



Monitoring the implementation of the Commission Recommendation and Guidance on speeding up permit-granting procedures for renewable energy and related infrastructure projects

Final report

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Abstract

The Recommendation and Guidance on speeding up permit-granting procedures for renewable energy and related infrastructure projects were adopted by the European Commission on May 18th, 2022. This initiative aimed to accelerate the deployment of renewable energy projects across the European Union, through better streamlining and speeding up permit-granting procedures. In May 2024, the European Commission updated both documents, to ensure their alignment with the developing regulatory framework. This study is a final report on the project, commissioned by DG ENER, that consisted of three components: (1) monitoring the measures implemented by Member States under the Recommendation, (2) support in the organisation of a series of meetings of the informal Expert Group on Accelerating permitting for renewable energy projects and (3) a stakeholder event. This final report provides actionable insights to expedite permit-granting procedures for renewable energy and related infrastructure projects.

Résumé

La recommandation de la Commission et les orientations relatives à l'accélération des procédures d'octroi de permis pour les projets dans le domaine des énergies renouvelables ont été adoptées par la Commission européenne le 18 mai 2022. Cette initiative vise à intensifier la progression des projets d'énergies renouvelables au sein de l'Union européenne. En mai 2024, la Commission européenne a mis à jour ces deux documents afin d'assurer leur concordance sur le plan réglementaire en évolution. Cette étude constitue le rapport final du projet commandé par la DG ENER, qui s'articule autour de trois volets principaux : (1) Le suivi des mesures mises en œuvre par les États membres sous la Recommandation. (2) Le soutien à l'organisation d'une série de réunions du groupe d'experts informel sur l'activation de ces procédures. (3) L'organisation d'un événement avec les parties prenantes. Ce rapport final fournit des recommandations concrètes et des informations exploitables pour simplifier et accélérer les procédures d'octroi de permis pour les projets d'énergies renouvelables et les infrastructures associées.

1 Executive summary

This is the final report within the project commissioned by DG Energy to support and monitor the implementation of the *Commission Recommendation and Guidance on speeding up permit-granting procedures for renewable energy and related infrastructure projects*.¹ The aim of the project has been to help the EU Member States in addressing the barriers related to permit-granting and other administrative procedures, which exist across the EU at national, regional, and local level. This initiative has been a part of the EU's wider effort to promote renewable energy infrastructure and support the Member States in their efforts to speed up their deployment of renewable energy projects.

The project comprised three components: (1) monitoring the measures implemented by Member States to expedite permit-granting procedures for renewable energy and related infrastructure projects, (2) support in the organisation of a series of meetings of the Member State Expert Group on Accelerating permitting for renewable energy projects² aimed at sharing best practices and knowledge exchange and (3) a stakeholder event, with participation of the Member States, business organizations, investors, renewable energy developer companies and civil society. During this event, challenges and different initiatives aimed at accelerating the permit-granting procedures were discussed.

The assignment commenced in April 2023 during the first meeting of the EU Member State Informal Expert Group on Accelerating permitting for renewable energy projects, where the project's objectives and methodology were introduced. Thereafter, three monitoring rounds were carried out, during which the measures taken by the Member States to align with the *Commission Recommendation and Guidance on Speeding up permit-granting procedures for renewable energy* have been analysed and evaluated.

The monitoring process and the framework for assessing Member States' adherence to the Commission's Recommendation and Guidance were initiated in the context of the 2022 Recommendation and related Guidance. In May 2024, the European Commission updated both documents, to ensure their alignment with the recent regulatory developments, which include the adoption of Directive (EU) 2023/2413 amending Renewable Energy Directive and the Wind Power Action Plan.³ In this context, the results of the first two monitoring rounds contributed to identifying best practices for the update of the Recommendation and Guidance in 2024.⁴

For the third round of monitoring the methodology has been adjusted to align with the updated Recommendation adopted in May 2024. This final report thus identifies more recent developments in the Member States as well as includes an overall assessment of the alignment of national frameworks with the updated Commission Recommendation.

This final report focuses on key areas where Member States are urged to take measures to simplify and speed up permit-granting procedures. The report examines best practices,

¹ Commission Recommendation (EU) 2024/1343, 14 May 2024 on speeding up permit-granting procedures for renewable energy and related infrastructure projects and Commission Recommendation (EU) 2022/822 of 18 May 2022 on speeding up permit-granting procedures for renewable energy projects and facilitating Power Purchase Agreements.

² [Register of Commission expert groups and other similar entities](#)

³ The Wind Power Action Plan in October 2023 announced actions, to further facilitate the acceleration of permitting. By April 2024, the Commission was called to update the Recommendation on speeding up permit-granting procedures for renewable energy projects and the Guidance. It was indicated that this update shall provide further guidance on topics such as repowering, simplification of environmental procedures or permitting for grids. The Wind Power Action Plan also called to upgrade **the informal expert group on permitting** to a dedicated forum to regularly exchange best practices and identify remaining obstacles, including regulatory barriers, that require further action at EU level. The European Wind Power Action Plan is available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023DC0669>

⁴ Link to the page of the expert group registry where the second monitoring report was published: [Register of Commission expert groups and other similar entities](#)

efficient solutions and areas that require improvement. There are eight specific areas of focus:

- Faster and shorter procedures
- Facilitating citizen and community participation
- Improving internal coordination
- Clear, transparent and digitalised procedures
- Sufficient human resources and skills
- Better identification and planning of locations for projects
- Easier network connection and efficient use of networks
- Innovative projects
- Monitoring reporting and review

The report builds upon the approach used in the previous rounds and provides up-to-date observations from the monitoring exercise across all EU-27 Member States, shedding light on both current and planned measures to accelerate the deployment of renewable energy projects.

In addition to the report, a knowledge base of ‘best practices’ on permit granting procedures has been built. Presentations and minutes from all meetings of the EU Member State Expert Group on Accelerating permitting for renewable energy projects are available at the register of Commission expert groups and other similar entities.⁵

Building on the overall monitoring process, the consortium has prepared country fiches with the main findings per Member States on two pages. They summarise the national situations, highlight areas where further action would be needed and include tailored recommendations.⁶

Our work has been based on strong collaboration with Member States that actively participate in the monitoring exercise as part of their engagement in the Informal Expert Group on accelerating permitting for renewable energy projects. Our results are based on desk research combined with interviews with Member States’ national administrations responsible for permitting of renewable energy (RE) projects. Therefore, we take the opportunity here to thank all Member States for their efforts and support in implementing this monitoring exercise.

This report has been prepared by a consortium led by COWI A/S in cooperation with Eclareon and Prognos. Assessments and recommendations provided in this report are those of the study team and shall not necessarily be considered as the official position of the European Commission and the Member States.

⁵ Link to expert group resources: <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3885>

⁶ Country fiches are placed together with other materials from the fifth Expert Group Meeting, which took place on 1st of October 2024. [Register of Commission expert groups and other similar entities](#)

2 Introduction

2.1 Summary of the monitoring exercise and knowledge exchange

The Commission Recommendation was initially published on 18 May 2022 as part of the REPowerEU plan.⁷ It aims to remove barriers that restrict or delay the deployment of renewable energy installations, particularly those related to permit-granting and other administrative procedures. The Recommendation is supplemented by a guidance document⁸ that highlights good practices to inspire effective implementation. Both the Recommendation and the Guidance were updated in May 2024 to reflect relevant changes in EU legislation and emerging good practices.⁹

The aim has been to help the EU achieve its target of at least 40% renewable energy by 2030, contributing to climate neutrality by 2050. The Recommendation and the accompanying guidance complement permitting reforms that need to be transposed by EU countries under the revised Renewable Energy Directive (as amended by Directive EU/2023/2413).

Given differences in national and regional permit-granting rules across Member States—particularly in the length and complexity of administrative procedures—the Recommendation and accompanying guidance aim to provide a direction for the Member States. They encourage Member States to identify areas for improvement and share best practices, exploring potential for improvements and learning from each other.

To encourage the implementation of the Recommendation, the Commission has established an Informal Expert Group on Accelerating permitting for renewable energy projects consisting of representatives from Member States. A consultancy project has been launched with the objective of monitoring progress on the implementation of the Recommendation. The consortium, consisting of COWI A/S, Prognos, and Eclareon, has been supporting the Directorate-General for Energy in facilitating the preparation, execution, and follow-up of the Informal Expert Group meetings.

⁷ Commission Recommendation of 18 May 2022 on speeding up permit-granting procedures for renewable energy projects and facilitating Power Purchase Agreements C/2022/3219, available at [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM:C\(2022\)3219](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM:C(2022)3219)

⁸ Commission staff working document Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements Accompanying the document Commission Recommendation on speeding up permit-granting procedures for renewable energy projects and facilitating Power Purchase Agreement SWD/2022/0149 final, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022SC0149>

⁹ Commission Recommendation (EU) 2024/1343 of 13 May 2024 on speeding up permit-granting procedures for renewable energy and related infrastructure projects (available at <https://eur-lex.europa.eu/eli/reco/2024/1343/oj>) and accompanying Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy and related infrastructure projects [Recommendation and guidance on speeding up permit-granting for renewable energy and related infrastructure projects - European Commission](#)

The aim of the project has been to assist EU Member States in addressing the barriers they face regarding permit-granting and administrative procedures. Such barriers exist across the EU at national, regional, and local levels. The intention has been to support Member States in their mission to accelerate the deployment of renewable energy projects and related infrastructure. This was accomplished by monitoring alignment across the EU-27 with the Commission's Recommendation on speeding up permit-granting procedures for renewable energy projects ('the Recommendation').

Building on the overall monitoring process, the consortium prepared overview country fiches of two pages in length. They summarise the national situations, highlight areas where further action would be needed and include tailored recommendations.¹⁰

The monitoring exercise consisted of three monitoring rounds. The first monitoring round took place between September and October 2023. The results of the monitoring round have been discussed at the informal Expert Group meeting on 23 October 2023. The second monitoring round took place between mid-December 2023 and February 2024. The results were discussed at the informal Expert Group meeting on 22 February 2024. The third, final monitoring round took place between 6th of June and 11th of September 2024. The main findings were presented at the informal Expert Group meeting on 1st of October 2024.

In addition to the Consortium's monitoring exercise, five meetings of the Informal Expert Group on Accelerating permitting for renewable energy projects have been organized, with the objective to facilitate knowledge exchange. Topics for these meetings included: human resources and skills, spatial planning and public involvement, digitalization, grid connection issues, repowering and permitting for small scale RES.¹¹ Presentations and minutes from all meetings of the informal Expert Group on Accelerating permitting for renewable energy projects are available at the register of Commission expert groups and other similar entities.¹² Materials from those meetings can serve as a useful knowledge base of best practices, challenges and the pathways Member States chose to speed-up permit-granting procedures.

To conclude the project, on 25 October 2024, the European Commission together with the Consortium organized a final stakeholder event, focused on the progress and challenges in accelerating the permitting process for renewable energy projects across the EU. The aim of this open stakeholder event was to discuss progress achieved on improving permit-granting procedures for renewable energy projects. The discussion was framed by the revised Renewable Energy Directive (EU) 2018/2001¹³, as amended by Directive (EU) 2023/2413¹⁴, the Recommendation on speeding up permit-granting procedures for renewable energy and related infrastructure projects, and the Guidance to Member States on good practices for these procedures.¹⁵ Key points examined included the progress in

¹⁰ Country fiches are placed together with other materials from the fifth Expert Group Meeting, which took place on 1st of October 2024. [Register of Commission expert groups and other similar entities](#)

¹¹ Presentations and minutes from those meetings can be found here : [Register of Commission expert groups and other similar entities](#)

¹² [Register of Commission expert groups and other similar entities](#)

¹³ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast), ELI <http://data.europa.eu/eli/dir/2018/2001/oj>

¹⁴ Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652, ELI <http://data.europa.eu/eli/dir/2023/2413/oj>

¹⁵ [Recommendation and guidance on speeding up permit-granting for renewable energy and related infrastructure projects - European Commission](#)

removing barriers and streamlining permitting processes at national and local levels, the role and interpretation of the legal framework, and administrative complexities in different regions. The participants discussed solutions at national, regional and local levels that have proved the most effective for streamlining permit-granting procedures, improving site selection and minimizing environmental impacts.

Stakeholders stressed the importance of community engagement and public participation in renewable energy projects. The discussions also highlighted the need for more resources for permitting authorities, increased digitalization, and better coordination among stakeholders to eliminate redundancies. Ensuring local benefits and gaining public acceptance for renewable projects were deemed essential. Panellists emphasized the importance of collaborating with environmental organizations and local communities to ensure a sustainable and balanced green transition. In addition to taking stock of what has already been achieved, the workshop explored the next steps that could be taken by Member States to ensure faster deployment of renewable energy projects.

2.2 Structure of the report

This final report highlights actions, undertaken by Member States, that can be considered good practices and align well with the goals of the Recommendation. Moreover, where evidence was available, we examined the effectiveness of the measures adopted at national level and highlighted any issues that limit their implementation.

Following an overview of the overall implementation of the Recommendation, the report is structured to align with the organization of the Recommendation itself. It groups the approximately 30 individual recommendations under thematic areas, as outlined below:

- ✓ Faster and shorter procedures
- ✓ Facilitating citizen and community participation
- ✓ Improving internal coordination
- ✓ Clear, transparent and digitalised procedures
- ✓ Sufficient human resources and skills
- ✓ Better identification and planning of locations for projects
- ✓ Easier network connection and efficient use of networks
- ✓ Innovative projects
- ✓ Monitoring, reporting and review

To provide a clear context for this final report, each thematic sub-chapter begins with a short analysis of the changes to the Recommendation and the way these changes have impacted our data collection. Given the recent revision of the Recommendation, the Consortium's ability to assess the effectiveness of some new measures was limited. Nevertheless, this final document offers timely insights across EU-27, highlighting both current and planned initiatives undertaken by different Member States to accelerate the deployment of renewable energy projects.

2.3 Methodology

The methodology deployed in this project has been based on an analysis of findings from country-level research, supplemented by knowledge exchange during Informal Member States Group Meetings.

The key components of project's methodology have included:

- ✓ **Data Collection:** Information was gathered through desk research and interviews with Member State experts. This included reviewing national legislation and policy documents, such as (Updated) National Energy and Climate Plans (NECPs), National Energy and Climate Progress Reports (NECPRs), Recovery and Resilience Plans (RRPs), the information gathered in the Single Market Enforcement Task Force, Member State national legislation on permitting and other key documents such as national energy and climate strategies. The Consortium has augmented the data gathered through desk research with interviews conducted with Member State representatives, who have offered their feedback on the country-level research and actively engaged in the knowledge exchange within the Informal Expert Group on Accelerating permitting for renewable energy projects.¹⁶
- ✓ **Assessment of Alignment:** The country research included evaluation of the extent to which the implemented measures align with the Recommendation. Measures have been classified as strong (good practices), moderate (partial alignment), or weak (non-alignment) based on their coherence with the overall principles of the Recommendation, the maturity of legislation, and the scope of the measures.
- ✓ **Good Practice Identification:** Good practice examples have been the focus of the expert group meetings, where different Member States have kindly agreed to share some of their practices and solutions. The aim was to showcase approaches that can serve as source of inspiration across the EU-27.
- ✓ **Overview country fiches** summarise alignment with the Recommendation, good practices in speeding up permit-granting procedures at individual Member State level. The fiches also highlight areas where further action would be needed and include tailored recommendations.

Our analysis has focused on insights into national measures — existing, ongoing, or planned — that align with the actions specified in the Recommendation. The analysis at the country level has emphasised the following:

- Information on the existence and characteristics of national (existing/ongoing/planned) measures aligned with the actions in the Recommendation.
- An assessment of the level of alignment of the measures introduced with the Recommendation, identifying if the measures represent good practices, and reviewing their level of effectiveness in speeding-up or facilitating the deployment of renewable energy and related infrastructure.
- The findings of the report are visually represented in "heat maps" that illustrate trends across EU-27, complemented by a summarized description of selected measures. Each thematic analysis begins with an overview of the measures' characteristics, highlighting the effectiveness of national efforts to facilitate the deployment of renewable energy and related infrastructure.

¹⁶ For the country level questionnaires, evidence was collected on the specific measures implemented by each Member State as outlined in the Recommendation. Our team of country experts has reached out to all Member States, and they have been invited to review and validate their respective country questionnaires. Most of the country reports have been validated through discussions with relevant representatives from the Member State administrations (members of the expert group). However, in a few cases, data collection had to rely solely on desk research.

- Recommendations for Member States on possible initiatives that could be taken in order to enhance alignment of their permit-granting legislation and administrative procedures with the Recommendation and Guidance of May 2024.

3 Third monitoring of the implementation of the Recommendation

3.1 Overall implementation of the Recommendation

As previously mentioned, the collection of information for the third, final monitoring round was based on a revised framework (the updated Recommendation). This new Recommendation, adopted in May 2024, has introduced several important changes which include, among others:

- The scope of the Recommendation has been expanded to include not only clean energy production but also related infrastructure, such as electricity, gas, and heat networks, or storage assets required for integrating renewable energy into the energy system.
- Underlining more strongly the need for fair transition towards climate neutrality. The updated Recommendation underlines the need to consider the perspectives of citizens, local authorities at all stages of renewable energy projects from policy development, spatial planning, project development and operation.
- Greater emphasis is placed on utilizing new technologies, including streamlining the permit-granting process for testing sites of emerging technologies and promptly implementing relevant EU legislation (e.g. the Gas Market Directive).¹⁷
- Facilitation of knowledge and capacity-building (for example within the Large-Scale Renewable Energy Skills Partnerships)¹⁸ and sharing of data. Data generated throughout the implementation of renewable energy projects, such as spatial planning data, information from previous environmental impact assessments, and monitoring of environmental impacts, should be more readily shared.

Overview of alignment data

Based on the collected data, the implementation status reveals that 38% of the measures align strongly with the Recommendation. The moderately aligned measures amount to 28%, while 21% show weak alignment. For 13% of the measures, an assessment of alignment could not be conducted.¹⁹

Figure 1 highlights a total of 1198 counted measures²⁰, with 901 of them being measures with either moderate or strong level of alignment with the Recommendation, which accounts to 75% of the total counted measures (65% of the total measures including missing data).

¹⁷ Directive - EU - 2024/1788 - EN - EUR-Lex (europa.eu)

¹⁸ Pact for Skills: Launch of large-scale renewable energy skills partnership

¹⁹ In several cases country research has been based on desk research mainly and not all data have been available.

²⁰ Measures counted are understood as individual actions taken by Member-States in relation to European Commission Recommendation, i.e. strong, moderate and weak measures, excluding missing data or N/A.

Figure 1 General overview of measures taken by the Member States, that have been reported

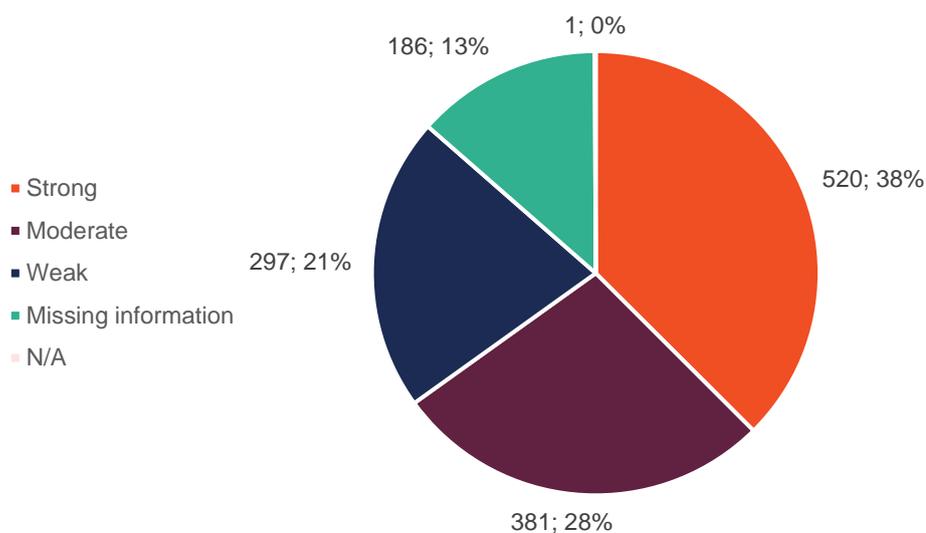
1198

Total number of individual actions in some form of alignment with the Recommendation

520

Strong measures

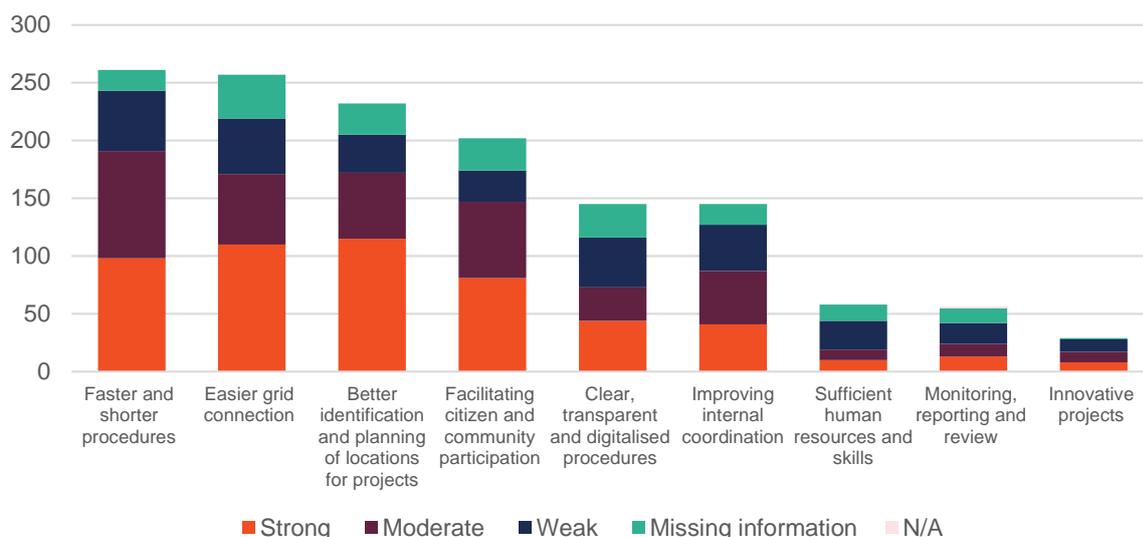
Counted measures distributed by alignment with Recommendation



Measures by alignment with Recommendation

Figure 2 below summarizes the various measures identified in the country questionnaires based on their alignment with the updated Recommendation. Our research indicates that implementation is taking place across all key thematic areas of the Recommendation within the EU-27. Efforts have been made to enhance project identification and planning, accelerate the deployment of renewable energy sources (RES), simplify application processes, and introduce digital procedures for permitting and administrative tasks (such as acquiring permits and conducting Environmental Impact Assessments). The graph shows that “Faster and shorter procedures” have the highest number of assessed measures, while “Better identification and planning of locations for projects” has the highest number of strong measures, and although “Easier grid connection” has a high total count of data, it also has the highest number of missing data. The graph provides a general overview of the total data collected.

Figure 2 Measures by alignment with Recommendation

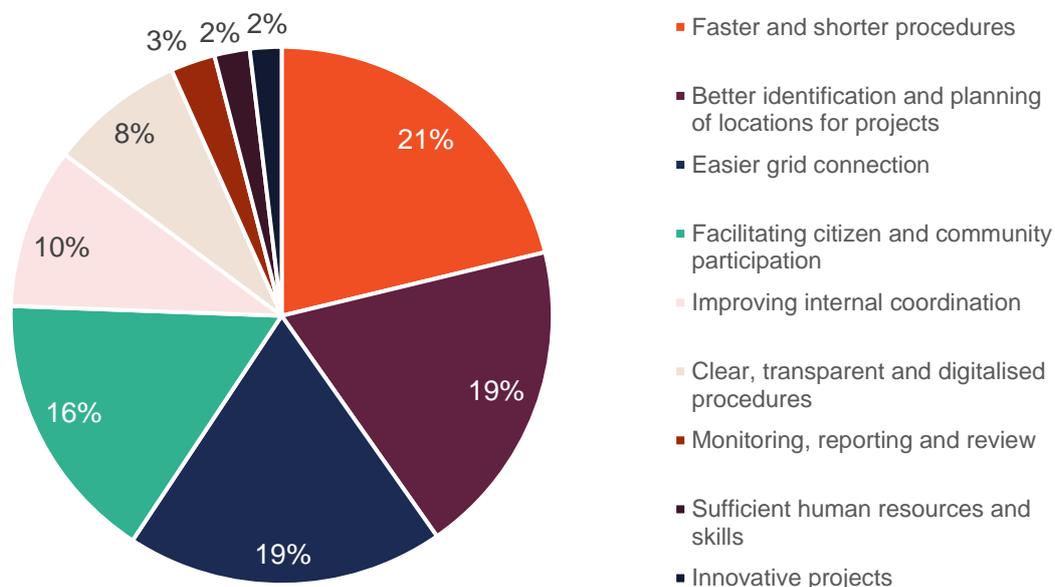


When assessing how the different thematic areas fared in regard to a positive assessment²¹ of MS actions towards measure implementation, it is possible to see in the graph below (Figure 3) that 21% of the positively assessed measures fall under the category of "Faster and shorter procedures," indicating a significant number of initiatives aimed at improving this aspect across Member States. Other areas of progress are "Better identification and planning of locations for projects" and "Easier grid connection," each accounting for 19% of the identified strong and moderate measures. Member States are also actively facilitating citizen and community participation in renewable energy and related infrastructure projects, with this category representing 16% of the measures with positive alignment. This means that most strong and medium measures taken by the MS fall under these areas.

In contrast, the areas of "Innovative projects," "Sufficient human resources and skills," and "Monitoring, reporting, and review" collectively account for only 7% of the total measures with strong or moderate alignment, which is considerably lower. These are the areas with the least number of positive actions taken, in the total pool of assessed actions. This does not necessarily mean that there wasn't significant progress, but that these are the areas with lower numbers of actions taken by the Member States. To understand how they perform in relation to the other areas, Figure 4 below will provide a better overview. Additionally, "Sufficient human resources and skills" and "Monitoring, reporting, and review" display a high ratio of missing data — 24% and 23%, respectively — compared to the total data collected. This signifies a need for Member States to enhance their oversight and documentation of ongoing efforts in these areas.

²¹ A positive assessment means an alignment value of "strong" or "moderate."

Figure 3 Total level of positive actions by thematic areas²²

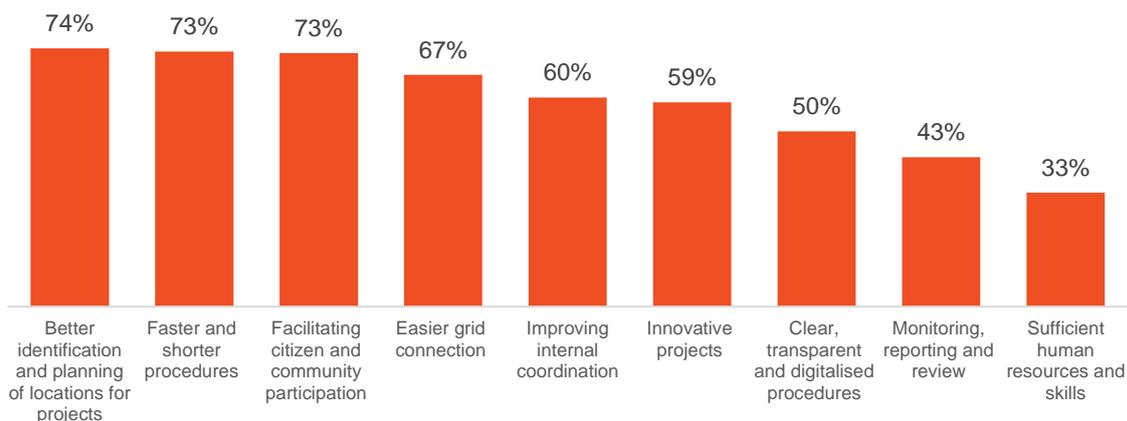


Additionally, we analysed the degree of strong and moderate alignment across thematic areas, as shown in Figure 4. The objective was to determine which areas have seen the most progress among Member States, specifically regarding permitting legislation and administrative systems that align with the Recommendation. Figure 2 and Figure 3 both count the number of questions for each measure. The different thematic areas have different numbers of questions on measures. Therefore, the total count of strong and moderate are only partially informative, as the data will be skewed to the areas with the greatest number of questions. Establishing an efficiency ratio of the positive answers by the total number of answers, allows us to identify how the different thematic areas are faring in a comparative manner.

For example, the area "Fast and shorter procedures" has a high number of measures with some level of positive alignment (moderate and strong). However, Figure 4 reveals that the efficiency of these measures, relative to the total, is comparable to those in "Better identification and planning of project locations" and "Facilitating citizen and community participation." Although "Easier grid connection" has a high count of total positive measures, it demonstrates lower efficiency (67%). In the lower end of the graph, "Sufficient human resources and skills" exhibits the lowest efficiency (33%) due to a high number of weakly implemented measures.

²² This refers to the distribution of the total measures that were assessed with a strong or moderate alignment

Figure 4 Degree of strong and moderate alignment across thematic areas²³



In general, the results of our monitoring exercise show that progress has been made in aligning measures with the updated Recommendation, particularly in areas such as "Faster and shorter procedures", "Better identification and planning of locations for projects", and "Facilitating citizen and community participation". However, significant gaps remain, especially in ensuring sufficient resources and skilled personnel to focus on permitting procedures and fast processing of renewable energy project applications. Another key aspect for Member States to focus on is making the permit-granting procedures transparent and fully digital, making clear links between steps instead of having them scattered. Moreover, the Member States have room for improvement when it comes to setting regulatory frameworks for innovative projects, the digitalisation and transparency of procedures, and on monitoring and reporting.

²³ Moderate + Strong responses divided by total questions from country questionnaires

3.2 Faster and shorter procedures

Streamlining the regulatory and administrative processes related to obtaining permits for renewable energy and infrastructure projects is one of the most important areas of speeding up permitting. Changes in this area can make a fast impact and accelerate the approval timelines for projects such as wind farms, solar installations, and infrastructure developments.

The updated Recommendation (recommendations 2-7) emphasizes the importance of developing energy infrastructure, particularly network development projects. Renewable energy projects should be recognized as having the status of "highest national significance." The Recommendation advocates for clearly defined deadlines for granting permits to build and operate renewable energy projects, including maximum timelines for all stages of the environmental impact assessment process.²⁴ Furthermore, a single unified application process is recommended. The rationale is to streamline the administrative permit application and granting process for renewable energy projects. The Recommendation suggests prioritizing the simultaneous processing of applications over a sequential approach, which should also apply to permits for grid connection projects.

Also, the updated Renewable Energy Directive and European Wind Power Action Plan emphasize the need for timely permitting processes, including specific deadlines for different stages of the permitting process and the prioritization of renewable energy projects. EU legislation has been supported by a number of studies and 'best practice' analysis.²⁵

Monitoring results

Our desk research and work with the Member States have shown that the EU Member States are actively working to meet their obligations in this area. Overall, efforts are being made to streamline processes, establish clear deadlines, and prioritize renewable energy projects. This includes introducing measures aimed at ensuring that renewable energy projects benefit from the most favourable permitting procedures. At least 20 Member States have introduced either strong or medium measures, to give renewable energy infrastructure projects priority over coal, oil and natural gas infrastructure when it comes to areas such as grid connection, building permits and other permitting processes.

Over the project's duration (2023-2024) we have observed a trend towards renewable energy installations and grid infrastructure projects receiving increasingly preferential treatment. In several countries, network development projects either carry the status of national significance or exhibit a clear effort to prioritize them at both the legislative and policy levels. In the Netherlands and Estonia, environmental regulations are characterized by clearly defined deadlines, including maximum duration times for the entire permitting process. Additionally, in most Member States, the time required to conduct Environmental Impact Assessments (EIA) has reduced, contributing to greater transparency in the overall process. 22 Member States reported on having measures that are either strongly or moderately aligned with the Recommendation, having introduced maximum deadlines for the EIA process.

²⁴ Reference to the Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413

²⁵ Examples include: Guidelines to faster and fairer permitting for Europe's Renewable Energy Transition, CAN Europe, October 2023 ([Fairer-and-Faster-permitting_CAN-Europe-Briefing.pdf](#)) and Simplification of permission and administrative procedures for RES installations (RES Simplify), publication from [Directorate-General for Energy \(European Commission\)](#), [Eclareon](#), [Oeko-Institut](#), [SolarPower Europe](#), [WindEurope](#), [Technical support for RES policy development and implementation – simplification of permission and administrative procedures for RES installations \(RES Simplify\) - Publications Office of the EU](#)

Table 1 Faster and shorter procedures – map analysis of measures supporting faster and shorter procedures (recommendations 2-7)^{*}

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Multiple authorities jointly respect deadlines and extensions in practice																													
Are there gaps in terms of deadlines not defined for some process steps																													
Maximum deadlines for the EIA process and other deadlines for any main steps																													
Applicants allowed to update their technology specifications of their project in the time between the permit application submission and the construction of projects																													
Qualification for the most favourable permitting procedures and status of the highest national significance for network development projects																													
Clearly defined, as short as possible, deadlines for all steps of the permitting cycle																													
Single unified application process for the entire administrative permit application and granting process																													
Established specific timeframes and procedural rules regarding access to justice																													
Simultaneous application when different authorizations are required or need to follow a pre-defined sequence																													

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Good practices – measures supporting faster and shorter procedures

Positive developments are observed in Denmark and France, where specific legislation regarding deadlines for all steps of the permitting cycle has been adopted.²⁶ In Denmark, the government plans to regularly revise the deadlines for permitting and to monitor whether they are adhered to by the relevant authorities, as part of the implementation of revised RED.²⁷ An interesting new development has been observed in Germany, where the government has introduced the Solar package 1 ("Solarpaket 1") and amended the Renewable Energy Sources Act and the Energy Industry Act. Projects for the expansion of the transmission and distribution grid are considered as being of overriding public interest and enjoy a special legal status. In addition, Solar Package I introduces a toleration obligation for publicly owned areas. As a result, the owners and other authorized users of such land are obliged, among other things, to tolerate the laying and operation of power lines to connect renewable energy systems to the connection point and to grant rights of way for the construction and dismantling of renewable energy systems.²⁸

Germany has also new provisions, which speed up parts of permitting processes related to repowering of wind energy turbines.²⁹ In specific cases of repowering of wind energy turbines, there is a tacit approval in the case that the competent authority does not act within the due timeframe of six weeks.³⁰

In Estonia, the permitting process is structured with clear and accelerated timelines. The Environmental Impact Assessment (EIA) is a core component of the application for a development permit. Decisions on the EIA are required to be made within a 90-day window. There are specific maximum and minimum timeframes for various steps of the EIA procedure.³¹

In Slovakia, a new amendment to the EIA Act No. 24/2006 Coll. was re-approved by the parliament (the National Council of the Slovak Republic), incorporating the President's comments in early December 2024. It is intended to simplify and speed up the processes

²⁶ Bekendtgørelse om kontaktpunkt, VE tilladelsesprocessen og områder til fremme af VE(BEK) 773 of 20/06/2024

²⁷ Legislation related to the national contact point, renewable energy permitting process and the promotion of renewables: Bekendtgørelse om kontaktpunkt, VE tilladelsesprocessen og områder til fremme af VE(BEK) 773 of 20/06/2024.

²⁸ [solarpaket-im-ueberblick.pdf \(bmwk.de\)](#)

²⁹ Law on the protection against harmful environmental effects caused by air pollution, noise, vibrations and similar processes (Federal Immission Control Act) [Entwurf eines Gesetzes zur Verbesserung des Klimaschutzes beim Immissionsschutz, zur Beschleunigung immissionsschutzrechtlicher Genehmigungsverfahren und zur Umsetzung von EU-Recht, BImSchG - Gesetz zum Schutz vor schädlichen Umwelteinwirkungen durch Luftverunreinigungen, Geräusche, Erschütterungen und ähnliche Vorgänge](#)

³⁰ See the new § 16b Section 9 of the Federal Emission Control Act

³¹ Amendments to the Energy Sector Organisation Act are currently underway (link to be published this week). The amendment will be published and available online in Estonian in the Draft Law Information System (official website: <https://www.riigiteataja.ee/>).

under the EIA Act, especially by introducing deadlines for decisions on some procedural steps that were previously missing (such as the one on scope determination). In addition, the thresholds for scoping and mandatory assessment have been increased for several RE-producing technologies. This may allow the currently non-existent small scale wind energy sector to develop, as wind projects with an installed capacity of up to 100 kW will no longer be a subject to EIA assessment.

Efforts to shorten and streamline procedures have been observed also in Ireland. In June 2024 the Accelerating Renewable Electricity Taskforce (established in 2023) has published an Implementation Plan to support achievement of onshore renewable electricity targets by 2030. A large part of this document is focused on streamlining, simplifying and better coordinating permitting procedures and provides clarity on roles and tasks in the permit-granting process. The plan identifies about 70 actions necessary to achieve Ireland's onshore renewable electricity targets. These actions are divided into three areas: planning and reporting, grid and storage, route to market.³²

When it comes to stimulating the participation of citizens, including from low and middle-income households, an interesting development has been noted in Romania, where a national network of "one stop shops" for energy efficiency and renewable energy production for prosumers has been established. These are information focal points at regional level, coordinated by the Ministry of Development, Public Works and Administration. They offer online and in-person guidance to vulnerable consumers and support to local energy communities in accessing funding and technical advice. The ambition is to have at least 42 of such information centres operational by the end of 2024.³³

Effectiveness analysis

The updated Recommendation, in alignment with the revised RED provisions, advises Member States to streamline certain environmental-related aspects of the permit granting procedures for renewable energy projects. Not in all Member States such work has been completed. There is a lot of legislative effort in progress. During our interviews and discussions with the Member States, participants emphasized the need for changes to be made in numerous national laws. Legislation is very often under responsibility of different ministries, institutions and often a lot depends on the success (and speed) of the parliamentary procedure and smooth internal coordination.³⁴

We have observed that there is no 'uniform' approach and there are challenges in ensuring consistency across the EU. Sections in national legislation, which give renewable energy projects preferential treatment, are formulated very differently across the national legislation of Member States. Some challenges remain particularly in addressing procedural gaps and improving coordination among multiple authorities. For example, less than half (twelve) of Member States have reported on having solutions related to simultaneous applications, when different authorizations are required.³⁵

There is also room for improvement in EIA processes. For example, in Slovenia, it is not possible to apply for different permits simultaneously, as in most cases, a specific permit or consent is required to apply for the next one. In a few instances (across the EU-27), we

³² Annex I, sets out milestones and timelines to achieve desired objectives within certain deadlines: Accelerating Renewable Energy Task Force Implementation Plan, June 2024 www.gov.ie/pdf/?file=https://assets.gov.ie/296116/012a860e-81e4-4335-8e5a-458a7b6357ec.pdf#page=null

³³ [The government approved the establishment of the national network of energy efficiency one-stop shops - EU funding opportunities, A new chapter for the Romanian NRRP: RES acceleration zones and One Stop Shop offices \(cms-lawnow.com\)](#)

³⁴ See presentation of the Federal Ministry for Economic Affairs and Climate Action, Accelerating Permitting Procedures – State of Play in Germany, presented at the stakeholder event on 25th of October 2024.

³⁵ Good analysis of this point is in recent study on permitting, conducted by Centre on Regulation in Europe, Speeding Up Renewable Energy Permitting in Europe: Overcoming Implementation Challenges, Catherine Banet Filippo Donati, October 2024, [CERRE Speeding-up-Renewable-Energy-Permitting-in-Europe FINAL.pdf](#)

have noted that although clear deadlines are established for Environmental Impact Assessments, they are often not respected in practice.

Moreover, throughout the EU-27, more could be done to allow investors and project developers to update the technology specifications of their projects between the submission of the permit application and the start of construction. This flexibility would facilitate the adoption of innovative technologies. For example, in Lithuania, permits are granted for specific technologies and developers are not allowed to exceed the capacity set in the permit or to request changes to increase the capacity. On a positive note, increasing number of Member States take into consideration the need to update technology and be flexible during the investment process for example when it comes to repowering. Best practices have been observed in Ireland, where one can update technology specifications after submission of application for a renewable energy project and in Germany (which has updated legislation on repowering).

3.3 Citizen and community participation

Streamlining the regulatory and administrative processes related to obtaining permits for renewable energy and infrastructure projects is one of the most important areas of speeding up permitting. Changes in this area can make a fast impact and accelerate the approval timelines for projects such as wind farms, solar installations, and infrastructure developments.

The updated Recommendation (recommendations 2-7) emphasizes the importance of developing energy infrastructure, particularly network development projects. Renewable energy projects should be recognized as having the status of "highest national significance." The Recommendation advocates for clearly defined deadlines for granting permits to build and operate renewable energy projects, including maximum timelines for all stages of the environmental impact assessment process.³⁶ Furthermore, a single unified application process is recommended. The rationale is to streamline the administrative permit application and granting process for renewable energy projects. The Recommendation suggests prioritizing the simultaneous processing of applications over a sequential approach, which should also apply to permits for grid connection projects.

Also, the updated Renewable Energy Directive and European Wind Power Action Plan emphasize the need for timely permitting processes, including specific deadlines for different stages of the permitting process and the prioritization of renewable energy projects. EU legislation has been supported by a number of studies and 'best practice' analysis.³⁷

Monitoring results

Our desk research and work with the Member States have shown that the EU Member States are actively working to meet their obligations in this area. Overall, efforts are being made to streamline processes, establish clear deadlines, and prioritize renewable energy projects. This includes introducing measures aimed at ensuring that renewable energy projects benefit from the most favourable permitting procedures. At least 20 Member States have introduced either strong or medium measures, to give renewable energy infrastructure projects priority over coal, oil and natural gas infrastructure when it comes to areas such as grid connection, building permits and other permitting processes.

Over the project's duration (2023-2024) we have observed a trend towards renewable energy installations and grid infrastructure projects receiving increasingly preferential treatment. In several countries, network development projects either carry the status of national significance or exhibit a clear effort to prioritize them at both the legislative and policy levels. In the Netherlands and Estonia, environmental regulations are characterized by clearly defined deadlines, including maximum duration times for the entire permitting process. Additionally, in most Member States, the time required to conduct Environmental Impact Assessments (EIA) has reduced, contributing to greater transparency in the overall process. 22 Member States reported on having measures that are either strongly or moderately aligned with the Recommendation, having introduced maximum deadlines for the EIA process.

³⁶ Reference to the Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413

³⁷ Examples include: Guidelines to faster and fairer permitting for Europe's Renewable Energy Transition, CAN Europe, October 2023 ([Fairer-and-Faster-permitting_CAN-Europe-Briefing.pdf](#)) and Simplification of permission and administrative procedures for RES installations (RES Simplify), publication from [Directorate-General for Energy \(European Commission\)](#), [Eclareon](#), [Oeko-Institut](#), [SolarPower Europe](#), [WindEurope](#), [Technical support for RES policy development and implementation – simplification of permission and administrative procedures for RES installations \(RES Simplify\) - Publications Office of the EU](#)

Table 2 Facilitating citizen and community participation (recommendations 8-12)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Measures aimed to stimulate the participation of citizens and energy communities in the planning, development, deployment and operation of projects																													
Inclusive and accessible stakeholder engagement opportunities (e.g. public hearings)																													
Early and regular stakeholder engagement opportunities in the project design and planning procedure																													
Simplified permit-granting procedures and proportionate permit-granting requirements for energy communities																													
Simplified permit-granting procedures for small scale renewables and renewables self-consumers, including lighter consent requirements in case of multiapartment buildings																													
Reduced production licensing procedures and requirements to a minimum for renewable and citizen energy communities																													
Adherence to the requirement of early, regular, and meaningful stakeholder engagement in grid development																													

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Good practices in citizen and community participation

Simplified procedures for small scale installations: Several Member States have made progress in simplifying permit-granting procedures for small scale renewables and renewables self-consumers. In the Netherlands, the newly introduced Environmental and Planning Act includes provisions that streamline permits for small renewable energy projects. Many small installations are exempt from extensive permitting requirements, facilitating quicker deployment. For example, small scale renewables such as solar panels do not require any permits for installation.³⁸

In Poland the government has decided to shorten the applicable maximum deadlines for proceedings regarding solar energy installations mounted on buildings and electricity storage facilities, heat pumps, devices and installations located in the same area. Currently relevant legislation is processed in the parliament.³⁹ In Czechia, changes in legislation have been introduced in 2023, easing procedures up to 50kW. The Act exempts the requirement to an electricity production license for all electricity production facilities under 50kW of installed capacity, an increase from the previous 10kW limit. Furthermore, since 2023 the Act also exempts RES installations of up to and including 50kW from a building permit or a building notice, a change from the previous limit which was 20kW.⁴⁰

Enhancing participation of citizens in RES projects: Notable measures aimed at stimulating citizen participation in RES projects have been observed in Romania. The new draft Energy Strategy 2025-2035 (published in August 2024) looks to implement targeted measures supporting local communities in accessing, financing, and establishing RES cogeneration plants or other small-scale RES facilities. The strategy envisions creating policies for establishing Energy Autonomous Villages (EAVs) or renewable energy communities. The strategy also focuses on measures to limit energy poverty.⁴¹

Public hearings are organized regularly and early in the process in Finland and Estonia. In Romania, public hearings must be organized during the Environmental Impact Assessment (EIA) procedure, and clear deadlines are provided for holding these hearings and issuing public announcements. The law and guidelines stipulate the early involvement of

³⁸ Decision on living space and construction (besluit bouwwerken leefomgeving, BBL), 2024

³⁹ Projekt ustawy o zmianie ustawy o odnawialnych źródłach energii oraz niektórych innych ustaw - Kancelaria Prezesa Rady Ministrów - Portal Gov.pl (www.gov.pl)

⁴⁰ Zákon č. 19/2023 Sb., kterým se mění zákon č. 458/2000 Sb., o podmínkách podnikání a o výkonu státní správy v energetických odvětvích a o změně některých zákonů (energetický zákon), ve znění pozdějších předpisů, a další související zákony <https://www.zakonyprolidi.cz/cs/2023-19>

⁴¹ Romania's Energy Strategy 2025-2035, with perspective for 20250: *Al doilea anunt public privind declararea etapei de încadrare pentru „Strategia Energetică a României 2025-2035, cu perspectiva anului 2050” – Ministerul Energiei (gov.ro)*

communities in the EIA process, although active participation from affected communities is not always guaranteed. Additionally, Romania has laws that require public authorities to announce draft regulations or decisions at least 30 days in advance for public input, and public debates must be organized if requested by authorized associations or other public authorities. In France, in addition to the mandatory public consultation required by the EIA procedure, project owners of renewable energy projects are obligated to organize project committees at their own expense. These committees bring together various stakeholders, including representatives from neighbouring communities and citizens, to discuss the feasibility and integration conditions of the project.

An interesting measure to increase stakeholder engagement in the project design and planning procedure has been undertaken by the Netherlands. In 2024 the new Environmental and planning act (Omgevingswet) entered into force and the digital system for the environmental and planning has been introduced. Through this system, various stakeholders - including local communities, citizens - are encouraged to participate in hearings, and give their opinions on permit procedures.

Continuous development of energy communities: Results of our monitoring exercise indicate growing alignment with Recommendation's provisions focused on introducing, enabling operation of energy communities. One of the most interesting 'best practices' has been noted in Ireland, where solutions aimed at supporting the development of energy communities seem to be very efficient. The current number of 'sustainable energy communities' is over 900. Sustainable Energy Authority of Ireland (SEAI) maintains a network of energy communities and has allocated assistance to these communities in obtaining access to funding, training, information on registration, and relevant procedures.⁴² Another good practice has been observed in the Flemish region of Belgium, where operational permits are not required for renewable and citizen energy communities. Renewable energy projects, particularly those set up by citizen energy communities, may be exempt from the need for operational permits. This is designed to facilitate the deployment of renewable energy projects and encourage local participation.

Effectiveness of measures focused on enhanced citizen and community participation

Public participation in renewable energy projects is increasingly recognized as essential for ensuring project success, fostering social acceptance, and promoting a fair and inclusive energy transition. In many Member States, there are well-functioning formal and informal procedures for early stakeholder engagement in the development of renewable energy projects. Often, private investors take the initiative, and in collaboration with local authorities, they drive the consultation processes (e.g. Denmark, Netherlands). At the same time, our monitoring results indicate that there is room for improvement in regular, meaningful stakeholder engagement in the grid planning process. Out of 27 Member States, 17 reported having introduced measures that either strongly or moderately align with the Recommendation.

While passing financial benefits to local communities becomes a prevailing practice, sometimes, legal definitions, for example of electricity sharing or premium payment on electricity production can be vague. Especially where the regulatory framework is very new, there can be lack of clarity, available guidance or implementing instructions on how these solutions shall work in practice. At the same time, some administrative solutions – such as direct compensation for local communities (Denmark), are new and in the process of being implemented.

Member States are at different stages of implementing measures from the Recommendation focused on easing permitting for renewable energy communities. Less than half of the Member States have introduced measures that either strongly or moderately

⁴² Sustainable Energy Authority of Ireland, [Start an Energy Community | SEAI](#)

align with the Recommendation. While there has been progress in implementing relevant EU legislation, some Member States (e.g., Romania, Slovenia, Slovakia) face challenges related to national legal frameworks, administrative procedures, and a lack of clarity regarding market rules. Our research has shown that many Member States still need to gain more experience with energy communities. For example, in Slovakia, the first energy community producing energy from renewable sources (RES) was officially registered only on 24 July 2023.

On a positive note, regarding permit granting procedures for small-scale installations and individual consumers, the measures undertaken by Member States appear to be efficient and in line with the revised Recommendation. Simplified permitting and licensing procedures for renewable energy self-consumers seem to function well once implemented. They visibly accelerate renewable energy deployment and effectively engage citizens and local communities.

3.4 Improving internal coordination

To ensure internal coordination, the updated Recommendation (recommendations 13-18) highlights the significance of immediate exchanges between single contact points and other relevant authorities at the beginning of the permit-granting process. This facilitates discussions on the needs and potential risks associated with the projects. Additionally, the Recommendation introduces measures that encourage communication between project developers and relevant authorities. The goal is to promote a uniform interpretation of permit-granting rules, thereby enhancing internal coordination among all stakeholders involved.

Monitoring results

Member States have made efforts to ensure efficient and effective decision-making, avoid delays, and enhance the overall permitting process. Examples of internal coordination measures include the establishment of task forces or working groups composed of experts from relevant ministries and regulatory bodies, as well as the development of forums or platforms for authorities to coordinate planning and address barriers to permitting processes. Key observations across the EU-27 are listed below:

Table 3 Improving internal coordination (recommendations 13-18)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Single contact points designed in a way to reduce number of authorities	Strong																												
Streamlining and authority coordination as part of the introduced procedures	Strong																												
Mediation of exchanges between project developers and other relevant authorities by single contact points	Strong																												
Introduction of consequences for delays or lack of action from administrative authorities	Strong																												
Information exchange between the single contact points and other relevant authorities on the needs and potential risks in the permit-granting of the projects	Strong																												

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

- In the majority of Member States (18), recommendations related to single contact points included in the updated Recommendation have not been implemented fully. While all Member States have established some forms of contact points, the process is rarely unified. The scope is also narrower than envisaged by the Recommendation.
- Our monitoring has shown that only in three Member States (Belgium, Croatia, Estonia) contact points mediate exchanges between project developers and authorities. They also facilitate exchanges between authorities. In quite a few cases single contact points have limited role and provide, for example, only information or 'guide' the developers without more active engagement (e.g. Ireland, Poland).
- We noted that several Member States (e.g. Hungary, Austria, Malta) are in the process of revising legislation and establishing relevant structures.

Good practices in fostering better coordination

Positive development has been observed in Czechia, where the newly adopted Building Act aims to simplify and expedite the permitting process while ensuring the protection of public interests during construction. As of 1 January 2024, the Transport and Energy Construction Authority (DESU) has been established. This is a new special authority responsible for

permitting key transport and energy infrastructure projects.⁴³ According to Article 16 of the RED II on the organisation and duration of the permit-granting process, Member States are required to set up or designate one or more contact points. In Czechia, this is being implemented by building authorities, including the newly defined Supreme Building Authority, the Specialised and Appellate Building Authority, regional building authorities, and other building authorities (Building Act No. 283/2021 Coll.).

Ireland has made progress in improving internal coordination. The Accelerating Renewable Electricity Taskforce provides a forum for public authorities to coordinate planning regarding renewable energy projects and related (grid) infrastructure and to ensure compliance of national legal framework with the EU legislation. The Taskforce identifies barriers and challenges to delivery of renewable energy infrastructure projects. One of its aims is to develop the single point of contact for all relevant permitting systems as required by the Renewable Energy Directive.⁴⁴

In Hungary, a similar focus on internal coordination related to permitting processes has been noted, where a working group has been established with experts from the Ministry for National Economy and the Hungarian Energy and Public Utility Regulatory Authority to assist local authorities and project developers in interpreting the law related to the permitting of renewable energy projects.

Effectiveness analysis

Some Member States are currently aligning their national laws with EU regulations and more progress on improving internal coordination, better alignment with the updated Recommendation can be expected in 2025. Adherence to the updated Recommendation can be assessed more fully only later. Currently, several months after introduction of the updated Recommendation, it appears that Member States need more time to adjust their legislation and institutional setups.

In general, there is a noticeable need to focus on the establishment of single contact points for permitting processes. For example, in Hungary, the government has recently launched a process to streamline and improve the one-stop in place. Similarly, progress on the measures related to one-stop shop and better streamlining of permitting processes is being made in Ireland, Croatia, and several other Member States, where authorities recognize the necessity for action.

Positive administrative silence is widely acknowledged as an efficient solution, where legally feasible. For example, in Croatia, positive administrative silence is considered to exist after 30 days of submitting the request for grid connection. It covers production plants, self-consumption, and demonstration projects with less than, or equal to, 10,8 kW installed capacity.

At times, tacit agreement application is limited to smaller and very specific types of installations. A good example here is Bulgaria, where tacit agreement applies only in one instance. When applying for the issuance of a building permit for installation to produce electrical energy from solar energy with a total installed capacity of 20 kW to 50 kW in existing buildings and structures in urbanized areas, if no response is received within one month from the chief architect of the municipality, the building permit is considered to have been issued.

⁴³ The DESU as a special authority provides permits for the following renewable energy production plants. <https://www.zakonyprolidi.cz/cs/2021-283>, <https://desu.gov.cz/>

⁴⁴ [gov - Accelerating Renewable Electricity Taskforce \(www.gov.ie\)](https://www.gov.ie/)

3.5 Clear, transparent and digital procedures

The digitalization of the permitting systems is important when it comes to simplification, acceleration of permitting procedures and closely correlates with the implementation of the revised RED (recommendations 19-24).

In comparison to the first and second monitoring rounds, the revision of the Recommendation has rendered an increase in its scope. The Recommendation not only targets RES projects, but also any related infrastructure. The changes emphasize the transparency of the permitting process and the full digitalisation of the process. Furthermore, the updated Recommendation promotes the use of new technologies such as AI and geospatial data to speed up the permit-granting procedure.

Beyond the digitalisation sphere, the Recommendation highlights the transparency aspects that the permitting process should attest to. In this regard, the updated Recommendation highlights the need for dealing with projects of cross-border relevance at the national level while involving local authorities as appropriate, and the need for permit-granting authorities to consult with developers and local authorities to assess the project permitting and public consultation needs at an early stage.

Monitoring results

Across the EU-27 Member States have started digitalising their permit-granting procedures. However, digitalisation is often scattered among permitting steps across different competent authorities and in the majority of Member States there is no unified digital process. Key results of our monitoring exercise show that:

- Each Member State's performance has been assessed based on five questions. The total assessment indicates 26 actions being assessed as having a strong alignment, while 21 were evaluated as having a moderate alignment, and 15 having a weak alignment.
- Two actions stand out with a relatively high level of alignment across the EU: 1) The involvement of national authorities for cross-border infrastructure projects, and 2) the availability of an online manual for the permitting procedures.⁴⁵ At the same time, the majority of Member States have not made available their manuals on procedures on Your Europe⁴⁶, as it is advised in the updated version of the Recommendation and required under the Single Digital Gateway Regulation.
- Although there are some good examples for specific Member States utilizing new technologies in the permitting process, there is a weak alignment with the Recommendation in regard to the utilization of these technologies across the EU-27 Member States.

⁴⁵ The question in our country questionnaire was: 'Has the MS provided an online manual of procedures as described in the Recommendation? Is it also made available on YourEurope?' (see annex)

⁴⁶ Available at <https://europa.eu/youreurope/index.htm>

Table 4 Clear, transparent and digital procedures (recommendations 19-24)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Provision of an online manual of procedure as described in the Recommendation																													
Use of new technologies (such as AI and geospatial data) to speed-up / automatize processing																													
Mandatory bilateral "pre-permitting" discussions between permit-granting authorities, project promoters and local authorities																													
Cross-border projects are dealt with at the national level and in that way bundling responsibilities of involved local authorities																													
Introduction of fully digital permit-granting procedures, allowing to monitor and enforce deadlines and to inform applicants of the status of their application																													

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Good practices in introducing clear, digitalised procedures

Digitalisation of different permit-granting processes (building permits, environmental permits) During our monitoring exercise we have identified several positive practices. Denmark has successfully digitized its permitting process for all types of permits. Moreover, certain permits benefit from advanced digital platforms that facilitate the application and permit-granting procedures. For instance, Bygogmiljø.dk serves as a specialized platform for building permits, while environmental approvals for renewable energy projects on land are handled through dedicated digital channels. The contact point overseeing these processes is equipped with monitoring capabilities to ensure the timely completion of permit granting. This is achieved through regular reports received from the relevant authorities, aiding in the efficient and transparent management of deadlines. Similar solution has been implemented in Estonia, where the Estonian Building Registry has been significantly digitized since 2016. The registry acts as a comprehensive digital one-stop shop for various stakeholders including municipalities and incorporates industrial settings like windmills alongside residential buildings.⁴⁷

In the Netherlands, all authorities are required to adhere to the deadlines specified in the Environmental Planning Act. A critical component of this act is the Digital System for the Environmental Act (DSO). The DSO is an online platform that aids in the process of obtaining environmental permits by directing applicants to the appropriate authority based on a few questions. It also outlines the requirements, both in terms of content and form, for a successful permit application. This platform serves as a connection point between authorities and permit applicants, acting as a national one-stop shop for environmental permits.

Furthermore, the Digital System for the Environment Act (DSO – Digitaal Stelsel Omgevingswet) functions as a comprehensive digital platform that combines multiple features related to environmental and spatial planning. These features include the submission of permit applications, notifications for specific activities, and a "map viewer" that displays relevant spatial and environmental plans and regulations for each location. The viewer consolidates municipal environmental plans, provincial and national regulations, as well as sector-specific provisions. Previously, these functions were provided by four separate platforms. The integration into one digital system (DSO), which collects and processes most environmental planning information, now enables easy access to relevant information and streamlines the processing of the permit-granting procedure.

Italy has also digitalised the Environmental Impact Assessment (EIA) process by developing a dedicated portal. Managed by the Ministry of the Environment and Energy Security (MASE), this portal serves as a central hub for all Environmental Assessments and

⁴⁷ See presentations and minutes from the 4th Informal Expert Group on Accelerating permitting for renewable energy projects. [Register of Commission expert groups and other similar entities](#)

Authorizations. Not only does it provide access to past assessments, but it also offers real-time updates on ongoing procedures. Additionally, the portal offers a web-GIS visualization, enhancing the user experience and enabling stakeholders to easily access and interpret spatial data.

Digital one-stop shops: Digitalisation, including one-stop shops, has been subject of one of the Informal Expert Group on Accelerating permitting for renewable energy projects, where best practices regarding digital one-stop shops from Cyprus and Finland were presented. In 2022 Cyprus developed a digital platform, the Digital One Stop Shop, fully funded by the Recovery and Resilience Facility (RRF). This platform, operational since June 2023, allows electronic submission of applications, provides all relevant information to applicants, and is anticipated to include further functionalities such as electronic evaluation and approval of applications. Finland is working on a single permit-granting authority. The project, supported by the Technical Support Instrument funded by the European Union, includes three main elements: establishing a permitting guidance and supervisory agency; a legislative support project and a project on digital one stop services.⁴⁸

Use of new technologies: As mentioned in the beginning, the updated Recommendation stresses the importance of new technologies, such as Geographic Information Systems (GIS). During our project implementation several good practices have been identified, including in Denmark and Ireland. Denmark has extensively utilised geospatial data that are useful in several aspects of the permitting process, including information on protected areas, safety distances, national interests, wind resource maps, the Danish Elevation Model, populated areas, transmission networks, culturally important areas, and groundwater, among other biological mapping. This data is publicly available, making the process easier for project developers and planning authorities. In Ireland, draft national renewable energy targets (National Planning Framework) have been derived from geospatial analysis. In addition, methodology for regional reference use of geospatial is currently being developed and Irish authorities are planning to use GIS more in the permitting process.⁴⁹

Effectiveness analysis

Although there haven't been significant changes since the last monitoring round, there is a positive and gradual trend towards digitalisation of permit-granting procedures and the availability of information online. Many Member States have already digitalised parts of their processes or made information accessible online. Others are in the process of doing so.

In Cyprus digitalization has helped to reduce procedural bottlenecks by automating the distribution of application components to relevant departments, significantly speeding up response times. Also in Denmark, Netherlands, Estonia digitalisation had a positive impact when it comes to speeding up and making permitting procedures more transparent.

As an example of efforts to push for the application of innovative tools, Portugal plans to develop the Environmental Impact Assessment Modernization Program (AIA 2.0), which will leverage artificial intelligence technologies to streamline and increase transparency in administrative procedures related to environmental licensing. Furthermore, the Portuguese National Laboratory for Energy and Geology (LNEG) is utilizing GIS data to identify optimal areas for renewable energy projects. This approach helps in establishing go-to locations for renewable energy installations.

One area where Member States are falling behind is promoting communication between relevant stakeholders and authorities during the pre-permitting phase. Additionally, there is

⁴⁸ The project is scheduled to be completed by April 2025. Finland plans to consolidate its 17 different authorities related to environmental regulation into one supervisory agency by January 1, 2026. Minutes from the 4th Informal Expert Group on Accelerating permitting for renewable energy projects. [Register of Commission expert groups and other similar entities](#)

⁴⁹ Accelerating Renewable Electricity Task Force envisages creation of GIS working group. [c7417205-8e56-412c-9c68-718cbab0b54d.pdf](#)

a need for a more systematic utilization of new tools such as GIS and AI to expedite the different steps of the permitting process (location analysis, EIAs, etc).

Overall, while progress has been made in digitalising permit-granting procedures and enhancing information accessibility, there is still room for improvement. Areas deserving particular attention include: communication, the implementation of new IT tools to expedite the permitting process and consolidation of the digital portals and making them interconnected, to facilitate access to information on the permit application process.

3.6 Sufficient human resources and skills

The recommendations on sufficient human resources and skills (recommendations 25-27) highlight the importance of utilizing national and EU funding opportunities to address the skills gap and enhance upskilling and reskilling efforts. Member States are encouraged to introduce measures that ensure the availability and qualification of administrative resources. More specifically, the EU-27 countries are encouraged to leverage cooperation with the Large-Scale Partnerships for Skills established under the Pact for Skills in the Onshore and Offshore Renewable Energy Ecosystems to bridge skills gaps. Other recommended measures include creating national centers for excellence and engaging in platforms for exchange among permit granting authorities.

Monitoring results

Across the EU-27, there is varying alignment in implementing measures related to human resources and skills. The availability and quality of administrative resources are common challenges. Tapping into funding opportunities at both the EU and national level for upskilling and reskilling has been identified as a commonly missed opportunity.

- During the assessment of the collected data on the implementation of measures to develop sufficient human resources and skills, five measures were found to have strong alignment, nine measures had moderate alignment, and fifteen measures had weak alignment.
- The actions that showed a higher level of alignment across the EU Member States were related to the availability and quality of administrative resources. More than half of the Member States that responded to the questionnaire or had available data on this topic indicated that they have implemented or initiated measures to ensure the availability and quality of administrative resources.
- The lack of sectoral cooperation on skills is a common challenge across the EU-27. Specifically, Member States have not yet established cooperation with the Large-Scale Partnerships for Skills to address this issue. Additionally, there is a missed opportunity for Member States to tap into funding opportunities at the EU or national level for upskilling and reskilling their personnel.

Table 5 Human resources and skills (recommendations 25-27)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Introduction of measures to ensure the availability and qualification of administrative resources	Strong																												
Member State, including regional and local authorities, cooperation with the Large-Scale Partnerships for Skills	Weak																												

Data missing

Weak

Moderate

Strong

*BE1 refers to Flanders and BE2 refers to Wallonia

Good practice examples

In Belgium, regular exchanges of information are held between Flanders and some of the 300 communes ("atria-meetings"). At these quarterly meetings between officials from Flanders and the municipalities, new laws that have an impact on the municipalities are presented and discussed, among other things. Exchanges of information are also held between Flanders and the provinces ("GOVC-POVC-overleg") and between Flemish permit granting authorities (Gecoördineerd Overleg over de Aanvraag, GOA). The aim of the

GOVC-POVC⁵⁰ meetings is to harmonise the approval procedures within the provinces so that projects in different provinces have similar chances of being approved. At the Coordinated Consultation on Applications Group (Gecoördineerd Overleg over de Aanvraag, GOA) meetings, a number of officials from the Flemish permitting administration meet regularly. At these meetings, legislation, procedures, best practices and court decisions are discussed once a month and their impact is outlined.⁵¹

Estonia has taken significant steps towards promoting training and knowledge sharing in the renewable energy sector. Support has been provided to empower local authorities in this area. There is a mechanism aimed at facilitating the recruitment of specialists, and the engagement of expertise tailored to the development of renewable energy projects, with a particular focus on wind energy. Wind energy project application, processed by a local authority will obtain dedicated specialists, with the possibility of the same specialists being hired by multiple local authorities.

Another two positive examples were shared during the discussions of the Informal Expert Group on Accelerating permitting for renewable energy projects. Finland presented a project (sponsored by the Recovery and Resilience Facility, RRF) focused on creating a one-stop shop. One of the elements of this project has been training of permitting staff for national authorities and for administrative courts. Denmark has presented the Renewable Energy Travel Team. It is a government task force which aims to support local municipalities in RES deployment. The team consists of employees from three different agencies, the Danish Environmental Protection Agency, the Danish Agency for Planning and Rural Development and the Danish Energy Agency (to combine regulatory knowledge on permitting) and has four main tasks: 1. it is the main point of contact for the municipal administrations, 2. facilitates knowledge sharing (through workshops, meetings) 3. offers guidance and 4. supports the municipalities and the citizen-oriented dialogue.⁵²

Effectiveness analysis

Several countries have taken actions to enhance and expand their administrative resources, as highlighted in the 'good practices' section. Some Member States have established platforms for knowledge-sharing, underscoring their commitment to collaboration and mutual learning. Countries such as Portugal, Italy, and Spain have acknowledged the importance of this issue and have drafted plans to address it.

Regarding cooperation with the Large-Scale Partnerships for Skills, nearly all countries lack action and knowledge concerning this initiative. It is recommended that Member States make efforts to raise awareness of the partnership and identify how it could be used to enhance and streamline efforts in developing skills. Estonia was the only Member State that reported carrying out activities related to the key points of the Pact for Skills. Determining the direct influence of the Pact itself on these outcomes is challenging, as these activities are likely to have been carried out irrespective of the Pact.

⁵⁰ Gewestelijke Omgevingsvergunningscommissie - Provinciale Omgevingsvergunningscommissie (GOVC-POVC)

⁵¹ [20231201_rapport-GOA_finaal.pdf](#)

⁵² See presentations and minutes from the 2nd Informal Expert Group on Accelerating permitting for renewable energy projects. [Register of Commission expert groups and other similar entities](#)

3.7 Better identification and planning of locations for projects

The 2022 Recommendation encouraged Member States to utilise the Energy and Industry Geography Lab (EIGL) datasets to address barriers related to project identification and planning, streamline environmental impact assessments (EIAs), minimise restricted areas for renewable projects (i.e. exclusion zones), and promote multiple use of sites as well as public participation in the planning from the early stages. The 2024 Recommendation builds upon these principles but extends its focus beyond "renewable energy projects" to encompass "related infrastructure". This highlights the significance of RES-related infrastructure, which is essential for supporting the ongoing growth of the green energy sector together with associated elements in the planning processes. The recommendations on streamlining of EIAs, alignment with environmental regulations, utilisation of scoping in the EIA process, and ensuring early public involvement and transparent project location disclosure all demonstrate a shift from exclusively addressing renewable energy projects to incorporating related infrastructure considerations.

Furthermore, the updated Recommendation introduces measures to promote the sharing of data from previous EIAs. By making this information publicly available, project developers can benefit from valuable insights for site selection, thereby also expediting their work. The updated Recommendation also encourages complementing EIGL data with the Photovoltaic Geographical Information System (PVGIS) and other national/regional/local datasets. These revisions seek to further enhance the identification and planning of project locations by using more comprehensive and improved datasets.

Monitoring results

Our results reveal positive momentum in simplifying the planning of renewable energy projects, streamlining EIAs, and facilitating public involvement. However, further action is needed to develop policies that reconcile agricultural land use with renewable energy deployment and promote the multiple use of sites. The main trends in the EU-27 are presented below.

- Action to identify priority land or sea areas for renewable energy projects and related infrastructure was “strong” in 14 cases, “moderate” in 7, “weak” in 5, reflecting an overall good alignment with the Recommendation.
- Member States took actions with regards to limiting the presence and scope of exclusion zones. Alignment with the Recommendation on this point is good, as we noted that 19 out of 27 Member States have implemented relevant provisions.
- 11 Member States featured “strong” alignment in that they streamlined EIA requirements and integrated it under a joint procedure with other environmental assessments, while a further 5 reflected “moderate” alignment, reflecting an overall rather strong alignment with the Recommendation.
- On facilitating the sharing of data from past environmental assessments and from the monitoring of environmental impacts of renewable energy and related infrastructure projects, according to the findings, 15 cases reflected “strong” alignment, while 3 were “moderate”.
- Early public involvement and transparent action were overall strongly aligned, with 23 Member States either “strong” or “moderate” in their alignment (17 and 6, respectively) with none reflecting “weak” alignment.

- Finally, regional cooperation in the planning of grids, storage, and production is relatively well developed, with several good examples across the EU-27.

Table 6 Better identification and planning of RES projects (recommendations 28-33)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Facilitating the sharing of data from past environmental assessments and from the monitoring of environmental impacts (e.g. publicly accessible portal)																													
The Member State has encouraged multiple use of sites																													
Early public involvement, and greater transparency in spatial planning																													
Systematic or mandatory use of scoping for related infrastructure projects to improve the EIA process																													
Identification of priority land or sea areas for renewable energy projects and related infrastructure																													
Coordinated planning of grids, storage and production at all levels, including regionally (i.e. in cooperation with other Member States)																													
Streamline EIA requirements and integrated it under a joint procedure with other environmental assessments																													
Definition of RE exclusion zones and steps taken to limit them, as advised in the Recommendation																													

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Good practice examples in identification and planning of projects

Encouraging multiple use of sites: Czechia’s case on the multiple use of sites offers an instructive case. In Czechia, there is already a practice of placing solar photovoltaic plants in industrial areas or brownfields that have been thoroughly mapped. This utilisation of existing industrial areas helps optimise land use and maximise the potential for renewable energy generation. This approach allows for the repurposing of underutilised or environmentally impacted sites, transforming them into productive locations for renewable energy generation. The government took further action on 1 July 2024, when it defined the term agrovoltaics in the Czech legislation while amending Act No. 334/1992 Coll. on the Protection of the Agricultural Land Fund. As a result, there is no need to change land designations and zoning plans.

Sharing data: Croatia offers an example where all completed environmental assessments have been made publicly available on the website of the competent ministry or competent local institutions, offering developers immediate access to essential data that can support their project development. Similarly in Portugal, the Environment Agency (APA) has made all the EIAs available online.

Identification of priority areas and defining exclusion zones:

Planning of renewable energy projects offshore is limited to designated zones according to the Danish Maritime Spatial Plan (MSP), which allocated approximately 30 percent of the Danish waters including the EEZ for the purpose. "Strongly protected marine strategy areas" have been designated in accordance with the Marine Strategy Framework Directive, which aims to contribute to achieving good environmental conditions in the marine environment. Within the strictly protected areas, the establishment of renewable energy projects is not permitted – these comprise approximately 6% of the total offshore area controlled by Denmark.

In 2022, Germany introduced the Act to Increase and Accelerate the Expansion of Onshore Wind Energy, which sets a federal land target of 2% for onshore wind energy by the end of

2032⁵³. This was followed by the Act on the Need for Wind Energy Sites, according to which the federal states are given binding targets and must identify sufficient priority land areas for onshore wind energy. In the case of offshore wind, the government designated an area for the development of 30 GW offshore wind power – equal to its 2030 targets. Furthermore, the Act on the Immediate Improvement of the Framework Conditions for Renewable Energy in Urban Planning Law stipulated (1) the swift opening-up of open-cast lignite mining areas for installation of solar photovoltaics and wind power by state ordinances, and (2) beneficial regulations for solar installations up to 200 metres from highways and major railways.

Effectiveness analysis

The results of our monitoring demonstrate continued positive momentum in the ‘Better Identification and Planning of Locations for Projects’ across Member States. Consistent with previous assessments, significant progress is visible in the simplified procedures for the planning of solar and onshore wind plants. Progress has been especially noteworthy in the case of streamlining EIAs and positive developments on making EIA results publicly available is also worth noting. Member States have also taken action to better align public involvement with the Recommendation. Governments have also been able to move forward on spatial planning as an increasing number of Member States identified priority areas while both defining and limiting exclusion zones. Progress is however gradual and paired with slow developments in other areas, such as the multiple use of sites. The latter is where Member States need to take further action: developing policies that reconcile the use of agricultural land, for instance, with the deployment of renewable energy to maintain the necessary momentum of the energy transition. Harmonising such goals allows for the inclusion of a broader societal base in the energy transition, not only accelerating its pace but also enabling the EU to achieve a just transition. Overall, the level of alignment with the Recommendation is growing and reflects sustained progress along the trajectory indicated in previous research rounds.

⁵³ Gesetz zur Erhöhung und Beschleunigung des Ausbaus von Windenergieanlagen an Land, <https://www.bmwsb.bund.de/SharedDocs/gesetzgebungsverfahren/Webs/BMWSB/DE/ExterneLinks/wind-an-land-gesetz.html>

3.8 Easier network connection and efficient use of networks

The updated Recommendation reflects a more nuanced and comprehensive approach to facilitating network connections and the efficient use of networks for renewable energy integration (recommendations 34-38). Key modifications include a shift from "grid" to "network" terminology, emphasising a broader infrastructure perspective. The document now explicitly calls for "anticipatory investment" in long-term planning, aligning grid development with renewable energy expansion goals. As in the 2022 version of the Recommendation, the update places notable emphasis on streamlining of procedures for repowering existing plants. The role of system operators has also been expanded to prioritise the development of network plans that effectively integrate renewable energy and electrification requirements.

In general, changes in the updated Recommendation demonstrate a more strategic and future-oriented approach to network development and the integration of renewable energy sources. There is a clear emphasis on further simplification, increased clarity, and adaptability to emerging technologies, all within the broader context of an evolving energy system.

Table 7 Eased network connection and efficient use of networks (recommendations 34-38)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Implementation of network development plans by system operators that appropriately integrate renewable and electrification needs																													
System operators provide information on grid capacities, and creation of incentives and mechanisms for better usage of grids and network connection requests management																													
Implementation of long term grid planning and anticipatory investment as necessary																													
Introduction of legal certainty for the repurposing of natural gas pipelines for hydrogen by clarifying the authorisations needed and permitting grandfathering																													
Introduction of legislative or regulatory reforms to optimise grid capacity by allowing power plants to combine multiple complementary technologies																													
Introduction of transparent and digital procedure for grid connection																													
Simplified procedures for repowering existing renewable energy plants, clarifying the applicable land use restrictions																													
Distinction between a new project and a repowering project																													
Is there a mechanism to avoid speculative applications for grid capacity allocation																													

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Member States' alignment with the updated Recommendation's provisions for easier grid connection shows varying degrees of progress across different aspects as presented below.

- For simplified procedures for repowering existing renewable energy plants, alignment is "strong" or "moderate". In total, 8 "strong" and 5 "moderate" national measures have been introduced, with several Member States not being in a position to respond to the specific questions on repowering procedures.
- Regarding transparent and digital procedures for grid connection applications, the level of alignment is high, with 18 Member States strongly or moderately aligning with the updated Recommendation. The provision of information on grid capacity shows even stronger alignment, with 23 Member States having introduced relevant measures.
- Legislation to optimise grid capacity by allowing power plants to combine multiple complementary technologies has progressed more slowly, with 8 "strong" and 10 "moderate" measures adopted by early 2024.
- As regards the repurposing natural gas pipelines for hydrogen, progress is limited. Only 5 Member States (Denmark, Finland, Italy, Poland and Sweden) have adopted robust national legislation, while 6 others have adopted measures with "moderate" alignment.

Best practices

Coordinated planning: Finland's approach to network planning is characterised by an emphasis on strategic coordination and proactive development. The country's National Energy and Climate Plan (NECP) goes beyond general guidelines to identify specific priority areas for grid development and reinforcement. This targeted strategy allows Finland to anticipate and prevent potential bottlenecks in the system before they occur. A key feature of the Finnish policy is the close cooperation between grid operators and project developers, which has resulted in significantly faster processes for the integration of renewables. This collaborative model ensures that grid development is not just reactive, but anticipatory and therefore closely aligned with the projected market growth. In Spain, a policy requires Transmission System Operators (TSOs) and Distribution System Operators (DSOs) to publish available grid capacity online, promoting transparency in the network.

Efficient use of networks and enabling infrastructure: Italy has made significant progress in digitising and streamlining processes critical to the development of renewable energy. The Ministry of the Environment and Energy Security (MASE) has implemented a comprehensive online portal for environmental assessments and authorisations, providing real-time updates on ongoing procedures and access to historical assessments. The portal's webGIS visualisation feature improves transparency and accessibility for stakeholders. Complementing this, Italy's ⁵⁴Econnextion platform⁵⁵ has been transforming the grid connection process for RE projects since early 2023. This digital system centralises high-voltage connection requests for RES and provides a transparent view of the geographical distribution and authorisation status of PV and wind projects across the country. By providing comprehensive data access to both stakeholders and operators, these digital initiatives not only reduce administrative burdens, but also foster a more informed and efficient RES sector, placing Italy at the forefront of digital integration in energy infrastructure planning.

Germany has demonstrated significant progress in optimising its energy infrastructure to support RES integration and future hydrogen deployment. Recent amendments to key energy laws have streamlined grid planning processes, allowing for more efficient bundling of electricity lines, and implementing forward-looking expansion strategies. This proactive approach ensures that grid development aligns with the anticipated growth in renewable energy production. Furthermore, Germany has taken a pioneering step by establishing a comprehensive legal framework for a core hydrogen network. The most recent amendment to the Energy Industry Act (Energiewirtschaftsgesetz) not only lays the groundwork for hydrogen infrastructure development but also empowers the Federal Network Agency with expanded regulatory oversight of gas and electricity grids. This legislative action provides the necessary legal certainty for repurposing existing natural gas pipelines for hydrogen use, while also outlining clear authorisation processes for new projects.

Repowering: Repowering has been one of the main themes during discussion of the third meeting of the Informal Expert Group on Accelerating permitting for renewable energy projects. Greece and Germany have established mechanisms to prioritize repowering projects over greenfield projects when it comes to the permitting process, simplified requirements have been introduced in Portugal, Denmark and Italy for repowering onshore wind plants if they are below a certain threshold in total capacity or capacity percentage of

⁵⁵ Available at <https://www.terna.it/en/electric-system/efficient-territorial-planning/econnextion>

the original capacity. Another helpful approach can be observed in Portugal where a detailed handbook with guidelines on repowering has been published.⁵⁶

Effectiveness analysis

The third monitoring round demonstrates continued positive momentum in improving grid connection processes for RES projects across Member States. In line with previous assessments, notable improvements can be observed in the streamlined procedures for grid connection of solar and onshore wind installations. Of particular significance is the widespread adoption of legislation that mandates transparent and digital information sharing regarding grid connection processes. This includes the implementation of capacity maps, which has become a common practice across the European Union.

While the final monitoring round has not revealed major breakthroughs since the Recommendation update, it showcases steady and incremental progress. Member States continue to refine and optimise their processes, maintaining the positive trajectory established in earlier monitoring rounds. However, the persistent lack of legislation enabling the combination of complementary technologies for optimised grid use remains a concern, albeit one partially explained by the current predominance of single-technology projects in the RES sector. Overall, the level of improvement observed aligns with previous rounds, indicating sustained progress in line with the updated Recommendation's guidance.

⁵⁶ See presentations and minutes from the 3rd Informal Expert Group on Accelerating permitting for renewable energy projects. [Register of Commission expert groups and other similar entities](#)

3.9 Innovative projects

The recommendation on Innovative Projects (recommendation 39) supports the introduction of regulatory sandboxes to grant targeted derogations from national, regional or local legislative frameworks for innovative technologies, products, services and approaches. The aim is to encourage regulatory learning, and the deployment of innovative solutions focused on decarbonization. The updated Recommendation includes the facilitation of permit-granting for test sites for new technologies.

Monitoring results

There have been no significant changes since the last monitoring round. Overall, Member States are at varying stages of implementing regulatory sandboxes for innovative projects. Our key observations are as follows:

Table 8 Innovative projects (recommendation 39)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Introduction of regulatory sandboxes to grant targeted exemptions to facilitate permit-granting for testing sites																													
	Data missing				Weak				Moderate				Strong																

*BE1 refers to Flanders and BE2 refers to Wallonia

- While some Member States, such as Spain, France, Lithuania, and Greece, have successfully developed dedicated regulatory sandboxes for innovative projects in renewable energy and related infrastructure, others have stated that their existing regulatory frameworks already accommodate testing sites and pilot projects, or regulatory sandboxes in a broader sense. In such cases, these sandboxes and testing sites extend beyond the renewable energy sector to encompass a wider range of applications.
- Although some countries, such as Denmark and the Netherlands, do not have dedicated regulatory sandboxes for innovative projects, they have implemented initiatives to support hybrid and innovative projects, including mechanisms that provide them with preferential treatment.
- Establishing an enabling regulatory environment for innovative projects remains an area requiring significant attention for many Member States. While seven Member States have demonstrated strong alignment with the Recommendation, and eight have shown moderate alignment, this represents only 58% of the total. Consequently, 42% of Member States have yet to develop a regulatory framework to support such projects. Greater efforts are needed to promote the comprehensive and widespread adoption of the necessary regulatory measures.

Good practice examples in supporting innovative projects

France has implemented a regulatory sandbox specifically for the energy sector. This sandbox allows the national regulatory authority, CRE, to grant exemptions from requirements related to network access and usage. These exemptions are provided to facilitate experimental trials for innovative technologies or services that support the energy transition, smart grids, and infrastructure development. Since November 2022, applications have been processed on a first-come, first-served basis. Project leaders can submit their applications through a dedicated platform.

Poland recently adopted a legal framework for regulatory sandboxes through an amendment to the Energy Law on July 28, 2023. These provisions permit exceptions to certain requirements under the Energy Law, including those related to grid operation, usage instructions, development plans, licensing conditions, and tariffs. However, these

exceptions are applicable only if specific conditions are met, such as compliance with state energy policy, the operation of the power system, and adherence to the principle of proportionality. The primary objective of these regulatory sandboxes is to support the development of innovative technologies, particularly those related to the hydrogen economy and smart grids.

In Denmark, although not defined as a 'regulatory sandbox', a new permit-granting procedure has been issued in July 2024 for offshore test-projects, which includes innovative projects. Under the new legislation, projects now require only a single permit from the Danish Energy Agency (instead of the previous three permits). This streamlined process significantly reduces administrative burdens and grants permits valid for three years.

Effectiveness analysis

While there is progress across the EU in adopting legislation focused on regulatory sandboxes, there are many different approaches. Moreover, several countries (e.g. Luxembourg, Finland, and Cyprus) have acknowledged the need for such a regulatory framework but are still in the process of designing it.

For instance, Croatia's draft updated National Energy and Climate Plan (NECP) for the period 2021–2030 includes a proposal to amend the *Ordinance on General Conditions for the Use of the Network and Electricity Supply*. This amendment aims to create a regulatory safe testing environment (regulatory sandbox/experiment) for implementing demand response projects in the distribution network. Similar progress is reflected in the draft NECPs of Romania and Italy, which also propose regulatory test environments for demand response projects.

3.10 Monitoring, reporting and review

The updated Recommendation (recommendations 40 and 41) stipulates that Member States should set up a contact point for project developers and for the Commission, tasked with regularly monitoring the main bottlenecks in the permit-granting process. A new requirement is that the Member States should conduct an audit of permit-granting procedures applicable to renewable energy projects and related infrastructure. Also, there should be regular evaluations to determine and implement measures to accelerate such procedures. Member States are to communicate to the Commission every two years as part of the integrated national energy and climate progress reports information on measures taken in the context of the Recommendation.

Monitoring results

Reporting on measures undertaken by the Member States in response to the updated Recommendation, has been challenging. The revision took place shortly before the start of our last monitoring round. Thus, it is difficult to evaluate how much has actually been done in response to the May 2024 update. We have noted (across EU-27) visible efforts to better understand and address challenges in permit-granting procedures. Two key observations are as follows:

- Approximately one-third of Member States have implemented some form of evaluation or monitoring of permit-granting procedures (e.g., Bulgaria, Estonia, Croatia, the Netherlands, Denmark, and Sweden). However, only two Member States — Sweden and Estonia — reported that they have implemented a comprehensive audit of their permitting procedures.
- Most of the Member States have established a contact point responsible for regularly monitoring bottlenecks in the permit-granting process. However, we did not observe evidence linking this action directly to the revised Recommendation, which specifies that such contact points should serve both project developers and the European Commission.

Table 9 Monitoring and review (recommendations 40-41)*

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
1) does such a contact point exist, and 2) is the expert selected for the expert group participating in that capacity	Strong																												
Carried out audit of MS permit-granting procedures	Weak																												

Data missing	Weak	Moderate	Strong
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*BE1 refers to Flanders and BE2 refers to Wallonia

Good practice examples

Estonia serves as a good example of a Member State that has conducted an audit of permitting procedures. In 2022, an audit was carried out to map the processes and authorities involved in renewable energy permitting⁵⁷. The report provided proposals which could significantly expedite the permitting process for wind farms and other renewable energy permitting processes. Recommendations from this audit included creating a single joint permit for offshore wind parks, streamlining Environmental Impact Assessment

⁵⁷ The very extensive report can be found at: <https://valitsus.ee/valitsuse-eesmargid-ja-tegevused/rohepolitika/taastuenergia-arendamine>

through creating a standardized EIA programme, increasing the number of management EIA experts and increasing the number of specialized trainings.

Similarly, in 2022, Croatia assessed its permitting procedures. Following this action, the Ministry of Economy and Sustainable Development published an *Assessment with recommendations for removing obstacles and disburdening administrative procedures that limit the greater use of energy from renewable sources.*⁵⁸

In Denmark, as part of the implementation of Article 16 of the Renewable Energy Directive (RED II), the planning and permitting processes were mapped. This led to the development of an online manual on permitting procedures.⁵⁹ Additionally, the Danish Energy Agency (DEA), responsible for permitting renewable energy projects, conducted a “service check” on offshore wind approval procedures. The DEA organized a workshop involving Danish authorities, environmental and permitting consultants, and offshore wind developers. Following this, the DEA is revising the Renewable Energy Act to remove a step in the permitting procedure and align it with the Environmental Assessment Act.

It is worth noting that as of August 2024, Slovakia is receiving support through a Technical Support Instrument (TSI) project called "Acceleration RES permitting in Slovakia " (October 2023-February 2025). The objective of this project is to assist the national authorities in Slovakia in enhancing their capacity to design, develop, and implement reforms to accelerate the permitting of renewable energy projects in the country.

Effectiveness analysis

National authorities across the EU-27 are making visible efforts to better monitor and understand bottlenecks in permit-granting procedures. A notable example is Hungary, where the Ministry of Energy has recently launched a consultation process with stakeholders to examine the permit-granting process. This initiative aims to identify bottlenecks and consider proposals for streamlining existing procedures.

At the same time, it is difficult to evaluate progress specifically related to the updated Recommendation. For example, while quite a few Member States have established contact points for permitting procedures, they are not for project developers and for the Commission specifically but rather a measure to improve the permitting process for RES in general. Similarly, the recommendation advocating for audit of permit-granting procedures applicable to renewable energy and related infrastructure projects is quite new and the majority of Member States have not implemented it so far.

⁵⁸ OIE - PROCJENA S PREPORUKAMA ZA UKLANJANJE PREPREKA verzija 3 FINAL.pdf (gov.hr)

⁵⁹ veprojekter.dk, manual of procedures implementing art. 16 RED II

3.11 Conclusion and Recommendations

Analysing results of the third monitoring round on the implementation of the Commission's updated Recommendation and Guidance on speeding up permit-granting procedures for renewable energy projects and related infrastructure projects ('the Recommendation'), the areas deserving most attention seem to be the following:

- ✓ **Human resources.** Quite a few Member States reported on insufficient capacity to tackle all administrative tasks, related to speeding up renewable energy deployment. The challenge is not just the complexity. The sheer amount of renewable energy and enabling infrastructure projects, number of applicants, project developers and broad stakeholder environment require more investment in people engaged in permit-granting processes. There is a need for the Member States to utilise, to a larger extent than it is currently, EU support instruments such as the Technical Support Instrument (TSI) and LIFE programme.
- ✓ **Digitalisation and transparency.** Even though in general Member States are trying to digitalise permit granting processes, this task is not always easy as it depends on the general level of digitalisation of public services in a given country. The results of our monitoring report, through best practice cases, have shown the positive potential in digitalisation and how it can significantly speed up permit-granting processes. The next steps for the Member States would be to explore making better use of new technologies, such as artificial intelligence and geospatial data.
- ✓ **Innovative projects** are a complex, fast changing area. Many Member States have updated their legislation and/or are planning to do so. Overall, there seems to be room for improvement when it comes to simplifying procedures for repowering and developing solutions allowing hybrid projects. This could be one of topics for discussion of the expert group in the future.

Below we present a set of area-specific, selected recommendations, addressed to the Member States (at national, regional, local levels) and, to some extent, also to the European Commission. These recommendations are applicable across EU-27 and take into account overall results of our assessment, from the third monitoring round.

Faster and shorter procedures

- Permitting procedures for construction of renewable energy projects, renewable energy generation, grid connection, and energy transmission need better coordination and integration. The Commission should continue to foster best practice exchange in this area, within the Informal Expert Group on Accelerating permitting for renewable energy projects and other, similar fora.
- Further steps need to be taken to introduce accelerated and unified procedures, ensure authorities are adequately resourced, and that deadlines are met especially where multiple authorities are involved in processes. Member States could look more into technical assistance from EU instruments such as TSI.
- There could be more focus on increasing flexibility, enabling changes and updates of technology, during processing permit applications of renewable energy projects. Especially large-size projects are increasingly complex and involve application of many different, new technologies. It is sometimes difficult to foresee everything at the planning stage, as in the meantime new technologies, more cost-efficient solutions can enter the market. More flexibility would help investors to avoid situations where changes and applying better, more modern technologies incurs the necessity to restart the whole permit-granting procedure.

- As a rule, the Member States should develop clear criteria in which cases new permits (in cases such as technology update, repowering) are necessary to avoid an unexpected restart of procedures.

Facilitating Citizen and Community Participation

- There could be more clarity, at Member States level, regarding the conditions, legal framework and administrative processes regarding permit granting (including licensing) for energy communities. There is a need for more action aimed at operationalizing national legislation on energy communities.
- Incentives for municipalities to host RES projects prove to be an efficient mechanism to increase renewable energy deployment. Such incentives can be introduced either at planning level (when it comes to development of local, regional spatial plans) or at later stage, during renewable energy projects' development and operation. The Commission (DG ENER) as well as Member States could consider a stronger focus on this theme during future work on speeding up permitting processes.

Sufficient human resources

- The Commission could encourage Member States to better use the EU funding on education, training and preparing human resources for accelerating permit-granting processes. Our research showed that there is room for improvement both at the EU and national level when it comes to available funding to support implementation, especially national training programs to boost skills, or obtain support on introducing reforms (such as under the Technical Support Instrument).
- We have noted that in some cases, even though a single contact point has been established, it is not functioning well due to lack of capacity – for example lack of adequate number of trained staff. Member States should pay attention that institutions, established to speed up permit-granting processes have clearly defined roles, are staffed, funded and equipped adequately.

Improving internal coordination

- Member States still need to implement the revised RED provisions regarding single contact points for permitting procedures. While there has been an effort to streamline information around Member States' permitting processes, in quite few cases the role of the contact point is merely informative.

Digital procedures

- Digitalisation is a key element of streamlining and enabling faster permitting processes, including enforcement of deadlines. Data analytics can be used, at national level, to evaluate deadlines and project timelines, progress tracking as well as ensure transparent, coherent information sharing.
- Digital procedures can contribute to shortening and improving project development processes, especially when it comes to preparing, filing and processing an application. It is recommended that across the EU-27 best practices regarding better use of new technologies, such as artificial intelligence and geospatial data, mentioned in the Recommendation and the accompanying Guidance are followed.
- While in most of the Member States, the grid connection procedure is digitalised, there are some where the procedure still requires paper submissions. Full digitalisation of processes related to grid connection is highly recommended. Online procedures should be evenly introduced that allow submission of applications, completion forms, communication of issued permits, but at the back end, also allow easy coordination between authorities so that notification can be provided, and opinions efficiently shared.

Sufficient human resources

- Not many Member States have actively participated in the Large-Scale Partnerships for Skills for onshore renewables – which has a workstream in the area of enabling better staffing and skilling for permitting institutions. More focus should be placed on ensuring relevant human resources, at national and regional level. This includes increasing the number of staff and improving their skills, particularly in areas such as spatial planning, environmental matters and network connection procedures.
- There is a need for increasing awareness at the local institutional level on training opportunities available for authorities engaged in the permitting processes. Also, the central government should increase resources available to public authorities to enable professional training regarding permitting processes.

Better identification and planning of locations

- The multiple use of sites is where Member States need to take further action: developing policies that reconcile the use of agricultural land, for instance, with the deployment of renewable energy is essential to maintaining the momentum of the energy transition.
- New technologies, such as AI and geospatial data, should be explored to optimise data reporting by project developers, leading to accelerated and automated processing of relevant approval stages. Geographic information systems (GIS) and data analytics can be also used in identifying the most suitable locations for various projects.

Easier network connection and efficient use of networks

- There could be more focus across EU-27 on streamlining grid connection processes and ensuring that capacity allocation is transparent and efficient. This includes coordination between the applicant for connection or extension to the network, the distribution network companies and the transmission network companies, especially when new connections to the electricity networks are being applied for.
- The Commission could explore the development of a harmonized format for digital platforms across Member States for grid connection applications. This standardized approach could facilitate the sharing of best practices, allowing successful elements from one country's system to be more easily adopted by others, potentially enhancing efficiency and transparency across the EU.
- There is a need to speed up legislation and relevant measures at national level that would allow combination of several complementary technologies to optimise grid use.
- Consider implementing real-time, updatable indicative timelines on digital platforms for grid operators to process connection requests and complete necessary upgrades. This dynamic system could provide clearer expectations for all parties involved, potentially accelerating the integration of renewable energy sources while adapting to changing circumstances.

Innovative projects

- There could be a more streamlined, aligned approach towards regulatory sandboxes across EU-27. In our monitoring process we noted a variety of different approaches and no unity in applying the EU's legislative framework, including the Recommendation. What has not been discussed and could be explored more, is helping the Member States to develop approach and models enabling short-term technology testing. The Commission could consider issuing guidelines in order to assist Member States in developing regulatory sandboxes at national level. For

technical support, Member States could consider using the Technical Support Instrument (TSI).⁶⁰

- As legislation on regulatory sandboxes and innovative projects advances at national level across the EU-27, there would be a need to ensure that relevant secondary regulation, as well as procedures, instructions for stakeholders involved in the process are in place.

Monitoring and reporting

- Our project has encountered some challenges in achieving consistent engagement of the national administrations across the EU-27. It appears that many administrations may benefit from additional support to enhance their capacity for effective monitoring and reporting, both vis-a-vis the European Commission as well as national stakeholders.
- A comprehensive evaluation of national and local level processes and permit-granting regulations, could help in identifying inefficiencies, streamline processes, and support the transition to renewable energy.

⁶⁰ Technical Support Instrument 2021-2027

4 Project conclusion

The 2022 Recommendation and complementary guidance have proven valuable by identifying the key areas for improving permitting of renewable energy projects through legislative and non-legislative measures: reducing the length and complexity of administrative authorization procedures, sufficient staffing and skilling of permit-granting entities and authorities responsible for environmental assessments, site selection procedures and grid connection issues.

In May 2024 the Commission has published the update of the Recommendation. It has developed partially thanks to the discussions within the Informal Expert Group on Accelerating permitting for renewable energy projects (E03885).⁶¹ It has proven to be a useful forum where Member States share best practices. Some of these practices have been reflected in both the updated Recommendation as well as accompanying guidance. More recent ones are reflected in this report, from our third round of monitoring.

Collaboration with the Member States has been central in this project as some of the most recent information – on planned updates, bottlenecks, challenges have not always been available publicly. Moreover, even though the assessment on measures undertaken to implement the Recommendation has been made by the Consortium, an effort has been made to validate it with the Member States.⁶²

The project, through country findings and their periodic review, provided a comprehensive EU-wide overview of the measures undertaken by individual Member States to implement the Recommendation. It also identified areas where additional focus and assistance could be valuable. Furthermore, the project enabled stakeholders in the Member States to gain an overview and a deeper understanding of planned reforms and measures at the national level.

This project has served as a valuable tool for Member States to monitor their alignment with the Recommendation. Additionally, the good practices identified in various Member States—shared through reports and discussions within the Informal Expert Group on Accelerating Permitting for Renewable Energy Projects—can inspire further improvements in the speed, transparency, and simplicity of permitting procedures across the EU-27.

The Informal Expert Group on Accelerating permitting for renewable energy projects has been a good forum for knowledge exchange and inspiration for Member States to adjust their policies, introduce measures aimed at removing bottlenecks to permitting and other administrative procedures. In addition to regular meetings of this expert group, a stakeholder event on progress and challenges in accelerating the permitting process for renewable energy projects across Europe took place in Brussels, on 25th of October. Member States, business organizations, NGOs, private investors discussed ways to simplify procedures, promote innovation, and ensure the successful and sustainable deployment of renewable energy projects.

The Informal Expert Group on Accelerating permitting for renewable energy projects has also assisted both the Member States and the Commission in relation to the implementation of existing Union legislation, programs and policies. There is planned continuation of this forum to keep the momentum in accelerating the permit-granting procedures for renewable energy and related infrastructure projects across the EU. The findings of this report and the

⁶¹ [Register of Commission expert groups and other similar entities](#)

⁶² At times this proved challenging. The level of engagement of Member States' representatives in this project has varied, which has influenced our results.

recommendations in the previous chapter can support the selection of topics for the upcoming meetings.

In summary, the project on *Monitoring the implementation of the Commission Recommendation and Guidance on speeding up permit-granting procedures for renewable energy and related infrastructure projects* has highlighted the necessity of efforts to streamline the permitting processes for renewable energy projects and emphasized the importance of collaboration among Member States. By facilitating the sharing of best practices through the Informal Expert Group on Accelerating Permitting, the project has fostered best practice sharing and collaborative approach across the Member States. It contributed to greater awareness of what measures can be introduced to speed up, simplify permitting procedures, thus speeding up deployment of renewable energy and related infrastructure projects in the European Union.

APPENDIX 1 – Monitoring the Implementation of the Commission Recommendation (EU) 2024/1343 and Guidance on speeding up permit-granting procedures for renewable energy and related infrastructure projects – Individual Measures Report Template

Rec No	Measure Details	Effectiveness Analysis
<p>Faster and shorter procedures (2)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Do RE and related infrastructure qualify for the most favourable permitting procedures?</p> <p>(2) Do all network development projects enjoy status of the highest national significance (if such status exists in national law)?</p>	<p>Alignment with the Recommendation (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: have the favourable procedures been used in practice? What impact have they had on accelerating roll out? If no, what obstacles persist?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Faster and shorter procedures (3)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Does the MS have clearly defined and accelerated deadlines for all steps of the permitting cycle – for RE and related infrastructure projects?</p> <p>(2) Where multiple authorities are involved in permit-granting procedures do they jointly respect deadlines and extensions in practice</p> <p>(3) Are there maximum deadlines for the EIA process, and are there other deadlines for any main steps (such as screening, scoping, issuing of the scoping statement issued by the authority, affected authorities to deliver opinions on draft scoping statement, consultation inputs to the EIA report, affected authorities to submit opinions to the consultation)?</p> <p>(4) Are there gaps in terms of deadlines not defined for some process steps of the overall permit-granting procedures (please explain)?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: has the introduction of accelerated deadlines had a meaningful impact in speeding up permitting procedures? If no, what barriers persist?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p> <p>(2) Effectiveness of the design and solutions: has the introduction of defined extensions and circumstances improved the predictability and efficiency of the procedures? If no, what barriers persist?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
Faster and shorter procedures (4)	(1) Description of the measure: Has the MS established specific timeframes and procedural rules regarding access to justice for RE and related infrastructure projects? Please distinguish between deadlines for (a) filing appeals and (b) the appeals procedure	Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak) Effectiveness of the design and solutions: has the timeframes and specific procedural rules led to more efficient legal proceedings related to access to justice? If no, what are the barriers? Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)
Faster and shorter procedures (5)	Measure title (year, law name and article) or policy document (year, name): (1) Description of the measure: has the MS created a single unified application process for the entire administrative permit application and granting process for renewable energy projects? (2) If different authorisations are required, can they be applied for simultaneously or do they need to follow a (pre-defined) sequence?	Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak) Effectiveness of the design and solutions: has the single unified application process led to a simpler and more efficient permitting procedure? If no, which of any of the process steps have been unified so far if any? Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)
Faster and shorter procedures (6)	Measure title (year, law name and article) or policy document (year, name): (1) Description of the measure: Are applicants allowed to update their technology specifications of their project in the time between the permit application submission and the construction of projects to facilitate the uptake of innovative technologies?	Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak) Effectiveness of the design and solutions: If yes, (1) has the greater flexibility produced any meaningful results in deploying different technologies and/or (2) reduced the administrative burden of undergoing further procedures? If no, what impact will this have on the efficient deployment of relevant technologies? Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)
Facilitating citizen and community participation (8)	Measure title (year, law name and article) or policy document (year, name): (1) Description of the measure: has the MS identified and introduced simplified permit-granting procedures for small scale renewables and renewables self-consumers, including lighter consent requirements in case of multiapartment buildings?	Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)

Rec No	Measure Details	Effectiveness Analysis
Facilitating citizen and community participation (9)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Did the MS introduce measures aimed to stimulate the participation of citizens, including from low and middle-income households, and energy communities in the planning, development, deployment and operation of renewable energy projects and the related infrastructure projects? Are there other measures to pass the financial benefits to local communities?</p> <p>(2) Does, and if yes how MS adhere to the requirement of early, regular and meaningful stakeholder engagement in grid development' announced in the Commission's communication on EU Action Plan for Grids?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the measures aimed to stimulate the participation of citizens, including from low and middle-income households, and energy communities in the planning, development, deployment and operation of renewable energy projects and the related infrastructure projects been effective?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Facilitating citizen and community participation (10)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Are public hearings, or other stakeholder engagement opportunities, organised early and regularly in the project design and planning procedure?</p> <p>(2) Are public hearings, or other stakeholder engagement opportunities inclusive and accessible? How is this ensured?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p>
Facilitating citizen and community participation (11)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS reduced to a minimum production licensing procedures and requirements, and similar operational permits for renewable and citizen energy communities?</p> <p>(2) Are there simplified permit-granting procedures and proportionate permit-granting requirements for renewable and citizen energy communities (beyond the measures for self-consumers mentioned above)?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: have the reduced production licensing procedures for renewable and citizen energy communities been efficient?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Improving internal coordination (13)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Have streamlining and authority coordination formed part of the procedures introduced? (Y/N)</p> <p>Please describe further:</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, what gains have been made by these streamlining and coordination efforts? If no, what barriers persist?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
Improving internal coordination (14)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Have single contact points been introduced in such a way to limit the number of authorities to what is necessary? (for renewable energy projects and for projects of common interest, projects of mutual interest)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, has the introduction of single contact points resulted in the reduction in the number of authorities involved made the process more efficient? If no, what are the barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Improving internal coordination (15)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Do the single contact points mediate exchanges between project developers and other relevant authorities to ensure a uniform interpretation of permit-granting rules and capacity-building in all involved authorities?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p>
Improving internal coordination (16)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Is there a dialogue, information exchange between the single contact points and other relevant authorities on the needs and potential risks in the permit-granting of the projects, immediately after the start of the permit-granting process?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, has the dialogue, information exchange led to speeding up, better streamlining of permit granting procedures?</p>
Improving internal coordination (17)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Has the MS introduced consequences for delays or lack of action from administrative authorities, such as tacit approval, also outside renewables acceleration areas?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, has positive administrative silence encouraged the timely issuing of replies or lawful acceleration of planning or deployment activities? Or has this led to an increased rejection of permits in the timeframe (e.g., due to lack of time, resources, etc.)? If no, what are the barriers to the introduction?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
<p>Clear, transparent and digitalised procedures (20)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Has the MS introduced fully digital permit-granting procedures, allowing to monitor and enforce deadlines and to inform applicants of the status of their application?</p> <p>(2) Description of the measure: Has the MS provided an online manual of procedures as described in the Recommendation? Is it also made available on YourEurope?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, what form has this taken e.g. an online manual of procedures or similar efforts (please provide links)? Has this been proactively advertised and communicated to applicants? If no, what are the barriers and what can be improved?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Clear, transparent and digitalised procedures (21)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: How does the MS make use of new technologies (such as AI and geospatial data) to replace data reporting by project promoters and speed-up / automatize processing?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Clear, transparent and digitalised procedures (22)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Has the MS ensured that cross-border projects are dealt with at the national level and in that way bundling responsibilities of involved local authorities? (especially relevant for infrastructure projects)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: did bundling of responsibilities have intended effect, did it lead to better streamlining of permit granting procedures for cross-border projects?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Clear, transparent and digitalised procedures (23)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1)Description of the measure: Are bilateral "pre-permitting" discussions between permit-granting authorities, project promoters and local authorities foreseen as mandatory step in early project planning? (Y/N)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: if introduced, do such discussions lead to more transparency, less NIMBY behaviours, smoother processing of RES project applications?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
<p>Sufficient human resources and skills (25)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Considering the need for accelerated roll out of RE and related infrastructure, have measures been introduced to ensure the availability and qualification of administrative resources? (measures such as national centers for excellence, platform for exchange among permit granting authorities) (Y/N)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the measures introduced facilitated sufficient availability of resources? If no, what are the main barriers?</p> <p>What is the main skill or resource gaps e.g. strategic planning, risk assessments, land use, permitting, authority coordination, EIA, public consultation, appeal proceedings, other (please explain) etc.</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Sufficient human resources and skills (26)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the Member State including regional and local authorities cooperated with the Large-Scale Partnerships for Skills established under the Pact for Skills in the Onshore and Offshore Renewable Energy Ecosystems?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p>
<p>Better identification and planning of locations for projects (28)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS identified priority land or sea areas for renewable energy and related infrastructure projects? Please also describe the type of RES and scale of projects.</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the identification of the priority sites led to further activities enabling planning and deployment? Are these identified typically areas associated with low levels of environmental sensitivity? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Better identification and planning of locations for projects (29)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Have RE exclusion zones been defined? If yes, have steps been taken to limit them e.g. related to distance to housing, civil or military aviation zones (Y/N)?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, what steps were used as part of the limiting of exclusion zones and/or justifications/evidencing exercise and have they improved the availability of space? If no, what are the main barriers to limiting exclusion zones?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
<p>Better identification and planning of locations for projects (30)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS streamlined EIA requirements and integrated it under a joint procedure with other environmental assessments? (for renewable energy and for related infrastructure projects)</p> <p>(2) Description of the measure: Has the MS ensured systematic or mandatory use of scoping for related infrastructure projects to improve the EIA process?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the steps taken made the EIA process more efficient? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p> <p>Effectiveness of the design and solutions: If yes, has the systematic or mandatory approach to scoping eased the EIA process? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g., when compared to other MS or Guidance suggestions)</p>
<p>Better identification and planning of locations for projects (31)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Does the MS facilitate the sharing of data from past environmental assessments and from the monitoring of environmental impacts of renewable energy and related infrastructure projects? Is this done through a publicly accessible portal?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the awareness of this and the portal acted as an enabling measure to ease planning activities? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
<p>Better identification and planning of locations for projects (32)</p>	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS ensured early public involvement, and greater transparency in spatial planning? Please describe further (referring also to any steps in the EIA process)</p> <p>(2) Description of the measure: Has the MS encouraged the multiple use of sites?</p> <p>(3) Description of the measure: Has the MS pursued coordinated planning of grids, storage and production at all levels, including regionally (i.e. in cooperation with other Member States)?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have these measures resulted in better public engagement and awareness? If no, what are the main barriers?</p> <p>Effectiveness of the design and solutions: If yes, have coordinated plans helped to boost deployment of RE? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
Easier grid connection (34)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS implemented long term grid planning and anticipatory investment as necessary (cf recommendation text)? (Y/N)</p> <p>Please describe further:</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, has the planning and investment translated into RE development activities on the ground? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Easier grid connection (36)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS ensured that system operators implement network development plans that appropriately integrate renewable and electrification needs?</p> <p>(2) Description of the measure: Has the MS introduced transparent and digital procedure for grid connection?</p> <p>(3) Description of the measure: Has the MS introduced legislative or regulatory reforms to optimise grid capacity by allowing power plants to combine multiple complementary technologies?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>(1) Effectiveness of the design and solutions: If yes, has the simplified procedure and related features eased repowering activities? If no, what are the main barriers?</p> <p>(2) Effectiveness of the design and solutions: If yes, has the transparent and digital procedure reduced the burden of the application process? If no, what are the main barriers?</p> <p>(3) Effectiveness of the design and solutions: If yes, has the development of power plants included activities to combine technologies? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Easier grid connection (37)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS introduced legal certainty for the repurposing of natural gas pipelines for hydrogen by clarifying the authorisations needed and permitting grandfathering? (Y/N)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, has the improved legal certainty eased the process of repurposing gas pipelines? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Innovative projects (39)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: Has the MS introduced regulatory sandboxes to grant targeted exemptions as defined in the recommendation, including to facilitate permit-granting for testing sites? (Y/N)</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: If yes, have the regulatory sandboxes encouraged deployment of innovative projects? If no, what are the main barriers?</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>

Rec No	Measure Details	Effectiveness Analysis
Monitoring, reporting and review (40)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>(1) Description of the measure: 1) does such a contact point exist, and 2) is the expert selected for the expert group participating in that capacity.</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p> <p>Effectiveness of the design and solutions: Have any issues encountered by project developers been addressed, based on such monitoring? (yes/no)</p> <p>Areas for improvement: (e.g. when compared to other MS or Guidance suggestions)</p>
Monitoring, reporting and review (41)	<p>Measure title (year, law name and article) or policy document (year, name):</p> <p>Has the Member State carried out an audit of their permit-granting procedures applicable to renewable energy projects and related infrastructure, mapping the processes and authorities involved?</p>	<p>Alignment with the Recommendation: (indicate i.e. Strong, moderate, or weak)</p>

APPENDIX 2 – Heatmaps

Legend:



Across the different tables, BE1 refers to Flanders and BE2 refers to Wallonia.

Citizen and community participation

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Measures aimed to stimulate the participation of citizens and energy communities in the planning, development, deployment and operation of projects																													
Inclusive and accessible stakeholder engagement opportunities (e.g. public hearings)																													
Early and regular stakeholder engagement opportunities in the project design and planning procedure																													
Simplified permit-granting procedures and proportionate permit-granting requirements for energy communities																													
Simplified permit-granting procedures for small scale renewables and renewables self-consumers, including lighter consent requirements in case of multiapartment buildings																													
Reduced production licensing procedures and requirements to a minimum for renewable and citizen energy communities																													
Adherence to the requirement of early, regular, and meaningful stakeholder engagement in grid development																													

Improving internal coordination

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Single contact points designed in a way to reduce number of authorities																														
Streamlining and authority coordination as part of the introduced procedures																														
Mediation of exchanges between project developers and other relevant authorities by single contact points																														
Introduction of consequences for delays or lack of action from administrative authorities																														
Information exchange between the single contact points and other relevant authorities on the needs and potential risks in the permit-granting of the projects																														

Clear, transparent and digital procedures

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Provision of an online manual of procedure as described in the Recommendation																													
Use of new technologies (such as AI and geospatial data) to speed-up / automatize processing																													
Mandatory bilateral "pre-permitting" discussions between permit-granting authorities, project promoters and local authorities																													
Cross-border projects are dealt with at the national level and in that way bundling responsibilities of involved local authorities																													
Introduction of fully digital permit-granting procedures, allowing to monitor and enforce deadlines and to inform applicants of the status of their application																													

Sufficient human resources and skills

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Introduction of measures to ensure the availability and qualification of administrative resources	Light Green	Dark Green	Dark Green	Light Green	Light Green	Dark Green	White	Light Green	Dark Green	Light Green	Light Green	Dark Green	Dark Green	White	Light Green	White	Light Green	Light Green	Dark Green	Light Green										
Member State, including regional and local authorities, cooperation with the Large-Scale Partnerships for Skills	White	White	White	Light Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Light Green	White	Dark Green	White	Light Green	White	White	Light Green	Light Green	White	Light Green	Dark Green	White	Light Green	White	Light Green	Dark Green	Light Green	Light Green	Light Green

Better identification and planning of locations for projects

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Facilitating the sharing of data from past environmental assessments and from the monitoring of environmental impacts (e.g. publicly accessible portal)																													
The Member State has encouraged multiple use of sites																													
Early public involvement, and greater transparency in spatial planning																													
Systematic or mandatory use of scoping for related infrastructure projects to improve the EIA process																													
Identification of priority land or sea areas for renewable energy projects and related infrastructure																													
Coordinated planning of grids, storage and production at all levels, including regionally (i.e. in cooperation with other Member States)																													
Streamline EIA requirements and integrated it under a joint procedure with other environmental assessments																													
Definition of RE exclusion zones and steps taken to limit them, as advised in the Recommendation																													

Easier network connection and efficient use of networks

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Implementation of network development plans by system operators that appropriately integrate renewable and electrification needs																													
System operators provide information on grid capacities, and creation of incentives and mechanisms for better usage of grids and network connection requests management																													
Implementation of long term grid planning and anticipatory investment as necessary																													
Introduction of legal certainty for the repurposing of natural gas pipelines for hydrogen by clarifying the authorisations needed and permitting grandfathering																													
Introduction of legislative or regulatory reforms to optimise grid capacity by allowing power plants to combine multiple complementary technologies																													
Introduction of transparent and digital procedure for grid connection																													
Simplified procedures for repowering existing renewable energy plants, clarifying the applicable land use restrictions																													
Distinction between a new project and a repowering project																													
Is there a mechanism to avoid speculative applications for grid capacity allocation																													

Innovative projects

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Introduction of regulatory sandboxes to grant targeted exemptions to facilitate permit-granting for testing sites																														

Monitoring, reporting and review

	AT	BE	BE1	BE2	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Referring to Recommendation 40, 1) does such a contact point exist, and 2) is the expert selected for the expert group participating in that capacity	Dark Green	Light Green	Light Green	White	Light Green	Light Green	Light Green	Light Green	White	Light Green	Dark Green	White	Light Green	Light Green	Light Green	White	Dark Green	Dark Green	Light Green	White	Light Green	Light Green	Dark Green	Dark Green	White	Light Green	Dark Green	Dark Green	Light Green
Carried out audit of MS permit-granting procedures	White	White	White	Light Green	Dark Green	Dark Green	Dark Green	White	Light Green	White	Light Green	White	White	Light Green	Light Green	White	Light Green	Light Green	Dark Green	Light Green	White	Grey	Dark Green	Light Green	Light Green				

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