

Independent Reporting Mechanism

Results Report:
Germany 2023-2025

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Germany’s fourth action plan led to strong early results in public procurement at the federal level and linked open data at the state level. Linkages to the 2021 coalition agreement led to ambitious commitments in the action plan. Among those, a Federal Transparency Act and transparency guidelines for federal public-private partnerships were not completed due to the collapse of the government in November 2024. Moving forward, Germany could re-energize engagement in the OGP process both from civil society and government and ensure a sustained multi-stakeholder collaboration.

Implementation

Germany’s fourth action plan (2023-2025) had 15 commitments, including 11 from the federal government and four from states (Länder). Despite the early collapse of the government coalition in October 2024, the federal commitments had high levels of completion, comparable to previous German action plans. However, some of the ambitious commitments that originated from the coalition agreement and required passing legislation were not completed, namely the introduction of a Federal Transparency Act (Commitment 1) and transparency guidelines for federal public-private partnerships (Commitment 3). For Commitment 9, the Federal Ministry of the Interior and Community (BMI) expanded the digital platform for procurement tenders, developed during the previous action plan, to include tenders whose anticipated value is lower than the EU-set thresholds. This commitment took important steps in making more below-threshold tenders available in a central space.

The state commitments saw important advancements and cooperation in linked open data (LOD) by Berlin and Schleswig-Holstein (Commitments 12-14). The publication of data as LOD allows users to more easily analyze across different datasets and reduces the burden on administrations, academics, and civil society in compiling composite datasets. The cooperation between these states on LOD could establish a best practice for future progress on open data in budgetary matters, energy, and education across Germany.

At a Glance

LEVEL OF COMPLETION

9/15

Complete or substantially complete commitments

EARLY RESULTS

7/15

Commitments with early results

0/15

Commitments with significant results

KEY OBSERVATIONS

- Commitments that involved multi-stakeholder participation saw stronger engagement among existing networks.
- Cooperation and cross-learning between state governments have helped advance open government reforms within and beyond OGP action plans.
- While the linkage to political goals from the 2021 coalition agreement led to limited completion in some cases, it significantly raised the ambition of federal commitments.
- Lack of opportunities for co-creation and co-implementation of commitments led to civil society disengagement.

Met the minimum requirements during implementation: No

Other commitments with early results include the Federal Ministry of Economic Affairs and Energy's report on the equivalence of living standards on the level of the 400 districts and self-governing towns and cities (Commitment 4), which was based on more than 30,000 citizen survey responses, and the Federal Foreign Office's foreign policy dialogues, a continued commitment which led to over 100 events explaining foreign policy to the public in 15 out of 16 federal states (Commitment 5).

Participation and Co-Creation

The Federal Chancellery leads the OGP process in Germany. The Open Government Network (OGN), an informal coalition of civil society organizations focused on transparency, open data, and technology-related issues in Germany, continued to be the main interlocutor between civil society and the government in the OGP process. Civil society and government engagement in the co-creation and co-implementation was lower than for earlier action plans.¹ The Point of Contact (PoC) at the Federal Chancellery has found it is challenging to coordinate with the federal government, due to varying levels of interest from ministries in participating in OGP action plans. Moreover, members of the OGN felt that the process did not offer them sufficient opportunities to shape the content of the action plan. However, the PoC noted that low levels of civil society interest largely precluded the need for a longer co-creation process.²

Implementation in Context

In October 2024, a little after the midpoint of the action plan's implementation, the coalition government collapsed due to budget disagreements.³ This meant that commitments that were tied to the government coalition agreement (Commitments 1 and 3) were not implemented. Elections were held in February 2025, and the new government took office in May 2025.⁴ This meant that, for more than seven months, commitment implementation was impacted by the lack of political leadership in the lead implementing government bodies.

After this period of political transition, Germany reaffirmed its commitment to open government as the new administration settled in. In October 2025, the German government signed the Vitoria-Gasteiz Declaration during the IX OGP Global Summit, reaffirming its commitment to democracy, civic space, and the open government principles outlined in the declaration.⁵

¹ Open Government Partnership, Independent Reporting Mechanism, Results Report: Germany 2021-2023, <https://www.opengovpartnership.org/documents/germany-2021-2023-results-report/>.

² Germany OGP Point of Contact, comments provided to the IRM during the 2023-2025 Action Plan Review's pre-publication period, 17 May 2024.

³ Dr. Robert Grimm, From economic powerhouse to search for direction: what does the 2025 election mean for Germany's future?, 17 March 2025, Ipsos, <https://www.ipsos.com/en/global-opinion-polls/economic-powerhouse-search-direction-what-does-2025-election-mean-germanys-future>.

⁴ Paul Kirby, Who's who in German elections and why this vote is important, 22 February 2025, BBC, <https://www.bbc.com/news/articles/cg5ynv58y8yo>; Richard Connor and Timothy Jones, Germany: CDU/CSU and SPD announce coalition government deal, 9 April 2025, Deutsche Welle, <https://www.dw.com/en/germany-cdu-csu-and-spd-announce-coalition-government-deal/live-72180120>.

⁵ Open Government Partnership, Vitoria-Gasteiz Declaration, IX Global Summit of the Open Government Partnership, <https://www.opengovpartnership.org/vitoria-gasteiz-declaration/>.

Section I. Key Observations

The key observations below offer reflections from Germany's fourth action plan cycle. These lessons aim to support Germany's future action plans and broader open government journey.

Observation 1: Commitments that involved multi-stakeholder participation saw strong engagement among existing networks. Several commitments brought together diverse groups of stakeholders to support their implementation. For example, the implementation of national action plans on opportunities for children and homelessness (Commitments 7 and 8) and the Federal Foreign Office's foreign policy dialogues (Commitment 5) benefited from robust engagement from diverse networks of stakeholders focused on policies transparency and open data, such as non-governmental organizations, foundations, academia, and youth organizations. Moving forward, the OGN could expand its membership beyond CSOs focused on open data and technology by including CSOs and groups of stakeholders convened as part of action plan commitments.

Observation 2: Cooperation and cross-learning between state governments have helped advance open government reforms within and beyond OGP action plans. The fourth action plan was the third consecutive plan to include commitments from states (Länder). Since the second action plan (2019-2021), eight of Germany's 16 states have either included their own commitment or have supported a federal commitment.¹ The ongoing involvement of states in Germany's national OGP action plans is a positive trend, given the substantial autonomy of states and the prevalence of open government initiatives at the state level. Another positive trend is state governments cooperating and learning from each other in implementing open government initiatives. In the fourth action plan, Berlin and Schleswig-Holstein cooperated on linked open data (Commitments 12-14). During the third action plan (2021-2023), North Rhine-Westphalia launched a central participation platform based on a similar platform developed by the Free State of Saxony in the second plan (2019-2021). Outside of the OGP process, Bavaria and Baden-Württemberg launched and populated state-level open data portals, while Berlin, Schleswig-Holstein, Saarland, and Brandenburg have convened citizen's assemblies on topics such as climate, education, participation, democracy, and health.² These initiatives can serve as best practices for further cooperation between states governments in pursuing the same policy and between state governments and civil society.

Observation 3: While the linkage to political goals from the 2021 coalition agreement led to limited completion in some cases, it significantly raised the ambition of federal commitments. The federal commitments in Germany's fourth action plan were directly tied to the priorities of the 2021 government coalition agreement.³ This allowed Germany to raise the ambition of its federal commitments, such as passing the Federal Transparency Act (Commitment 1) and introducing mandatory transparency guidelines for federal public-private partnerships (Commitment 3). Other ambitious commitments linked to the coalition agreement were creating an arms export database (Commitment 2) and continuing the digitization of public procurement (Commitment 9). The break-up of the coalition government in November 2024 prevented these commitments from being fulfilled, except for Commitments 3 and 9. Nevertheless, most of the commitments that leveraged existing initiatives from ministries but without requiring passing legislation from ministries were completed (such as Commitments 5-8). Furthermore, the linkages to the coalition agreement have led to civil society mobilization and follow-up, such as petitions launched in 2024 through the Alliance for the Federal Transparency Act.⁴

Observation 4: Lack of opportunities for co-creation and co-implementation of commitments led to civil society disengagement. Since the first action plan (2017-2019), civil society stakeholders have coordinated their participation in the OGP process via the informal Open Government Network (OGN). Over time, interest among OGN members in the OGP process has declined. The OGN has faced a lack of structure and funding. During the co-creation of the fourth action plan, OGN members mentioned there were insufficient opportunities and time allocated to discussing the commitments, which limited their desire and ability to participate. However, the Point of Contact noted that, for each consultation phase, little input from civil society reached the government, which precluded the necessity of a longer co-creation process.⁵ The PoC pointed to the lack of coordination within NGO networks as a potential contributing factor to civil society disengagement.⁶ A consortium comprising Transparency International Germany, the Open Knowledge Foundation, and the Open Government Institute received a grant from the OGP Helen Darbshire Fund for Civil Society to strengthen and expand the OGN.⁷

For future action plans, the Federal Chancellery and interested members of the OGN could work together to identify a space where government and civil society could conduct long-term iterative dialogue on reforms related to transparency, civic participation, and public accountability.

¹ Federal states that have included their own commitment or supported a federal commitment are North Rhine-Westphalia, Saxony, Schleswig-Holstein, Baden-Württemberg, Bremen, Hamburg, Berlin, and Mecklenburg-Western Pomerania.

² 'Bavaria goes 'open bydata' with a new open data portal', Interview with Luis Mossburger, Product Owner Open Data at the Bavarian Digital Agency, 2 October 2023, <https://data.europa.eu/en/publications/datastories/bavaria-goes-open-bydata-new-open-data-portal>; 'Open Data für Baden-Württemberg' [Open Data for Baden- Württemberg], <https://im.baden-wuerttemberg.de/de/digitalisierung/open-data-fuer-baden-wuerttemberg>; Bürgerrat, Citizens' assemblies on state level, <https://www.buergerrat.de/en/citizens-assemblies/citizens-assemblies-on-state-level/>.

³ Mehr Fortschritt Wagen – Bündnis für Freiheit, Gerechtigkeit und Nachhaltigkeit. Koalitionsvertrag 2021-2025 zwischen der Sozialdemokratischen Partei Deutschlands (SPD), Bündnis 90/ Die Grünen und den Freien Demokraten (FDP) [Daring to make more progress – Alliance for freedom, justice and sustainability. 2021-2025 Coalition agreement between the Social Democratic Party of Germany (SPD), Alliance 90/The Greens, and the Free Democrats (FDP)], https://www.spd.de/fileadmin/Dokumente/Koalitionsvertrag/Koalitionsvertrag_2021-2025.pdf

⁴ Transparenzgesetz.de, <https://transparenzgesetz.de>; Transparency International Germany, Petition gestartet: Transparenzgesetz jetzt! [Petition launched: Transparency law now!], 16 April 2024, <https://www.transparency.de/aktuelles/detail/article/eil-appell-startet-transparenzgesetz>; Mehr Demokratie, Über 50.000 Unterschriften für ein Transparenzgesetz an Fraktionsvize von Notz übergeben [Over 50,000 signatures for a transparency law handed over to parliamentary group deputy von Notz], 10 June 2024, <https://www.mehr-demokratie.de/nachrichten/einzelansicht/transparenzgesetz-ueber-50000-unterschriften-an-fraktionsvize-von-notz-uebergeben#c67952>.

⁵ Open Government Partnership, Independent Reporting Mechanism, Germany Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/germany-action-plan-review-2023-2025/>.

⁶ Germany OGP Point of Contact, comments provided during the report's pre-publication period, 19 December 2025.

⁷ Open Government Partnership, Announcing the Recipients of the Helen Darbshire Fund for Civil Society, 6 October 2025, <https://www.opengovpartnership.org/news/announcing-the-recipients-of-the-helen-darbshire-fund-for-civil-society/>.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 9: Provided the technical framework for federal states to voluntarily publish below-EU threshold procurement notices on a central portal.

Commitments 12-14: Led to the publication of Berlin's and Schleswig-Holstein's budget data and Schleswig-Holstein school and wind turbine data as linked open data (LOD) format, increasing transparency. The cluster also sets the foundations for further publication of open data as LOD.

Commitment 9: Data-based value-added services in public procurement

Implementers: Federal Ministry of the Interior and Community (BMI) and Procurement Office of the Federal Ministry of the Interior and Community (BeschA)

Context and Objectives

This commitment aimed to improve Germany's central public procurement notice platform, "Bekanntmachungsservice" (Announcement Service). The BMI and BeschA aimed to publish standardized datasets, develop prototype questions on an online dashboard in consultation with stakeholders, and include tenders of monetary value lower than the EU-set minimum threshold at the federal level. Previously, only tenders of value above the EU-set minimum threshold were available for all levels of government.¹ It built on a commitment from the 2021-2023 action plan, which established Bekanntmachungsservice as well as the government's 2021 coalition agreement, which called for digitizing public procurement.

Early Results: Moderate Results

The IRM assesses this commitment as having moderate early results because it provided the technical framework for federal states to voluntarily publish below-EU threshold procurement notices on a central national-level portal.

Three out of four milestones were completed. Under milestone 1, in compliance with EU-wide procurement requirements, the BeschA started publishing German tender data only in the eForms-DE data standard starting in October 2023.² Milestone 2, to set up the technical and legal framework to expand Bekanntmachungsservice to below-threshold tenders, was implemented. This involved using the EU's eForms E2, E3, and E4 to define form types for submitting procurement notice data below the EU thresholds, which could then be sent to Bekanntmachungsservice for central publication in a uniform manner.³ BeschA provided information to the states about the possibility of free shared use and provided them with the option to participate in a test phase.⁴ According to the government, as an example, 4,684

procurement notices below the EU thresholds were published in the second half of June 2025.⁵ BeschA connected the German public procurement portal to the EU's Public Procurement Data Space (PPDS).⁶ This means that tenders from Bekanntmachungsservice are now also published to the PPDS. According to the lead implementer, they opted to link Bekanntmachungsservice to the PPDS to simplify benchmarking and avoid duplication of effort.⁷ Beyond the commitment, German public procurement tender data is integrated into the dashboards on the PPDS, a suite of analytical indicators on procurement performance across EU countries.⁸ Milestone 4 aimed to create dashboard prototypes to help the government agencies make well-informed and cost-effective purchasing choices in collaboration with procurement authorities, businesses, and civil society organizations (CSOs). These dashboards are available in Bekanntmachungsservice.⁹ The German dashboards are also available via the PPDS.¹⁰ The prototype for the dashboards was provided by the European Commission's Directorate-General GROW and were customized by the Federal Office for Public Procurement's development partner.¹¹ Where possible, text was translated into German for national adaptation.¹² However, the dashboard prototype was developed solely by the BMI without the involvement of stakeholders outside the federal government.¹³

With this commitment, the BeschA sought to help administrations and businesses better understand the procurement market and monitor their goals, enable greater public scrutiny, and increase the competitiveness of public procurement. While more below-threshold tenders are being published, the BeschA has not yet measured the availability of how many below-threshold public procurement notices are published on the platform.¹⁴ A civil society stakeholder noted that, while there is no singular platform that contains all data and links it to above-threshold public procurement data, this commitment is an important step towards achieving this goal for above-threshold tenders.¹⁵ They noted that there are numerous platforms on which below-EU-threshold data is published with varying levels of completeness, making cross-regional dataset comparisons challenging.¹⁶

Implementation was aided by the EU-wide eForms Regulation (2019/1780). The BeschA took the regulation as an opportunity to organize centralized data collection using the new EU-wide standard and to make this data available as open data.¹⁷ However, tender data for below-EU-threshold procurement procedures was only provided to Bekanntmachungsservice by state contracting authorities on a voluntary basis, as each federal state is free to decide on its application of the German Regulation on Sub-Threshold procurement (UVgO).¹⁸ This led to the incomplete coverage of below-threshold tenders on the portal.

Looking Ahead

The BMI is supporting the completion of publicly accessible procurement data via the creation of all the necessary technical prerequisites. However, both the BMI and a civil society stakeholder noted that the collaboration of all federal states is necessary to increase the availability of below-EU-threshold data as open data on Bekanntmachungsservice.¹⁹

Moving forward, the BMI and the BeschA could:

- **Further promote the use of Bekanntmachungsservice and eForms standard among public contracting authorities at the state level.** This initiative could include presenting the benefits of using the platform and could be undertaken along with interested business associations and CSOs.
- **Set up a working group of practitioners in federal and state administration working on public procurement to agree on common terminology and data standards.** The group would work with tender data, ensuring compatibility with the

eForms-DE data standard, and draft templates for public procurement notice and tender data with a view to having an agreed template and data in a common format to ensure interoperability.

- **Provide technical assistance to states to publish below-EU-wide-threshold tenders.** This process could include federal and state-level procurement offices, as well as technical experts, and could involve identifying barriers to tender publication and providing recommendations to overcome them. Liaising with businesses and civil society to support this engagement process could be crucial in convincing federal states to expand their efforts in below-EU-wide-threshold tender publication.
- **Consult interested government officials, private sector operating in typical tender fields, and civil society groups to identify key information for Bekanntmachungsservice.** This could enhance the government’s understanding of user needs for future changes to the portal.
- **Conduct trainings on how to use open contracting data.** These trainings could target businesses, state auditing institutions, civil society, researchers, and journalists. The trainings could include identifying red flags and integrity risks across the procurement cycle and could be organized in partnership with civil society.
- **Make the data user-friendly through online tools and visualizations.** This process could include liaising with interested stakeholders to identify user needs and plan visualizations addressing them. For example, Ukraine’s Prozorro business intelligence tool includes several filters and different visualizations.²⁰

Commitments 12-14: Linked Open Data

Implementers: Berlin Senate Department for Finance (Commitment 12) and State Chancellery of Land Schleswig-Holstein (Commitments 13 and 14).

Context and Objectives

This cluster aimed to advance Linked Open Data within the states of Schleswig-Holstein and Berlin. Schleswig-Holstein aimed to publish its budget data and other datasets as linked open data (Commitment 14) and develop a visualization tool for its budget data (Commitment 13). Berlin aimed to publish budget data as linked open data (LOD) in collaboration with civil society (Commitment 12). The concurrent sharing of budget data as LOD involved the joint development of a standardized terminology to enable linkage between datasets.²¹ Schleswig-Holstein’s commitments formed part of a larger project to expand the state’s open data infrastructure, while Berlin’s commitment built on the 2022 visualization of Berlin budget data and forms part of the goals in Berlin’s 2024 Open Data Strategy, jointly developed with business and civil society stakeholders.²² Commitment 12 also aimed to document Berlin’s experience of linking open budget data and share lessons with Schleswig-Holstein.

Early Results: Moderate Results

The IRM assessed this cluster as having moderate early results. It led to the publication of budget data for Berlin and Schleswig-Holstein in LOD format, making them the first states to do so.²³ In Schleswig-Holstein it also led to the publication of datasets on schools and wind turbines as LOD.²⁴ Linked Open Data allows for dataset contents to be labelled and then create automatic connections with other datasets, increasing data accuracy and transparency.²⁵ Progress was also made in both states on automatically identifying and linking data.²⁶ This

cluster is particularly innovative in Germany, where many agencies do not adequately fulfill their legal open data obligations.²⁷

Two out of three commitments in the cluster were implemented. As part of milestone 1 of Commitment 12, a BarCamp²⁸ (an open participatory workshop without a pre-set agenda or formal process), was co-organized by the Berlin Senate Department for Finance and the Open Knowledge Foundation (OKF) in October 2023.²⁹ The BarCamp was moderated by one of OKF's coordinators and the 25 participants from 10 institutions from government, as well as civil society and academia.³⁰ OKF also set up the technical infrastructure for documenting the outputs of the BarCamp on the Etherpad platform, published the results on the organization's Open Data Knowledge Hub and launched a secure communication channel on the Matrix platform.³¹ Participants explored potential implementation avenues, use cases, and potential obstacles to LOD data publication. According to the Senate Department for Finance, this format was conducive for informal knowledge sharing and networking.³² The BarCamp also helped in identifying the differences and similarities between Berlin's and Schleswig-Holstein's state budgets.³³ Milestone 2 led to the modeling of Berlin budget data as LOD and developing a shared software component to accelerate development with Schleswig-Holstein. Since both state budgets were already available as structured open datasets, the collaboration focused primarily on data modeling and standardization, with Schleswig-Holstein proposing a common framework to organize and understand important project concepts and Berlin adapting it to the requirements of Berlin's budget.³⁴ OKF participated in the meetings between the two states, providing organizational and advisory support and writing a LOD checklist for other interested administrations.³⁵ OKF is also hosting the shared vocabulary for budget data at the level of German federal states on GitHub.³⁶ Milestone 3 saw the publication of Berlin's budget data as LOD in turtle format files (ttl) and on GitHub. Their publication on GitHub ensures that the data remains accessible, reusable, and linkable with other datasets.³⁷ The commitment was presented as a practical example of Berlin's Open Data strategy at the 2024 Berlin Open Data Day and two workshops discussing use cases of LOD, while OKF documented the project on its knowledge hub.³⁸ Milestone 1 of Commitment 14 led to the development of a triple store with a SPARQL endpoint for testing.³⁹ SPARQL endpoints allow users to directly ask questions and get answers from the data, without having to download and sort through the files themselves.⁴⁰ Milestone 2 led to the modeling of household data and the development of a shared code framework between Schleswig-Holstein and Berlin.⁴¹ This involved meeting with the Berlin Senate Department of Finance and co-developing the software for publishing data as LOD.⁴² Milestone 3 saw Schleswig-Holstein publish its budget data in RDF file format.⁴³ Finally, under milestone 4, two datasets, on wind turbines and schools were released as LOD in RDF format.⁴⁴ Commitment 13 only saw limited completion, with milestone 1 leading to ttf as the format chosen under which annual municipal financial statements are to be submitted for visualization. The other three milestones were not implemented.⁴⁵

The LOD datasets in both states are now interoperable and machine readable. For Commitment 12, the Senate Department for Finance representative noted that it improves the efficiency and quality of data processing within the administration and proves that standardized handling of budget data as LOD is feasible within Germany's federal structure. It also provides a reference point for other state budgets, increases budget transparency, and lays the foundation for further developments in LOD.⁴⁶ For Commitment 14, Schleswig-Holstein's State Chancellery noted that data for non-physical items such as the budget data and data for well-known physical items such as schools and wind turbines were chosen to demonstrate the versatility of LOD.⁴⁷ The shared code framework between Berlin and Schleswig-Holstein also allows for

automatic integration with other data online.⁴⁸ The cluster significantly increases transparency of budget data and the potential for reuse of open data.

OKF views the implementation of LOD as important, as this data format had previously not received much attention from government decision makers and had only been mentioned in states' open data strategies. According to OKF, the publication of this data provides a reference for stakeholders and could serve as an important reference for other states and public bodies intending to publish LOD.⁴⁹

The cluster's implementation benefitted from a network of partners and enhanced capacity and resources. For Commitment 12, the Berlin Senate Department for Finance collaborated with partners within and outside of the Berlin administration, such as OKF and Berlin's Open Data Information Office. The inclusion of a data scientist in the implementation team allowed for technical expertise in data modeling and programming to be built in-house. Finally, strong project management and political support were decisive in implementing the commitment.⁵⁰ OKF commended the Berlin Senate Department of Finance's strong commitment to this project. For Commitment 14, a key enabling factor was the allocation of a sizable, dedicated budget for open data projects by the Schleswig-Holstein parliament, outside of the traditional yearly fiscal period.⁵¹

However, the cluster's implementation also faced technical challenges. Specifically, for Commitment 12, Berlin's public administration lacks the technical infrastructure necessary for storing and analyzing semantic data (triple store). As a workaround, the Berlin Senate Finance Department decided to publish the turtle files on GitHub instead, a solution that was developed by the Berlin-owned IT DZ company BerlinOnline.⁵² For Schleswig-Holstein's State Chancellery, the steep learning curve LOD involves for software developers impacted implementation of Commitment 14, while problems with the external service provider led to Commitment 13 only reaching limited implementation.⁵³

Looking Ahead

Moving forward, both states plan to advance their efforts to publish datasets as LOD. In Berlin, the Senate Finance Department noted that this commitment aimed to lay the foundations to create more linked open datasets in Berlin.⁵⁴ As of July 2025, the long-term publication of budget data is explicitly planned, while the goal is to also publish other suitable datasets as LOD.⁵⁵ The OKF hosted a second BarCamp with project partners to discuss future prospects for the linked budget data and additions such as more textual information about budget terms.⁵⁶ The Berlin Open Data Information Office also developed a prototype tool for developing LOD through the case study of creating machine-readable administration organization charts. This has already enabled several Berlin authorities to publish their first LOD organizational charts.⁵⁷ The Berlin state government is also in dialogue with federal authorities and cross-state initiatives to expand the project beyond Berlin and Schleswig-Holstein.⁵⁸ OKF is also in talks with other German states that have expressed interest in publishing their budget data as LOD using the developed vocabulary.⁵⁹ In Schleswig-Holstein, Commitments 13 and 14 are part of a broader project to expand the state's open data infrastructure. Furthermore, the state of Schleswig-Holstein and the Federal Office of Motor Vehicles (Kraftfahrtbundesamt) signed a letter of intent to cooperate in the field of LOD.⁶⁰

While there is progress on expanding the publication of open data as LOD in other interested German states, it is unclear at the time of writing whether the next OGP action plan will include a relevant commitment. Berlin is establishing the regular publication of its budget data as LOD, in accordance with the principle of 'open by default' identified in the 2024 Berlin Open Data

Strategy, while Schleswig-Holstein is implementing a broader project to automate the generation of LOD based on datasets.⁶¹

Moving forward, the Berlin Senate Department for Finance could:

- **Accelerate the development of a triple store technical infrastructure for Berlin government entities.** The Senate Department for Finance could involve external technical experts to provide necessary technical knowledge and address any challenges.
- **Liaise with the federal government to find an appropriate central location to store and maintain the shared vocabulary** which is now under the responsibility of OKF.

Both the Berlin Senate Department for Finance and the Schleswig-Holstein State Chancellery could:

- **Provide regular capacity building to state administration employees on publishing LOD.** This could help raise awareness of the importance and benefits of LOD as well as ensure that the necessary technical knowledge is being cultivated.
- **Conduct awareness-raising about LOD.** Showcasing the benefits of publicizing open data as LOD could help increase momentum around this initiative. Aspects to highlight could include increased transparency, strengthened administrative efficiency, and increased innovation capacity. This could target researchers, journalists, and academics interested in public accountability, and businesses or programmers interested in developing applications using the data, and could leverage the connections and resources of the OKF.
- **Expand the publication of other open data as LOD.** Identifying high-priority datasets with interested civil society, business, app developers, and academic stakeholders could be a first step in this process. For Berlin, the Berlin Open Data Information Center identified infrastructure data, environmental data, and traffic data as potentially promising policy areas in which to publish Berlin state data as LOD.
- **Convene interested federal states to develop cross-state LOD standards.** Involving all interested states in developing nationwide semantic processing standards regarding LOD could support wider uptake of similar initiatives. This could be pursued through the Digital Ministers' Conference or the IT-Plannungsrat (IT Planning Council). Berlin and Schleswig-Holstein stakeholders could continue working together on LOD with the eight out of 16 states that have open data portals in the country.⁶² Stakeholders could also take advantage of the experimentation clauses that the October 2025 state modernization agenda aims to introduce.⁶³

¹ Government representative, comments provided during the report's pre-publication period, 19 December 2025.

² Vergabeblog – Deutsches Vergabernetzwerk [Procurement blog – German Procurement Network], Erfolgreicher Start des Datenservice Öffentlicher Einkauf [Successful Launch of the Public Procurement Data Service], 31 October 2023, <https://vergabeblog.de/2023-10-31/bescha-erfolgreicher-start-des-datenservice-oeffentlicher-einkauf/>.

³ Federal Ministry of the Interior official, correspondence with the IRM, 17 October 2025.

⁴ Federal Ministry of the Interior official, correspondence with the IRM, 17 October 2025.

⁵ Federal Ministry of the Interior officials, correspondence with the IRM, 7 July 2025; The German public procurement portal, <https://oeffentlichevergabe.de/ui/en/>.

⁶ European Union, Ted – tenders electronic daily, Active notices in Germany, <https://ted.europa.eu/en/search/result?place-of-performance=DEU&search-scope=ACTIVE>.

⁷ Federal Ministry of the Interior official, correspondence with the IRM, 17 October 2025.

⁸ European Commission, Dashboards, European Public Procurement Data Space, <https://www.public-procurement-data-space.europa.eu/en/dashboards>.

- ⁹ Federal Ministry of the Interior officials, correspondence with the IRM, 7 July 2025.
- ¹⁰ European Union Public Procurement Data Space, <https://www.public-procurement-data-space.europa.eu/en/dashboards>
- ¹¹ Federal Ministry of the Interior official, correspondence with the IRM, 17 October 2025.
- ¹² Federal Ministry of the Interior official, correspondence with the IRM, 17 October 2025.
- ¹³ Transparency International Germany representatives, correspondence with the IRM, 26 August 2025.
- ¹⁴ Federal Ministry of the Interior official, correspondence with the IRM, 2 September 2025.
- ¹⁵ Transparency International Germany representatives, correspondence with the IRM, 26 August 2025.
- ¹⁶ Transparency International Germany representatives, correspondence with the IRM, 26 August 2025.
- ¹⁷ European Union, Commission Implementing Regulation (EU) 2019/1780 of September 2019 establishing standard forms for the publication of notices in the field of public procurement and repealing Implementing Regulation (EU) 2015/1986 (eForms), EUR-Lex, https://eur-lex.europa.eu/eli/reg_impl/2019/1780/oj/eng; Federal Ministry of the Interior official, correspondence with the IRM, 2 September 2025.
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Section III. Participation and Co-Creation

Co-creation followed a similar process to previous German action plans. However, consultations with the Open Government Network (OGN) did not lead to significant changes to the commitments or the addition of new commitments. During implementation, the federal government provided updates on the statuses of commitments to civil society on the OGP website and at OGN meetings. Moving forward, the federal government and civil society could work together to identify a space for long-term iterative dialogue on reforms related to transparency, civic participation, and public accountability.

OGP in Germany

The Federal Chancellery has led the OGP process since Germany joined OGP in 2016. There have been no major procedural changes in the organizational leadership of OGP in Germany since then. A Point of Contact (PoC) at the Federal Chancellery coordinates the OGP process. All federal ministries and states (Länder) involved in OGP action plans assign points of contact. Germany allocates a dedicated budget for communication purposes, specifically design, translation, and publication of action plans and self-assessments, as well as maintenance of the OGP website, Open Government Deutschland.¹

Civil society participation in the OGP process is principally organized through the informal Open Government Network (OGN). The OGN comprises 26 civil society organizations (CSOs) and foundations.² However, not all these organizations participate in OGP consultations. The OGN's steering committee is elected every two years and represents the network externally. Any interested organization can participate in the OGN, and its decisions are made by the steering committee.³ The OGN meets monthly to discuss open government-related topics in Germany, though only a part of its work directly concerns OGP. The PoC at the Federal Chancellery sometimes attends OGN meetings to give updates on the status of OGP action plans and to obtain members' feedback on draft commitments and progress on commitment implementation.

Communication around the OGP process in Germany is done through the government's OGP website.⁴ The website contains current and past action plans, all co-creation documentation for the fourth action plan and all past action plans, as well as regular updates on implementation of commitments.⁵ The PoC also shares information on the OGP process via a free newsletter.⁶

Action Plan Co-Creation

The PoC informed the OGN that the action plan would be developed from spring to summer 2023. The PoC attended the meeting of the OGN on 3 April 2023, where the civil society platform prepared for the consultation. The government decided on the list of possible commitments in advance of the public consultations.⁷ An overview of participation opportunities was published on the OGP website on 25 April 2023.⁸ The outline of commitment proposals for the first consultation was also published. The first consultation took place from 25 April until 12 May and was open to the public.⁹ On 9 May, the Federal Chancellery hosted the first discussion between the ministries involved in the action plan and interested OGN members.¹⁰ Civil society discussed the proposed commitments with the responsible ministries and received feedback to their questions and comments.¹¹ Civil society stakeholders noted that the three-week consultation period did not enable them to meaningfully contribute during the co-creation process. According to the PoC, this time span is longer than what is usually allocated to

ministries to provide responses.¹² The second consultation was held from 24 July until 6 August.¹³ Several stakeholders also found the timing of the second consultation, which coincided with summer holidays, limited their ability to participate. The PoC at the Federal Chancellery noted that low levels of civil society interest largely precluded the need for a longer co-creation process. He also noted that accounting for the OGN members’ summer holidays, due to their staggered nature, would have meant pausing the process from July until September.¹⁴

While both co-creation consultations were documented on the OGP website, and the POC and government stakeholders provided some reasoned response to civil society stakeholders both orally and in writing, OGN members expressed uncertainty as to how their feedback impacted the final action plan.¹⁵ The PoC confirmed that no justifications for each individual change were provided, partly because the comments did not lend themselves to concrete responses.¹⁶ The action plan was submitted in August 2023.

Participation During Implementation

There was no formal involvement of civil society stakeholders in the implementation of the action plan. The PoC provided updates on commitment implementation during OGN meetings on 7 August and 2 October 2023, and 5 August and 2 December 2024.¹⁷ Civil society were also consulted in writing during the preparation of the government’s self-assessment report in October 2024. According to the PoC, the two response letters received during the public consultation motivated the government to request additional information from commitment holders.¹⁸ The self-assessment report was published in January 2025 and provided implementation progress as a graphic visualization.¹⁹ Comprehensive implementation updates were also provided throughout the action plan implementation period on the government’s open government website.²⁰ A civil society stakeholder noted that a self-assessment report containing analysis of the status of each commitment along with the relevant evidence would increase transparency, as the monitoring provided via the website could be changed at any given moment.²¹

According to the PoC, among the challenges to implementation were the different levels of interest and engagement among the federal ministries, as well as the declining interest from civil society in the OGP process.²² The PoC further noted that civil society rarely provided feedback on commitment implementation.²³ Compared to the previous action plan, the government’s levels of engagement and dialogue with civil society remained low.²⁴ The PoC noted that this could be due to declining interest in dialogue on behalf of civil society.²⁵

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.²⁶ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.²⁷ The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.²⁸

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: Germany does not have a formal space for dialogue to oversee the OGP process. Instead, the point of contact (PoC) at the Federal Chancellery attends the	Yes	No

<p>meetings of the Open Government Network (OGN) on an <i>ad hoc</i> basis to obtain civil society’s feedback on the development and implementation of action plans. The OGN continues to be the main interlocutor between the government and civil society in the OGP process. The rules for participation in the OGP process are publicly available.²⁹ The OGN met monthly during the implementation of the 2023-2025 action plan (August 2023 to July 2025). The PoC attended four of these meetings (7 August 2023, 2 October 2023, 5 August 2024, and 2 December 2024). Civil society members also discussed commitment implementation with the PoC on 3 April 2024.³⁰ As of November 2025, the PoC has not attended any other OGN meetings.³¹ The PoC noted that the number of meetings he attended can be ascribed to a minimal need for government-civil society exchange following the regular online implementation updates as well as the premature dissolution of the government in November 2024.³²</p> <p>Although a space for dialogue existed during the fourth action plan, the frequency of meetings during implementation fell short of the minimum requirements under OGP’s Participation and Co-creation Standards. This minimum requirement states that countries should have a space for ongoing dialogue with participation from government and civil society that meets at least every six months throughout the action plan cycle. As the PoC did not attend any OGN meeting between 2 December 2024 and the end of the implementation period on 30 June 2025, a period longer than six months, the minimum requirement is assessed as not met.</p>		
<p>2.1 OGP website: The Federal Chancellery manages Germany’s OGP website, www.open-government-deutschland.de, that includes past and current action plans, updates on commitment implementation, and information on the OGP process.³³</p>	<p>Yes</p>	<p>Yes</p>
<p>2.2 Repository: Germany’s OGP website functions as the country’s repository. The Federal Chancellery provides updates on action plan implementation. The updates contain information and evidence on the status of commitments and are not timestamped. Germany also published a self-assessment report in January 2025.³⁴</p>	<p>Yes</p>	<p>Yes</p>

3.1 Advanced notice: See the Action Plan Review. ³⁵	Yes	Not applicable
3.2 Outreach: See the Action Plan Review.	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review.	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review.	Yes	Not applicable
5.1 Open implementation: The PoC attended four OGN meetings to provide updates on action plan implementation, on 7 August 2023, 2 October 2023, and 5 August 2024. Civil society members also discussed with the PoC on 3 April 2024. ³⁶	Not applicable	Yes

¹ Germany OGP Point of Contact, correspondence with the IRM, 26 June 2025.

² Open Government Netzwerk Deutschland [Open Government Network Germany], Netzwerk: Mitglieder [Network: Members], <https://opengovpartnership.de/netzwerk/>.

³ Open Government Netzwerk Deutschland [Open Government Network Germany], Mitmachen [Participate], <https://opengovpartnership.de/mitmachen/>; Open Government Netzwerk Deutschland [Open Government Network Germany], Strategiegruppe des Netzwerks [Network Steering Committee], <https://opengovpartnership.de/strategiegruppe-des-netzwerks/>.

⁴ Open Government Deutschland, <https://www.open-government-deutschland.de/opengov-en>.

⁵ Vierter Nationaler Aktionsplan [Fourth National Action Plan], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/4-nap>; Dokumentation 2023 [2023 Documentation], <https://www.open-government-deutschland.de/opengov-de/ogp/dokumentation-2023-2183708>.

⁶ Newsletter per Email: Aktuelles zu Open Government [Newsletter by email: Latest news on Open Government], <https://www.open-government-deutschland.de/opengov-de/newsletter?view=>.

⁷ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review 2023-2025, https://www.opengovpartnership.org/wp-content/uploads/2024/07/Germany_Action-Plan-Review_2023-2025_EN.pdf.

⁸ Startschuss zur Erarbeitung des 4. NAP [Start of the development of the 4th NAP], 25 April 2023, <https://www.open-government-deutschland.de/opengov-de/startschuss-zur-erarbeitung-des-4-nap-2183710>

⁹ See, for example, <https://www.bmas.de/DE/Arbeit/Arbeitsrecht/Staerkung-der-Tarifbindung/Oeffentliche-Konsultation-zur-Tarifreue/oeffentliche-konsultation-zur-tarifreue.html>; Startschuss zur Erarbeitung des 4. NAP, [Commencement of the development of the 4th NAP], Open Government Deutschland, <https://www.open-government-deutschland.de/opengov-de/startschuss-zur-erarbeitung-des-4-nap-2183710>; Zeitliste [Timeline], Open Government Deutschland, <https://www.open-government-deutschland.de/opengov-de/ogp/mitmachen/zeitleiste-1591046>.

¹⁰ Open Government Deutschland, Ergebniszusammenfassung: Multistakeholder-Gespräch zum 4. Nationalen Aktionsplan [Summary of results: Multi-stakeholder discussion on the 4th National Action Plan], 9 May 2023, <https://www.open-government-deutschland.de/resource/blob/1567548/2191038/b346e82aef87e21e329e0613c84f2851/protokoll-ogp-09mai2023-data.pdf?download=1>.

¹¹ Dokumentation 2023 [2023 Documentation].

¹² Germany OGP Point of Contact, comments provided during the report's pre-publication period, 19 December 2025.

¹³ Zeitliste [Timeline], Open Government Deutschland.

¹⁴ Germany OGP Point of Contact, comments provided to the IRM during the 2023-2025 Action Plan Review's pre-publication period, 17 May 2024; Germany OGP Point of Contact, comments provided to the IRM during the report's pre-publication period, 19 December 2025.

¹⁵ Dokumentation 2023 [2023 Documentation]; "Betreff: 4. Nationaler Aktionsplan Open Government Partnership," [Subject: 4. National Action Plan Open Government Partnership], Open Government Deutschland, 31 August 2023, <https://www.open-government-deutschland.de/resource/blob/1567548/2216932/e7e8612b4329a48f3afdd3017bebc1e8/reasoned-response-nap4-data.pdf?download=1>.

¹⁶ Germany OGP Point of Contact, comments provided during the report's pre-publication period, 19 December 2025.

¹⁷ Open Government Netzwerk meeting minutes, <https://pad.okfn.de/p/akogpde>.

¹⁸ Germany OGP Point of Contact, correspondence with the IRM, 10 October 2025.

- ¹⁹ Konsultation zum Zwischenbericht [Consultation on the interim report], Open Government Deutschland, 11 October 2024, <https://www.open-government-deutschland.de/opengov-de/konsultation-zum-zwischenbericht-2314586>; Stand der Umsetzung des Nationalen Aktionsplans [Status of Implementation of the Fourth National Action Plan], Open Government Deutschland, 27 January 2025, <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/stand-der-umsetzung-des-4-nationalen-aktionsplans-2322650>; Germany OGP Point of Contact, correspondence with the IRM, 10 October 2025.
- ²⁰ Open Government Deutschland, <https://www.open-government-deutschland.de/opengov-en>.
- ²¹ Open Government Netzwerk member, comments provided to the IRM for the 2021-2023 Germany Results Report.
- ²² Germany OGP Point of Contact, correspondence with the IRM.
- ²³ Germany OGP Point of Contact, correspondence with the IRM, 10 October 2025.
- ²⁴ Open Government Partnership, Independent Reporting Mechanism, Results Report: Germany 2021-2023, <https://www.opengovpartnership.org/documents/germany-2021-2023-results-report/>.
- ²⁵ OGP Point of Contact, comments provided during the report's pre-publication period, 19 December 2025.
- ²⁶ Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.
- ²⁷ Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.
- ²⁸ On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024, <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; For information on the OGP Procedural Review Policy, <https://www.opengovpartnership.org/procedural-review/#IC>.
- ²⁹ Machen sie mit [Participate], Open Government Netzwerk Deutschland [Open Government Network Germany], <https://www.open-government-deutschland.de/opengov-de/ogp/mitmachen/machen-sie-mit-1947380>.
- ³⁰ Open Knowledge Foundation, Open Government Netzwerk meeting minutes, <https://pad.okfn.de/p/akogpde>.
- ³¹ Open Knowledge Foundation, Open Government Netzwerk meeting minutes, <https://pad.okfn.de/p/akogpde>.
- ³² OGP Point of Contact, correspondence with the IRM, 25 November 2025.
- ³³ Vierter Nationaler Aktionsplan [Fourth National Action Plan], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/4-nap>; Aktionspläne und Berichte [Action Plans and Reports], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte>.
- ³⁴ Stand der Umsetzung des Nationalen Aktionsplans [Status of Implementation of the Fourth National Action Plan]
- ³⁵ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: Germany 2023-2025, https://www.opengovpartnership.org/wp-content/uploads/2024/07/Germany_Action-Plan-Review_2023-2025_EN.pdf.
- ³⁶ Open Government Netzwerk meeting minutes.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time.

The Action Plan Review for Germany's 2023-2025 Action Plan clustered Commitments 12, 13, and 14, which relate to linked open data (LOD) in the Länder of Berlin and Schleswig-Holstein. All three commitments aimed to promote wider uptake of LOD and the publication of datasets as LOD. However, implementation of these three commitments varied, with Commitments 12 and 14 being implemented and Commitment 13 reaching limited completion. As such, this Results Report conducts the assessment of early results at the individual commitment level, rather than the cluster level.

The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by IRM staff and was reviewed by Jeff Lovitt, IRM external expert. The IRM methodology, quality of IRM products, and review process is overseen by the IRM's International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see "OGP Glossary," <https://www.opengovpartnership.org/glossary/>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ "International Experts Panel," Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ "IRM Overview," Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ "OGP Glossary," Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Transparency Act

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
|---|--|

The commitment aimed to draft and pass a Federal Transparency Act, establishing proactive publishing duties and a legal obligation to open data.² According to the 2021 government coalition agreement, the law would combine the three existing federal information laws.³ The commitment was a promising commitment in the 2023-2025 Action Plan Review.⁴ In January 2024, the Federal Ministry of the Interior and Home Affairs (BMI) noted that it was working on a draft law, though it could not state its contents.⁵ Despite pressure from journalists and civil society organizations (CSOs), BMI has not reported on the status of the project.⁶ According to the self-assessment report, implementation of the commitment is no longer possible due to the breakup of the federal government in November 2024.⁷ As the commitment was not implemented, it had no notable results in opening government at the time of assessment.

Commitment 2: Arms export database

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
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This commitment aimed to make arms exports more transparent by establishing a searchable up-to-date database of licensing data relating to German arms export control. Under milestones 1 and 2, the Federal Office for Economic Affairs and Export Control (BAFA) developed a concept for the database at the end of 2023.⁸ Following new federal measures to simplify procedures and accelerate arms export control, the basis for data collection changed. Specifically, while the focus of the commitment had been on collecting case-by-case licensing data, in September 2023, the government introduced new general export licenses and expanded existing general export licenses. This meant that no data on individual licensing procedures could be collected for all arms exports.⁹ According to the government, this made implementation of the beta version of the platform (milestone 3) and the publication of the database (milestone 4) more complex and impossible in the shortened legislative term, as the types of available data were now mixed.¹⁰ The Federal Ministry for Economic Affairs and Energy (BMWE, formerly BMWK) stated that the commitment will not be continued in the current legislative term.¹¹ As it was not completed, the IRM assesses the commitment as having no notable results in opening government.

Commitment 3: PPP Transparency guidelines

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
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<ul style="list-style-type: none"> ● Potential for results: Substantial 	
<p>The commitment aimed to create the first legally binding transparency obligations for federal-level public-private partnerships (PPPs) in Germany. While most PPPs in Germany are at the state level, the financial figures of federal PPPs greatly surpass the state ones.¹² The commitment was highlighted as promising in the Action Plan Review.</p> <p>Two of four milestones were completed. Under milestone 1, the Federal Ministry for Finance (BMF)¹³ drafted transparency guidelines in consultation with ministries involved in PPPs, such as the Federal Ministry of Transport (BMV), the Ministry for Defense (BMVg) and the Federal Agency for Real Estate Tasks.¹⁴ The outline of the guidelines included requirements to present PPP project data, such as project outlines and implementation progress, as well as PPP contract data, such as summaries of contract provisions and representations of the contractual risk distribution between partners.¹⁵ Previously, the implementing agency at BMF stated that there are concerns that the publication of the Public Sector Comparator could harm the fiscal interests of the state. Instead, the BMDV published a sample economic feasibility assessment.¹⁶ The BMF also commissioned a study on existing transparency practices in PPPs and policy recommendations.¹⁷ For milestone 2, the BMF conducted three workshops to discuss the draft guidelines in April-June 2024, attended primarily by industry associations, academics, and Transparency International Germany.¹⁸ The BMF shared the draft for public consultation and two industry associations contributed their position.¹⁹ Milestone 3 aimed to create the draft legal document for the PPP guidelines, while milestone 4 aimed to make the guidelines legally binding. These milestones were not implemented due to the breakup of the federal government in November 2024.²⁰</p>	
<p>Commitment 4: Report on the equivalence of living standards</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate Results
<p>The commitment aimed to publish the first report on the equivalence of living standards in regions across Germany. All four milestones were completed.²¹ The Federal Ministry for Economic Affairs and Climate Action (BMWK) and the Federal Ministry of the Interior (BMI) published the report in July 2024.²² It is the first such report by a German government and presents a structured analysis of federal regional convergence policies. The report analyzed €3.7 billion in funding. The main findings regarding the effectiveness of the German Federal Funding System for Structural Development Regions (GFS) were that states that belonged to the former German Democratic Republic received 52.8 percent of funds though it only has 19.4 percent of Germany’s population, that GFS funding was largely aligned with structural need, that there are sometimes large differences in utilizing GFS funding in East German states, and that rural regions disproportionately benefited from funding.²³ The report drew on more than 30,000 citizen survey responses and two expert opinions, completed under milestones 1 and 2. As part of the report, under milestone 3, focus groups discussed the cohesion policy within their regions. The groups discussed different thematic focuses and included members from diverse stakeholder groups. Specifically, focus groups discussed digital participation, mobility and public transportation, climate and the environment, skilled</p>	

workers and integration, structural change and strengthening, health and care, commitment, volunteering and social cohesion, and local amenities and cultural participation.²⁴ Beyond the commitment, the BMWK initiated a consultation process to implement the recommendations of the report, involving an online consultation and a dialogue workshop with approximately 20 citizens.²⁵

Commitment 5: Foreign policy citizen dialogues

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate Results |
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The commitment continued a commitment from the second action plan (2019-2021) that aims to bring foreign policy closer to the public. It involved organizing decentralized dialogues between the pool of volunteers at the Federal Foreign Office (FFO)’s Visitor Centre and the public throughout Germany.²⁶ Three of the five milestones were completed. Milestone 1 aimed to increase the FFO’s volunteer pool for hosting the dialogues. The number of volunteers increased to 125 in 2023 and 200 in 2024, an approximate 50 percent increase.²⁷ As part of milestone 2, which aimed to establish cooperation with three-five CSOs to co-organize citizen dialogues, the FFO cooperated with the German Association of Cities, the state governments of Thuringia, Saarland, and Mecklenburg-Western Pomerania, the West-East Encounters Foundation, and Luftkind film distribution company.²⁸ The FFO aimed to reach new stakeholder groups beyond the networks of the FFO’s communication channels.²⁹ Milestone 3 aimed for 20-30 discussion events to be held in 2023. As only 15 events were hosted, the milestone was not completed. Milestone 4 involved an evaluation after the first year and milestone 5 involved hosting 50-100 events in 2024. The FFO stated that the evaluation was completed and over 100 events were held in 15 of 16 states.³⁰ Milestone 6, to produce a two-year evaluation, was implemented in July 2025. The commitment involved the organization of in-person citizen dialogues on diverse security-related topics in Lower Saxony, Thuringia, Saxony-Anhalt, and Baden-Württemberg, a notable expansion from the three online citizen dialogues organized as part of the 2019-2021 action plan.³¹ Moving forward, the FFO could partner with more CSOs and create pathways for incorporating the input collected through the citizen dialogues in the FFO’s work.

Commitment 6: Dialogue network for sustainable agriculture

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
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Under this commitment, the Federal Ministry of Agriculture, Food and Regional Identity (BMLEH) aimed to publish an experience report on its dialogue network on sustainable agriculture. Milestone 1, aiming to collect methodological and member feedback as a first stage for drafting the report, was completed in April 2025.³² The results of the feedback collection process were made available to the dialogue network members.³³ Milestone 2, involving the publication of the experience report, is planned for early 2026.³⁴ As the

commitment was not implemented, it is assessed as having no notable results in opening government at the time of assessment.

Commitment 7: National Action Plan Opportunities for Children

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: No Notable Results |
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The commitment aimed to create a multi-stakeholder body to coordinate and accompany the monitoring of the implementation of a National Action Plan (NAP) for opportunities for children, with participation from federal, state, and municipal governments, CSOs, and academic bodies. The commitment also entailed the direct involvement of children and young people in the implementation of the NAP.³⁵ The NAP was developed through a participatory process before the start of the OGP action plan.³⁶

Four of five milestones were implemented. Under milestone 1, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ) created a multi-stakeholder committee, whose constituent meeting was held in September 2023 in Berlin.³⁷ The committee is composed of 52 members, roughly half of which are from federal ministries, state, and municipal governments, and half from civil society, foundations, and academia. The committee members were closely involved in drafting the NAP.³⁸ The committee meets twice per year.³⁹ It is tasked with commenting on the biennial progress reports written by the German Youth Institute.⁴⁰ However, a civil society participant in the committee noted that none of the proposals developed as part of the NAP or the interim progress reports can influence the federal budget. Therefore, the committee has an advisory role and cannot influence implementation.⁴¹

As part of milestone 2, two stakeholder conferences on combatting poverty at the local level were held in November and December 2023 and October 2024.⁴² Milestone 3, aiming to hold a conference involving the participation of young people, led to a workshop by the German Youth Institute, where 15 young people and young adults were invited to discuss the NAP and its contents.⁴³ A conference on youth participation was also held in July 2024.⁴⁴ Under milestone 4, the NAP committee submitted the first progress report to the European Commission on the implementation of the EU Child Guarantee in Germany in February 2025.⁴⁵ A fifth milestone to establish a digital portal to monitor the progress of the NAP was not completed.⁴⁶ Beyond the commitment, the BMBFSFJ, with the German Youth Institute and Dein München, established a team of 20 people aged 14 to 25 to consult on implementation.⁴⁷ While this commitment was substantially completed, the IRM did not find evidence that the multi-stakeholder committee enabled non-government partners to meaningfully shape implementation.

Commitment 8: National Action Plan and Forum Homelessness

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|--|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results |
|--|---|

The commitment aimed to develop a National Action Plan (NAP) to address homelessness and set up a national forum to guide the implementation of the NAP. Milestone 1, a conference to develop guidelines and commitments for the NAP, was held before the start of the OGP action plan.⁴⁸ Under milestone 2, the Federal Ministry for Housing, Urban Development and Building (BMWSB) submitted the draft version of the NAP for public consultation from 29 February to 25 March 2024.⁴⁹ Entries can be found in the lobby registry of the German parliament.⁵⁰ The milestone was delayed by a few months. Under milestone 3, the NAP was adopted in April 2024.⁵¹ Under milestone 4, the BMWSB created the National Forum Against Homelessness to guide implementation of the NAP. According to one civil society stakeholder, this is the first such national-level forum against homelessness in Germany.⁵² The kick-off meeting of the forum took place on 3 June 2024, attended by approximately 650 participants.⁵³ A second annual meeting of the forum was held in January 2025.⁵⁴ The BMWSB provided financial support to CSOs to coordinate three implementation working groups, which met four times in 2024 and three times in 2025.⁵⁵ However, the forum does not design, implement, or influence measures to address homelessness. Its work is largely advisory and consists of formulating policy recommendations.⁵⁶ Beyond the commitment, the government set up a Competence Center for Homelessness at the Federal Institute for Research on Building, Urban Planning and Spatial Development in June 2024, which supports implementation. While this commitment was completed, the IRM did not find evidence that the multi-stakeholder committee enabled non-government partners to shape implementation of the NAP.

Commitment 9: Data-based value-added services in public procurement

<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate Results
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This commitment is assessed in Section II above.

Commitment 10: Data cube environment

<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate Results
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The commitment aimed to improve open data related to the environment by introducing a “data cube” for accessing diverse data in structured formats. All three milestones were completed. Under milestone 1, the German Environment Agency launched the publicly available data cube.⁵⁷ Milestone 2 led to the organization of a data workshop with public participation in November 2024.⁵⁸ Milestone 3, the commissioning of the data cube system with all its components, was completed in April 2025.⁵⁹ Users can now filter, download, visualize, and share environmental data in human- and machine-readable formats.⁶⁰

Commitment 11: Implementation recommendation SDGs in legislation

<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results
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<ul style="list-style-type: none"> ● lens? Yes ● Potential for results: Modest 	
<p>The commitment aimed to evaluate how government departments have integrated the Sustainable Development Goals (SDGs) into the legislative process, following relevant government recommendations.⁶¹ All four milestones were completed. Under milestone 1, the Federal Ministry of Justice and Consumer Protection (BMJV) presented the project to civil society stakeholders.⁶² As part of milestone 2, the BMJV submitted a report on the implementation of the recommendations to the State Secretaries’ Committee for Sustainable Development in November 2023. The Committee issued a resolution taking note of the report and asking government departments to use the report’s findings and suggestions for improving their sustainability in legislation practices.⁶³ Milestone 3 led to the creation of the module “Sustainability in Legislation” at the Federal Academy of Public Administration, held in November 2023 and April 2024.⁶⁴ Milestone 4 involved a stakeholder dialogue entitled “Sustainability in Legislation”, which was organized in May 2024 for Open Gov Week.⁶⁵ The fifth milestone involved re-referral of the report to the State Secretaries’ Committee for Sustainable Development if needed, but that was ultimately not necessary as the committee issued a resolution upon first submission of the report. As the commitment focused on research and analysis, without clear pathways for implementation of insights, it is assessed as having no notable results in opening government at the time of assessment.</p>	
<p>Commitment 12: Berlin budget data as linked open data</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● This commitment has been clustered as: Linked Open Data (Commitments 12, 13, and 14 of the action plan) ● Potential for results: Substantial 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate Results
<p>This commitment is assessed in Section II above.</p>	
<p>Commitment 13: Visualization of municipal and Land budget data</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● This commitment has been clustered as: Linked Open Data (Commitments 12, 13, and 14 of the action plan) ● Potential for results: Substantial 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: Moderate Results
<p>This commitment is assessed in Section II above.</p>	
<p>Commitment 14: Publicly available data as linked open data</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes 	<ul style="list-style-type: none"> ● Completion: Complete ● Early results: Moderate Results

<p>lens? Yes</p> <ul style="list-style-type: none"> • This commitment has been clustered as: Linked Open Data (Commitments 12, 13, and 14 of the action plan) • Potential for results: Substantial 	
<p>This commitment is assessed in Section II above.</p>	
<p>Commitment 15: Digital building applications</p>	
<ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? No • Potential for results: Unclear 	<ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results
<p>Under this commitment, Mecklenburg-Western Pomerania aimed to digitize the process for building applications as a digital service to be used in all of Germany under the Online Access Act. Milestone 1, to complete the nationwide roll-out of the online service for participating states, is in progress. Twelve states have agreed to participate in the online service developed in Mecklenburg-Western Pomerania.⁶⁶ Preparation of enforcement agencies to adopt the new system and connection of digital systems for building applications of the 13 states are under way.⁶⁷ Milestone 2 aimed to improve and simplify data collection for building construction statistics, in accordance with the once-only principle (citizens or companies submit their data and documentation only once when applying for administrative services).⁶⁸ Initial assessments and feasibility studies have taken place. The milestone is planned to be completed in Q4 2025. Milestone 3, to enable submitting digital building applications using supporting information from the open Building Information Modeling Standard database, is in progress. As the commitment involved digitalization of an administrative procedure, it has not led to changes in open government. Therefore, it is assessed as having no notable results.</p>	

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level. As implementation of clustered commitments in this action plan varied widely, the assessment of early results is conducted at the individual level, rather than the cluster level (See Section IV. Methodology).
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Germany's action plan: <https://www.opengovpartnership.org/documents/germany-action-plan-2023-2025/>.
3. For more information on the assessment of the commitments' design, see Germany's Action Plan Review: <https://www.opengovpartnership.org/documents/germany-action-plan-review-2023-2025/>.

² Open Government Deutschland, Fourth National Action Plan 2023-2025, https://www.opengovpartnership.org/wp-content/uploads/2023/08/Germany_Action-Plan_2023-2025_June_EN.pdf.

³ The three laws referenced are the Law Regulating Access to Federal Information, the Environmental Information Act and the Law on Improving Health-Related Consumer Information. BMI: Transparenzgesetz "Privatsache" der Ministerin [Minister's Transparency Law is a private matter], Heise Online, 29 October 2024, <https://www.heise.de/news/BMI-Transparenzgesetz-Privatsache-der-Ministerin-9997761.html>.

⁴ Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: Germany 2023-2025, https://www.opengovpartnership.org/wp-content/uploads/2024/07/Germany_Action-Plan-Review_2023-2025_EN.pdf.

⁵ Referentenentwurf für Transparenzgesetz in Arbeit [Draft bill for transparency law in progress], 5 June 2024, Deutscher Bundestag [German Parliament], <https://www.bundestag.de/presse/hib/kurzmeldungen-985214>.

⁶ BMI: Transparenzgesetz "Privatsache" der Ministerin [Minister's Transparency Law is a private matter].

⁷ Vierter Nationaler Aktionsplan 2023-2025: Bericht zur Umsetzung [Fourth National Action Plan 2023-2025: Implementation Report], 19 December 2024, <https://www.open-government-deutschland.de/resource/blob/1591050/2325432/11ceb28682e0f4fef94aeda7f88c6e62/bericht-nap4-final-de-data.pdf?download=1>.

⁸ Vierter Nationaler Aktionsplan [Fourth National Action Plan], Verpflichtung 2: Einrichtung einer recherchierbaren Datenbank zur Veröffentlichung von Genehmigungsdaten der Rüstungsexportkontrolle [Commitment 2: Establishment of a searchable database for the publication of arms export control approval data], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/4-nap/einrichtung-einer-recherchierbaren-datenbank-zur-veroeffentlichung-von-genehmigungsdaten-der-ruestungsexportkontrolle-2225424?view=>.

⁹ Vierter Nationaler Aktionsplan [Fourth National Action Plan], Verpflichtung 2: Einrichtung einer recherchierbaren Datenbank zur Veröffentlichung von Genehmigungsdaten der Rüstungsexportkontrolle [Commitment 2: Establishment of a searchable database for the publication of arms export control approval data]; Bundesamt für Wirtschaft und Ausfuhrkontrolle [Federal Office for Economic Affairs and Export Control], Exportkontrolle: 4. Maßnahmenpaket von BMWK und BAFA als Teil der Wachstumsinitiative macht Ausfuhrkontrollverfahren digitaler, schneller und effizienter [Export control: 4th package of measures from BMWK and BAFA as part of the growth initiative makes export control procedures more digital, faster and more efficient], 13 December 2024,

https://www.bafa.de/SharedDocs/Pressemitteilungen/DE/Aussenwirtschaft/2024_14_massnahmenpaket4_bmwk_bafa.html;

Exports from Germany: Simplified procedures for exporting controlled goods to partner countries as of September 2023, Blomstein, 4 August 2023, <https://www.blomstein.com/en/news/exports-from-germany-simplified-procedures-for-exporting-controlled-goods-to-partner-countries-as-of-september-2023>;

Dr. Alexa Ningelgen and Dr. Tim Oliver Weill, German Authorities Take Action to Accelerate Export Control Procedures, 24 May 2024, McDermott, Will & Schule, <https://regandtrade.com/2024/05/german-authorities-take-action-to-accelerate-export-control-procedures/>.

¹⁰ Vierter Nationaler Aktionsplan [Fourth National Action Plan], Verpflichtung 2: Einrichtung einer recherchierbaren Datenbank zur Veröffentlichung von Genehmigungsdaten der Rüstungsexportkontrolle [Commitment 2: Establishment of a searchable database for the publication of arms export control approval data].

¹¹ Federal Ministry for Economic Affairs and Energy official, correspondence with the IRM, 30 October 2025.

¹² “Chancen und Risiken Öffentlich-Privater Partnerschaften,” [Opportunities and risks of public-private partnerships], p.11, https://www.bundesfinanzministerium.de/Content/DE/Downloads/Ministerium/Wissenschaftlicher-Beirat/Gutachten/2016-09-22-chancen-und-risiken-oeffentlich-privater-partnerschaften.pdf?__blob=publicationFile&v=8.

¹³ Eckpunkte der ÖPP-Transparenzrichtlinie [Key points of the PPP Transparency Directive], Bundesministerium der Finanzen [Federal Ministry of Finance], <https://www.bundesfinanzministerium.de/Content/DE/Standardartikel/Service/Oeffentlich-Private-Partnerschaften/transparenzrichtlinie-eckpunkte.html>.

¹⁴ Vierter Nationaler Aktionsplan [Fourth National Action Plan], Verpflichtung 3: ÖPP-Transparenzrichtlinie [Commitment 3: PPP Transparency], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/4-nap/oepptransparenzrichtlinie-2225428?view=>; Deutscher Bundestag [German Parliament], Unterrichtung durch die Bundesregierung [Information from the Federal Government], Bericht der Bundesregierung über ÖPP-Projekte im Betrieb [Federal Government report on PPP projects in operation], 9 October 2023, <https://dserver.bundestag.de/btd/20/087/2008720.pdf>.

¹⁵ Federal Ministry of Finance, Transparency for public-private partnerships, <https://www.bundesfinanzministerium.de/Content/DE/Standardartikel/Service/Oeffentlich-Private-Partnerschaften/transparenzrichtlinie-eckpunkte.html>.

¹⁶ Bundesministerium für Verkehr [Federal Ministry for Transport], Muster-Wirtschaftlichkeitsuntersuchung. Wirtschaftlichkeitsuntersuchung für die Vergabe eines Verfügbarkeitsmodells im Bundesautobahnbau anhand eines Beispiel Projektes [Sample economic feasibility study. Economic feasibility study for the award of an availability model in federal highway construction based on an example project], https://www.bmv.de/SharedDocs/DE/Anlage/StB/oepm-muster-wirtschaftlichkeitsuntersuchung.pdf?__blob=publicationFile

¹⁷ David Gstrein, Elena Herold, Florian Neumeier, Niklas Potrafke, Tuuli Tähtinen and Pascal Zamorski, Transparenz bei Öffentlich-Privaten Partnerschaften: Studie im Auftrag des Bundesministeriums der Finanzen im Rahmen des Forschungsauftrags fe 3/19 [Transparency in public-private partnerships: Study commissioned by the Federal Ministry of Finance as part of research contract fe 3/19], https://www.bundesfinanzministerium.de/Content/DE/Downloads/Oeffentliche-Finanzen/Studien-Kurzexperten/ifo-studie-transparenz-bei-oepm.pdf?__blob=publicationFile&v=2.

¹⁸ Federal Ministry of Finance, ‘Transparenz für öffentlich-private Partnerschaften’ [Transparency for public-private partnerships], Beteiligungsprozess [Participation Process], <https://www.bundesfinanzministerium.de/Content/DE/Standardartikel/Service/Oeffentlich-Private-Partnerschaften/transparenzrichtlinie-uebersicht.html>; Federal Ministry of Finance official, correspondence with the IRM, 10 July 2025.

¹⁹ Federal Ministry of Finance, ‘Transparenz für öffentlich-private Partnerschaften’ [Transparency for public-private partnerships], Beteiligungsprozess [Participation Process].

²⁰ Federal Ministry of Finance official, correspondence with the IRM.

²¹ Vierter Nationaler Aktionsplan [Fourth National Action Plan], Verpflichtung 4: Erster Gleichwertigkeitsbericht der Bundesregierung [Commitment 4: First equivalence report of the Federal Government], <https://www.open-government-deutschland.de/opengov-de/ogp/aktionsplaene-und-berichte/4-nap/erster-gleichwertigkeitsbericht-der-bundesregierung-2225434?view=>.

²² Gleichwertigkeitsbericht der Bundesregierung 2024: Für starke und lebenswerte Regionen in Deutschland (barrierefrei) [Equivalence report of the Federal Government 2024: For strong and livable regions in Germany (barrier-free)], 3 July 2024, <https://www.bundeswirtschaftsministerium.de/Redaktion/DE/Publikationen/Wirtschaft/gleichwertigkeitsbericht-der-bundesregierung-2024.html>.

²³ Federal Government, https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/2024/gleichwertigkeitsbericht.pdf?__blob=publicationFile&v=7, p.176-180.

²⁴ Federal Government, https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/2024/gleichwertigkeitsbericht.pdf?__blob=publicationFile&v=7, pp. 113-114.

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