DSO Entity's Response to DG ENVI's call for evidence on the simplification of administrative burden in environmental legislation on permitting-related aspects

27 August 2025

Why are we being consulted

The call for evidence organized by DG Environment investigates measures that aim to simplify environmental legislation to reduce administrative burden and streamline administrative procedures for EU businesses without affecting the environmental objectives set under the existing legislation.

Among the measures considered, the consultation addresses the permitting challenges related to environmental assessments. DSO Entity is actively involved in working on the permitting topic from the perspective of the Distribution System Operators (DSOs) as part of our mandate and contribution to the EU Grid Action Plan's delivery.

Please find below DSO Entity's input related to the environmental assessment providing recommendations on how to ensure simplified, streamlined and faster permitting procedures while maintaining a high level of environmental protection through a balanced approach.

For further materials, please consult the feedback provided by DSO Entity for the Implementation Dialogue on environmental assessments and permitting organized on 9 April 2025 by Environment Commissioner Jessika Roswall and our Permitting Paper (accessible here).

DSO Entity's recommendations

Environmental assessments and protection duties, complex procedures and administrative hurdles are among the **biggest challenges identified by DSOs when it comes to permitting procedures** for grid infrastructure projects (as identified by an internal survey conducted among DSO Entity's Country Expert Group)[1]. Environmental assessments could be further simplified to accelerate permitting without undermining environmental protection and EU's goals. An example is the complexity brought by the high number of competent administration levels involved in granting environmental authorisations (i.e., local, regional, national).

[1] DSO Entity (2025). Permitting Paper « Guidance on EU permitting-related provisions on grid and renewable energy projects". Available online. URL: https://eudsoentity.eu/wp-content/uploads/2025/01/2025-Permitting-Paper-DSOEntity-1.pdf

Concrete examples of measures to be considered:

Below are some examples of measures describing how permitting procedures related to environmental assessments could be further streamlined and simplified to support DSOs and accelerate the energy transition.

- A **more generalised one-stop shop for all permitting procedures** will contribute to simplifying the applications of permits for grid development projects. Furthermore, a grid mainstreaming approach is also needed in permitting-related provisions to always consider the needs of grids in relevant legislation. For instance, **the recognition of physical energy infrastructure as net-zero strategic projects in the Net-Zero Industrial Act** would enable DSO projects to benefit from the streamlining and simplification of permit-granting processes (incl. one-stop shop approach and priority status).

- **Streamlining and simplification measures for permitting should be considered beyond the TEN-E Regulation when it comes to grid infrastructure projects.** Indeed, while at the EU level, Chapter III of the TEN-E Regulation (2022/869/EU) provides streamlined environmental assessment processes for projects listed as Projects of Common Interest (PCIs), it is mainly designed for transmission grid projects. As a result, very few DSOs actually benefit from this provision given that only electricity smart grid projects are eligible for DSOs and most of them do not end on the PCI list.

- The **digitalization of permitting procedures** handled by competent administrative authorities can also lead to simplifying permitting procedures and hence reduce delays (see related examples of good practices in the annex box). For instance, when it comes to the renewable acceleration areas and dedicated grid areas as provided under the Renewable Energy Directive (2023/2413/EU), **the use of existing digital and geospatial tools and platforms** should be envisaged to further support and optimise the identification of areas with regular updated data including the environmental situation and environmental constraints, potentially simplifying authorization procedures

- **Other simplification measures** could also be considered such as the **implementation of responsible declarations or statements in place of the obtention of authorisation permits and/or tacit approvals** for environmental permitting procedures in case of smaller projects with no expected significant environmental impact. The **setting of binding deadlines** for the granting of environmental authorizations can also help accelerate the procedures and avoid projects to be stuck. Indeed, in Greece for example, forestry permits face setbacks due to the absence of standardised technical specifications for works within forest areas. Furthermore, it is of utmost importance to ensure that, when such measures are taken at the EU and national levels, they are implemented by local authorities as some Member States report inconsistency (see Spain's example in the annex box).

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Annex: List of examples of good practices from DSOs

France and Greece's good practices on digitalization of permitting procedures

In France, the implementation of digitalized permitting procedures through online procedures for environmental assessments and environmental authorisation as well as preliminary consultation with mayors and public domain managers led to lower delays in procedures. For grid construction and permitting for primary substations, it is also now possible to conduct an electronic consultation for the simplest cases with communication between the system operators and the administration digitalized. These new provisions save up to 9 months on the procedure. Simplified administrative procedures for the environmental authorisation procedure were also set allowing for public consultation and application review to be carried out simultaneously for some industries under the French Law for Green Industries (n°2023-973). As a result, one may estimate a 3-month time saving during the procedure. Furthermore, general procedures already exist to integrate environmental considerations into the development of a project or planning.

In Greece, the development of an interactive geospatial tool (GIS/kml) for spatial planning, aiming to identify and avoid high priority areas in the dedicated infrastructure areas, will contribute to environmental impacts minimization. Moreover, in the context of the Greek DSO HEDNO's strategic plan for biodiversity, guidelines and action plans will be developed for the planning phase of new projects in priority areas of biodiversity value.

Spain's good practice on administration simplification for permitting procedures

In Spain, new national provisions introduced simplified administrative procedures for grid connections in case of installation of charging points for electric vehicles. The obtention of a license or prior authorisation from the competent administrative authorities for grid works, operation or activity of an environmental nature (or other analogous class), previously required to connect the installation of charging points to the grid, is no longer mandatory and has been replaced by a 'responsible declaration' to the competent administrative authorities. The 'responsible declaration' must contain an explicit statement of compliance with current regulations, including, where appropriate, being in possession of whatever documentation that may be required. However, local authorities ignore this provision from national law in some cases, preventing benefits.

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About DSO Entity

DSO Entity is a technical expert body mandated by the Electricity Market Regulation (2019/943/EU) to promote the functioning of the electricity market and to facilitate the energy transition. DSO Entity represents around 830 diverse Distribution System Operators (DSOs) connecting 250 million households to the electricity grid in 27 Member States. Among DSO Entity's core tasks are the development of technical rules for the electricity system in the form of Network Codes together with the mandated organisation of the Transmission System Operators (ENTSO-E), the facilitation of renewables integration and the promotion of the digitalisation and smartening of the grid as well as sharing knowledge and best practices.