EUROGAS RESPONSE TO THE CONSULTATION ON PERMIT GRANTING PROCEDURES FOR ENERGY INFRASTRUCTURE PROJECTS

Q1. As explained above, a complex and non-transparent procedural framework as well as poor administrative practice are major reasons for delays. There are different options which could help to facilitate administrative procedures. These include, as outlined in the Communication "Energy infrastructure priorities for 2020 and beyond – A Blueprint for an integrated European energy network", the establishment of a national contact and coordination body ("one-stop shop") per cross-border project, the introduction of a time limit, and the provision of rewards and incentives to regions or Member States which facilitate the permit granting process.
Would you consider these measures as useful? If so, under which conditions? Are there any additional measures you would propose to facilitate the administrative procedures?

Eurogas supports the Commission views on making it easier to build infrastructure, with regard to permitting procedures, further clarification on effective costs allocation between users and beneficiaries (in particular for cross-border projects) and, if appropriate, further regional coordination using the right platforms involving the relevant stakeholders and decision makers.

More particularly, Eurogas agrees indeed that complex and lengthy permitting procedures represent an impediment/hindrance to the realization of energy investments. These procedures need to be streamlined and an updated procedural framework must be established.

Furthermore, Eurogas believes that the **harmonization** of permitting procedures and implementation of European rules for new investments is crucial for the realization of new infrastructure projects. Common or even standardized procedures at EU level would indeed speed up and ease the implementation of cross-border projects preventing delays and procedural incoherencies among Member States.

Therefore, Eurogas believes the streamlining of authorization procedures is very important and that they should be available and applicable **to all infrastructure projects**, whether or not projects are considered as priority corridors or labeled as "projects of European interest".

While respecting the subsidiarity principle, the **EU may have an useful added-value in two respects:**

1) Regarding the permitting issuance, ,
   - The EU should play a key role in favouring the harmonization of permitting procedures across Europe by providing a set of standardized procedures for local authorities.
   - The EC can contribute to foster cooperation between Member States through e.g. **exchange of best practices**;
   - Only once truly harmonized permitting procedures will be achieved all over Europe, provided that all interested parties are consulted the EU could consider

the idea of introducing a **common EU time-limit** within which the competent authorities should deliver the needed authorizations. The common EU time-limit would vary depending on the type of technology;

- The **one-stop-shop principle** might be also relevant in order to streamline the permitting of cross-border projects. A single interface might be helpful to coordinate the process between projects developers and the local, national or regional competent authorities involved, provided that it evidently speeds up the procedure. At this stage, it is however unclear how such one-stop-shop could be organized;
- Where several Member States are affected by infrastructure projects, the EU might also play an important role as a **facilitator in trans-border authorization** processes;
- Finally, the idea of a **single permit** covering all aspects of the projects should also be further investigated.

2) Concerning **public acceptance of local population** which is also a key issue in the permitting process, the EU could contribute to enhance public understanding by leading public awareness initiatives for the energy infrastructure projects. For example for PEIs an EU facilitator may be appointed.

Q2. To increase the transparency and predictability of the permit granting process for all parties involved, guidelines targeted at ministries, local and regional authorities, project developers and affected citizens could be developed.
Would you consider them useful? Which issues should they address?

We believe that a closer cooperation between the European Commission and Member States concerning the alignment of national permitting and authorization processes will make permitting processes more efficient and thereby contribute to the fast realization of projects. This could be done via Guidelines for Good Practices in order to ensure generally accepted and well planned standards and rules across Europe.

Besides, there is a need for transparent objective and non-discriminatory criteria which are used by authorities to assess a project.

Q3. The lack of public acceptance poses a major hindrance for the implementation of energy infrastructure projects, and the associated achievement of energy and climate policy objectives. What should be done, apart from efforts to increase general transparency, to improve communication with citizens at an early stage of the project and to ensure that the environmental, security of supply, social and economic costs and benefits of a project are correctly understood? Who should be responsible for / involved in this communication?

Public attitude towards large scale infrastructure projects may indeed delay even prevent projects implementation. Therefore this issue needs to be addressed.
One possibility could be for the European Commission to play the role of facilitator by for example implementing awareness campaigns.

Q4. Requirements for compensation mechanisms: In your opinion, could minimum or harmonised requirements on compensation of affected populations, targeted at individual or community level, help to increase public acceptance? Which compensation schemes would you deem useful, and who should provide for the compensation?

In general gas infrastructure does not disturb individuals or community to a large extent. In the event that there is a disruption, any obligatory requirements for compensation mechanism for affected populations could be counter-productive since it would increase the project costs without necessary commensurate benefits. In any case, the impact of compensation mechanisms has to be borne in mind.

Q5. Have you encountered any national best-practices which have helped to facilitate the permit granting process? Which measures were taken in view of administrative procedures, transparency and communication with citizens, and how has the public responded?

In order to have a better understanding, a benchmark of best-practices within the EU and at international level (e.g. the US FERC procedures) should be prepared.