

Joint Statement of the Informal Coalition on Permitting

Executive Summary

Europe's ability to deliver its climate, competitiveness, and security-of-supply objectives depends on permitting systems that are fast, coherent, and fit for purpose. Yet today, fragmented procedures, overlapping legal requirements and capacity bottlenecks delay projects across all industrial ecosystems: from upstream (energy and raw materials sourcing and processing), to manufacturing, infrastructure, hydrogen and carbon capture, utilisation and storage (CCUS and CCS), and the Circular Economy. These delays weaken European competitiveness, deepen strategic dependencies, undermine the EU's capacity to safeguard domestic supply chains, and impede the deployment of clean technologies at scale. In this context, we acknowledge and welcome that the European Commission has already published several legislative proposals aimed at simplifying and accelerating permitting procedures to speed up decarbonisation projects across the Union. We commend the Commission for these efforts and see them as an important step in the right direction.

We, the Informal Coalition on Permitting (ICP), representing over 15 European organizations, 3 national organisations from the energy, raw materials, Circular Economy, industrial, and infrastructure sectors, call on EU co-legislators to prioritise structural permitting reform as a strategic enabler of Europe's industrial transformation. We jointly outline below five cross-sector priorities to ensure that permitting becomes a catalyst, not an obstacle, for the energy transition, resilient value chains, and long-term industrial investment. We look forward to cooperating closely with EU institutions to address these critical issues to help deliver the most efficient, predictable, and where feasible harmonised permitting framework: one that has a real, tangible impact in accelerating decarbonisation projects across Europe.

Five joint priorities for a deep and transformative Permitting reform

1. Streamline burden alleviation for individual sectors and projects into a coherent permitting framework

A general framework for permitting provides overall consistency, but it must be further refined to reflect the integrated nature of modern industrial value chains. While efforts to prioritise strategic projects through tailored and proportionate frameworks are welcome, a focus on bespoke permitting for only strategic projects risks fragmentation and overlooks the systemic needs of the wider industrial ecosystem. In practice, the requirements stemming from water, nature protection, soil restoration, waste and industrial emissions legislation are important and should be regulated, yet in a more integrated and efficient fashion to avoid that their cumulative requirements continue to act as a cross-cutting impediment for all sectors. Cluster-level permitting approaches, risk-based assessments and clearer mechanisms for balancing environmental protection with strategic public interests are therefore essential to accelerate deployment and reinforce European competitiveness.

Industrial and energy projects subject to multiple EU directives (e.g. Water Framework Directive, Waste Framework Directive, Birds and Habitats Directives, IED, Soil Monitoring, SEA/EIA, Nature Restoration Law) face complex and overlapping legal obligations and, in certain cases, objectives that are difficult to reconcile in practice. The resulting cumulative burden cannot be effectively addressed through additional guidance or limited reporting simplification alone, but requires a substantive review of these frameworks to assess their fitness for purpose and operational effectiveness. In this regard, we acknowledge that several of these challenges have been recognised in the endeavour to simplify the administrative procedures, and consider these initiatives important steps in the right direction that should be preserved and further strengthened by the European Parliament and the European Council.

2. Make permitting a strategic enabler of Europe's competitiveness, resilience, and industrial value chains

Permitting should be recognised as a strategic public function, central to Europe's climate, industrial and security-of-supply objectives. Today, slow and unpredictable procedures delay the deployment of critical infrastructure, constrain production capacity in strategically relevant sectors, and undermine competitiveness in industries where the EU still claims global leadership, with spill-over effects on research and innovation. Lengthy and inconsistent processes erode investor confidence, increase project costs, and risk diverting investment to global competitors. Treating permitting as a strategic priority requires aligning industrial realities with regulatory timelines and political ambitions, to ensure that Europe's resilience, net-zero transition, circular economy and security of supply are accelerated rather than obstructed.

In this context, we recognise and support the inclusion of tacit-approval mechanisms introduced in all simplification proposals. However, this critical element must be fully endorsed by the co-legislators and effectively implemented across all 27 Member States to secure legal certainty for companies.

3. Streamline and align permitting requirements arising from EU legislation and rules for cross-

border projects to reduce duplication and legal uncertainty

The issue is compounded when projects are cross-border. Despite shared EU frameworks, national/regional implementation remains inconsistent, leading to duplicative assessments, conflicting interpretations, and procedural fragmentation of cross-border projects such as energy infrastructure that are facing multiple implementation regimes with very different requirements at the same time. Greater coherence across EU legislation, combined with clearer guidance and where feasible harmonized procedures, will reduce litigation risks and accelerate deployment of strategic projects while maintaining high environmental standards.

4. Introduce enforceable time limits, digital tracking, and accountability mechanisms

Today, bringing a new greenfield project to operation takes from a few years to two decades, with most of this time consumed by administrative procedures rather than project implementation (See *ICP Report*). These timelines create an investment horizon that is too long for global capital and decisions too slow for climate transition. Time discipline is essential for unlocking strategic investments. Enforceable time limits for permit decisions, paired with transparent digital tracking tools, can substantially improve predictability and ensure legal certainty for companies. Mechanisms such as “tacit approval”, targeted for simple and standard projects increase accountability and prevent administrative deadlock provided there are measures ensuring legal certainty for the companies. Cut-off time rules must prevent the permitting process from requiring repeated adjustments to changes in the legal framework. Early consultation structures, pre-application processes, and clear escalation channels should be embedded to support efficient decision-making. We also need a reform of the right of associations to initiate proceedings. In future, only those directly affected should be able to take legal action.

5. Strengthen permitting authorities through resources, capacity, and modern digital tools

Permitting delays often stem from capacity constraints, personnel faced with an avalanche of complexities from regulatory requirements, siloed operations and limited digitalisation within competent authorities. To bridge the gap between EU-level ambition and local implementation, both the EU and Member States should invest in upskilling, technical expertise, alignment on strategic priorities, interoperable digital systems and risk-based information requirements. Additional resources and streamlined IT systems would enable authorities to manage the complexity of today’s project portfolios — from hydrogen valleys and CCS hubs to renewable plants, industrial clusters and mining operations — while improving transparency and public trust.

However, while various sector or project-specific legislations introduce important procedural improvements, they do not address the persistent issue of staffing levels and administrative capacity within permitting authorities. Without targeted action to strengthen human resources alongside process simplification, the effectiveness of these reforms risks being constrained at the implementation stage.

About the *Informal Coalition on Permitting (ICP)*

The Informal Permitting Coalition brings together over 18 European, and national organizations from the energy, raw materials, Circular Economy, industrial and infrastructure sectors. It serves as a cross-sector platform to identify systemic permitting bottlenecks and advocate for practical, evidence-based solutions.

The Coalition promotes reforms that accelerate strategic and enabling projects while upholding robust environmental standards, ensuring that permitting becomes a driver of Europe's energy transition, competitiveness, and security of supply.