

## Policy Brief

# Socially Just Climate Policies: Selected Examples and Lessons Learned from Germany

To meet climate targets for 2030 and beyond, emission reductions must be accelerated across all sectors. This is particularly urgent in the transport and heating sectors, where progress is lagging behind that of other sectors and where the transition directly affects households. The upcoming Emission Trading System 2 (ETS2), which will put a price on emissions in the transport and heating sectors across the EU from 2028 onwards, plays an important role in driving this transition.

To ensure the ETS2 is both effective and socially just, it must be accompanied by measures that mitigate its financial burden and enable all households to participate in the transition. A policy mix for a socially just transition should be based on four pillars: i) climate-friendly public infrastructure, such as public transport and district heating, to make low-emission choices accessible to everyone; ii) socially differentiated subsidies for investment in low-carbon heating systems and vehicles; iii) regulation, for example to address the landlord-tenant split incentive; and iv) a targeted direct income support mechanism to protect vulnerable households facing high costs. The pillars must be further grounded in complementary information and communication measures.

Many EU Member States have already implemented socially just measures or are in the process of introducing them as part of their Social Climate Plans. Exchanging ideas, experiences and lessons from these measures is therefore crucial for improving policy design. This policy brief aims to contribute to this mutual learning process by presenting examples of socially just climate policies in Germany in the housing, energy and transport sectors. Figure 1 provides an overview of the selected measures across the four pillars. Although there is still room for improvement regarding the social dimension of climate policy in Germany, we highlight positive aspects, key learnings and areas that require further attention with respect to the selected examples.

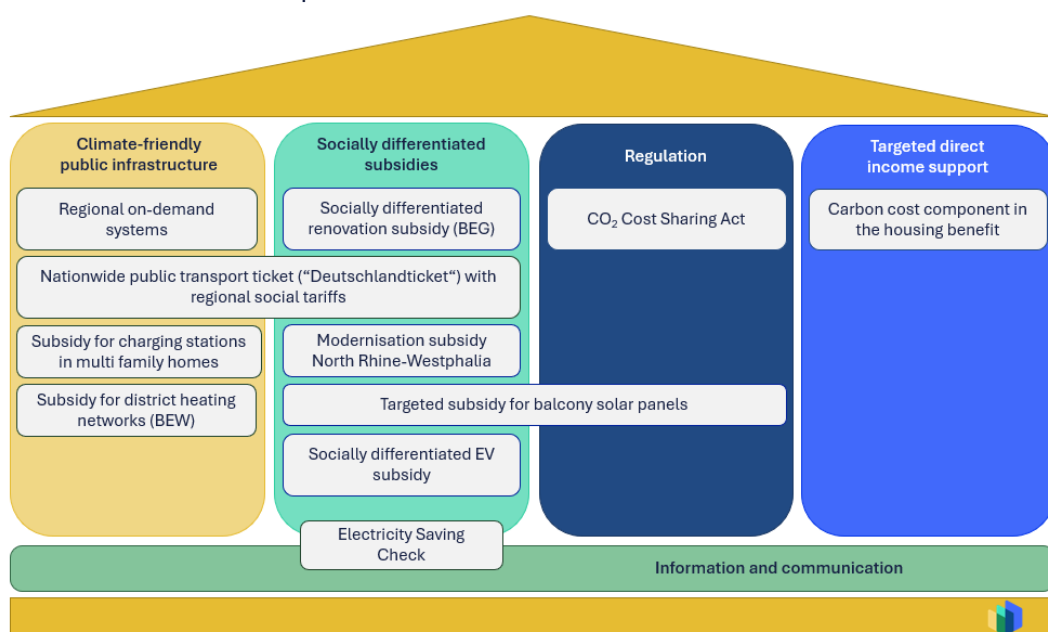


Figure 1: Summary of selected examples across the four pillars



# Measures in the housing sector

## 1.1 CO<sub>2</sub> Cost Sharing Act

Germany has had a national carbon pricing system in place since 2020, covering fuel emissions from transport and heating. The carbon price is intended to set an incentive to reduce the use of fossil fuels and encourage a switch to low-carbon solutions such as heat pumps. However, this mechanism works imperfectly in the case of rented housing, where the incentive for landlords is weakened because carbon costs are passed on to tenants through their heating bills. Such cases of split incentives are widespread in Germany, where around half the population – and lower-income households in particular – live in rented accommodation.

To address split incentives and reduce the burden of the carbon price on tenants, the CO<sub>2</sub> Cost Sharing Act (“CO<sub>2</sub>-Kostenaufteilungsgesetz”) was introduced in 2023.<sup>1</sup> This legislation regulates how the costs of the national carbon price are allocated between landlords and tenants. Cost shares are determined by the flat’s energy performance. Lower annual CO<sub>2</sub> emissions per square meter of living space result in a higher share being borne by the tenant, whereas higher emissions increase the landlord’s share. In a gas-heated building with moderate energy efficiency, for instance, carbon costs are shared equally between the landlord and tenant. CO<sub>2</sub> emissions per square meter are calculated using flat’s estimated energy efficiency, which is derived from annual heating energy consumption per square meter and the carbon intensity of the respective energy source.<sup>2</sup>

### KEY TAKEAWAYS



Addresses split incentives between tenants and landlords in the context of carbon pricing.



The allocation of carbon costs is included in the existing submetering and billing process, allowing the system to be implemented with only limited additional administrative effort.

### ROOM FOR IMPROVEMENT



The system requires careful calibration based on the energy performance of the building stock to ensure a fair distribution of the burden. This calibration is not yet balanced in the German case: although the objective was for the burden to be shared equally between landlords and tenants on average, tenants currently bear around 70 per cent of the costs on average.



When tenants have direct contracts with energy suppliers, the carbon cost allocation is not applied automatically. In such cases, tenants must actively approach their landlord to claim reimbursement for the landlord’s share, which can be a significant administrative burden.



Using energy consumption as a proxy for the energy performance of a flat is imperfect. Underconsumption can distort this measure, as low-income households in poorly insulated buildings may consume less energy, leading to an overestimation of the building’s efficiency. Where objective building performance indicators are available – such as through energy performance certificate registers – and can be readily integrated into billing systems, their use would be preferable.

<sup>1</sup> A current proposal by the government foresees changes to the cost sharing for newly installed heating systems from 2028. According to the proposal, carbon costs are to be shared equally between landlord and tenant irrespective of the energy efficiency of the flat. Furthermore, gas network fees, as well as additional costs imposed by a biogas quota for new gas boilers from 2029, must be split equally between landlord and tenant. For existing heating systems, the current system of carbon cost sharing based on the flat’s energy efficiency is maintained.

<sup>2</sup> For more information on the CO<sub>2</sub> Cost Sharing Act, see Braungardt (2026); Braungardt et al. (2025).



## 1.2 Socially differentiated subsidies for renovation and heating system replacement (“BEG”)

The federal BEG (“Bundesförderung für effiziente Gebäude”) is a nationwide support programme designed to improve energy efficiency and accelerate the use of renewable energy in residential and non-residential buildings. It provides grants and low-interest loans for measures such as insulation upgrades, heating system replacement and deep energy-efficient renovations, thereby helping property owners reduce energy consumption, lower emissions and cut long-term operating costs. Within the programme component for heating system replacements, a base subsidy of 30 percent is provided. Additional funding rates are available if certain conditions are met, allowing a heating system replacement to be subsidised by up to 70 percent. In particular, the subsidy is increased by 30 percentage points for households with a taxable income of below €40,000 per year, with the income tax assessment serving as proof of eligibility.<sup>3</sup>

### KEY TAKEAWAYS



The bonus for lower-income households is a first step towards income-based tiered subsidies.



A digitalised application process for subsidies for heating system replacements has been introduced, simplifying the procedure for both administrators and applicants.

### ROOM FOR IMPROVEMENT



Income-based tiering could be extended to other areas of the BEG, such as renovation measures on the building envelope, and further differentiated across income distribution while also accounting for household size.



Access to loans for all households could be facilitated by removing restrictions based on age or a lack of equity.



In Germany, not all households are required to file an income tax assessment, and lower-income households in particular often choose not to do so. Instead of relying on the income tax assessment, alternative documentation that is universally available to all applicants should be used as proof of eligibility.

## 1.3 Socially differentiated subsidy for modernization in North Rhine-Westphalia

In addition to supporting the modernization of owner-occupied homes, the modernization programme in the federal state of North Rhine-Westphalia also provides subsidies for the renovation of rental flats. Owner-occupiers must meet certain income limits depending on household size and are required to occupy the property themselves for the duration of the interest subsidy (30 years).

For rental flats, long-term rent caps apply, which vary by region. These caps may be exceeded if the modernization leads to energy savings for tenants, meaning that total housing costs remain unchanged. Moderate rent increases remain permitted on a permanent basis. Upon tenant turnover, modernised flats may only be rented to households with a housing entitlement certificate (“Wohnberechtigungsschein”,

<sup>3</sup> For more information, see BMWF (2026a), (2026b).



WBS).<sup>4</sup> The property owner selects new tenants, while existing tenants are not required to provide a WBS and may remain in their homes.<sup>5</sup>

#### KEY TAKEAWAYS



The limit on rent increases after receiving the subsidy, combined with the WBS requirement for new tenants, ensures that modernised flats remain accessible to lower-income households. Tenants can directly benefit from government support. Consideration of total rent is beneficial, as it accounts for energy savings achieved through renovation.



The targeted subsidy enables low-income households to modernise their homes. Income limits for subsidy eligibility are adjusted according to household size, reflecting differences in financial capacity and needs across households.



As the property is used as collateral, a modified credit check is carried out in which the applicant's age has no bearing on their creditworthiness. Moreover, the option of 100% financing enables households without significant equity to undertake modernization measures.

#### ROOM FOR IMPROVEMENT



The programme is not exclusively focused on energy-efficient modernization. Other forms of modernization, such as improving accessibility, security and perceived safety, installing modern digital infrastructure and enhancing the surrounding environment, are also eligible. The programme could place stronger emphasis on energy-efficient modernization.



The application process is complex and more time-consuming than applying for a standard loan. For example, the calculation of income limits for owner-occupied homes is complex.<sup>6</sup> A standardised method that takes household size into account would be desirable.<sup>7</sup>

## 1.4 Federal subsidy for efficient districting heating networks (“BEW”)

Complementing the subsidies for renovation and heating system replacement BEG (see above), a federal funding scheme (“Bundesförderung für effiziente Wärmenetze”, BEW) supports the decarbonization and expansion of district heating networks. This scheme is designed to bridge the economic viability gap associated with such investments. Its primary objective is to enable the decarbonization of heat supplied to households connected to district heating systems while limiting increases in consumer prices. In Germany, district heating networks are predominantly used by tenant households, which on average tend to have lower incomes.

#### KEY TAKEAWAYS



Although not explicitly targeted, this funding protects lower-income households from price increases while supporting the decarbonization of heating.

<sup>4</sup> A WBS in Germany is an official certificate that confirms an individual's eligibility to rent subsidised, low-income housing based on specific income limits.

<sup>5</sup> For more information, see MHKBD.NRW (2025); MHKBD.NRW and NRW.BANK (2025).

<sup>6</sup> See NRW.BANK (2025).

<sup>7</sup> On a federal level, a system similar to the French income tax assessment could be adopted, which includes a weighting factor for household size and a reference income approximating net equivalised income.



By subsidising the expansion of district heating systems, the programme increases the number of households benefiting from being connected to district heating and therefore not needing to invest in decarbonization themselves.



To qualify for subsidies, operators must demonstrate how the district heating network will become emission-free by 2045. This ensures that only networks committed to decarbonization are subsidised.

#### ROOM FOR IMPROVEMENT



Because district heating systems represent natural monopolies, they require careful regulation. Without adequate regulatory frameworks, subsidies may fail to reach households and may instead be captured by operators. In Germany, district heating often remains costly for households and price transparency is limited.

## 1.5 Carbon cost component in housing benefit

With the introduction of the national carbon price in 2021, a carbon cost component was added to housing benefit in Germany to compensate beneficiaries for rising heating costs due to carbon pricing. The housing benefit is a means-tested subsidy available to renters and certain homeowners whose income is insufficient to meet housing expenses, but who do not receive other basic social benefits. Introduction of the carbon cost component increased the rent considered in calculation of the benefit, which in turn leads to both higher benefit levels and an expansion of the group of eligible recipients.

#### KEY TAKEAWAYS



The carbon cost component illustrates how climate policy aspects can be integrated into social policy. It provides a mechanism to compensate lower-income households receiving housing benefit for costs arising from carbon pricing.<sup>8</sup>

#### ROOM FOR IMPROVEMENT



Since its introduction, the carbon cost component has remained at the same level, although the national carbon price has increased from 25 €/t CO<sub>2</sub> in 2021 to a corridor of 55-65 €/tCO<sub>2</sub> in 2026. The carbon cost component should be indexed to the carbon price to accurately reflect rising carbon cost burdens due to increasing carbon prices.



The carbon cost component could be further differentiated based on the energy carrier used for heating or the energy efficiency of the building to provide more targeted compensation.



Around 40% of eligible households do not receive housing benefit because they do not apply for it.<sup>9</sup> These households therefore do not benefit from the compensation provided through the carbon cost component. Take-up could be increased by simplifying the application procedures.

<sup>8</sup> In addition to the carbon cost component, a climate component was introduced to housing benefit in 2023. The climate component aims to take into account the fact that renovated flats with higher energy efficiency tend to be more expensive. Accordingly, it raises the rent limits to be considered in calculation of the benefit. However, due to administrative complexities and a lack of data, it is not differentiated by renovation status or the flat's energy efficiency.

<sup>9</sup> In 2023, around 1.2 million households received the housing benefit, although some two million households are estimated to be eligible (Bundesregierung (2025)).



## 2 Measures in the energy sector

### 2.1 Energy Saving Check (“Stromspar-Check”)

The Electricity Saving Check, introduced in 2008, aims to help low-income households and those receiving social benefits to reduce their energy costs. Households receive free on-site or online advice on how they can save energy based on an analysis of their consumption patterns and devices. They are also provided with free low-cost energy-saving devices such as water-saving shower heads or draft excluders and, in some cases, vouchers for more energy-efficient refrigerators. After one year, savings achieved through the implemented measures are analyzed. While the focus is on reducing electricity consumption, attention is increasingly paid to reducing heating energy use as well. The on-site advice is delivered by previously unemployed individuals who have been specifically trained for this programme. The project is implemented by one of Germany’s welfare organizations (Deutscher Caritasverband) in cooperation with energy agencies and is subsidised by the Federal Ministry for the Environment. The German government is currently exploring plans to expand the project to more regions, increase its funding and strengthen its focus on reducing heating energy use alongside electricity savings.

#### KEY TAKEAWAYS



The programme targets low-cost energy-saving measures that are often highly effective and can reduce the financial burden of energy costs for low-income households.



The peer-to-peer approach, in which previously unemployed individuals deliver on-site advice, helps improve understanding of the target group’s context and needs, increases acceptance of the programme and provides employment and skills training to the energy advisors.

### 2.2 Targeted subsidies for balcony solar panels

In recent years, many federal states and municipalities have offered direct grants for households installing small solar modules that can be attached to balconies, making solar power available to tenants as well. Subsidy rates vary regionally and are often higher for tenants and households with lower incomes, for instance in the cities of Düsseldorf, Hamburg, Bonn and Darmstadt. In many cases, the required co-payment of applicants is very low (e.g. 10 percent) or the modules are provided free of charge, with installation integrated into the Energy Saving Check (see above). At the same time, legislative changes have simplified administrative procedures and given tenants the right to install solar modules, with landlords able to refuse approval for valid reasons only. This has led to a boom in the uptake of such solar systems: while in 2022 fewer than 100,000 small solar modules were installed, the number rose to one million installations by mid-2025.<sup>10</sup>

#### KEY TAKEAWAYS



Combined with socially differentiated subsidy rates, solar modules have also become affordable for lower-income households, enabling them to participate in the energy transition and directly reduce their energy costs.



Legislative amendments that reduce complexity in administration and tenancy laws can reduce barriers to the uptake of subsidy programmes.

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<sup>10</sup> Korb (2025).



## ROOM FOR IMPROVEMENT



Even after the legislative changes, landlord refusal to approve installations without providing valid justification remains a barrier. This is particularly relevant for lower-income households, which are often unlikely to pursue legal action against their landlord following refusal. Greater emphasis should be placed on enforcement and households should be supported in asserting their rights vis-à-vis landlords.

## 3 Measures in the transport sector

### 3.1 Nationwide public transport ticket (“Deutschlandticket“) combined with social tariffs

During the energy crisis of 2022, the “€9 ticket” was introduced for three months. For this price, users could access local and regional public transport throughout Germany for one month. The ticket represented an expansion and harmonization of previous public transit passes, which were valid only within a specific region at a substantially higher price. Its successor, the state-subsidised nationwide ticket for local and regional public transport (“Deutschlandticket”), was introduced in May 2023 at a price of €49 per month, which increased to €63 per month by 2026. For this reason, some federal states and cities have introduced additional social tariffs and discounts for students, volunteers and children, with varying levels of support.<sup>11</sup>

#### KEY TAKEAWAYS



The harmonization, expansion and reduction of ticket prices lowered barriers to mobility for all households.



Some studies indicate that overall mobility increased, suggesting that the more affordable ticket helped reduce transport poverty and improved access to mobility for previously disadvantaged groups.



Social tariffs are essential to enable climate-friendly mobility and to reduce transport poverty

#### ROOM FOR IMPROVEMENT



Scientists differ in their assessment of the extent of the measure's climate protection impact.<sup>12</sup>



Studies show that the tickets' effect on social participation is strongly price-dependent.<sup>13</sup> In light of this, it is important to look closely at price increases that have occurred over time. Social tariffs for low-income households and children should be introduced at a national level.



Locally implemented social tariffs differ substantially in their eligibility and price. Nationwide implementation and harmonization would ensure equal access across all regions.

<sup>11</sup> An overview of the various social tariffs can be found at Deutscher Paritätischer Wohlfahrtsverband Gesamtverband (2026).

<sup>12</sup> For a discussion of the studies, see Krämer (2025).

<sup>13</sup> See greenpeace (2025).



## 3.2 Regional on-demand transport services

On-demand mobility systems are flexible shared transport services that operate using minibuses or vans without fixed routes or timetables. Instead, passengers request rides via an app or by phone when needed, and the relevant software pools similar trip requests so that passengers can be picked up along efficient routes. The core idea is to close gaps in conventional public transport, especially in rural areas, suburbs or during off-peak hours where regular bus or rail services are limited or inefficient. This makes mobility more accessible for people without cars, including low-income households, older people, children and individuals with mobility constraints.

In Germany, numerous such schemes have been implemented at the regional level.<sup>14</sup> While a number of pilot schemes already existed in the 2010s, growth in on-demand systems was particularly strong in 2021 and 2022, partly driven by a legislative change in 2021 that provided a legal basis for such systems. To date, more than 120 on-demand systems are in operation in Germany.<sup>15</sup> The services are often integrated into the systems of public transport authorities, with small surcharges on standard public transport fares. In many cases, the schemes are subsidised to ensure affordability and profitability in rural or low-demand areas. Several on-demand systems that started as local pilot projects have expanded to cover a greater regional area.

### KEY TAKEAWAYS



On-demand services address the limitations of traditional public transport services, which are typically concentrated in high-density areas and often leave rural areas underserved. These services help close this gap and improve accessibility for transport users in rural areas in particular.



These services have the potential to reduce individual motorised transport by offering a convenient and affordable transport service. The convenience of the systems also improves transport accessibility for elderly people, people with disabilities and children.



The systems should be well-integrated into existing public transport infrastructure and designed to complement rather than duplicate existing transport options.



Continual system optimization, harmonization and expansion across regions are important to reduce costs and improve the user experience. Further financial savings can be achieved, for example, by replacing low-demand rural bus routes (such as night services) with more flexible on-demand services.

### ROOM FOR IMPROVEMENT



On-demand services tend to be more expensive to operate than traditional public transport and thus require more financing through subsidies or municipalities. These costs may be more justifiable in rural areas, where on-demand services can substantially improve the quality and coverage of public transport, than in urban areas that are already well served by conventional public transport.

<sup>14</sup> Examples include sprinti in Hanover, RMV-OnDemand-Shuttles in the Rhine-Main metropolitan region, WendlandMobil in Lüchow-Dannenberg and Dalli in the federal state of Brandenburg.

<sup>15</sup> VDV (2025).



### 3.3 Subsidised purchase and leasing of new electric vehicles

At the beginning of 2026, a new federal subsidy scheme for electric vehicles was introduced. The purchase or leasing of a new electric car is subsidised up to a certain income threshold, which varies depending on the number of children in the household. The level of the subsidy is determined by household income, the number of children and the type of vehicle: plug-in hybrid electric vehicles (PHEV) receive lower subsidies than battery electric vehicles (BEV).<sup>16</sup>

#### KEY TAKEAWAYS



Income-based subsidies make electric vehicles more affordable for low- and middle-income households and reduce windfall effects among higher-income households.



To ensure comparability across different household types, it is essential to take the number of children in the household into account when assessing income.

The scheme also applies to leasing, which is beneficial as lower-income households often cannot afford outright vehicle purchases.

#### ROOM FOR IMPROVEMENT



The income threshold of €80,000 is set relatively high for single-person households. While it is positive that up to two children are accounted for separately, a more consistent adjustment for all household members would be desirable.<sup>17</sup>



The eligibility of cars for the subsidy could be further tightened: PHEVs should no longer be subsidised, used electric vehicles could be included and a maximum price for eligibility could be introduced. The scheme could also be extended to all vehicle segments, including bicycles.



For leasing agreements, coverage of additional charges for delivery and registration of the vehicle should be ensured for low-income households. Moreover, protections against financial risks for this group are needed, similar to those in the French Social Leasing scheme. This could include mandatory comprehensive insurance, linking lease agreements to subsidy approval, clear rules regarding wear and tear, and reliable early termination rights in the event of changes in personal circumstances.

### 3.4 Support programme for charging stations in multi-unit buildings

For households in multi-unit residential buildings, access to charging points for electric vehicles is a significant challenge, as they depend on investments by the homeowners' association or landlords. Without access to charging points in their homes, they must rely on public charging stations, where electricity prices are significantly higher. At the federal level, a new subsidy programme for charging infrastructure in multi-family buildings was introduced in 2026. The programme aims to support the installation of charging points in existing multi-unit buildings and thereby accelerate the market uptake of e-mobility. There are three categories of eligible applicants, each with distinct criteria and separate procedures: i) homeowners' associations, ii) small and medium-sized enterprises and private owners of




<sup>16</sup> For more information, see BMUKN (2026).

<sup>17</sup> For example, a system similar to the French income certificate could be adopted, which includes a weighting factor for household size and a reference income approximating net equivalised income.






rented properties and iii) housing associations and property companies. Funding is available for the purchase and installation of private charging points, including technical equipment, grid connection and necessary installation and construction work. The amount of funding varies depending on whether a wallbox is installed and whether it supports bidirectional charging.<sup>18</sup> A similar programme has been implemented in the federal state of North-Rhine Westfalia.<sup>19</sup>

#### KEY TAKEAWAYS

-  Tenants benefit from this programme and are enabled to switch to e-mobility and charge at a lower price than at public charging stations.
-  The subsidy helps alleviate financing constraints for homeowners' associations.
-  The mandatory use of 100% renewable electricity ensures an additional positive climate impact

#### ROOM FOR IMPROVEMENT

-  To reduce dependence on the initiative of landlords, tenants should be eligible to apply for the subsidy themselves. This is already the case in the programme in North-Rhine Westfalia, but not in the federal scheme.
-  The federal programme could be extended to include parking spaces for employees, car-sharing services and mobile social services, as is already the case in North-Rhine Westfalia.
-  The social impact of the programme depends on regulation of how investment costs are passed through to tenants. Safeguards are needed to ensure that tenants are not disproportionately burdened by rent increases following installation.

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<sup>18</sup> For further information, see Bundesministerium für Verkehr (BMV) 2026, o. J.

<sup>19</sup> For further information, see MWIKE.NRW o. J.



## Conclusions and remaining gaps

The presented measures show that there are already several examples in which social aspects have been integrated into climate policies in Germany. For instance, subsidy programmes are starting to be differentiated by income, which is important to ensure that support primarily reaches those who need it most. The examples also show that the take-up of subsidies can be improved if they are complemented by regulatory changes (for example, in the case of balcony solar panels). Experiences further suggest that cooperation with welfare organizations that are already in contact with the target groups, as in the case of the Electricity Saving Check, as well as peer-to-peer approaches and on-site events, can be helpful in increasing take-up among lower-income households. There are also efforts to address the landlord-tenant split incentive, which is particularly important in Germany given the high share of tenants, for example through the CO<sub>2</sub> Cost Sharing Act. Finally, climate aspects are increasingly being integrated into social policies as well, as in the case of housing benefit.

Some general gaps remain:

- Evidence shows that higher-income households benefit more from existing subsidy programmes in Germany. Therefore, programmes should be targeted more strongly.
- Reaching lower-income households remains a barrier across most subsidy programmes. This could be improved by reducing administrative barriers and strengthening efforts to disseminate information about available support to these households.
- Despite the subsidies, lower-income households often still struggle to finance investments in renovations or electric vehicles, as remaining upfront costs remain a barrier and subsidies are frequently disbursed only with a delay.
- Most of the examples presented here fall within the domain of subsidies and infrastructure measures. Compensatory measures should also be a pillar of a socially just transition (see Figure 1). In times of high CO<sub>2</sub> or energy prices, the ability to provide targeted direct payments to vulnerable households may be particularly important. So far, Germany still lacks a mechanism for such direct payments or other relief measures that can be differentiated by income, for example.

Overall, the examples show that designing socially just climate policies is possible and that useful examples already exist in Germany. Together with a policy brief on EU examples,<sup>20</sup> this policy brief aims to encourage further exchange of ideas and good practices in order to learn from one another and improve existing policies, especially in the light of the introduction and preparations for ETS2 and the Social Climate Fund.

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<sup>20</sup> Zukunft KlimaSozial (2026).



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