Accelerating Permitting Procedures

- with One Stop Shops -

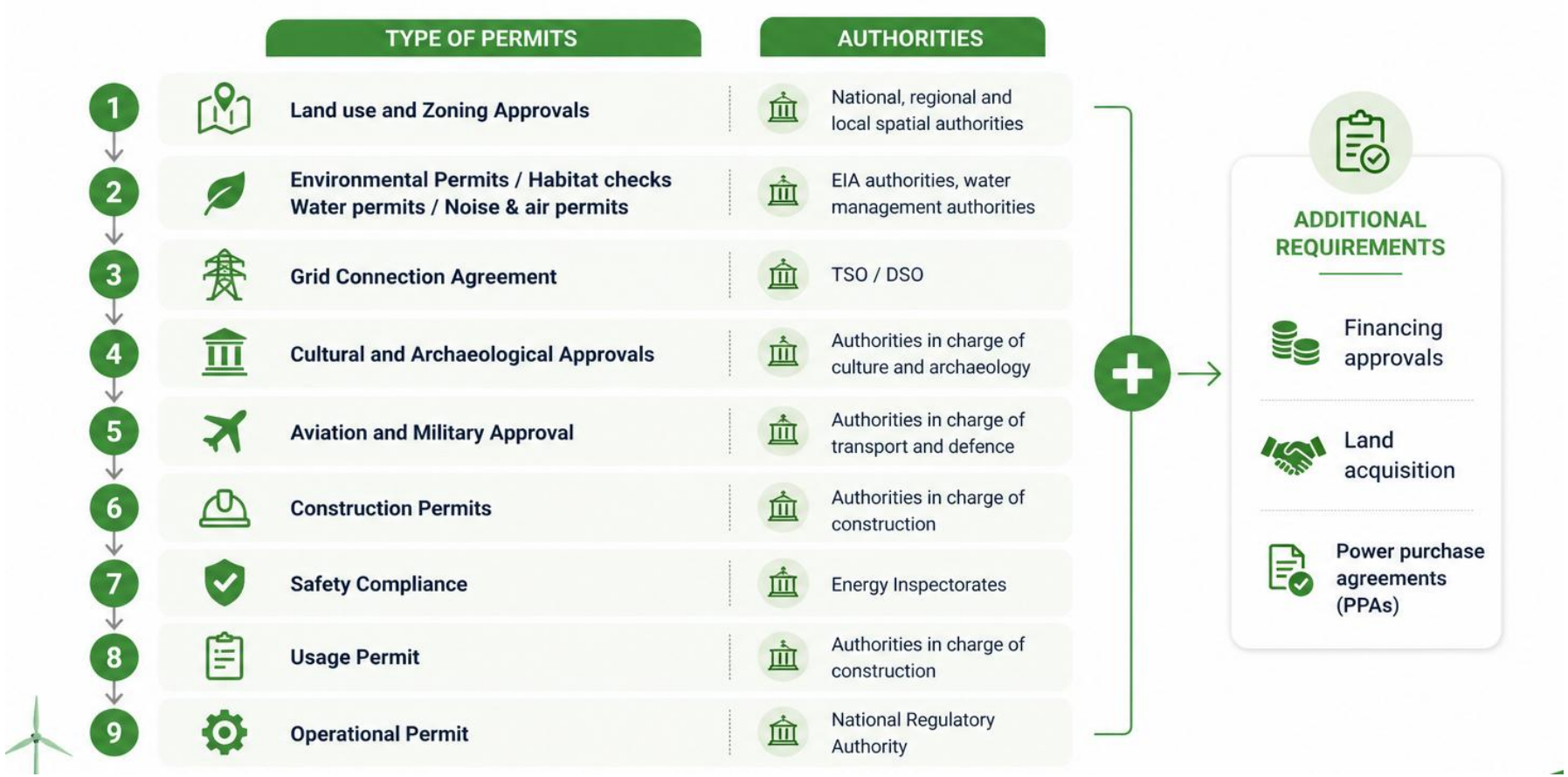
The Energy Community Secretariat, Technical Workshop on Renewable Acceleration Areas (RAAs) and RES Permitting Reform , Podgorica, 29 April 2026

The Nature Conservancy, Biljana Grbić LL.M, Renewable Energy Planning and Permitting Expert

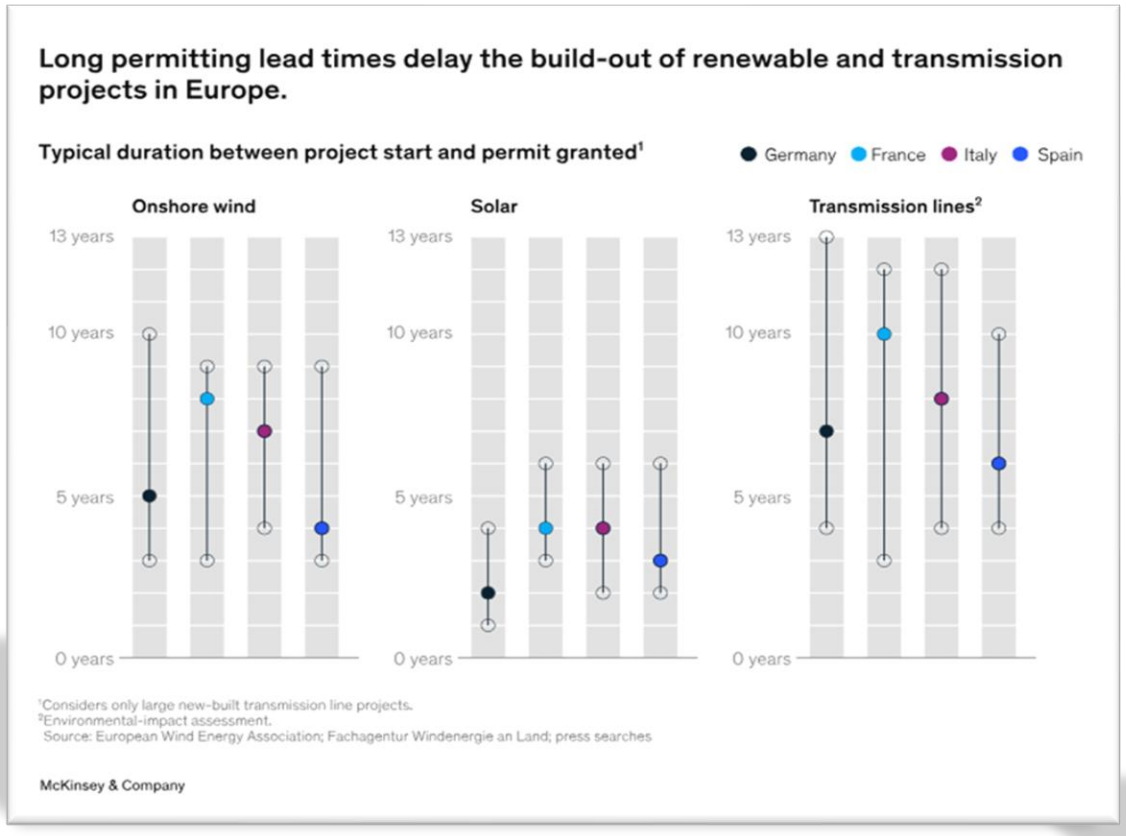
Agenda

1. Rationale
2. State of Play
3. Step by Step in Establishing OSSs
4. Discussion about challenges and improvements

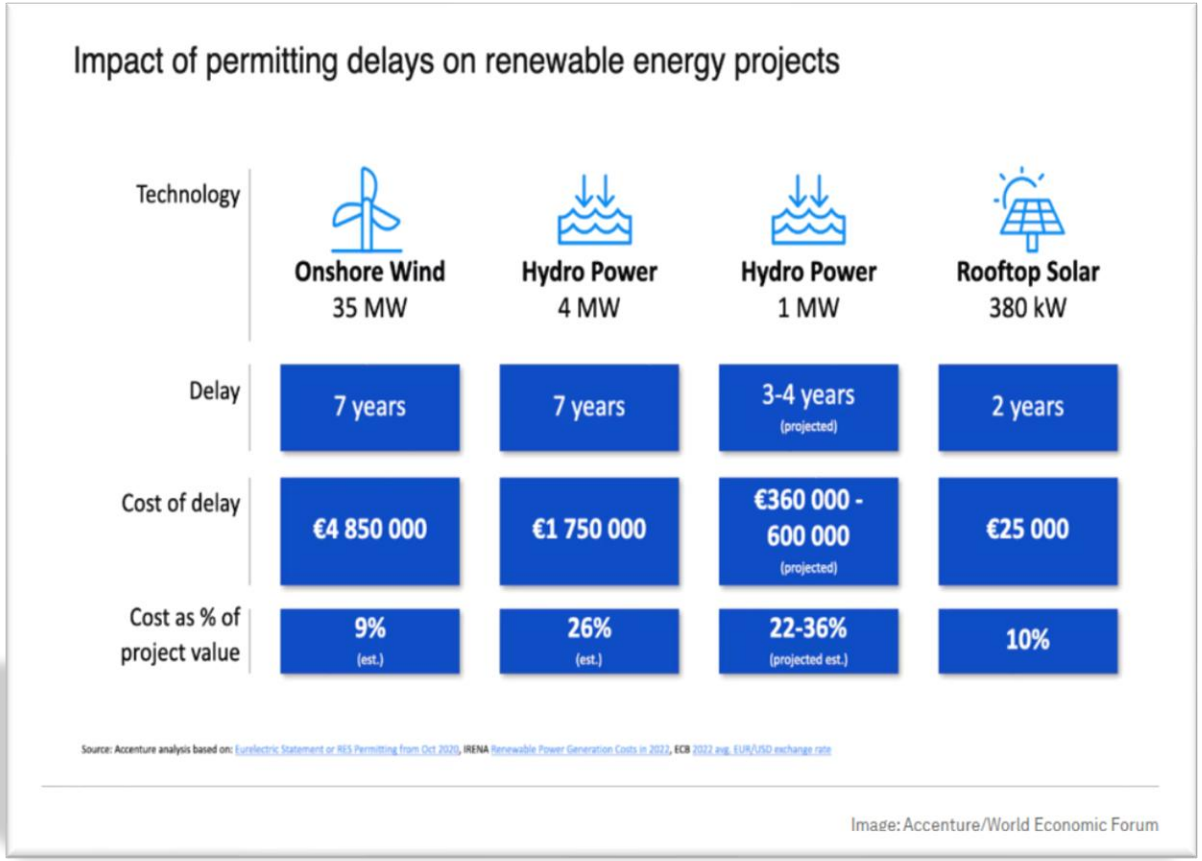
RE-related permits



Impact of permitting delays

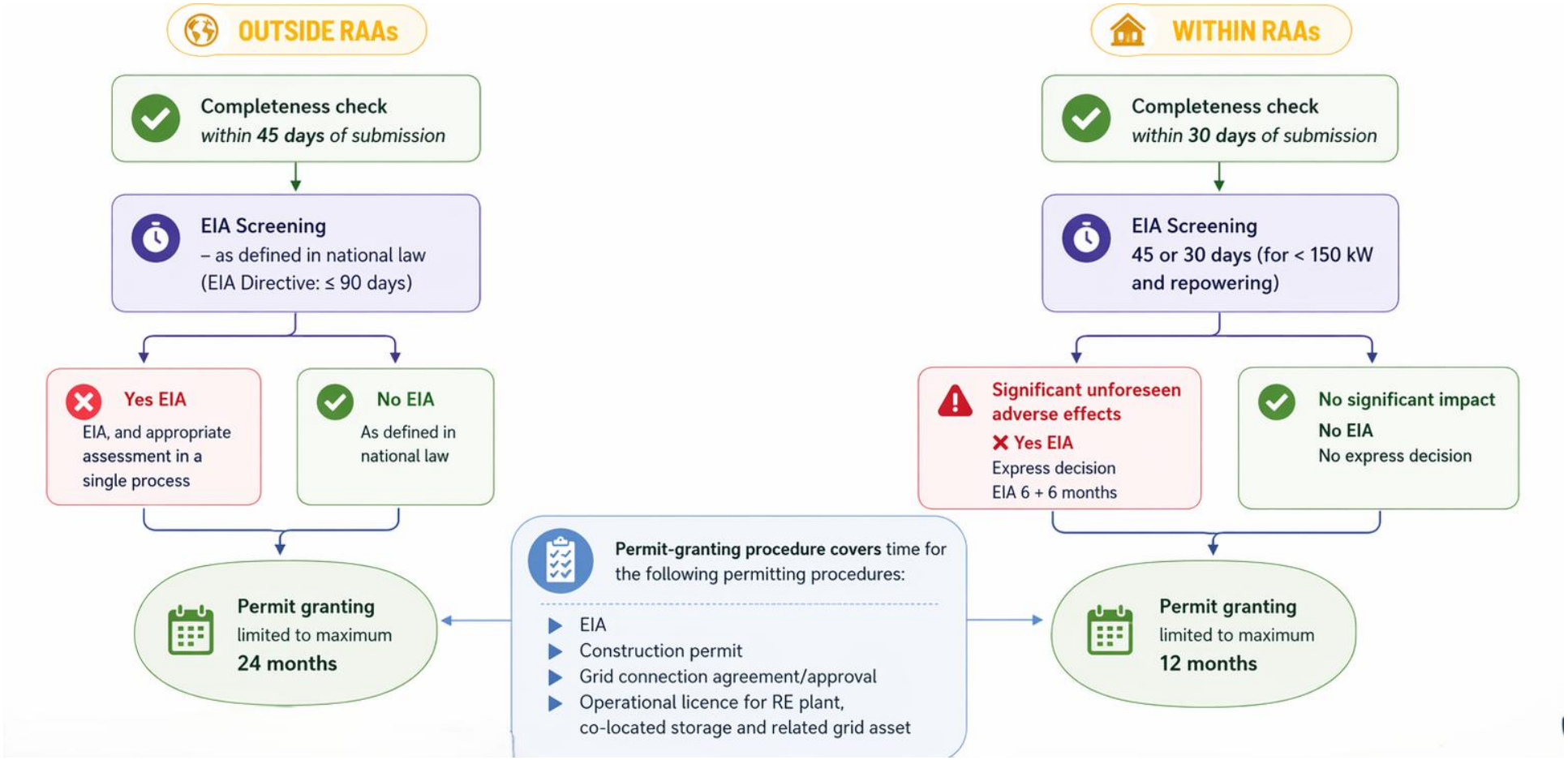


McKinsey & Company, Five key action areas to put Europe's energy transition on a more orderly path, August 2023.

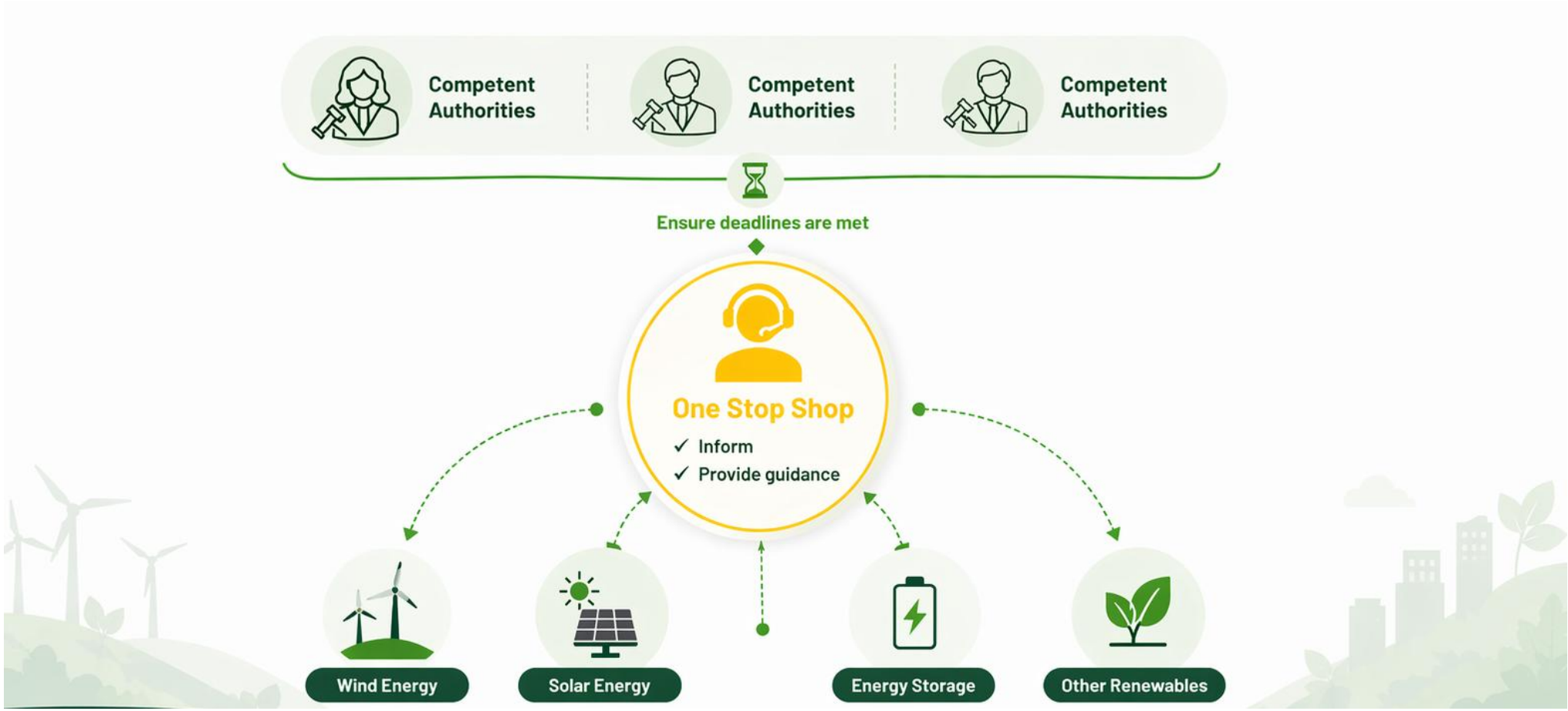


World Economic Forum, How permitting processes are hampering Europe's energy transition, September 2024.

Permitting procedures in revised RED



One Stop Shop in the revised RED



Step by step in establishing OSS

Step 1.1 – Conducting a permitting audit

Checklist for assessing and monitoring of records of applications

☑ 1. Identify and Access Registers

Locate all administrative registers where permit applications are recorded.

Verify whether registers are digital or paper-based and confirm accessibility.

☑ 2. Record basic application data

For each permit application, check that the following fields are captured:

- Start date: when the application is submitted.
- Type of application: e.g., construction, grid connection, storage, or other RES-specific projects.
- Applicant type: citizen, business, energy community, etc.
- Assigned staff or unit handling the application.

☑ 3. Verify RES-specific disaggregation

Check whether the register allows identifying renewable energy projects separately.

- Is it recorded as RES specifically or lumped under "energy projects"?
- Does it distinguish between different technologies, and storage projects?

Note any limitations or gaps in categorization.

☑ 4. Track Procedural Steps and Timelines

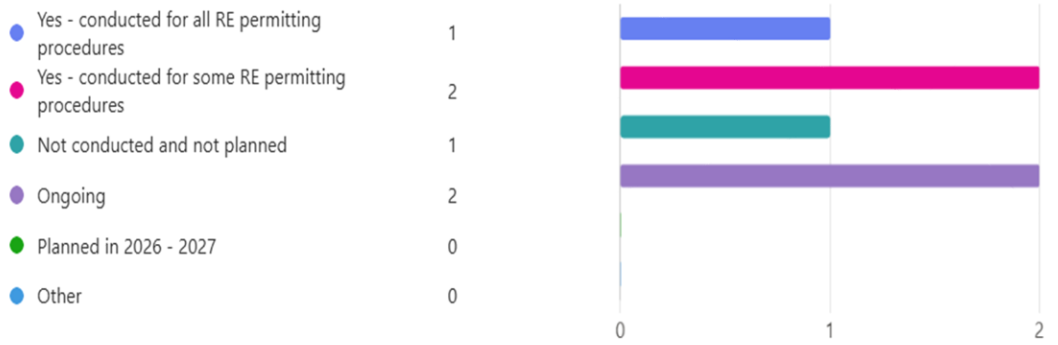
For each application, record the duration of each step:

- Submission → validation → review → decision → notification.

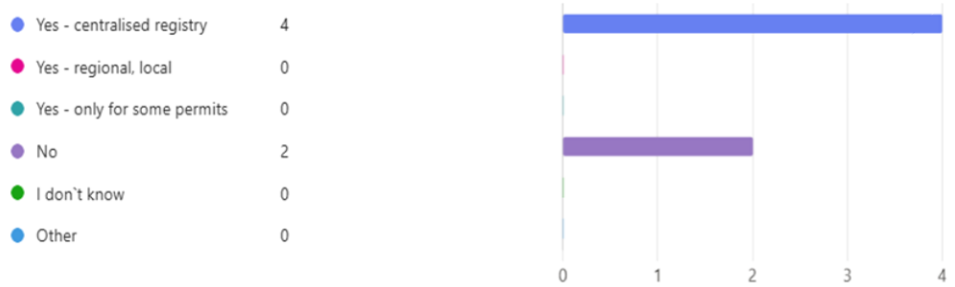
Identify whether timestamps are automatically recorded or need manual extraction.

Assessing permitting registries

1. **Have you conducted or plan to conduct an assessment of the current state of permitting procedures and main bottlenecks for RE projects and related infrastructure?** More details



2. **Is there a registry/registries of procedures for RE permitting (EIA for RE, EIA screening, other RE-related permits registries)?** More details

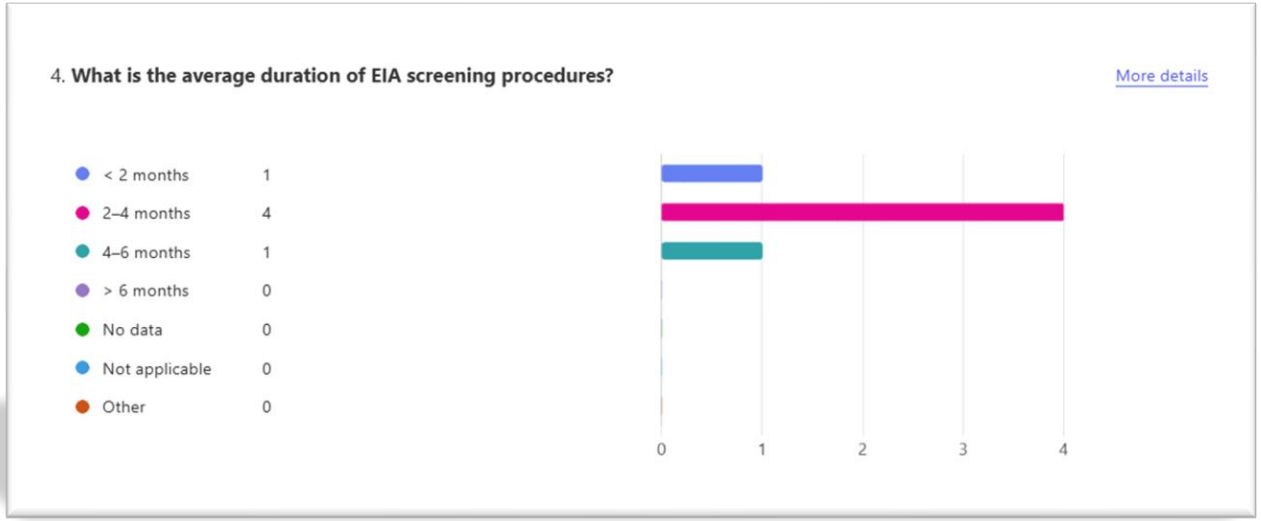


3. **If you answered yes in the second question, which data does the registry record?** More details

Additional Questions for Discussion:

1. Are the registries digitalised?
2. Who is analysing the data from the registries?
3. For which procedure have you conducted auditing?
4. Why did you choose that procedures?
5. What is the purpose of auditing? Do you plan to simplify procedures?

What is the average duration of EIA screening procedures?

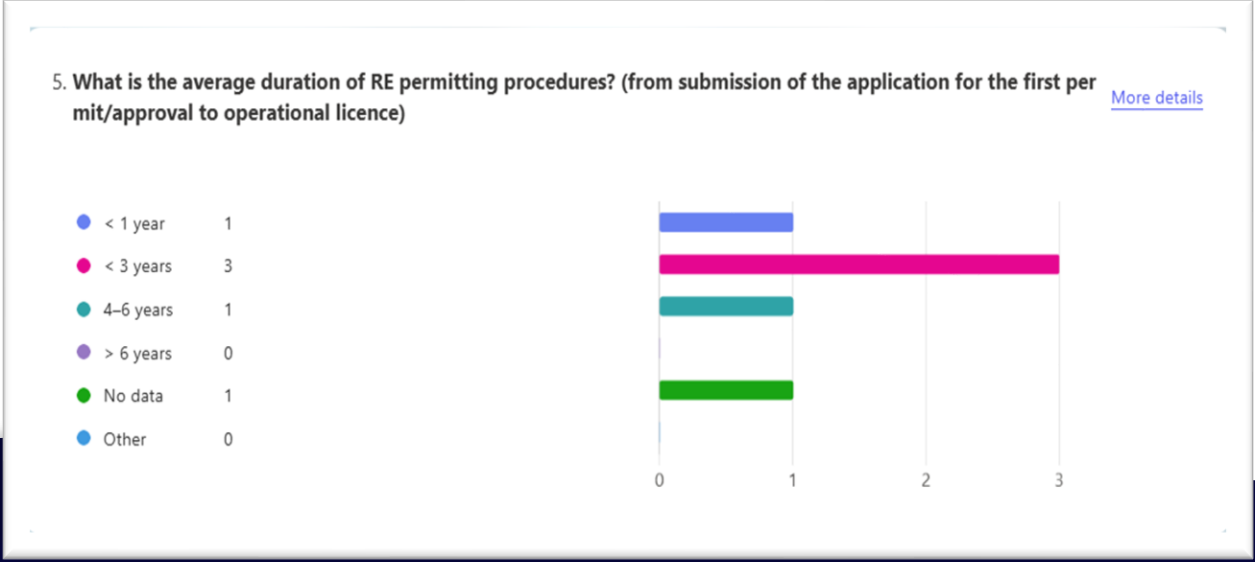


Environmental Impact Assessment Directive 2011/92/EU:

- ⏱ **≤ 90 days (≈ 3 months)** for screening decision

Renewable Energy Directive (EU) 2023/2413:

- ⏱ **≤ 45 days** → for renewable energy projects within RAAs
- ⏱ **≤ 30 days** → for:
  - installations **< 150 kW**, and
  - **repowering** of renewable energy plants



Renewable Energy Directive (EU) 2023/2413:

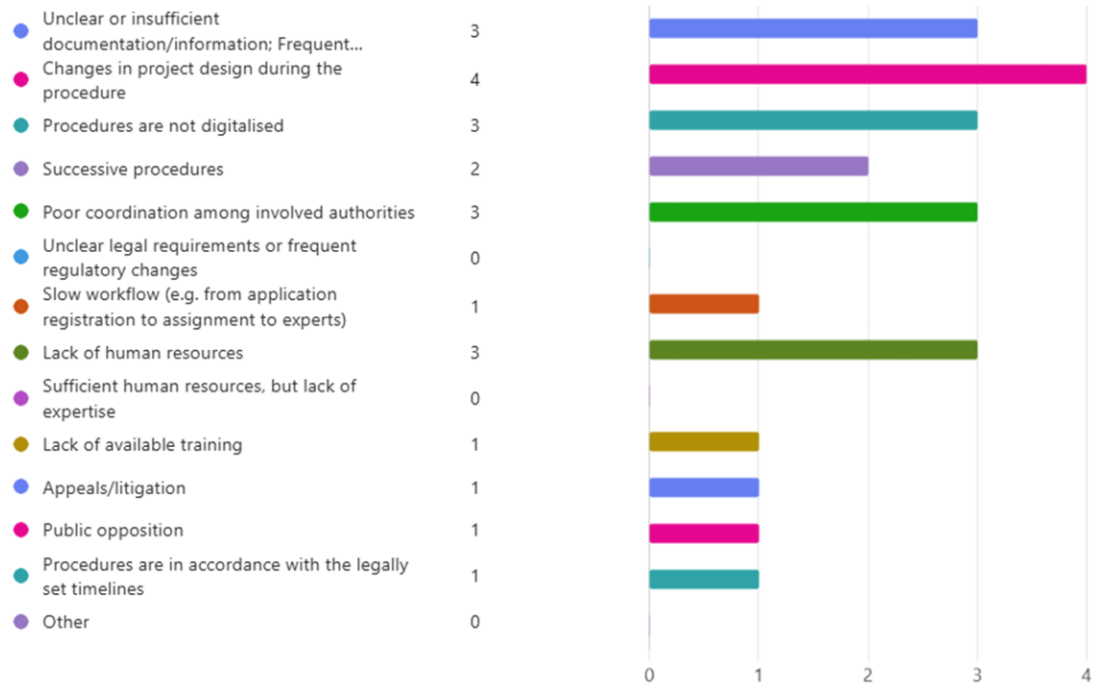
- **Renewables permitting:**
  - ⏱ **≤ 12 months** → projects in “renewables acceleration areas”
  - ⏱ **≤ 24 months** → projects outside such areas

Compliance with EIA screening timeline

CONTRACTING PARTY	Deadline for screening decision	Possible extensions	Compliance with 90-day EIA directive	Compliance with 45-day red (RAAs)
Albania	45 days from complete application	Yes, up to +1 month	Yes (≤90 days)	Yes (meets 45 days, but extension may exceed)
Bosnia and Herzegovina (FBIH)	60 days from submission	Not specified	Yes	No
Bosnia and Herzegovina (RS)	60 days from complete request	Not specified	Yes	No
Georgia	10–15 days after application registration	Not specified	Yes	Yes
Kosovo*	Up to 60 days (max 90 with extension)	Yes, capped at 90 days	Yes	No
Montenegro	4 working days after opinion deadline	Not specified	Yes	Yes
Moldova	20 days after opinion deadline	Yes, in exceptional cases	Yes	Yes (if no extension)
North Macedonia	30 days from submission	Not specified	Yes	Yes
Serbia	30 days from complete request	Not specified	Yes	Yes
Ukraine	Not defined in the law	Not defined in the law	n/a	n/a

What is the typical cause of the long duration of RE-related permitting procedures?

6. **What is the typical cause of the long duration of procedures you are involved in (EIA procedure/other RE-related permitting procedure)?** More details



Additional Questions for Discussion:

1. What is a typical cause of changes in project design during the procedures? How could this be prevented?

Step 1.2- Mapping legal framework for permitting and contact points

Table 5: Mapping legislation and authorities relevant for RE permit-granting

Legal Category	Relevant Laws (non-exhaustive)	Authorities
Specific Laws Regulating Permitting	**Laws concerning energy permits, operational licences and connection permits/agreements** → Law and bylaws regulating energy → Law and bylaws regulating renewable energy sources → Law and bylaws regulating electricity market → Laws, bylaws and technical standards and rulebooks regulating grid connection → Laws, bylaws and technical standards and rulebooks regulating the issuance of licences for energy generation	Ministry in charge of energy, TSOs, DSOs, national regulatory authorities for energy, industry association, chamber of commerce
	Laws concerning construction and usage permits, land use/ zoning approvals → Laws and bylaws regulating land use and spatial planning and national, regional and local decisions and spatial plans → Laws and bylaws regulating construction → Laws and bylaws regulating mining and geological exploration → Law and bylaws regulating public property → Laws and bylaws regulating expropriation → Laws and bylaws regulating agricultural land	Ministry in charge of construction and spatial planning, agriculture, institutes in charge of cultural heritage, regional and local government units
	Laws concerning environmental assessments → Law and bylaws regulating EIA → Law and bylaws regulating SEA → Law and bylaws regulating nature protection, protection of habitats and birds → Law and bylaws regulating water management and protection → Laws and bylaws regulating cultural heritage → Laws and bylaws regulating waste management → Rules and procedures ensuring compliance with the Aarhus Convention	Ministry in charge environmental protection, and other public bodies relevant for environmental assessments (e.g. Agency for environmental protection, or regional or local authorities), citizens, communities and civil society organisations as participants in public consultations

The outcome of this assessment is to determine:

01

if **laws** need to be changed or newly adopted so to establish **OSSs**

02

how **laws** need to be changed or newly adopted to **transpose revised RED** and **simplify procedures**

Source: Permitting Protocol

Step 2:
Defining goal and scope of RE OSS

1.

Responsibilities of OSSs

Responsibilities of OSS models

Feature	Informative Model	Coordinating Model	Integrated Model
Core function	Provides guidance	Coordinates authorities	Single authority decides
Legal and institutional changes	Low	Medium	High
Improvement	Low	Medium	High
Complexity reduction	Low	Medium	High
Administrative capacity needed	Low	Medium	Medium-High

Informative model

Provides guidance and information

Coordinated model

Coordinates multiple authorities

Integrated model

Single authority decides

The OSS model evolves from providing guidance a to coordinating efforts to enabling a single authority decision.

2.

Technology and size of projects that the OSS will serve

Who are beneficiaries of OSS?

Procedures are different for different type of projects (technology and size) – **One size does NOT fit all**

To have effective service, it should be **tailor-made** for particular beneficiaries:

TAILORED FOR KEY BENEFICIARIES

Developers of utility scale projects

Large projects, complex permitting & grid access

Promoters of cross-border infrastructure projects

Multi-country coordination & compliance

Energy communities

Guidance, capacity building & financial support

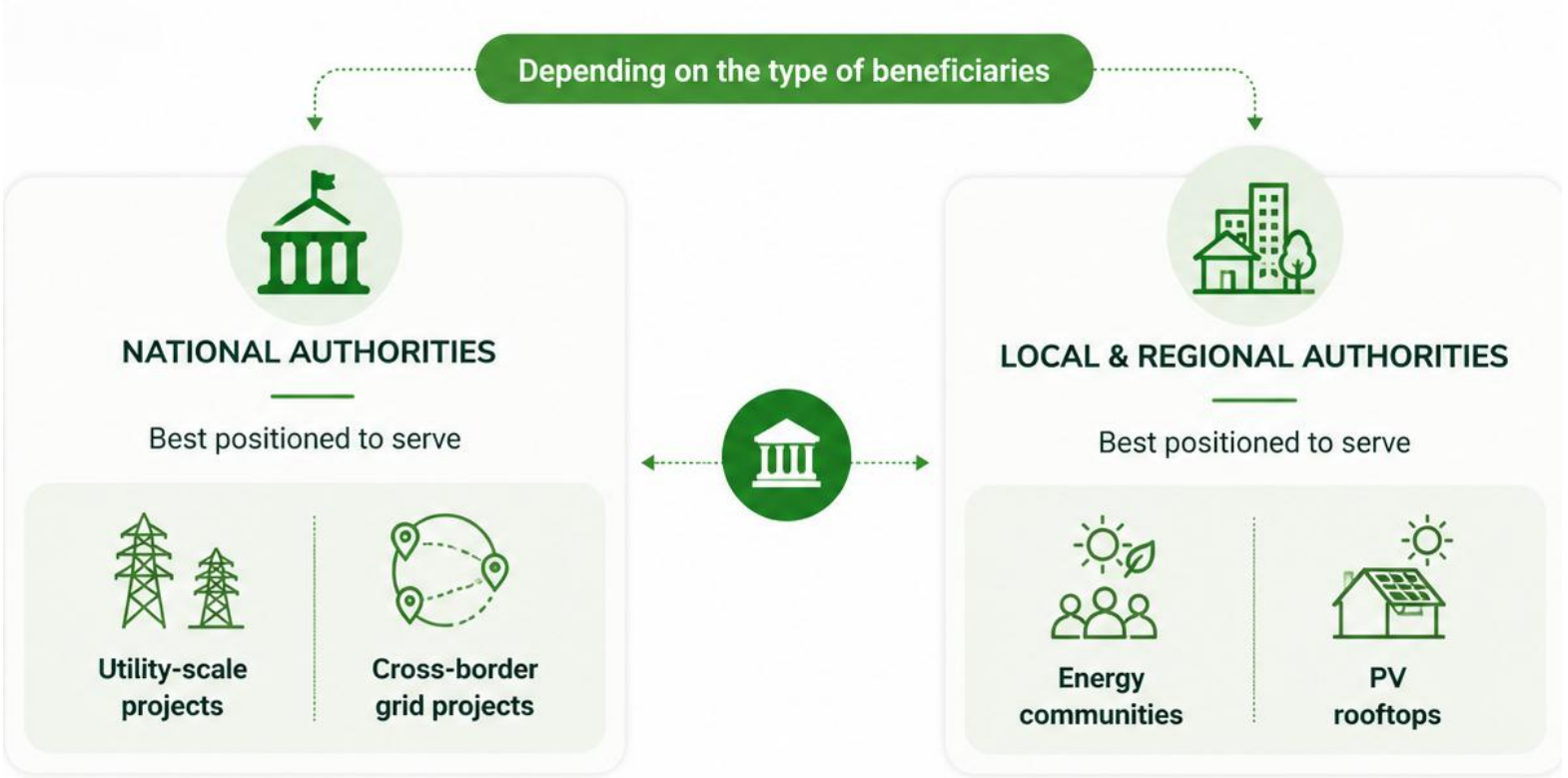
PV rooftops

Simple, fast & low-bureaucracy processes

3.

Administrative level that establish an OSS

Who does establish OSS?
Local, regional or national authorities?



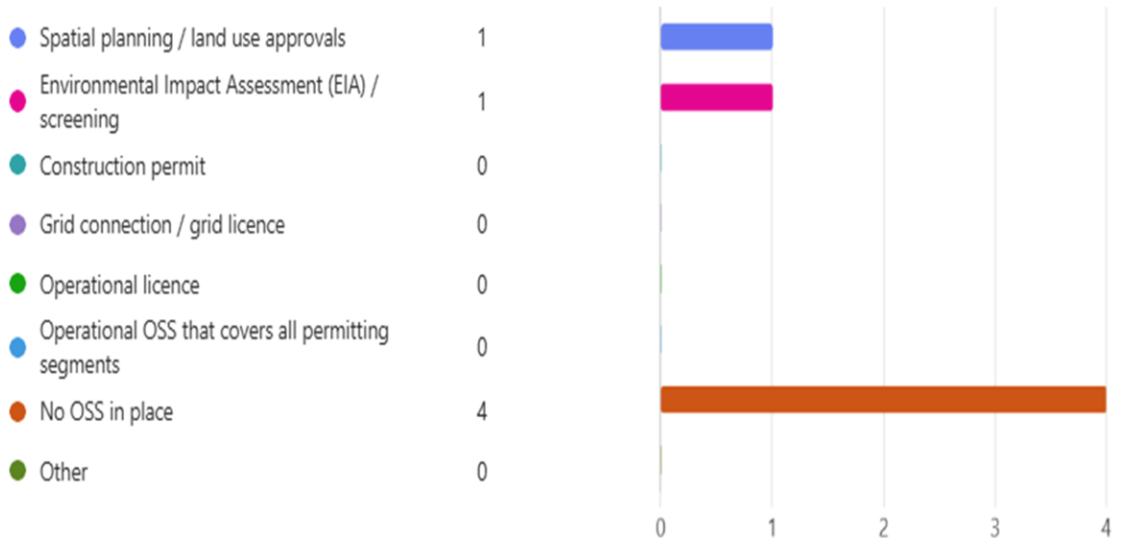
Which measures for accelerating RE permitting procedures are currently integrated?

Additional Questions for Discussion:

1. How are the deadlines monitored?
2. Who runs a website where a manual of procedures is published?
3. Is it possible to implement simultaneous procedures at this moment ?

For which segments of the RE permitting process is an OSS or single contact point available?

8. **For which segments of the renewable energy permitting process is a OSS or single contact point available?** More details



Additional Questions for Discussion:

1. What are the responsibilities of existing OSS?
2. Who has established it and for what size of projects?
3. Could existing OSS be upgraded in accordance with revised RED?

Step 3.
Resource assessment and setting up the system

Table 7 sets out a matrix that identifies key inputs needed to evaluate available resources aiming to determine their suitability for establishing an RE OSS and required actions.

Table 7: Available resources assessment

Resource Category	Key Inputs Needed	Purpose / Function	Current Status (Example)	Gaps Identified	Actions Required
Human Resources	Administrative support, permitting experts, legal advisors, IT staff	Record and process applications and provide technical expertise	Limited staff with uneven expertise	Staff shortages, skills gaps, processing delays	Recruit additional staff, targeted training
Training & Capacity Building	Continuous training programmes, onboarding materials	Build capacity and support reforms	One-off trainings	Insufficient ongoing capacity-building	Implement continuous training programme
Office Space & Facilities	Offices, meeting rooms	Support operations and stakeholder engagement	Centralised national office	Limited regional accessibility	Set up offices or shared facilities
Coordination & Governance	Inter-agency agreements	Clarify roles and support cooperation	Informal coordination	Unclear responsibilities	Formalise coordination mechanisms
Technological Infrastructure	Digital OSS platform, document management system, secure data storage	Enable online submissions and application tracking	Partially digitalised	Lack of system integration	System integration
Communication with Applicants	Helpdesks, guidance materials, training sessions	Improve transparency and application quality	Limited guidance available	High number of incomplete applications	Establish helpdesk, publish guidance, hold workshops
Monitoring & Performance Management	KPIs, reporting and tracking tools	Monitor timelines and identify bottlenecks	No systematic monitoring	Lack of performance data	Introduce KPIs, monitoring and reporting framework

Source: Permitting Protocol

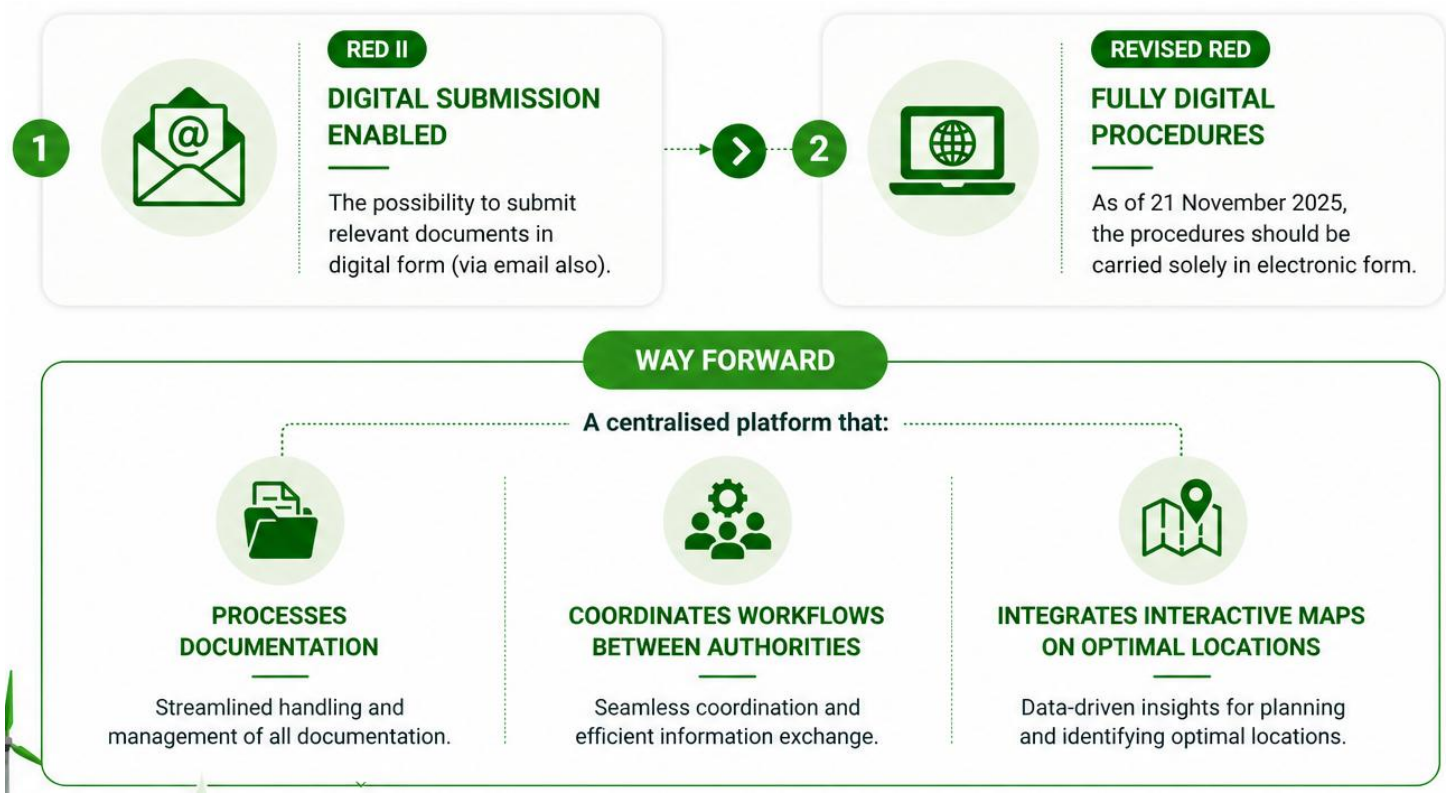
Assessing human resources – example & exercise

Guiding questions:

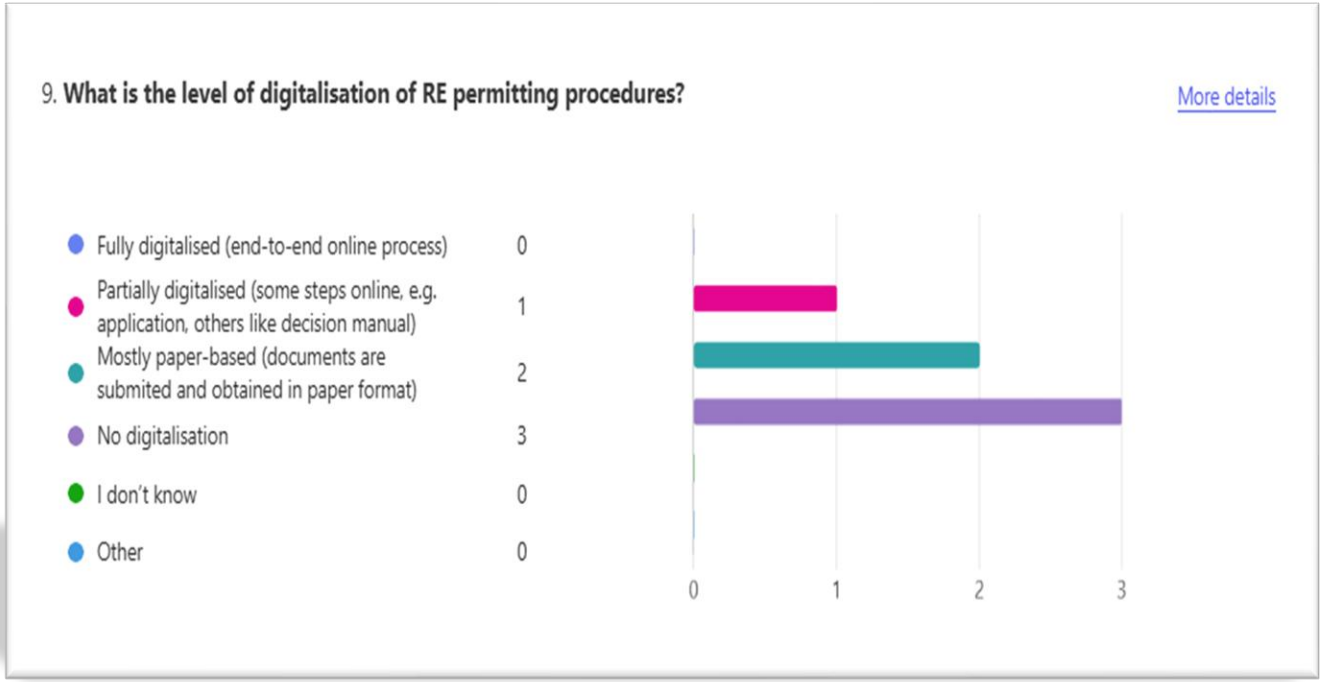
- What number of EIA screening procedures per year do you expect< taking into account your NECP targets? ie 56
- What is an average completion time per screening? ie 7 months
- What working hours per month each screening requires? Ie 80-120 working hours
- How much is total effort in working hours?
- How much full-time equivalent staff over the period is needed?

Inspiration taken from: Duration of the environmental impact assessment process and comparative development of renewable energy technology Energy community,25th meeting of the Environmental Task Force

Digitalisation in the EU renewables acquis and way forward



What is the level of digitalisation of RE permitting procedures?



Additional Questions for Discussion:

1. Is the submission of documents and communication with investors available via email?
2. Is there a centralised platform for RE permitting?

Step 4.
Monitoring Performance of the OSS

Table 8: Monitoring matrix

KPI Category	Indicator	Definition / Measurement	Frequency of Monitoring	Target / Benchmark	Status (example)	Trend (example)
Time	Average processing time per permit	Total time from submission to decision (in days/weeks)	Monthly / Quarterly	≤ statutory deadline	🟢	↑
	Time per procedural step	Duration of each step (submission → validation → review → decision → notification)	Monthly	≤ step-specific standard	🟡	→
	Time for acknowledgment of completeness	Duration of assessment of completeness of the application	Monthly / Quarterly	≤ statutory deadline of 45 days (outside RAAs) and 30 days (in RAAs)	🟢	↑
Volume	Number of applications received	Total number of permit applications submitted	Monthly	Trend tracking vs. previous period	🟢	↑
	Number of applications processed	Total number of permits issued/decided	Monthly	≥ 95% of received applications processed	🟡	→
Success / Quality	Permit approval rate	% of applications successfully approved vs total received	Monthly	≥ 90%	🟢	↑
	Completeness of applications	% of applications submitted with all required documents	Monthly	≥ 95%	🟠	↓
	Compliance with legal timelines	% of permits issued within statutory deadlines	Monthly	100%	🟡	→

Source: Permitting Protocol

Key Messages

01

Conduct a **permitting audit** as a first step

02

Start with an **informative OSS model**
Progress towards a **coordinating model**
Aim for a **fully digitalised OSS**

03

Ensure **adequate and skilled competent authorities**

04

To significantly accelerate permitting procedures, **utilise maps on optimal locations** for RE

Thank you for your attention!

Get in touch:
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Check out:
TNC's projects and publications on smar
siting approach