



## Communication to the Aarhus Convention Compliance Committee

### I. Information on correspondent submitting the communication

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### II. Party concerned

The Federal Republic of Germany.

### III. General information

1. The German Federal Climate Action Act (Bundes-Klimaschutzgesetz, KSG) is the overarching climate governance tool in Germany setting the state's climate ambition, along with a mechanism to steer, plan, monitor, and review climate action. Section 3 para. 1 KSG lays down the national climate targets (-65% GHG-reductions compared to 1990 by 2030; -88% by 2040). In Annex 2 and Annex 2a of the KSG, these emission reduction targets are translated into annual emission budgets laid down by way of a governmental ordinance. Pursuant to Section 4 para. 4 KSG, the government had to decree the ordinance detailing the annual emission budgets for the years 2031-2040 by the end of 2024. However, that ordinance had not been decreed as to this date. It was apparent from the cabinet meeting agendas of the current Federal Government, that a draft of this ordinance existed, but that negotiations and adoption of this draft got postponed and delayed from cabinet meeting to cabinet meeting. According to Section 9 para. 1 KSG, the Federal Government must adopt a climate action programme (Klimaschutzprogramm, KSP) within twelve months after the commencement of a new legislative term. The KSP must contain measures to achieve the national climate targets as laid down in Section 3 para. 1 KSG and by achieving compliance with the total annual emission budgets as laid down in the corresponding ordinance.
2. Pursuant to Section 9 para. 2 KSG, the federal ministries must, no later than six months after the commencement of a new legislative term, propose adequate emission reduction measures capable of complying with the total annual emission budgets to be included in the KSP. These proposed measures must include scientific estimates of the

probable greenhouse gas reduction effects, as well as scientific estimates of potential economic, social and other environmental impacts. The estimates shall also include as far as possible effects on employment trends, the economic structure, the equivalence of standards of living, and the efficiency of the use of natural resources.

3. The preparation, drafting and adoption of the KSP therefore happens in four phases: phase one, proposals for measures within the different sectors that the different Federal Ministries are responsible for (Section 9 para. 2 KSG); phase 2, negotiations within the Federal Government and within the Federal Ministries on a set of measures; assessment of the agreed set of measures by an Independent Council of Experts on Climate Change (Expertenrat für Klimafragen, ERK) as to their greenhouse gas reduction potential (Section 12 para. 3 no. 3 KSG); phase 3, review of the agreed set of measures within the Federal Government with regard to the ERK's assessment, with amendments or additional measures if necessary; and, phase 4, adoption of the final set of measures.
4. Section 9 para. 3 KSG obliges the Federal Government to involve the German states (Länder), municipalities, business associations, civil society organisations and scientific advisory bodies of the Federal Government in the process of every KSP through a public consultation procedure.
5. The 21st legislative term commenced on 25 March 2025, and a government under the leadership of the parties CDU, CSU and SPD was formed. According to government press statements, all ministries submitted proposals for emission reduction measures within the legal deadline. However, the government did not publish the ministries' submissions. The only ministry to publish its submission was the Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN).
6. On 8 December 2025, the party concerned commenced the public consultation for the KSP 2026. Prior to the official commencement, the party concerned gave no indication as to when the public consultation would be conducted. The consultation period lasted until 13 January 2026 (roughly one month and 5 days) and consisted of the following five questions:
  - a. "1) What additional, concrete measures in the energy, industry, transport, buildings, agriculture, and land use/forestry sectors (including cross-sectoral measures) or changes to existing measures can help to ensure that these targets are achieved? What financial or legal requirements, including regulatory law, are necessary to achieve this?;
  - b. 2) How can the climate protection program be designed in such a way that it does not place an excessive burden on vulnerable groups, especially low-income households, ensures a fair distribution of costs and benefits, and enjoys a high level of acceptance throughout society?
  - c. 3) What changes to framework conditions and incentives can help accelerate further investment in the transition to climate neutrality and the market penetration of key technologies for climate neutrality? How can the competitiveness of German industry be strengthened in this context? How can the effectiveness of market-based instruments be best ensured?
  - d. 4) How can the climate protection program stimulate economic recovery? What should be given particular attention in view of the substantial consolidation requirements in the federal budget and the need for cost efficiency?
  - e. 5) How can the climate protection program help to optimize cooperation between the federal, state, and local levels in the implementation of climate protection measures?"
7. The party concerned did not provide any additional information. Most notably, the measures submitted by the ministries were not provided. Neither was the draft

ordinance containing the annual emission targets provided, against which the climate action measures would have to be checked with view to their effectiveness. The five questions were only sent to certain stakeholders and were not made public. If someone wanted to participate in the consultation, but had not previously received the questions, they had to contact the ministry to receive the questions.

8. During a court hearing on 29 January 2026, concerning a case unrelated to the present communication, a government representative stated that the government deemed to have fulfilled all its participatory obligations in the context of the upcoming KSP (KSP 2026). This statement indicates that the government is neither planning nor willing to conduct another round of public participation. On 7 February 2026, German media outlet "Der Spiegel" reported on the inadequacy of the measures contained in the KSP, based on a draft that had been leaked to the media. On 9 February 2026, several other German newspapers picked up on the news (e.g. taz). The leak got published on 9 February 2026. Many of the measures contained in the draft KSP lack accompanying calculations of the estimated greenhouse gas reduction impact. Following the publication of the leak, the Federal Government still gave no indication that it intended to conduct a proper public participation procedure with all the necessary information for effective participation.
9. On 4 March 2026, the German federal parliamentary group "Die Linke" launched a written parliamentary inquiry to demand information by the Federal Government on the process, stakeholder participation, and results of the public consultation concerning the KSP. The inquiry critically demands an explanation as to why the government did not include essential information for the consultation, and why it was conducted at a late stage – with mere ten weeks left after the closing of the consultation until the legal deadline to adopt the KSP. As of this date, it has not been officially transmitted to the Government yet.

#### IV. Provisions of the Convention with which non-compliance is alleged

10. This communication alleges non-compliance with Art. 7 sentence 1 and sentence 2 AC in conjunction with Art. 6 para. 2 (a), (b), (d), 6 para. 3 and 6 para. 4 AC.
11. According to Art. 7 sentence 1 AC, the public must be involved in the preparation of environmental plans and programs. This stipulates that the public must be provided with the necessary information and then involved in a transparent and fair manner. In addition, Art. 7 refers to the provisions of Art. 6 para. 3, 4 and 8 AC. In addition, the requirements of Art. 6 para. 2 are brought in through para. 3 of that Article. According to these provisions, the public must be given sufficient time for effective preparation and participation, which means that it must receive all relevant information at an early stage. This includes that the public shall be informed early in an environmental decision-making procedure, and in an adequate, timely and effective manner. The information must entail, inter alia: the proposed activity and the application on which a decision will be taken; the nature of possible decisions or the draft decision; the envisaged procedure, including for example the opportunities for the public to participate, an indication of the public authority from which relevant information can be obtained and where the relevant information has been deposited for examination by the public; an indication of what environmental information relevant to the proposed activity is available. Furthermore, public participation must take place at an early stage, at a time when all options are still open and the results can still be taken into account. The government is also obliged to take due account of the outcome of the public participation.

## V. Nature of alleged non-compliance

### a) Applicability of Art. 7 AC

12. The KSP is a program relating to the environment within the meaning of Art. 7 AC. “Plans and programmes” are not defined within the text of the AC. When determining how to categorize a document under the Convention, the document’s substance, legal functions and effects must be evaluated, rather than its label in domestic law. A typical plan or programme: (a) is often regulated by legislative, regulatory or administrative provisions; (b) has the legal nature of a general act (often adopted finally by a legislative branch); (c) is initiated by a public authority, which (d) provides an organized and coordinated system that sets, often in a binding way, the framework for certain categories of specific activities, and which (e) usually is not sufficient for any individual activity to be undertaken without an individual permitting decision.<sup>1</sup> However, all these characteristics are merely “typical” – they are neither exhaustive nor elements that must each be satisfied in order to come within the scope of Art. 7 AC.<sup>2</sup> The term “policies” applies to other kinds of strategic documents, subject to preparation and/or adoption by an authority.<sup>3</sup>
13. The KSP has the term “programme” in its name. Even though its label in domestic law is not the defining factor to categorize a document, it can serve as an additional indicator. The KSP is regulated by legislative provisions, namely Section 9 of the KSG (characteristic a). The KSP has the nature of a general act, because it is adopted by the Federal Government (characteristic b). Even though it is not fully equivalent to a legal act in its nature, it still sets forth a table of measures and activities, along with corresponding budget indications. The Committee has, in a different case, concluded that a plan adopted by the Prime Minister and approved by governmental resolution, which contained a timetable of measures and activities, allocating certain tasks to different state agencies and interested organizations and indicating deadlines, expected results and sources of funding, constitutes a plan in the form of a general act.<sup>4</sup> The KSP is adopted and approved by the Federal Government and contains a table of measures and activities up to the year 2040, allocating them to different state ministries and agencies, with expected results of greenhouse gas emission reduction effects and financing plans. According to Section 9 KSG, the KSP is prepared by the Federal Government of Germany under the lead of the Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN), a public authority (characteristic c). The KSP provides an organized and coordinated system that sets the framework for climate protection measures to be taken by the state, across different sectors (characteristic d). It is not sufficient for any individual activity to be undertaken, but requires further realization of the measures laid out in the KSP by legislation or government ordinances – it merely paints the big picture forming a coherent set of interlocking measures that, taken together, are able to achieve Germany’s climate goals (characteristic e).
14. The KSP is a programme relating to the environment. Whether a particular plan or program relates to the environment should be determined with reference to the implied definition of “environment” found in definition of “environmental information” in Art. 2

<sup>1</sup> ACCC/C/2014/105 (Hungary), para. 126-128; Maastricht Recommendations, para. 154.

<sup>2</sup> ACCC/C/2014/105 (Hungary), para. 130.

<sup>3</sup> ACCC/C/2014/105 (Hungary), para. 129; Maastricht Recommendations, paras. 154-156.

<sup>4</sup> ACCC/C/2013/88 (Kazakhstan), para. 29, 126.

para. 3 AC,<sup>5</sup> which includes the state of elements of the environment, such as air and atmosphere (Art. 2 (3) (a) AC). Climate change is influenced by the state of the atmosphere, namely the concentration of greenhouse gases within and emission of greenhouse gases into the atmosphere.

15. Plans and programmes relating to the environment may include land-use and regional development strategies and sectoral planning in transport, tourism, energy, heavy and light industry, water resources, health and sanitation, etc., at all levels of government. They may also include government initiatives to achieve particular policy goals relating to the environment, such as incentive programmes to meet certain pollution reduction targets or voluntary recycling programmes, and complex strategies, such as national and local environmental action plans and environmental health action plans.<sup>6</sup> The KSP includes measures grouped into different sectors such as energy production, industry, transport, buildings, agriculture, waste management, and land-use (change) and forestry). These measures are intended to achieve Germany's policy goals relating to climate and is intended to protect the climate.
16. In conclusion, being the central steering and guiding programme for Germany's short-, medium, and long-term climate protection measures, the KSP has a direct environmental relevance. Art. 7 sentences 1-3 AC are therefore applicable.

#### **b) Failure to comply with Art. 7 sentence 1, 2 and Art. 6 para. 2, para. 3 AC**

17. The Federal Government failed to provide "the necessary information to the public" within the meaning of Art. 7 AC in conjunction with Art. 6 para. 2 and para. 3 AC. The word "necessary" should be understood in the context of effective participation.<sup>7</sup> It includes requirements both (a) to actively disseminate the information indicated in Art. 6 para. 2, including information about the opportunities to participate and availability of the relevant information; and (b) to make available to the public all information that is in the possession of the competent authorities and is relevant to the decision-making and is to be used for that purpose. The relevant information under category (b) would normally include the following information: (i) The main reports and advice issued to the competent authority; (ii) Any information regarding possible environmental consequences and cost-benefit and other economic analyses and assumptions to be used in the decision-making; (iii) an outline of the main alternatives studied by the competent authority.

#### **aa) Failure to actively disseminate the information indicated in Art. 6 para. 2 to the public**

18. Contrary to these legal obligations, the Federal Government has provided the public with none of the listed necessary information. It did not give any indication of the specific timeframe for the public consultation prior to the commencement of public consultation on 8 December 2025, giving the public no time to prepare, plan, or set aside organizational capacity for the consultation work. It did not publish or make available sufficient relevant information. Furthermore, the consultation questions were not actively disseminated to the public, but only to certain stakeholders. However, Art. 7 AC calls for effective participation of the "public" as opposed to the narrower "public concerned".<sup>8</sup> While the consultation notice was public on the governmental website,

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<sup>5</sup> ACCC/C/2013/88 (Kazakhstan), para. 128; AC Implementation Guide, p. 176.

<sup>6</sup> AC Implementation Guide, p. 176.

<sup>7</sup> AC Implementation Guide, p. 178.

<sup>8</sup> AC Implementation Guide, p. 178.

the consultation questions were sent by e-mail to a selected group of stakeholders. It was not discernible which criteria the Federal Government applied to select the stakeholders. The public consultation notice on the website did not contain the stakeholder questions; one had to send the Federal Government an e-mail to gain access to the questions.

**bb) Failure to make available to the public all information relevant to the decision-making**

19. Most prominently, the relevant information according to the decision-making was not made available to the public. To be able to effectively participate in the consultation, the public needed to know the proposed measures of all federal ministries, along with the corresponding assessments on greenhouse gas reduction effects and the possible economic, social, and other ecological consequences, as well as the yearly emission budgets for 2031-2040, broken down to different sectors. Instead, proposed measures of all federal ministries were kept under seal, with the exemption for the measures proposed by the Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN). However, the invitation and commencement notice for the consultation did not include a reference that this information was relevant nor that it was publicly available. Since it was public knowledge that the proposals handed in by the ministries by the deadline of 25 September 2025 were not sufficient to enact a lawful climate protection program, at least those proposed measures and the remaining greenhouse gas reduction gap had to be disclosed. The same applies to the draft ordinance containing the yearly emission budgets, against which the proposed measures would be assessed as to their effectiveness. Moreover, scientific assessments of the expected greenhouse gas reduction effects and the possible economic, social, and other ecological consequences, which the federal ministries were required to submit together with the proposed measures, were not provided.
20. Instead, the Government only addressed five key questions to certain stakeholders without providing any further background information. In these circumstances, it was not possible for the public to support measures that had been proposed already, suggest additional measures, or criticize the impacts of the proposed measures – when making the contributions to the consultation, the public had to “go in blind” and could not establish strategies for targeted contributions to maximize impact. Without knowing what specific climate protection measures have already been considered by the various departments and what greenhouse gas reduction gap still needed to be closed, it was difficult to make an appropriate statement. In doing so, the federal government ultimately jeopardised the creation of an effective and lawful KSP and risks violating its obligations under the KSG, hindering effective climate action.
21. As stated by the Federal Government in a court hearing on 29 January 2026, it did not intend to make up for the faulty consultation by conducting another round of public participation. In any case, at the time of this communication it would be too late to rectify the error because the legal deadline for the climate protection program is ending on 25 March 2026.

**c) Failure to comply with Art. 7 sentence 1, 2 and Art. 6 para. 4 AC**

22. The Federal Government also failed to provide for early public participation pursuant to Art. 7 AC in conjunction with Art. 6 para. 4 AC, when all options are open and effective public participation can take place. The government failed to include reasonable time-frames for public participation for the different phases according to Art. 7 in conjunction

with Art. 6 para. 3 AC. The preparation, drafting and adoption of the KSP happens in four phases: phase one, proposals for measures within the different sectors that the different Federal Ministries are responsible for (Section 9 para. 2 KSG); phase 2, negotiations within the Federal Government and within the Federal Ministries on a set of measures; assessment of the agreed set of measures by an Independent Council of Experts on Climate Change (Expertenrat für Klimafragen, ERK) as to their greenhouse gas reduction potential; phase 3, review of the agreed set of measures within the Federal Government with regard to the ERK's assessment, with amendments or additional measures if necessary; and, phase 4, adoption of the final set of measures.

23. In light of these different steps, the stage where all options are truly open is when the proposals of the Federal Ministries have not yet been handed in. This is when the first stage of public participation should have been conducted, for every Ministry individually, ensuring public participation on the proposals they had to hand in by 25 September 2025. Due to the gravity of the climate change crisis and the far-reaching long-term impact of the KSP on Germany's course on climate action, another round of public participation must be conducted before each of the stages described above, because at each of those stages new information can come to light and substantial changes can arise.<sup>9</sup>

#### d) General failure to comply with Art. 7 AC in the context of the KSP

24. This communication concerns a general failure by the party concerned to correctly implement the Convention in the specific case of drafting the climate protection program (KSP) in the years 2025 and 2026. However, this non-compliance also arises from the fact that the national legislation specifying the public consultation on this matter (Section 9 para. 3 KSG) does not correctly implement Art. 7 AC because of its vagueness and room for erroneous execution. Section 9 para. 3 KSG obliges the government to conduct a consultation ahead of every KSP, but limits this consultation to certain parts of the public, namely the Länder (states), municipalities, trade associations, civil society organisations and scientific advisory bodies of the Federal Government. However, Art. 7 AC demands effective participation for the "public" rather than the narrower "public concerned" (Aarhus Convention Implementation Guide p. 178). "Public" means one or more natural or legal persons, and, in accordance with national legislation or practice, their associations, organizations or groups, Art. 2 para. 4 AC. Individual natural people are not stated in Section 9 para. 3 KSG and could therefore not invoke a claim for public participation. Furthermore, Section 9 para. 3 KSG does not specify the details of the consultation. It does not oblige the government to provide the necessary information, or to conduct the consultation at the earliest possible time.
25. Additionally, this communication shows a general failure by the Federal Government to comply with the Convention in the wider context of the KSG, as becomes apparent when taking the communication ACCC/C/2023/203 into account (Deutsche Umwelthilfe v. Germany concerning a failure to comply with Art. 8 AC with respect to the draft amendment to the Climate Protection Act/ KSG). Here it becomes apparent that in the context of combatting climate change, one of the most pressing issues of humanity, the rights of the public arising from the Convention are not being taken seriously by the party concerned.

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<sup>9</sup> ACCC/C/2010/50 (Czech Republic) para. 69; AC Implementation Guide, p. 145.

**e) Possible non-compliance with Art. 7 sentence 1, 2 and Art. 6 para. 8 AC**

26. The communicant would like to reserve the right to elaborate on additional facts and alleged non-compliance with additional provisions of the Convention, especially concerning the obligation to take due account of the outcome of the public participation, Art. 7 in conjunction with Art. 6 para. 8 AC. At the time of completion of this communication, it is not yet determined whether the party concerned has taken the results of the public participation in due account.

**VI. Use of domestic remedies**

27. No domestic remedies were used because no domestic remedies were available or because they would be unreasonably prolonged or obviously would not provide an effective and sufficient means of redress.<sup>10</sup> Both a request for access to the necessary information (see below para. 28-31) and the request for an administrative court order to conduct a round of public participation with full attention to the obligations arising from the AC (see below para. 32-36) would be unreasonably prolonged for the purpose of the KSP or obviously would not provide an effective and sufficient means of redress.

**a) Non-feasibility of request for access to information**

28. A request for access to necessary information under the UIG (Umweltinformationsgesetz, Federal Environmental Information Act) and the IFG (Gesetz zur Regelung des Zugangs zu Informationen des Bundes, Informationsfreiheitsgesetz, Freedom of Information Act) would not provide an effective and sufficient means of redress.

29. Firstly, Art. 7 AC obliges parties to proactively and publicly provide all information necessary for effective participation. The burden cannot be shifted onto every single member of the public to individually request the necessary information. Even if the government granted access to information to one member of the public, effective and sufficient redress would not have been reached because the rest of the public still lacks that information.

30. Secondly, a request for information under the UIG or IFG would be unreasonably prolonged and obviously would not provide an effective and sufficient means of redress. According to both UIG and IFG, the deadline for providing the requested information is one month. The consultation started on 8 December 2025 and the deadline was on 13 January 2026, with only one month and 5 days for the consultation and with a nationwide public holiday and vacation period falling within (Christmas and New Year's). In light of this, if the information request had been granted by the Government after a month, there would not have been sufficient time left within the consultation period to effectively use the information for a substantiated submission.

31. In the more likely case of a denial of the information request, the government has one month time to inform the requesting party of its decision. By then, it would be futile to invoke further formal redress methods, because the consultation closed after 1 month

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<sup>10</sup> ECE/MP.PP/2/Add.8 = Decision I/7 of the Meeting of the Parties, Annex, para. 21; Guide to the ACCC, p. 52, para. 243 p. 56.

and 5 days. Formal redress methods following a denied information request would be an administrative review, followed by judicial proceedings at the administrative court. There is no written deadline for the administrative review, and combined with a following judicial proceeding at the administrative court it is obvious that neither the administrative review nor the judicial proceeding would grant positive results within a timeframe that leaves enough time for the public to analyse the information and use it for the public consultation before its deadline on 13 January 2026.

#### b) Non-feasibility of judicial injunction to conduct effective public participation

32. A petition for a judicial injunction aimed at the government to conduct effective public participation would have proven equally futile. For an administrative court to grant a judicial injunction, one must prove a claim to the petitioned act or behaviour (“Anordnungsanspruch”), as well as the particular urgency of the case (“Anordnungsgrund”). The German legal order does not include such a claim for the public.
33. Section 9 para. 3 KSG obliges the government to conduct a consultation ahead of every KSP, but limits this consultation to certain parts of the public, namely the Länder (states), municipalities, trade associations, civil society organisations and scientific advisory bodies of the Federal Government. This fits the definition of the “public concerned” within the meaning of Art. 2 para. 5 AC: “the public affected or likely to be affected by, or having an interest in, the environmental decision-making; for the purposes of this definition, non-governmental organizations promoting environmental protection and meeting any requirements under national law shall be deemed to have an interest”, because Section 9 para. 3 KSG excludes any unrelated natural or legal persons. However, Art. 7 AC demands effective participation for the “public” rather than the narrower “public concerned” (Aarhus Convention Implementation Guide p. 178). “Public” means one or more natural or legal persons, and, in accordance with national legislation or practice, their associations, organizations or groups, Art. 2 para. 4 AC. Individual natural people are not stated in Section 9 para. 3 KSG and could therefore not invoke a claim for public participation. Thus, any possible claim based on Section 9 para. 3 KSG could not be invoked by and for the “public” within the sense of the Art. 7 AC, but only for the “public concerned”. Any claim based on Section 9 para. 3 KSG would therefore not provide an effective and sufficient means of redress.
34. Furthermore, Section 9 para. 3 KSG does not specify the details of the consultation. It does not oblige the government to provide the necessary information. The terms of modalities of the consultation are left entirely to the discretion of the government. Since a court cannot provide relief that goes beyond the wording of the law that the claim is based on, for this additional reason, a claim based on Section 9 para. 3 KSG would not provide an effective and sufficient means of redress.
35. Within the German legal order, there are no other laws or legal grounds on which a claim for effective public participation for the climate protection programme could be based.
36. Such a petition would also be unreasonably prolonged in the context of the KSP. Even after the draft KSP got leaked in February, the time between the leak and the legally binding deadline for the KSP on 25 March 2026 would be too short to petition for a judicial injunction, provide all the necessary information, allow sufficient time for the

public to prepare, allow sufficient time for the participation, and sufficient time to give due regard to the outcome of the participation.

#### **VII. Use of other international procedures**

37. No other international procedures besides the ACCC have been invoked.

#### **VIII. Confidentiality**

38. The information of the communicant can be made transparent. For security and fraud prevention purposes, the communicant politely requests the Committee to redact the signatures when publishing the communication.

#### **IV. Supporting documentation**

39. The following documents are attached to the Communication:

- Annex 1 – Climate Action Act (Klimaschutzgesetz – KSG) (paras. 1-4, 13, 22, 24, 33, 34)
- Annex 2 – Press releases and press clippings proving the existence of the ministry proposals, and their insufficiency (paras. 5, 19)
- Annex 3 – Notice on the commencement of consultation for the KSP: e-mail by BMUKN and notice release on BMUKN website (paras. 6 -7, 18-20)
- Annex 4 – Press clippings proving the KSP leak after closure of consultation and commenting on its insufficiency (paras. 8)
- Annex 5 – Parliamentary inquiry on KSP consultation procedure (paras. 9)
- Annex 6 – Environmental information act (Umweltinformationsgesetz – UIG) and Freedom of information act (Informationsfreiheitsgesetz – IFG) (paras. 28-30)
- Annex 7 – Code of Administrative Court Procedure (Verwaltungsgerichtsordnung – VwGO) (para. 32)

Berlin, Germany, 23 March 2026

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