the Act to Improve Climate Protection in Immission Control, to Accelerate Immission Control Licensing Procedures	Federal and Länder	Q1 2025	Completed
			Enhancement of the Federal Digital Academy	Federal	Q2 2024	Completed
7	Exploring the potential of digitalisation in public partici-	Streamlining the consultation process and public participation procedures and simplifying participation	Entry into force of the Act to ensure proper planning and approval procedures during the COVID-19 Pandemic and the	Federal and Länder	Q4 2022	Completed

#	Measure identifier in the second report	Area of action	Deliverables	Responsibility	Milestone due	Implementation status
	pation processes [196]	through digitalisation	Law Amending the Planning Security Act			
			Entry into force of the Act to Strengthen Digitisation in the Urban Land Use Plan Procedure and to amend other provisions	Federal and Länder	Q1 2025	Completed
8	Further legal changes to support acceleration of planning, in particular for rail and local public transport [201]	Accelerating planning, in particular rail, local public and private transport	Entry into force of the Act on the acceleration of authorisation procedures in the transport sector and the implementation of Directive (EU) 2021/1187	Federal and Länder	Q1 2025	Completed
9	Further verification of accelerating planning and infrastructure initiatives [208]	Further accelerating planning and approval processes	Amendment to the Renewable Energy Sources Act	Federal and Länder	Q3 2022	Completed
			Amendment to the Spatial Planning Act	Federal and Länder	Q1 2023	Completed
			Amendment to the Energy Industry Act	Federal and Länder	Q3 2022	Completed
			Amendment to the Grid Expansion Acceleration Act	Federal and Länder	Q3 2022	Completed
			Amendment to the Federal Requirements Plan Act	Federal and Länder	Q3 2022	Completed

Measure one (*Measure comprising action for accelerating the outflow of funds, identifying obstacles, supporting municipalities [20]*) aims to accelerate the outflow of funds, identify respective obstacles and support municipalities in accessing funding. It has two main deliverables: (i) the publication of the Final Report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid (*Abschlussbericht der Bund-Länder-Arbeitsgruppe im Maßnahmenprogramm für Bürokratieabbau und Verwaltungsmodernisierung im Bereich der Finanzhilfen*) and (ii) the relaunch of the Fund Data Base (*Förderfinder*) with an extended scope that compiles funding programmes. Their achievement is proven by a copy of the publication of the final Report of the Federal-Länder Expert Working Group on Accelerating the Outflow of Funds for Federal Financial Aid on 09 July 2025, available for download on the website of the Federal Ministry of Justice and Consumer Protection: https://www.bmju.de/DE/themen/buerokratieabbau_rechtsetzung/bessere_rechtsetzung/beschluesse_publicationen/mpk-beschluesse/mpk-beschluesse_node.html (Evidence No. 37). The Commission services accessed the link provided by the authorities on 23 February to verify that the report was published and available for download. This check was completed successfully, confirming that the requirement of the publication of the Final Report of the Federal-Länder Expert Working Group on Accelerating the Outflows of Funds for Financial Aid was satisfactorily fulfilled. The copy was sent

to the concerned ministries on 22 November 2024 (Evidence No. 2 and 3), and an active weblink to the fund database (Evidence No. 4) showing its relaunch – from prototype to a functioning portal. Compared to the funding database of the federal government, the new Fund Database lists more funding programmes and for each programme links to the relevant documents.

Measure two (*Setting up federal grants in a uniform way [35]*) aims to further promote the uniform structure of federal government grants to the Länder and municipalities across all ministries and to limit deviations from their standardized structure to exceptional, sufficiently justified cases. It has two deliverables: (i) the publication of a First Report of the Federal Government on the All-German Funding System for Structurally Weak Regions - Stocktaking and Progress Report on Regional Structural Funding in Germany (*Erster Bericht der Bundesregierung zum Gesamtdeutschen Fördersystem für strukturschwache Regionen*) and (ii) the publication of the report Better Promote 2.0 – a common approach to funding consultation (*Besser fördern. Besser beraten. Die Teilhabe strukturschwacher Regionen an Zukunftsentwicklungen stärken*). The fulfilment of this measure is proven firstly by the copy of the publication of the report on the funding system for structurally weak regions in April 2021 (Evidence No. 5). The report can be downloaded on the website of the Federal Ministry of Economic Affairs and Energy: <https://www.bmwk.de/Redaktion/DE/Downloads/B/erster-bericht-der-bundesregierung-zum-gesamtdeutschen-foerdersystem-fuer-strukturschwache-regionen.html>. The Commission services accessed the link provided by the authorities on 25 February 2026 to verify that the report was published and available for download.

The report has since been followed up by a newer version, as demonstrated by the 2024 Equivalence Report (Evidence No. 6). Furthermore, a copy of the “Better Promote 2.0” report (Evidence No.7), that was published in November 2023 (Evidence No. 8) and is available for download on the website of the Federal Ministry for Housing, Urban Development and Construction: https://www.region-gestalten.bund.de/Region/DE/vorhaben/better-promote20/_node.html, proves the fulfilment of the second deliverable of the measure. The Commission services accessed the link provided by the authorities on 23 February 2026 to verify that the report was published and available for download. This check was completed successfully, confirming that the requirement of the publication of the report Better Promote 2.0 was satisfactorily fulfilled.

Measure three (*Task force company succession [46]*) pertains to setting up a task force dedicated to the improvement of business ownership transfers that identifies approaches to simplifying regulations and increase the attractiveness of business successions. The measure required a legal opinion on the universal succession of public law positions on behalf of the task force. The Federal Ministry of Economics and Energy, chairing the task force, had assigned the mandate to draft a legal opinion on the major challenge to business succession identified by the task force to Luther advocate company mbH. The legal experts completed the opinion on the assessment of implementing methods of universal succession (*Rechtsvereinfachung bei Unternehmensnachfolgen – Potentiale und Umsetzungsmöglichkeiten einer Gesamtrechtsnachfolge für öffentlich-rechtliche Berechtigungen*) in November 2022 (Evidence No. 9). This legal opinion is marked as confidential and is thus not publicly available.

Measure four (*Revising the Musterbauordnung [79]*) seeks to introduce a revision to the model building code with the aim to accelerate building projects by promoting non-commercial and residential construction. The measure required the amendment of the Model Building Code (*Musterbauordnung – MBO*) and its publication. The amendment is evidenced by the protocols of the meetings of the 140th, 142nd, and 145th Conference of Building Ministers of the Länder (*Bauministerkonferenz*) (Evidence No. 10 - 16) on 22/23 September 2022, 23/24 November 2023 and 26/27 September 2024. The amended version of the Model building code, adopted on 26/27 September

2024 by the Building Ministers (Evidence No. 17), is available for download on the website of the German Institute for Structural Engineering (*Deutsches Institut für Bautechnik*): <https://www.dibt.de/de/aktuelles/meldungen/nachricht-detail/meldung/geaenderte-musterbauordnung-jetzt-verfuegbar-1>. The Commission services accessed the link provided by the authorities on 23 February 2026 to verify that the amended version of the model building code was published and available for download. This check was completed successfully, confirming that the requirement of the publication of the revision of the model building code was satisfactorily fulfilled.

Measure five (*Strengthening planning and approval authorities [184]*) aims to strengthen planning and approval authorities to accelerate implementation by decreasing the scope of audits and increasing the application of the so-called simplified approval procedure. The measure has three deliverables:

- The first part is the Adoption of the Federal-Länder-Pact to speed up planning and approval procedures (*Pakt für Planungs-, Genehmigungs- und Umsetzungsbeschleunigung zwischen Bund und Ländern*). This is proven by a copy of the protocol and its annex from the meeting of the Federal Chancellor with the heads of government of the Länder (*Besprechung des Bundeskanzlers mit den Regierungschefinnen und Regierungschefs der Länder*) on 6 November 2023. According to the protocol, under item four of the agenda, the attendants agreed to the pact that streamlines planning and approval procedures through modernising legislation, reducing verification requirements and increasing standardisation and digitalisation of procedures (Evidence No. 18). The adopted pact is in the annex to item four (Evidence No. 19).
- The second part of the measure is the go-live of the federal Building Information Modelling (BIM) portal. The portal was launched in 2022 as confirmed by the following link: <https://www.bundesregierung.de/breg-de/aktuelles/bim-portal-freigeschaltet-2132842> and is available under this link: <https://via.bund.de/bim/infrastruktur/landing>. The Commission services accessed the links provided by the authorities on 26 February 2026 to verify that the federal Building Information Modelling (BIM) portal went live. This check was completed successfully, confirming that the requirement of the go-live of the BIM portal was satisfactorily fulfilled
- The third component of measure five consists in the entry into force of the Law of the Acceleration of Administrative Court Proceedings in the Infrastructure Sector from 14 March 2023 (*Gesetz zur Beschleunigung von verwaltungsgerichtlichen Verfahren im Infrastrukturbereich*). Article six in the issue of the Federal Law Gazette from 20 March 2023 indicates the entry into force of the law on 21 March 2023 (Evidence No. 22).

Measure six (*Determining the need for skilled staff, timely improvement of recruitment and staff availability [189]*) aims at improving the recruitment of skilled staff and ensuring an improved staffing situation by identifying the need for specialised staff and recruitment/equipment in good time. This is to be achieved through three separate deliverables:

- The first component is the adoption of the Federal-Länder Pact to speed up planning and approval procedures. The adoption of the pact is proven as in measure five by the copies of the protocol of the meeting of the Federal Chancellor with the heads of government of the Länder where the pact was adopted under item four as well as the corresponding annex containing the adopted pact (Evidence No. 18 and 19).
- The second deliverable is the entry into force of the Act to Improve Climate Protection in Immission Control, to Accelerate Immission Control Licensing Procedures and to Implement

EU Law (*Gesetz zur Verbesserung des Klimaschutzes beim Immissionsschutz zur Beschleunigung immissionsschutzrechtlicher Genehmigungsverfahren und zur Umsetzung von EU-Recht*). The entry into force of this law is attested by a copy of the Federal Law Gazette confirming its entry into force on 9 July 2024 under article eight (Evidence No. 24).

The third component is the enhancement of the Federal Digital Academy (*Digitalakademie Bund*, available under: https://www.digitalakademie.bund.de/DE/Home/home_node.html) (Evidence No. 26). This is achieved through the establishment of the new qualification format (i.e.: a curriculum for improving digital skills) “digital journey” for executives in the public administration as a recurring offer and further training programmes. The achievement of the sustainable establishment and impact is assessed in the final report on the completed pilot project (2022- 2023) and its follow-up project (2023 - 2024). The report attests to the successful implementation of the completed first two digital journeys (Evidence No. 25). On the website of the Federal Digital Academy two posts about the digital journeys are available, reporting the structure of the workshop and the attendants (available under: https://www.digitalakademie.bund.de/SharedDocs/04_Aktuelles/Meldungen/SonstigeMeldungen/32_Digital_Journey_2/32_Digital_Journey2.html; https://www.digitalakademie.bund.de/SharedDocs/04_Aktuelles/Meldungen/SonstigeMeldungen/46_Digital_Journey_3/46_Digital_Journey3.html). Furthermore, the final report attests to the creation of another training programme #Transformationspaten, that builds on insights from the digital journeys. The programme aims to equip employees of the public administration with the skills necessary to lead digital transformation processes in their institutions. This extended training offer has enhanced the Federal Digital Academy. The Commission services accessed the links to the digital academy provided by the authorities on 23 February 2026 to verify that the website and the different links to the digital journeys were indeed available. This check was completed successfully, confirming that the requirement of the enhancement of the Federal Digital Academy was satisfactorily fulfilled.

Measure seven (*Exploring the potential of digitalisation in public participation processes [196]*) aims to streamline consultation processes and public participation procedures through digitalising the hearing process and public participation as well as simplifying participation. This is to be achieved through the entry into force of the Act to ensure proper planning and approval procedures during the COVID-19 Pandemic, the Law Amending the Planning Security Act (*Gesetz zur Sicherstellung ordnungsgemäßer Planungs- und Genehmigungsverfahren während der COVID-19-Pandemie – Plan-SiG; Gesetz zur Änderung des Planungssicherungsgesetzes*) and the Act to Strengthen Digitisation in the Urban Land Use Plan Procedure and to amend other provisions (*Gesetz zur Stärkung der Digitalisierung im Bauleitplanverfahren und zur Änderung weiterer Vorschriften*).

- The copies of the Federal Law Gazette show the entry into force of the Plan-SiG and of its amendment prolonging the validity of the initial act in articles seven and two respectively (Evidence No. 27 and 28). The laws amended process regulations under 23 laws, such as the Federal Water Act (*Wasserhaushaltgesetz*) and the Telecommunications Act (*Telekommunikationsgesetz*), introducing the possibility to digitally publish information on processes and projects as well as permitting online consultation processes. The act and its amendment introduced this possibility only temporarily to minimise the risk of infection through in-person consultations during the pandemic.
- With the entry into force of the 5th Administrative Procedure Amendment Act (*Fünftes Gesetz zur Änderung verfahrensrechtlicher Vorschriften sowie zur Änderung des Sechsten Buches Sozialgesetzbuchs – 5. VwVfÄndG*) on 9 December 2023, see article 6 of the law, (Evidence No. 29), the Act to ensure proper planning and approval procedures during

the COVID-19 Pandemic was again prolonged until the end of December 2024, with exception of the transitional regulation, that was prolonged until 30 September 2029. Moreover, it introduced an amendment to the Administrative Procedure Act (*Verwaltungsverfahrensgesetz*) making the digital publications a permanent method, necessary also if published in another way, and permitted online consultations for processes regulated by the Administrative Procedure Act.

- Finally, the entry into force of the Act to Strengthen Digitisation in the Urban Land Use Plan Procedure and to amend other provisions (*Gesetz zur Stärkung der Digitalisierung im Bauleitplanverfahren und zur Änderung weiterer Vorschriften*) is attested by the copy of the Federal Law Gazette proclaiming in article six its entry into force on 4 July 2023 (Evidence No. 30). The law introduces amendments to the building code such as the requirement of the timely publication on the internet. It further introduces changes to the Federal Land Utilisation Ordinance with regard to digitalisation and renewable energy production.

Measure eight (*Further legal changes to support acceleration of planning, in particular for rail and local public transport [201]*) aims to accelerate planning, in particular rail, local public and private transport to promote climate friendly mobility. The deliverable is the entry into force of the Act on the acceleration of authorisation procedures in the transport sector and the implementation of Directive (EU) 2021/1187 on streamlining measures for advancing the realisation of the trans-European transport network (TEN-T) (*Gesetz zur Beschleunigung von Genehmigungsverfahren im Verkehrsbereich und zur Umsetzung der Richtlinie (EU) 2021/1187 über die Straffung von Maßnahmen zur rascheren Verwirklichung des transeuropäischen Verkehrsnetzes*). This achievement is proven by a copy of the Federal Law Gazette stating in article 15 that the act entered into force on 23 December 2023 (Evidence No. 31).

Measure nine (*Further verification of accelerating planning and infrastructure initiatives [208]*) seeks to implement further acceleration measures. To this end, five acts needed to enter into force:

- The Act on Immediate Measures for the Accelerated Expansion of Renewable Energies and Further Measures in the Electricity Sector of 20 July 2022 (*Gesetz zu Sofortmaßnahmen für einen beschleunigten Ausbau der erneuerbaren Energien und weiteren Maßnahmen im Stromsektor*) entered into force on 1 January 2023 as attested by article 20 in the copy of the law published in the Federal Law Gazette (Evidence No. 32 and 33).
- The Act amending the Spatial Planning Act and other regulations of 22 March 2023 (*Gesetz zur Änderung des Raumordnungsgesetzes und anderer Vorschriften – ROGÄndG*), entered into force on 28 September 2023 as attested by article 15 in the copy of the Federal Law Gazette (Evidence No. 34).
- The Act on the Amendment of Energy Industry Law in Connection with the Immediate Climate Protection Programme and on Adjustments in the Law on End-Customer Supply of 19 July 2022 (*Gesetz zur Änderung des Energiewirtschaftsrechts im Zusammenhang mit dem Klimaschutz-Sofortprogramm und zu Anpassungen im Recht der Endkundenbelieferung*) that amended in Article 1 the Energy Industry Act, entered into force on 20 July 2022 as attested by article nine in the copy of the Federal Law Gazette (Evidence No. 35).
- The Act amending the Energy Security Act and other energy industry regulations dated 8 October 2022 (*Gesetz zur Änderung des Energiesicherungsgesetzes und anderer energiewirtschaftlicher Vorschriften*), entered into force on 9 October 2022 as attested by article twelve in the copy of the Federal Law Gazette (Evidence No. 36).
- The Act on the Amendment of Energy Industry Law in Connection with the Immediate Climate Protection Programme and on Adjustments in the Law on End-Customer Supply of 19

July 2022 that amended in Article 8 the Federal Requirements Plan Act, entered into force on 20 July 2022 as attested by article nine in the copy of the Federal Law Gazette (Evidence No. 35).

As stated in the table and evidenced above, all nine measures identified in the second progress report have been fulfilled as all the related deliverables as described above have been provided. Thereby, an implementation rate of 100% has been achieved.

Measure eight, pertaining to the digitalisation of public participation processes, requires the entry into force of the Act on the acceleration of authorisation procedures in the transport sector and the implementation of Directive (EU) 2021/1187. This act has also been assessed under milestone 128 as having entered into force.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 121 Consultations certificates issued

Related Measure: 6.2.2 Expansion of consulting services of PD – Berater der öffentlichen Hand GmbH

Quantitative Indicator: Number of consultations certificates issued

Baseline: 0

Target: 100

Time: Q3 2024

1. Context:

The objective of the measure is to enable municipalities and other public entities to better integrate public funding programmes into their investment projects, as well as advance the rollout of IT investments in schools. The measure consists in consulting work supporting municipalities and other public entities in navigating funding programmes, creating consulting concepts for the digitalisation of schools and advise school authorities. Target 121 requires that for 100 consultations, a certificate of conclusion of consultations (signed by the beneficiary) has been issued.

Target 121 is the second step of the implementation of the reform. It follows milestone 120, related to identifying suitable funding programmes and will be followed by target 124, related to further consultations with funding programme beneficiaries being concluded, and target 122 and milestone 123 on the development and dissemination of revision concepts to make the funding programmes more accessible. The second part of the reform concerns the digitalisation of schools and consists of target 125, followed by milestone 126 and target 127.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document, issued by the German Federal Ministry of Finance (hereinafter referred to as "the BMF"), duly justifying how the target was satisfactorily fulfilled
2	General overview (<i>Gesamtuebersicht</i>)	Spreadsheet with the list of 120 projects, each with an individual project number, the recipient, the status, a short description of the content of the consultation and an indication whether the consultations are part of a more encompassing advisory service (issued by the BMF).
3	Confirmation of consultation (<i>Beratungsbestätigung</i>) ranging from <i>Evidence No 2 (Beratungsbestätigung EXT-1007)</i> to <i>Evidence No 121 (Beratungsbestätigung EXT-1151)</i>	Confirmation of consultation for each of the 120 projects with individual project numbers matching the number in the General overview, each signed by the recipient and PD – Berater der öffentlichen Hand GmbH, a public-sector consultancy firm owned mostly by the federal state and the Länder (hereinafter referred to

	(issued between 02/11/2022 and 03/01/2024)	as 'PD').
4	“Investitionsberatung für lebenszyklus- und wirkungsorientierte Beschaffung“- (hereinafter referred to as IBA)- „Deutscher Aufbau und Resilienzplan“ (hereinafter referred to as DARP) contract for the first phase (IBA-DARP-Vertrag – Phase 1) (signed on 21/09/2021)	The contract between the BMF and PD (issued by PD) on the implementation of the first phase of measure 6.2.2 of the DARP. Contract for the consultation programme “ <i>Investitionsberatung für lebenszyklus- und wirkungsorientierte Beschaffung</i> “ (IBA) in the framework of the (DARP). This contract also covers the consultation activities from Milestone 120, which was the preceding part of the reform.
5	IBA-DARP contract for the second phase (IBA-DARP-Vertrag – Phase 2) (signed on 07/07/2022)	The contract between the BMF and PD on the implementation of the second phase of measure 6.2.2 of the DARP. This contract also covers consultation activities from Milestone 120.
6	Proof of identification of funding programme BULE (<i>Nachweis Identifikation Förderprogramm BULE</i>) (issued on 26/09/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Food and Agriculture and PD, confirming that the consultation programme “ <i>Bundesprogramm Ländliche Entwicklung – BULE</i> ” was jointly identified as suitable for measure 6.2.2.
7	Proof of identification of funding programme GAK-ILE (<i>Nachweis Identifikation Förderprogramm GAK-ILE</i>) (issued on 26/09/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Food and Agriculture and PD, confirming that the consultation programme “ <i>Gemeinschaftsaufgabe Agrarstruktur und Küstenschutz Integrierte ländliche Entwicklung – GAK-ILE</i> ” was jointly identified as suitable for measure 6.2.2.
8	Proof of identification of funding programme KFN (<i>Nachweis Identifikation Förderprogramm KFN</i>) (issued on 14/11/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Housing, Urban Development and Building and PD, confirming that the consultation programme “ <i>Klimafreundlicher Neubau – KFN</i> ” was jointly identified as suitable for measure 6.2.2.
9	Proof of identification of funding programme Urban development (<i>Nachweis Identifikation Förderprogramm Städtebauförderung</i>) (issued on 16/12/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Housing, Urban Development and Building a, confirming that the consultation programme “ <i>Städtebauförderung</i> ” was jointly identified as suitable for measure 6.2.2.

10	Consultation offer for the DARP (<i>PD-Beratungsangebot im Rahmen des DARP</i>) (issued in 2024)	A brochure (issued by PD) for municipalities and schools explaining measure 6.2.2 of the German RRP.
11	Additional documents Overview of milestones T121 and T127 (<i>Zusatzbelege Überblicke Meilensteine T121 T127</i>)	Spreadsheet and PDF matching the additional documents provided with the original evidence per project (issued by the BMF).
12	Additional documents (<i>Zusatzbelege</i>) (issued between 18/05/2022 on 15/11/2023)	120 Documents (issued by PD) that provide a record of the content of the consultations for the projects matching the defined area of consultation as per the confirmation of consultation.
13	Subsequent requirements overview milestone T121 (<i>Nachforderungen Überblick Meilenstein T121</i>)	Spreadsheet (issued by the BMF) matching the supplementary documents provided with the original evidence.
14	Supplementary document for additional claims (<i>Zusatzbeleg Nachforderung</i>) incl. EXT 1066, 1071 – 1078, 1080 – 1086 (dated 21 June 2022)	An e-mail (from the German Labour Ministry), dated 21 June 2022, containing a link and information for a meeting to discuss first aspects before the first workshop, with representatives of 11 organisations benefiting from the consultations being addressed.
15	Supplementary document for additional claims (<i>Zusatzbeleg Nachforderung</i>) incl. EXT 0923, 0957, 0975	Individual Spreadsheets, which assess the result of the ' <i>Reifegradmodel</i> ' evaluation of the municipalities and correspond to the aspects evaluated in the respective PowerPoint presentations for 3 projects.

3. Analysis:

The justification and substantiating evidence provided by the German authorities covers all constitutive elements of the target.

For 100 consultations, a certificate of conclusion of consultations (signed by the beneficiary) has been issued.

According to the evidence provided, 120 consultations with funding programme beneficiaries have taken place. The Commission verified that indeed 120 certificates for conclusion of consultations for municipalities or other public bodies (who were selected for funding) were provided, thus exceeding the goal of 100 completed consultations by 20.

The includes a spreadsheet (Evidence No. 2) listing the consultations with a unique project identification reference indicating:

- i. The funding programme beneficiary
- ii. The status of the consultation, which is "completed" for all 120 projects

- iii. A short description of what is covered in the consultation
- iv. Whether the consultations are part of a more encompassing advisory service, which applies for 20 consultations included in this overview.

To further substantiate the validity of (and reasoning for) the consultations, Germany also provided as evidence the contracts between the BMF and PD (Evidence No. 4-5) and a confirmation of start of consultations (signed by the BMF) for each of the selected funding programmes (Evidence No. 6-9) and a brochure by PD for municipalities (Evidence No. 10), specifying the intended goals and content of the consultations. For each of the 120 consultations, the German authorities submitted the confirmation of conclusion of consultations with individual project numbers matching the number in Evidence No. 2, each signed by the recipient and PD listed as Evidence No. 3. For each of the 120 consultations, it was found that the individual project numbers in the confirmation of consultation matches the number in the general overview (Evidence No. 2). To help with matching the additional evidence with each project an overview provided by Germany was also used (Evidence No. 11 and 13).

Furthermore, in line with the measure description, **the measure consists in consulting work supporting municipalities and other public entities in navigating funding programmes [...].**

The fact that i) the consulting work was directed at municipalities and other public entities and ii) aimed to help them navigate the funding programmes was checked by analysing the subject matter of the consultations as set out and signed for each project by both parties in the confirmation of consultations (Evidence No. 3) and the corresponding documents proving that the set out topic was indeed covered (Evidence No. 12, 14 and 15). Germany provided documents from each consultation provided by PD, in total reflecting 12 reports and 108 presentations (Evidence No. 12). The documents contained in Evidence No. 12 correspond to the matter described in the consultation confirmations included in Evidence No. 3. These documents confirmed that all the consulting work from the evidence was directed at municipalities and other public entities.

In 15 individual cases, where the information regarding the substance of the consultation was insufficient or the recipient was not clear based on the additional documents, supplementary documentation was submitted. For 11 cases, an email (Evidence No. 14) was also provided containing an invitation for a first preparatory meeting for the consultation of PD. The topic of the meeting and the information in the email match the matter of the consultation as set out in the confirmation and visible in the presentation shared for these cases in Evidence No. 12. For four cases, the German authorities provided Excel sheets containing specifics about the evaluation of the “*Reifegradmodell*” (maturity model or structured framework used to assess and improve an organisation’s processes) of the individual recipient of the consultations (Evidence No. 15). These supplementary documents allowed Commission services to match the recipients of the consultations as set out in the confirmations of consultations with the corresponding documents of the consultation for all but one project.

For the project with the individual project number *EXT-1078* and the name “*DARP 6.2.2.1: TB GE - Landkreis Wittenberg - Serie 3 ÖGD - 9/18*” the submitted documentation does not establish a verifiable link between the confirmation of consultations and the description of consultation content in the supporting evidence. For the remaining 119 projects, however, the link between the project, the confirmation of consultation and the supporting documents demonstrating the substance of the consultation can be made.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 122 - Concepts for revision of funding programmes issued

Related Measure: Reform 6.2.2 Expansion of consulting services of PD - Berater der öffentlichen Hand GmbH

Quantitative Indicator: Concepts for funding programme revisions

Baseline: 0

Target: 4

Time: Q3 2024

1. Context:

The objective of the measure is to enable municipalities and other public entities to better integrate public funding programmes into their investment projects, as well as advance the rollout of IT investments in schools. The measure consists in consulting work supporting municipalities and other public entities in navigating funding programmes, creating consulting concepts for the digitalisation of schools and advise school authorities.

Target 122 requires that four revision concepts have been issues which also contain insight to inform the design of other programmes.

Target 122 is part of the second step of the implementation of the reform. It follows Milestone 120, which concerns the identification of suitable funding programmes, and will be followed by Target 123, which relates to the dissemination of revision concepts developed under Target 122 to make the funding programmes more accessible, as well as Targets 121 and 124, which concern consultations with funding programme beneficiaries. The second part of the reform concerns the digitalisation of schools and consists of target 125, Milestone 126 and Target 127.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document, issued by the Ministry of Finance, duly justifying how the target has been satisfactorily fulfilled.
2	List of revision concepts (<i>Liste der Revisionskonzepte</i>) (issued in 2024)	The list of four revision concepts developed for funding programmes which align with the Evidence No. 4 to 7. These were developed by PD – Berater der öffentlichen Hand GmbH, a public-sector consultancy firm owned mostly by the federal state and the Länder (hereinafter referred to as ‘PD’). The funding programmes in question are the one identified in Target 120. Indicated as well is the ministry which is responsible for the individual funding programme.
3	List of funding programmes (<i>Liste der F</i>	The list of funding programmes, issued by PD, lists the four funding programmes that were jointly identified by PD and the Federal Ministries for Food and Agriculture

	orderprogramme) (issued in 2024)	(Bundesministerium für Ernährung und Landwirtschaft – BMEL) and Housing, Urban Development and Building (Bundesministerium für Wohnen, Stadtentwicklung und Bauwesen – hereinafter referred to as BMWWSB).
4	Evidence of revision concept bule (Nachweis Revisionskonzept bule) (issued on 26/09/2022)	The document, issued by PD, provides information on the first revision concept “Beratung des Bundesministeriums für Ernährung und Landwirtschaft (BMEL) zum Bundesprogramm Ländliche Entwicklung (hereinafter referred to as BULE)”
5	Evidence of revision concept gak ile (Nachweis Revisionskonzept gak ile) (issued on 26/09/2022)	The document, issued by PD, provides information on the second revision concept “Beratung des Bundesministeriums für Ernährung und Landwirtschaft (BMEL) zur Gemeinschaftsaufgabe Agrarstruktur und Küstenschutz – Förderbereich 1: Integrierte Ländliche Entwicklung (hereinafter referred to as GAK-ILE)”
6	Evidence of revision concept kfn (Nachweis Revisionskonzept kfn) (issued on 3107/2024)	The document, issued by PD, provides information on the third revision concept “Beratung des Bundesministeriums für Wohnen, Stadtentwicklung und Bauwesen (BMWWSB) zur Erstellung einer Richtlinie „Klimafreundlicher Neubau“
7	Evidence of revision concept st adtebauforderung (Nachweis Revisionskonzept Stadtebauforderung) (issued on 06/11/2023)	The document, issued by PD, provides information on the fourth revision concept “Beratung des Bundesministeriums für Wohnen, Stadtentwicklung und Bauen (BMWWSB) zur Prozessoptimierung im Kontext der Stadtebauforderung”
8	Proof of identification of funding programme BULE (Nachweis Identifikation Förderprogramm BULE) (issued on 26/09/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Food and Agriculture and PD, confirming that the consultation programme “Bundesprogramm Ländliche Entwicklung – BULE” was jointly identified as suitable for measure 6.2.2.
9	Proof of identification of funding programme GAK-ILE (Nachweis Identifikation Förderprogramm GAK-ILE) (issued on 26/09/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Food and Agriculture and PD, confirming that the consultation programme “Gemeinschaftsaufgabe Agrarstruktur und Küstenschutz Integrierte ländliche Entwicklung – GAK-ILE” was jointly identified as suitable for measure 6.2.2.
10	Proof of identification of	A confirmation of the start of the consultation, signed by

	funding programme KFN (<i>Na- chweis Identifikation Förder programm KFN</i>) (issued on 24/11/2022)	both the Federal Ministry for Housing, Urban Development and Building and PD, confirming that the consultation programme “ <i>Klimafreundlicher Neubau – KFN</i> ” was jointly identified as suitable for measure 6.2.2.
11	Proof of identification of funding programme Urban development (<i>Na- chweis Identifikation Förder programm Städtebauförderung</i>) (issued on 26/12/2022)	A confirmation of the start of the consultation, signed by both the Federal Ministry for Housing, Urban Development and Building and PD, confirming that the consultation programme “ <i>Städtebauförderung</i> ” was jointly identified as suitable for measure 6.2.2.
12	Objectives description of revision concept (<i>Zielbeschreibung Revisionskonzept</i>) (issued on 01/08/2022)	The document, signed by the Ministry of Finance and PD, outlines the objective of the revision concepts.

3. Analysis:

The justification and substantiating evidence provided by the German authorities covers all constitutive elements of the target.

Concepts for funding programme revisions have been issued for four funding programmes.

Germany has provided evidence that revision concepts for four funding programmes have been developed. In this context, a revision concept is understood as a set of recommendations to change existing funding programmes of public entities, also containing lessons for the design of future funding programmes.

The Federal Ministry of Food and Agriculture (*Bundesministerium für Ernährung und Landwirtschaft – BMEL*) and the Federal Ministry for Housing, Urban Development and Building (*Bundesministerium für Wohnen, Stadtentwicklung und Bauwesen – BMWBS*) have identified, jointly with PD a public-sector consultancy firm owned mostly by the federal state and the Länder (*PD - Berater der öffentlichen Hand GmbH*, hereinafter referred to as “PD”), four suitable funding programmes that support investments by financially disadvantaged municipalities. For these four programmes, PD consulted and provided recommendations (revision concept) in order to improve these programmes. Germany has provided a list of these funding programmes as Evidence No. 3 “List of the funding programmes”. This was confirmed by PD and the relevant ministries in written and signed agreements (Evidence No. 8 – 11). Germany also provided a document, signed by PD and the Ministry, in which the scope and objectives of the consultations are clearly outlined (Evidence No. 12).

The funding programmes for which PD created recommendations (revision concepts) match the funding programmes identified and assessed in Milestone 120, namely: BULE, GAK-ILE, KFN and Urban Development – process optimisation (step 2):

Federal Programme for Rural Development (*Bundesprogramm Ländliche Entwicklung - BULE*): The Federal Ministry of Food and Agriculture together with PD jointly identified this programme as suitable and have confirmed this in a proof of identification funding programme BULE (Evidence No. 8).

- ii. Federal Programme Joint task agricultural structures and coastal protection – integrated rural development (*Bundesprogramm Gemeinschaftsaufgabe Agrarstruktur und Küstenschutz – Integrierte ländliche Entwicklung – GAK-ILE*): The Federal Ministry of Food and Agriculture together with PD jointly identified this programme as suitable and have confirmed this in proof of identification of funding programme GAK-ILE (Evidence No. 9).
- iii. Development of funding guidelines for the programme “climate friendly new construction” (*Entwicklung Förderrichtlinie Klimafreundlicher Neubau – KFN*): The Federal Ministry for Housing, Urban Development and Building together with PD jointly identified this programme as suitable and have confirmed this in a proof of identification of funding programme KFN (Evidence No. 10).
- iv. Urban Development – process optimisation (step 2) (*Städtebauförderung - Prozessoptimierung (Stufe 2)*): The Federal Ministry for Housing, Urban Development and Building together with PD jointly identified this programme as suitable and have confirmed this in a proof of identification of funding programme *Städtebauförderung* (Evidence No. 11).

Germany also provided a list of the four revision concepts (Evidence No. 2) and one revision concept document for each of the four funding programmes, in the form of analysis reports written by PD.

- i. Revision concept „*Beratung des Bundesministeriums für Ernährung und Landwirtschaft (BMEL) zum Bundesprogramm Ländliche Entwicklung (BULE1)*“ (Evidence No. 4)
- ii. Revision concept „*Beratung des Bundesministeriums für Ernährung und Landwirtschaft zur Gemeinschaftsaufgabe Agrarstruktur und Küstenschutz – Förderbereich 1: Integrierte Ländliche Entwicklung (GAK-ILE2)*“ (Evidence No. 5)
- iii. Revision concept „*Beratung des Bundesministeriums für Wohnen, Stadtentwicklung und Bauwesen zur Erstellung einer Richtlinie “Klimafreundlicher Neubau” (KFN)*“ (Evidence No. 6)
- iv. Revision concept „*Beratung des Bundesministeriums für Wohnen, Stadtentwicklung und Bauen zur Prozessoptimierung im Kontext der Städtebauförderung*“ (Evidence No. 7)

These four revision concepts were reviewed by Commission staff and were each found to indeed contain a set of recommendations intended to improve the respective funding programme.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 126 Model concept for school IT

Related Measure: 6.2.2 Expansion of consulting services of PD – Berater der öffentlichen Hand GmbH

Qualitative Indicator: Model concept for school IT created

Time: Q3 2024

1. Context:

The objective of the measure is to enable municipalities and other public entities to better integrate public funding programmes into their investment projects, as well as advance the rollout of IT investments in schools. The measure consists in consulting work supporting municipalities and other public entities in navigating funding programmes, creating consulting concepts for the digitalisation of schools and advise school authorities.

Milestone 126 requires that a model concept for school IT has been created and IT-related educational materials have been published on a website (which may include, but is not limited to, checklists and guides).

Milestone 126 is the seventh step of the implementation of the reform. It was preceded by Target 125 and implemented in parallel with Target 127. Both targets relate to consulting projects for school authorities on school IT. Target 125 set an interim goal of 5 consulting projects, while Target 127 defined the final goal of 50 projects.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target has been satisfactorily fulfilled.
2	Monitoring list (<i>Monitoringliste</i>) (issued on 22/01/2025)	A spreadsheet listing all model IT products developed and issued by the contractor PD – Berater der öffentlichen Hand GmbH, a public-sector consultancy firm owned mostly by the federal state and the Länder (hereinafter referred to as 'PD'). It includes 62 products overall, each indicating which of the five modules forming the overall concept it belongs to.
3	Target description of model IT concept and implementation phase (Zielbeschreibung Muster-IT-Konzept und Implementierungsphase) (issued on 01/08/2022)	A document, issued by PD, setting out the targets for the model IT concept and the different educational materials.
4	Certificate acknowledging the creation of a model IT concept related educational materials	A copy of the certificate of completed work issued by the contractor PD and signed by the Federal Ministry of Finance. It includes a short

	(Bestätigung Muster-IT Konzept und Implementierungsprogramm) (issued on 01/10/2024)	overview of the targets for the model IT concept and the educational materials as well as outlining how those were fulfilled.
5	Link to the model concept for school IT	Link to the model concept for school IT, published on the website by the contractor (PD): http://www.schul-it-navigator.de/ (link verified on 17/02/2026)
6	Model IT Products (<i>Model IT Produkte "M-IT_xx_ [...]"</i>) (issued between September 2022 and Oct 2024)	One document for each of the 62 model IT-products, issued by PD, addressing school authorities regarding one part of the overall concept.

3. Analysis:

The justification and substantiating evidence provided by the German authorities covers all constitutive elements of the target.

A model concept for school IT has been created and IT-related educational materials have been published on a website (which may include, but is not limited to, checklists and guides).

The German authorities provided a document setting out the structure and the content of the model concept for school IT and the IT-related educational materials (Evidence No. 3). This document describes that both consists of five modules, each with several model IT products (such as inventory lists or manuals for specific IT-items).

The German authorities defined this document (Evidence No. 3) with and for PD – Berater der öffentlichen Hand GmbH, a public-sector consultancy firm owned mostly by the federal state and the Länder (hereinafter referred to as 'PD'), who were the consulting agency in charge of the implementation as set out in the measure description. The structure and content of both the model and related IT products indeed focus on the digitalisation of schools (as required by the milestone description).

To complement this document, a copy of the certificate of work completion was provided, issued by the contractor (PD) and signed by the competent authority (DE Federal Ministry of Finance), confirming that both the model and education materials have been completed and are operational (Evidence No. 4).

In this context, a model concept for school IT is understood as being a set of templates, suggestions and documentation meant to guide schools in improving their IT-setup. The model IT concept consists of five different modules, all consisting of different IT products. These products are all listed in the monitoring list (Evidence No. 2). The 62 model IT products (Evidence No. 6) consist of different kinds of documents e.g. checklists, guidelines, assessments and handouts and refer to different stages and aspects of the modules of the IT concept. The first module ("assessment") consists of 6 products, the second module ("strategy and planning") of 16 products, the third module ("equipment and procurement") of 15, the fourth module ("technical support") of 17 and the fifth module ("Management and Cooperation") of 8 individual products. Overall, it can be concluded that the various

products across the five modules together constitute a comprehensive model IT concept that is broadly applicable to the field of school IT.

The website (Evidence No. 5) was developed in parallel with the model IT materials in order to make the guidance material (for example specific guides and checklists for an IT set-up) accessible for school authorities. The website was built to provide a central platform to access all the material developed for the model IT concept. The Commission services accessed the link provided by the authorities on 19 December 2025 to verify that it contains a platform with the materials for the model IT concept. This check was completed successfully, confirming that IT-related educational materials were published on this website.

The website and the material are clustered according to the same five modules of the model IT concept. To enhance the useability, the website provides descriptions for each module and video explanations. This is outlined in the certificate acknowledging the creation of the model IT-concept and related IT materials (Evidence No. 4) and was validated on the website, where upcoming sessions were announced, and the documents of previous sessions are made available for interested parties.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 127 School IT consulting projects

Related Measure: 6.2.2 Expansion of consulting services of PD – Berater der öffentlichen Hand GmbH

Quantitative Indicator: 50

Baseline: 5

Time: Q3 2024

1. Context:

The objective of the measure is to enable municipalities and other public entities to better integrate public funding programmes into their investment projects, as well as advance the rollout of IT investments in schools. The measure consists in consulting work supporting municipalities and other public entities in navigating funding programmes, creating consulting concepts for the digitalisation of schools and advise school authorities.

Target 127 requires certificates of conclusion of consultations (signed by the beneficiary) to be issued for consultations on school IT of 50 school authorities.

Target 127 is the final step of the implementation of the reform. It was preceded by target 125, related to the roll-out and pilot consulting projects on school IT and in parallel with milestone 126, related the development of a model IT concept for schools as well as targets 121, 122, 124 and milestone 123 related to supporting investment activity by municipalities. The reform has a final expected date for implementation on 31 August 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target has been satisfactorily fulfilled.
2	General overview (Gesamtübersicht)	Spreadsheet with a list of 60 projects, each with an individual project number, the recipient, the status, a short description of the content of the consultation and an indication whether the consultations are part of a more encompassing advisory service.
3	Confirmation of counselling (<i>Beratungsbestätigung</i>) ranging from Evidence No 2 (<i>Beratungsbestätigung EXT-0765.10</i>) to Evidence No 40 (<i>Beratungsbestätigung EXT-1728</i>) and Evidence No 42 (<i>Beratungsbestätigung EXT-1973</i>) (issued between 04/04/2023 and 02/07/2024)	Confirmation of completed counselling for 40 projects with individual project numbers matching the number in the General overview, each signed by the recipient and PD – Berater der öffentlichen Hand GmbH, a public-sector consultancy firm owned mostly by the federal state and the Länder (hereinafter referred to as 'PD').

4	<p>Confirmation of the start of the counselling (<i>Bestätigung über den Start der Beratung</i>) including Evidence No 41 (<i>Bestätigung über den Start der Beratung EXT-1953</i>) (issued on 01/10/2024) and ranging from Evidence 43 (<i>Bestätigung über den Start der Beratung EXT-2055.1</i>) to Evidence No 61 (<i>Bestätigung über den Start der Beratung EXT-2049</i>)</p> <p>(issued between 02/12/2024 and 08/04/2025)</p>	<p>Confirmation of the start of counselling for 20 projects with individual project numbers matching the number in the General overview, each signed by the recipient and PD with a timeline indicated for the completion of the counselling.</p>
5	<p>Additional documents Overview of milestones T121 and T127 (Zusatzbelege Überblicke Meilensteine & Subsequent requirements overview milestone T127 (Nachforderung Überblick Meilenstein T127)</p>	<p>Spreadsheet and PDF (issued by the Federal Ministry of Finance) matching the additional documents provided with the original evidence per project.</p>
6	<p>Additional documents (Zusatzbelege T121 T127)</p> <p>(issued between 13/03/2023 on 19/12/2024)</p>	<p>33 documents (issued by PD) that provide a record of the content of the consultations for the projects matching the defined area of consultation as per the confirmation of (the start of the) counselling.</p>

3. Analysis:

The justification and substantiating evidence provided by the German authorities covers all constitutive elements of the target.

Certificates of conclusion of consultations (signed by the beneficiary) have been issued for consultations on school IT of 50 school authorities.

Germany has provided evidence that consultations of 60 school authorities' have been completed or are in the process of being carried out, of which 40 have been completed and 20 are in the process of being carried out.

This is reflected in a spreadsheet (Evidence No. 2) containing a list of the consultations, each with a unique project identification reference, the status of the projects ("completed" or "in the process of being carried out"), as well as the number of schools under each school authority.

For the 40 completed consultations of school authorities' the German authorities provided the certificate of concluded consultation (Evidence No. 3) issued by the contractor, PD – Berater der öffentlichen Hand GmbH (hereinafter referred to as "PD" or "contractor") and signed by the school authorities receiving the consultancy service. For the remaining 20 consulta-

tions, certificates of the start of the consultation (Evidence No. 4) were provided for each, also indicating the content of the consultation, and issued by the contractor and signed by the authority receiving the consultancy service. All 60 documents provide essential information like the recipient the period of consultation and the matter of the consultation.

To demonstrate that the content of all consultations indeed focused on school IT, Germany later also provided 33 documents that further detailed the content of projects (Evidence No. 6) and an overview Excel list for the additional evidence (Evidence No. 5).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 131 Interim target for registration of zero-emission vehicles

Related Measure: 7.1.2 Support programme for light- and heavy-duty zero-emission transport

Quantitative Indicator: Zero-emission commercial vehicles

Baseline: 0

Target: 670

Time: Q4 2024

1. Context:

The objective of this measure is to increase zero emission road transport. The measure consists in the registration of zero-emission commercial vehicles and the commissioning of electric charging stations.

Target 131 relates to the registration of 670 zero-emission commercial vehicles, including at least 190 vehicles of class N3.

Target 131 is the first target of the investment and it will be followed by target 132 related to the registration of 1 139 zero-emission vehicles, including at least 529 vehicles of class N3, and the commissioning of 1 000 electric charging stations.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Copy of the funding guideline for the promotion of light and heavy commercial vehicles with alternative, climate-friendly drives and the associated refueling and charging infrastructure for electrically operated commercial vehicles (pure battery electric vehicles, externally rechargeable hybrid electric vehicles, and fuel cell vehicles), published on 29 July 2021 in the Federal Gazette (<i>Bundesanzeiger</i>) and entered into force on 2 August 2021.	Published on the Website of the Federal Ministry of Transport https://www.bmv.de/SharedDocs/DE/Anlage/G/richtlinie-KsNI.html . The link was verified as operational on 23 February 2026.
3	Copy of the call for funding for to promote climate-friendly commercial vehicles and associated refueling and charging infra-	Published on the website of the Federal Logistics and Mobility Office: https://www.balm.bund.de/SharedDocs/Downloads/DE/Foerderprogramme/KsNI/2_Foerderung/2_Foer

	structure from June 2022 (06/2022), in accordance with the regulation on the promotion of light and heavy commercial vehicles with alternative, climate-friendly drive systems and the associated refueling and charging infrastructure for electrically powered commercial vehicles (pure battery electric vehicles, externally rechargeable hybrid electric vehicles, and fuel cell vehicles) dated July 29, 2021, last amended on March 21, 2022 (Regulation KsNI).	derauf- ruf KsNI Fahrzeuge Infrastruktur Teil1.html?nn=3688112 . The link was verified as operational on 23 February 2026.
4	Special call for proposal submission for the promotion of climate-friendly special vehicles and the associated refueling and charging infrastructure from June 2022, in accordance with the guideline for the promotion of light and heavy commercial vehicles with alternative, climate-friendly drives and the associated refueling and charging infrastructure for electrically operated commercial vehicles (pure battery electric vehicles, externally rechargeable hybrid electric vehicles, and fuel cell vehicles) from July 29, 2021, most recently amended on March 21, 2022 (Guideline KsNI)	Published on the website of the Federal Logistics and Mobility Office: https://www.balm.bund.de/SharedDocs/Downloads/DE/Foerderprogramme/KsNI/2_Foerderung/2_Foerderung_auf_ruf_KsNI_MBS_Teil2.html?nn=3688112 . The link was verified as operational on 23 February 2026.
5	Copy of the State Aid SA.103346 (2022/N) – Germany Guideline for the promotion of commercial vehicles with alternative and climate-friendly drives, the associated infrastructure and environmental studies (SA.59352/SA.63458)	Published on the website of the European Commission: https://ec.europa.eu/competition/state_aid/cases1/202306/SA_103346_808F3A86-0100-CB0F-A876-94F91FA9B3D7_76_1.pdf . The link was verified as operational on 23 February 2026.
6	Excel spreadsheet containing 670 vehicles	This document shows an excel spreadsheet containing 670 vehicles with the official references of the vehicle and grant decisions, along with the corresponding license plate and class of vehicle.

7	Sample of 60 units	<p>On the basis of a sample, the Commission has reviewed</p> <p>(a) a copy of the relevant grant decision (<i>Bewilligungsbescheid</i>) supporting the purchase, issued between 22/07/2022 and 16/03/2025;</p> <p>(b) a copy of the registration document for the vehicle (<i>Zulassungsbescheinigung Teil 1</i>) which includes the information on the type of the vehicle showing that it is a zero-emission vehicle according to the fuel code (<i>Kraftstoffcode</i>).</p> <p>(c) a copy of the Payment notice (<i>Auszahlungsbescheid</i>)</p>
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3. Analysis:

The justification and substantiating evidence provided by the German authorities cover all constitutive elements of the target.

670 zero-emission commercial vehicles, including at least 190 vehicles of class N3, have been registered.

An excel spreadsheet containing 670 zero-emission commercial vehicles was submitted (Evidence No. 6). Out of the 670 zero-emission commercial vehicles, 200 vehicles belong to the N3 classification.

Following the selection of a random sample of 60 units, Germany submitted a copy of the relevant grant decision (*Bewilligungsbescheid*) supporting the purchase, a copy of the registration document for the vehicle (*Zulassungsbescheinigung Teil 1*) which includes the information on the type of the vehicle showing that it is a zero-emission vehicle according to the fuel code (*Kraftstoffcode*) and a copy of the Payment notice (*Auszahlungsbescheid*) to demonstrate the payment for the vehicles has been executed.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met. For each vehicle in the sample, a full set of individual documentation was reviewed, including documentation for 7 vehicles of class N3. This covered:

- i) The grant decision identified the vehicle type (purely electric), category (N1, N2 or N3), funding amount, and official reference to the funding call (Evidence No. 3-4). While the two funding calls made hybrid (plug in) vehicles eligible for funding, only purely electric vehicles were funded under the RRF and submitted as evidence for the fulfilment of this target;
- ii) the payment notice, confirming that the vehicle was purchased in accordance with the criteria in the grant decision and providing the vehicle identification number which could be cross referenced with the vehicle registration certificate, along with the recipient's name which could be cross referenced with the grant decision;
- iii) the vehicle registration certificate, providing conclusive proof of registration and verifying the zero-emission status via the fuel code (only purely electric vehicles funded), as well as the vehicle category, vehicle identification number and license plate.

4. Commission Preliminary Assessment: Satisfactorily fulfilled