PAPER

46

The List and the Date

GERMANY'S CHEMICAL LOCATION POLICY: WHAT HAS BEEN ANNOUNCED, WHAT IS IN FORCE, AND WHAT CAN BE CHECKED

Germany has a chemical-industry agenda, a phased roadmap and a named coordinating ministry. This paper asks which commitments have become implemented measures, and whether progress can be checked publicly.

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20 Nov
2026: the day the Bundesrat adopted its resolution on the competitiveness of the chemical industry

17 months
from the first resolution of the state premiers on the subject to the Bundesrat's resolution

7 months
the standard statutory decision period under immission-control law, subject to rules on commencement and extension; three months in the simplified procedure

12 Dec
2026: the European compliance date for existing installations covered by the chemical-sector waste-gas BAT conclusions

01 What the Bundesrat adopted

On 20 November 2026, in its 1070th session, the Bundesrat adopted the resolution "Safeguarding the competitiveness of the chemical industry in Germany" (Drucksache 548/26, decision). It goes back to a motion by North Rhine-Westphalia dated 22 September, which Baden-Württemberg joined and which went through four committees. According to the minutes nobody asked to speak, neither a state nor the federal government; the plenary voted on the committee recommendations and adopted the resolution by majority. The adopted text has seventeen numbered points on nine pages. The ones that matter for this paper:

Number 2 states that the industry is in a structural crisis and that the current slight stabilisation is temporary. It then says that the necessary measures concern the EU, the federal and the state level, at all of which implementation is in many cases too slow, and adds: there is no lack of insight, but of speed in carrying it out.

Number 3 welcomes the federal Chemieagenda 2045 in principle. All agreed measures have to be realised as fast as possible now and underpinned with a binding implementation roadmap, clear responsibilities and measurable progress.

Number 4 expects the federal government to present immediate measures that take effect in the short term.

Number 8 calls for accelerated development of hydrogen and CO_2 infrastructure, power grids and pipelines, for federal infrastructure funds to be usable for them, and for greater attention to cross-border infrastructure development.

Number 11 asks the federal government to use national leeway in transposing EU law to relieve companies and to speed up planning and permitting.

Number 12 welcomes the energy-cost measures of 1 January 2026, among them the permanent reduction of the electricity tax for manufacturing, and asks that the industrial electricity price be implemented using the full scope of EU state-aid rules, widened to more beneficiaries, and that the improved conditions for 2026 be continued beyond that year.

Number 15 welcomes the EU Commission's proposals of 17 July 2026 on emissions trading and sees considerable need for improvement: realistic benchmarks, applied retroactively; a reduction path that leaves liquidity in the market after 2039; continued free allocation without additional investment conditions; recognition of carbon capture and use. Number 16 asks for binding requirements in public procurement and for quotas, for example for recycled content.

Number 17 holds to the climate targets and turns to the industry: what is needed is a clear commitment of the sector to reliable investment in Germany.

The resolution sets the federal government no deadline and asks for no report by a given date. Its time words are "as fast as possible", "in the short term" and "swiftly". It contains no commitment of the states themselves.

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What the plenary did not adopt belongs to the picture. The committees had put seven recommendations to it (Drucksache 548/1/26 of 6 November). Three found a majority: the regional reference to the Netherlands and Flanders was taken out of number 8, and two sentences on the European chemicals alliance and on trade-defence procedures were reworded. Four did not. One of them was a complete alternative text from the environment committee, which tied competitiveness expressly to climate neutrality by 2045, the circular economy and the protection of environment and health, wanted carbon capture limited to process emissions that are hard to avoid, and contained the only sentence in the papers on this resolution that asks for a check of results: because the relief is paid largely from public budgets, its effectiveness should be reviewed regularly and, where possible, linked to investment in efficiency and decarbonisation. Another was the economics committee's proposal to exempt basic chemicals and refineries from emissions trading until an economic decarbonisation option exists. The economics committee also wanted to delete the binding procurement requirements in number 16; they stayed.

IN SHORT

The resolution was adopted without debate. The states say two things in it that are easy to miss. In number 2 they include their own level among those that implement too slowly. In number 17 they ask the industry for a commitment in return. What the text does not contain is a date, a report, or a measure the states take on themselves.

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02 What a resolution is, and what it can ask for

A resolution of the Bundesrat is not a law. It is a statement of political will, addressed as a rule to the federal government. It creates no legal duty to act. The federal government can respond; it is not obliged to adopt what is asked.

That does not make it the wrong instrument. A resolution can ask for an action plan, and it can ask for a report by a named date. It cannot make either binding. The distinction this paper works with follows from that: between what has been announced, what has been decided, what is in force, and what has been shown to work. The last stage has three levels of its own. Implementation: the law applies, an application can be made, a payment has been made. Direct effect: a cost or a processing time has fallen. Location effect: investment, output or employment develop better than they would have.

> **THE OTHER SIDE**
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> A resolution is not nothing. It puts a majority of the state governments on record, it gives ministries a mandate they can cite, and in a system where the Bundesrat must consent to much of what the federal government wants to do, a stated position is a negotiating fact. In March 2026 the state premiers asked for an industrial electricity price that can be combined with the compensation for indirect CO_2 costs; on 17 November the EU Commission approved that combination. Whether one caused the other cannot be shown. That the request was made and has since been met can.

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03 Seventeen months, six selected milestones

The six entries are a selection, not a complete record, and they are not the same kind of thing. Two are resolutions of the state premiers, one is a federal agenda, one is a letter, one is a coalition decision, which is neither a government nor a legislative act, and one is a Bundesrat resolution.

Date	Body and kind	Content	Dates and reporting
5 June 2025	State premiers, resolution	Eight points: Chemieagenda 2045, bureaucracy, power and gas, relief for energy-intensive companies, EU chemicals law, skilled workers, carbon capture and the hydrogen core network, raw materials	None; "immediately", "swiftly"
5 March 2026	State premiers, resolution	Six points; welcomes the measures of 1 January 2026, asks for the industrial electricity price to be widened and extended	None; "swiftly", "as fast as possible"
By 25 March 2026	Seven states, joint letter	Asks for more bindingness, speed and ambition	None
26 March 2026	Federal government, agenda	Chemieagenda 2045: three phases, a steering committee led by the economics ministry	Phases by years; dates for some measures (Section 04)
18 November 2026	Coalition committee, political decision	Electricity tax at the EU minimum for all consumers	2027, about €5.4bn; beyond that subject to the 2028 budget
20 November 2026	Bundesrat, resolution	Seventeen points (Section 01)	None

Two observations. The content repeats: energy cost, EU regulation, emissions trading and bureaucracy appear in June 2025, March 2026 and November 2026 in much the same order. And the demand for bindingness is itself repeated: by letter before the agenda was published, and by resolution eight months later.

Note. *The states' letter shows that seven governments found the results of the agenda process not binding enough before the text was published. It does not show that the agenda contains no responsibilities or dates. What it does contain is the subject of the next section.*

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04 What the agenda contains, and what it does not

It would be wrong to say that the Chemieagenda has no roadmap, no owner and no dates. The published text of 26 March 2026 runs to 50 pages. What follows is taken from it.

It has phases (pages 6 and 7). Phase 1, stabilisation and immediate measures, 2026 to 2027: the industrial electricity price and wider CO_2-cost compensation, the steering committee, reform of emissions trading from 2026, digitalised and faster permitting, secured funding programmes, stabilisation of chemical parks and refineries. Phase 2, transformation and scaling, 2026 into the 2030s: hydrogen infrastructure, grid-charge reform, demonstration plants, the circular economy. Phase 3, the 2030s: defossilised production and technology leadership. The phases carry years. The items within them carry none.

It has a lead. The agenda is under the lead of the economics ministry (page 4); for a few measures another lead ministry is named.

It has dates for some measures. A draft law on grid connection is to go to cabinet by the end of the first quarter, and the transmission operators change their allocation of connection capacity from 1 April 2026 (page 19). The industrial electricity price runs for 2026 to 2028 (pages 7 and 18). The package transposing the industrial-emissions directive was adopted by cabinet on 21 January 2026, to meet a transposition date of 1 July 2026 (page 44).

It has a governance chapter, and this is the shortest in the document: three sentences on pages 49 and 50. The economics ministry sets up a steering committee at state-secretary level for the ministries concerned, economics, environment and finance, with others as needed; the states, the chemical association VCI and the union IGBCE are invited; the meetings cover the agenda's three fields. The chapter names no chair, no meeting cycle, no report, no key figures and no publication of results. The chair, state secretary Frank Wetzel, and the half-yearly cycle are in the ministries' joint release of 1 June 2026, not in the agenda.

And it has a reservation. All measures of the agenda are subject to financing and to the federal government's constitutional competence, and they do not prejudge the budget legislator (page 6).

Note. *The release of 1 June lists what has been delivered; it is not a measure-by-measure account against the agenda's own list.*

IN SHORT

The agenda has phases, a lead ministry and, since June, a chair with a name. Its own governance chapter provides for a committee and nothing on how progress is measured or reported. No consolidated public implementation register, with each measure, its owner, its date and its status, was identified in the sources examined for this paper. Number 3 of the Bundesrat's resolution asks for a binding roadmap, responsibilities and measurable progress. A public register would make those requirements externally checkable.

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05 Announced, decided, in force, shown to work

The same measures look different depending on which stage one asks about.

Measure	Stage on 26 November 2026	Public evidence
Electricity-tax relief for manufacturing	In force since 1 January 2026 and made permanent	Agenda, page 7; state premiers' resolution of March
Electricity tax at the EU minimum for all consumers	Announced; financed for 2027	Coalition decision of 18 November; no law yet
Industrial electricity price	In force for 2026 to 2028; applications for 2026 in 2027	Guideline of 27 April 2026, Federal Gazette of 6 May (BAnz AT 06.05.2026 B1); EU approval of 16 April 2026; no payment before 2027
Combination with CO_2-cost compensation	Approved by the EU Commission on 17 November	Agency report
CO_2-cost compensation	Widened to further sectors, retroactive from 2025	Federal summary
Subsidy to transmission-grid costs, 2027 to 2029	Parliamentary procedure completed: Bundestag 12 November, Bundesrat 20 November without calling the mediation committee	Decision 656/26; promulgation and entry into force not verified for this paper
Grid connection: draft law to cabinet by end of Q1 2026	Cabinet adopted the draft on 29 July 2026, four months after the date in the agenda (page 19); a cabinet decision, not yet law	Economics ministry release of 29 July
Grid connection: transmission operators change allocation from 1 April 2026	Done on the date	Law-firm report of 31 July
EU emissions trading for industry	Commission proposals of 17 July 2026; Bundesrat asks for improvements	Resolution, number 15
EU chemicals law (REACH)	Commission keeps the current form, according to the federal environment minister	Ministry release of 1 June
Hydrogen and CO_2 infrastructure	Asked for	Resolution, number 8; no dates

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The table shows three things. One dated commitment of the agenda was met four months late, and the reader learns this by comparing a page of the agenda with a press release four months later. More has reached the stage "in force" than the public debate suggests. And for the commitments that carry a date, the reader has to assemble the status from laws, releases and decisions. No consolidated public implementation register was identified in the sources examined for this paper.

THE OTHER SIDE

A register is not a result. A government can publish a faultless status table and still deliver too little, too late. Some of the most important items are not Germany's to date at all: benchmarks and free allocation in emissions trading are decided in Brussels, and the honest entry there is a German negotiating position, not a deadline. And a register stops at implementation. Whether electricity costs or processing times have in fact fallen can be measured; whether a plant was built here because of a measure is much harder to show.

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06 Permitting: the deadline exists

On permitting speed the statute already contains what the resolutions lack. Under section 10 (6a) of the Federal Immission Control Act the authority has to decide within seven months, and within three months in the simplified procedure. The start of that period has rules of its own (section 7 of the Ninth Immission Control Ordinance): the authority has one month to check whether the application is complete, extendable once by two weeks, and the decision period begins when that check period ends or, where documents were requested, when the first requested documents arrive. It may extend the period once, by up to three months, if the examination is difficult or the applicant has caused the delay, and has to give reasons. Any further extension needs the applicant's consent. The authority has to inform its supervisory authority each time a deadline is exceeded.

So the open question is not which processing time the states promise. It is how long procedures actually take, when the clock starts, how often it is extended and where the delay arises.

The permits are issued by authorities of the states. The states shape organisation, staffing and execution; they do not set the legal and technical requirements alone. The reporting duty should provide an administrative starting point. Whether the states compile complete and comparable statistics on compliance is not established here. None of the six milestones in Section 03 contains such figures.

> **THE OTHER SIDE**
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> The states do not control what they are most often blamed for. Staffing a permitting authority is a budget question in years of tight state budgets; the complexity it administers is largely EU and federal law; and an authority that decides fast and loses in court has helped nobody. The same Bundesrat session dealt with a restructuring of the clean-air rules that, according to the Bundesrat's notes, also serves measures agreed between federation and states to accelerate procedures. That is slow, technical work that produces no headline.

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07 The same session: where dates do exist

On the same day the Bundesrat dealt with item 53: the administrative regulation that puts the EU's conclusions on best available techniques for waste-gas management and treatment in the chemical sector into German rules (Drucksache 578/26).

Here the elements are all present. An addressee: the operators of installations covered by these conclusions. A content: emission values for sulphur dioxide, nitrogen oxides and carbon monoxide, tightness requirements, wider duties of measurement. A date: existing installations have to comply four years after the conclusions were published on 12 December 2022. A check: the supervising authority. A review: an evaluation after five years. The federal government puts the avoided environmental damage at about €84m a year.

The European date has been known since 2022, so nobody learned of the requirements on 20 November. The narrower point stands: the national specification comes late before an existing European compliance date. According to the explanatory notes, the regulation was intended to enter into force on the day after promulgation, because the deadline for adapting the national rules had already passed. The Bundesrat has consented; publication of the final version and entry into force are not verified for this paper.

The Bundesrat did not simply pass it. It consented with sixteen changes (Drucksache 578/26, decision), most of them on how leaks and diffuse emissions are measured and documented, and it added a resolution of five points. That resolution calls the sharply increased frequency of measurements in the EU conclusions disproportionate, says the intervals do not match the capacity of the measuring institutes, and asks the federal government to press the Commission for a practicable design and to examine whether operators' own measurements can be recognised. Its last point asks the federal government to report on the results of that examination and on the further steps intended. Here too, according to the minutes, nobody asked to speak.

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So on the same day the same chamber asked for a report in one resolution and for none in the other. The report it asked for concerns the measuring of emissions. The resolution on the competitiveness of the industry asks for measurable progress and for no account of it.

IN SHORT

The German system can write a rule with an addressee, a date, a check and a review, and the Bundesrat can ask for a report when it wants one. Both happened on 20 November for obligations of the industry. For the state's own commitments to the industry it has phases, a committee and a list of things delivered, and no comparable account.

THE OTHER SIDE

The comparison is not symmetrical. The emission rules are binding EU law that Germany has to transpose; the states did not only pass the burden on, they changed the rules in sixteen places and asked for less frequent measurement, which is relief for the plants concerned; and cleaner air benefits the people who live next to chemical plants, in an amount the government itself has put a figure on. A resolution on competitiveness is a different kind of instrument. The point is limited: the system specifies where it is obliged to.

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08 What it means for the companies in this series

Paper 45 ended with two chemical companies going on alone: BASF with about 9,200 jobs cut since 2024 and fixed costs in its core business to fall by up to 20 percent by 2029, Evonik with a programme that removes 3,200 jobs by the end of 2029. In the VCI's member survey of June 2026, 43 percent of responding companies said they were shifting investment abroad in part or significantly.

A board deciding where to put the next plant can calculate with an instrument that has a term. It cannot calculate with "swiftly". The instruments have to be read one by one, because their terms differ.

The electricity-tax relief for manufacturing is permanent. The extension to all consumers that the coalition decided on 18 November is a different matter and is not the test for a chemical plant, which already benefits.

The industrial electricity price runs for three accounting years, 2026 to 2028. Its guideline says what that is worth as a planning basis: there is no legal entitlement, payment is subject to the budget funds available in the year of payment, and if the funds do not cover all claims, every payment is cut by the same quota. At least half of the amount received has to be invested in measures the guideline defines. Changes are reserved. The states asked in March and again in November for the instrument to be widened and extended.

The subsidy to transmission-grid costs is set for three further years, 2027 to 2029.

The compensation for indirect CO_2 costs follows its own EU rules and conditions.

A cracker, an electrolyser or a recycling plant is written off over fifteen to twenty years. Against that, one of the four instruments is permanent, two run for three years, and one of those two is paid only as far as each year's budget reaches.

> **THE OTHER SIDE**
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> Location policy is one factor among several; global demand, capacity, portfolio choices and company-specific costs also matter. BASF names a weak global market; Papers 42 and 44 showed that for the car industry the gap is labour cost and volume, not electricity. A government that delivered everything on the list would not restore the margins of 2021. What policy can remove is one source of uncertainty among several.

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09 What would make it checkable

The question is not how to invent a roadmap. It is how the existing one becomes something that can be checked from outside. Number 3 of the resolution asks for a binding roadmap, responsibilities and measurable progress; the table is this paper's own way of making that concrete.

Element	What it would look like	Who could put it down
A register of measures	Every measure of the agenda in one public table: content, responsible ministry, date, stage	The steering committee
The stage, not the intention	For each measure: announced, decided, in force, with the document that proves it	Each responsible ministry
The effect	Where it can be measured: the cost or the processing time before and after	Each responsible ministry
A public status	Published after each half-yearly meeting	The chair of the steering committee
The states' own part	Publish actual permitting times, compliance with statutory deadlines, extensions and the reasons for delay, using comparable definitions	Each state government
The term of relief	For each energy instrument: until when, under which conditions it can change, what is secured beyond one budget	The federal government
Brussels	Where the decision lies with the EU: the German position and its date	The responsible ministry

Note. *The table describes what would make existing commitments checkable. It takes no position on which measures are right, and it is not a forecast that any of it will be adopted.*

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10 A personal note

The nine sections before this one are analysis. This one is my view.

Is it a soap bubble? No. The documents contain responsibilities, timeframes and measures already delivered. And the Bundesrat has written the most honest sentence of the whole file itself: there is no lack of insight, but of speed in carrying it out, at the EU, the federal and the state level. Is it a plan in the sense in which a company uses the word? Not yet. What I cannot yet verify is whether the programme is tracked publicly, measure by measure, against its own commitments.

There is a ministry in the lead and a state secretary in the chair. What I did not find is the page on which I can see, for each measure, who owes it, by when, and where it stands. I had to put that together myself for this paper, from laws, press releases and Bundesrat papers, and for some lines I could not.

The states ask the federal government for a roadmap, responsibilities and measurable progress, and they are right to. By their own sentence they owe the same on their side. The permitting deadlines are in the law, and authorities have to report upwards when they exceed them. Whether anyone adds that up into figures that can be compared between states, I could not establish. It is in none of the papers.

One detail stays with me. A resolution that says the problem is speed, not insight, was adopted without anyone asking to speak. The one proposal to check regularly whether the relief works was in the version that lost.

In a company, a list is a plan only when each line has an owner, a date and a status that somebody outside the project can read. I would apply the same test here. And I would rather read five lines that are kept than fifty that are intended.

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Methodology & Sources

Bundesrat: resolution adopted on 20 November 2026, Drucksache 548/26 (decision); motion of North Rhine-Westphalia, Drucksache 548/26; committee recommendations, Drucksache 548/1/26 of 6 November 2026; decision on the waste-gas regulation with accompanying resolution, Drucksache 578/26 (decision); decision 656/26 on the transmission-grid subsidy 2027 to 2029; minutes of the 1070th session on 20 November 2026 (items 30, 53 and 63); explanatory notes for the session (items 10, 30, 53 and 57). **Conference of the heads of government of the states**: resolutions of 5 June 2025 (item 1.7.4) and of 5 March 2026 (item 9). **Federal government**: Chemieagenda, published text of 26 March 2026 (50 pages; page references in the text), and the summary of its key results; release of the economics ministry of 29 July 2026; guideline on the industrial electricity price of 27 April 2026 (BAnz AT 06.05.2026 B1); joint release of the economics and environment ministries of 1 June 2026. Joint letter of seven states on the Chemieagenda, as reported in the releases of Saxony-Anhalt of 25 March and Baden-Württemberg of 26 March 2026. **Federal Immission Control Act**, section 10 (6a), and Ninth Immission Control Ordinance, section 7. **CMS** legal update of 31 July 2026 on the grid-connection bill. **VCI** member survey of June 2026. **dpa-AFX** on the coalition committee of 18 November 2026 and the EU approval of 17 November 2026. IMP Intelligence Series Nos. 42, 44 and 45. A coalition decision is treated as a political announcement, not as a government or legislative act. Section 10 is the author's opinion and is not part of the analysis. Disclosure: IMP InterMediaPartners GmbH has an existing professional relationship with Evonik. Evonik was not consulted on this paper and no non-public information was used. Companies and individuals are named only as matters of public record. Data cut-off: 26 November 2026. Not investment advice.

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