

A	INDUSTRIAL	Permits/procedure	Authorities	Integration	Appraisal
1	Austria	EIA procedure single permit  IPPC procedure sectoral laws	EIA authority  IPPC one-stop-shop as far as possible	Federal laws, provincial laws Only partially integrated or separate permits	Consistent and coherent
2	Belgium	Building permit  Environmental permit	Different authorities Different procedures	Linking provision	Good enough
3	Croatia	EIA procedure Environmental permit Location permit Building permit Use permit Waste management permit	Ministry of the Environment City of Zagreb County	After 2013 not integrated anymore	Possibility to refuse for env reasons never used in practice. Only for contradiction with plans
4	Czech Republic	Three main stages for permitting: Development permit, building permit, final inspection approval. 'binding environmental opinion' during the first two stages. IPPC permits	Environmental authorities Other authorities (health, safety, fire protection)	Joint procedure for different permits. IPPC permit integrates environmental opinions.	Since 2003 some integration but still Imperfect Lengthy and expensive procedures
5	Denmark	EIA and environmental permit (IE) is integrated – the IE permit constitutes an EIA-permit  Offshore separate permits not integrated	Danish EPA or Municipals are competent authority	Not all integrated since waste water released to municipal sewage, and drinking water supply is not integrated in the permit – neither are permits under the Nature Protection Act or under the Soil Contamination Act integrated	First step is often contact to the competent authority. When all substantial environmental matters are negotiated, the formal application for IE permit and EIA is initiated by the developer – making the formal time consuming with 6-12 month
6	Estonia	Several types of permits: building permit Environmental permits (IPPC permit, sectorial permits, special permits)		Not integrated, not coordinated	Fragmented, inconsistent, scattered requirements
7	France				
8	Finland	EIA separate procedure environmental permit (IE + national) building permit separate around 20 other permits depending the project	Regional permit Ay (AVI) and municipality A for environmental permits Other A for EIA Building permit municipal A	Not all integrated (water, air, waste - yes) separate procedures (Integration is governmental goal, projects set for new legislation, research project for the model dl 30.6.2016)	Very lengthy procedures (if EIA and/or land use plan change needed +++ time), system fragmented, authorities separate on regional level

9	Germany	Standard model procedure for industries and infrastructures		Some streamlining elements (preliminary decisions, partial permits, irrelevance of procedural mistakes in some cases)	Some facilitation elements are useful, others are detrimental.
10	Greece	Notification procedure for low impact installations, simplified authorization for medium impact		Integration to the largest extent possible in one single permit environmental+waste+forest EIA+IPPC+habitats	Integration in 1 single permit contributes to acceleration but lowers env. protection (less demanding information required)
11	Hungary	Diversity of permitting requirements. Integrated permit/environmental permit + building permit, operation permit, permit for a site, water uses permit, nature conservation permit, waste permit...	Structure of public administration changed. Each county has its own "governmental office" (the head is a politician)	Eliminating special authorities replaced by territorial authority with some concentrated functions (but not all (risk, water are still specialized)	Complex and complicated system. Modest integration.
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12	Ireland	Planning permission, other consents, licenses, etc Multiple EIA for various aspects of a development	Local planning authorities, An Bord Pleanála (Planning Appeals Board), Environmental Protection Agency (EPA)	Measures of coordination provided in the laws; Mandatory consultations between planning and environmental authorities. An Bord Pleanála and EPA have agreed on a "memorandum of understanding"	Concerns on integration when planning permission and environmental licenses are necessary. Working group for transposition of new EIA directive
13	Italy	Integrated environmental permit, Building permit, EIA Decision, operating permit (other consents -- like nature conservation -- may be added to the main permit)	Single office for production activities in each municipality + permitting authority	Streamlining decree introduced a new type of single permit for SME Single office for production activities receives the request, permitting authority coordinates and promotes the "services conference"	Single Integrated permit reduces bureaucracy but speeding up sometimes affects proper assessment and reduces possibility of public participation
14	Latvia	Multiple permits system: main three: 'Acceptance decision' after EIA); construction permit; and environmental permit (integrated permit or sectoral). For 'complex projects' – detailed plan might be required. Some sectoral permits (for mining, waste, sea)	Environmental State Bureau  Local government  State Environmental Services	Coordination mechanism by one centralized state authority as regards environmental permit. Subsequent procedures: next authority has to take into account the previous one; mandatory consultations.	Comprehensive assessment, but fragmented procedures

15	Poland	Multiple permit system: EIA decision + planning permission + construction permit +Integrated permit or sectoral permit	Various authorities Mostly: self-governmental bodies at local or regional level	No serious attempt to integrate all procedures	System with separate EIA decision at the earliest stage is rather effective. Public participation and public right to appeal most extensive at the EIA decision and possible (though limited) at consecutive stages
16	Portugal	Single environmental license condensates 10 legal regimes and administrative permits Responsible Industry System and	Centralized Environmental Agency	Computer based platform Shorten decision deadlines and streamlines procedures Standardized technical conditions (ready to wear instead of case-by-case analysis) Responsible business zones	Simplification initiatives are promising and expectations are high
17	Slovenia	Environmental protection consent, building permit (umbrella procedure), operating permit,	Ministry for the environment, other ministries, different territorial units	Coordination mechanism	Ongoing
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18	Spain	Fragmented normative context Building permit, environmental permit, IPPC permit, additional sectoral permits (water, waste, CO2...), operating permit	Decentralized country: state+17 autonomous regions having legislative and executive powers (for industry and agriculture)	Inter-administrative cooperation but 17 powerful regional authorities	Ongoing process, driven by the Bolkerstein directive (one window), but insufficient for industrial activities
19	Sweden	Environmental permits for high impact installations issued by Land and Environmental Courts. Large scale operations water operations issued by the County Administrative Boards. Specific permit decisions (mining and infrastructure) Detailed development plan	Municipalities, County administrative boards or Land and Environmental Courts	Environmental Code	Truly integrated
20	Switzerland	(used to be complex and cumbersome) Series of permits Construction permit,	Municipal authorities Cantonal Authorities,	Substantive coordination, formal coordination. Concentration model (replace all permissions by	Far reaching steps, fruitful coordination efforts

		specific permits	Federal Authorities (competition among cantons and among municipalities improved efficiency of the system	one single decision) OR Coordination model (several decisions but coordinated) Federal act on special planning	
21	United Kingdom <i>Focus on England</i>	Planning permission, environmental permits, greenhouse permit	Local Government Councils/ Secretary of State/National Infrastructure Planning Commission (for planning, depending on scale and features); Environment Agency (for environmental + GHG permits)	Environmental Permitting Regulations 2007 replaced a plethora of statutory instruments for environmental permitting only (single administrative procedure)	Huge simplification exercise, substantially improved the coherence, albeit with transparency costs

B	Waste facility	Time-frame and average decision time	Permit procedure	Public participation/ appeal/standing
1	Austria	EIA=6,8 months 13 months considering timing of the applicant No time-limit for intermediate steps but authority must present a schedule at the beginning of the procedure with steps and time-limits	Land government for EIA, Planning and environmental authorities if no EIA	General public, Environmental Ombudsman, ENGOS, ad hoc citizen groups. For individual neighbours only if legal right or interest
2	Belgium	EIA 150 days Building permit 290 days Environmental permit 420 days /BUT will be shortened to 360 days EIA*permit=570 days Plus promoter timing	3 Levels of competent authorities (local, provincial, Flemish government)	Public participation only in the first stage of the permitting procedure (prior participation will disappear)
3	Croatia	Screening 4 months EIA 4-13 months Environmental licence 31-36 months Since 2013 17 months in practice (6 in the law) If time-line is not respected access to court (2 years)	EIA and environmental licence: Ministry of Environment Waste management permits are the Ministry and the administrative body of the county or City of Zagreb	EIA and environmental licence: Parties, public authorities that have participated in the procedure with their opinions (never used in practice), ENGOS (2 pre-requisites), any natural or legal person who can prove a violation of his/her right provided that has participated in the procedure (contrary to general requirements prescribed by Administrative Disputes Act)
4	Czech Republic	In general 30n days can be extended to 60 days 15 days for objections of environmental authorities 10 days in the building permit For the case provided 2 years minimum if appeal to court + 2 years	Ministry of Environment or regional authority (less danger to the environment)	Regular participants, ENGOS
5	Estonia	No time-limit to issue permits except IPPC: 180 days to issue an integrated permit If the project is complex the timings can be longer, up to 1 year time-limits for intermediate procedural acts (public display 14 days, opinions 21-30 days)	Environmental Board	Any person who considers that his/her rights have been harmed. Environmental organisation shall be assumed to have a justified interest or to have its rights violated if the challenged administrative act or action is related to the environmental protection objectives or past environmental protection activities of the organisation.
6	Denmark	No time limit – and the formal time used does not reflect the informal negotiations between developer and competent authority before formal application	The Environmental Protection Agency	The effected public – wide scope
7	France			
8	Germany	7 months term	Different government	Local authorities have standing

		1 month for comments by affected authorities, presumptions of consent after expiry 6 weeks for comments, preclusion of delayed comments	levels	only if his right of self government is affected.
B	Waste facility	Time-frame and average decision time	Permit procedure	Public participation/appeal/standing
9	Greece	EIA 110 days + time for operator to prepare the EIA study 200 days if scoping +X if complex project Operation permit 100 days Building permit 45 days Total 265-270 for incineration, 230-295 for chemical treatment	Depends on level of disturbance. High: Ministry for development or for environment and energy. Medium: Regional Directorate for development	Public participation only for category A projects (high disturbance). No quasi jurisdictional appeal except for refusal of big (>€1000000) investments. Any natural or legal person having legal interest can lodge a simple administrative appeal to the Minister of the Environment.
10	Hungary	Preliminary examination 30+21 days EIA, IPPC 70 days + 21 Appeal 70+21	Environmental department of the government office	Less time for participation and shorter periods for comments for larger public interest installations. Any party, having participated or not in the procedure can lodge an appeal.
11	Ireland	Planning permission for strategic infrastructure development – An BordPleanala has statutory objective to determine application within 18 weeks from last day of submissions from public. Public participation - minimum period of 6 weeks  8 weeks from application for EPA to issue proposed determination 28 days to object to proposed determination Then 4 months for EPA to issue final determination Extensions of time possible where An BordPleanala or EPA seek further info.	An BordPleanala and EPA	An BordPleanála decision on strategic infrastructure application – no administrative appeal - only challenge is by way of judicial review; No ‘external’ administrative appeal in case of EPA licensing, only objections on the draft license or judicial review afterwards
12	Italy	Administrative procedure starts 30 days after application, 60 days for observations, 30 days further documents, 45 days to respond, 60 days, services conference, 120 days final decision.	Depends on type and size of installation. Range from State (ministry) to regional or province level.	Broad announcement and wide use of public participation on the application (not on the draft decision) Any party having legitimate interest in the administrative procedure (including citizens and NGOs) can lodge an appeal
13	Latvia	Env. Procedures, i.e. excluding	Environmental State	The 3 decisions (3 stages of

		construction permit: 1) EIA – aprox. 6 months; 2) Integrated permit - 20+90 days or 40+100 days (if missing information from operator)	Bureau (EIA), local government (acceptance, construction permit), State environmental services (environmental permit)	procedure) can be appealed. Rights based approach but “anybody” can challenge permitting decisions if environmental law is violated
14	Poland	21 days for public written comments (will be 30 in 2017), no specific time frames for other stages of public participation. 14 days for opinions of environmental and health authorities	Local authorities, district authorities, regional authorities	Only environmental NGOs and parties (any person whose legal interest is affected) to the administrative proceedings can challenge in court Extremely limited possibility of challenging integrated permit - only environmental NGOs
15	Portugal	EIA and IPPC - 90 working days or 70 working days if accredited entity Report on environmental conformity 60 or 48 days (with accredited entity) Possibility of tacit deferral (positive silence) Time-limits are suspended if the operator is required to submit further information/documents	Environmental Agency	Everybody can lodge an administrative appeal to the Ministry of the environment for the protection of diffuse interests. Local governments can file complaints.
B	Waste facility	Time-frame and average decision time	Permit procedure	Public participation/appeal/standing
16	Slovenia	30 days for comments by NGOs or neighbours. Total time needed difficult to predict and estimate In case of appeal, 1,5-2 years Negative silence. Action for inactivity.	Ministry for environment and special planning (administrative units of the Ministry in every town), Agency for Environmental Protection, Institute for Nature Conservation (opinions)	Appeals to the Ministry or to the administrative court. Some NGOs acting in public interests as declared by the authorities have locus standi. Citizens can file a lawsuit if they are directly affected (living or owners in the vicinity) and were a party of the procedure.
17	Spain	For IPPC State legislation establishes 9 months max. but considering that the procedure can be “stayed” in some cases and that time frames depend on the autonomous region, it is extremely difficult to provide accurate data. For appeals can be one month (same body) or three months (superior body) In any case negative silence	Competent regional authorities, municipalities (planning opinion), river basin authority (opinion as a state body)	Operator, persons, groups of persons and NGOs can appeal before the same body or before a higher body.
18	Sweden	No time limit but 2 months for representation, 10 months for processing the permit application if there is a detailed development plan=10 -12 months. If appeal 15-18 months	County administrative bodies (regional environmental licensing delegation), Land and Environmental Courts, municipalities (detailed development plan)	Decisions appealed to the Land and Environmental Courts (reformatory powers)
19	Switzerland	Depends on the territorial entities involved. In Berne a permission procedure for a waste disposal	Competent authorities at the Municipal, cantonal or federal level depending on	Third parties (neighbors, NGOs, municipality and cantons) can appeal to a

		installation lasted several years.	the installation and relevant questions at stake.	municipal or cantonal administrative authority, cantonal administrative court and federal tribunal.
20	United Kingdom	Planning permission publicity 21 days (soon 30 days), decision 13 weeks, applicant appeal on merits within 6 months; environmental permit public consultation 20 working days, decision on permit 13 weeks, applicant appeal on the merits 6 months.	Local planning authorities (local government councils), secretary of state for communities and local government, National Infrastructure planning Commission, Environmental Agency	Appeal for planning decisions or for environmental permits by the applicant to the Planning Inspectorate (neighbors and other interested parties can only make representation in the appeal for large and medium scale developments).

C. INFRASTRUCTURE		Plan	SEA	EIA	Local gov.standing
1	Austria	Inscription in the Federal road register	Yes	Yes	Host municipality
2	Belgium	If foreseen in the land use plan, no revision. If not foreseen in the land use plan, previous revision.	No yes	Yes	Host municipality or neighboring municipality if impacts on the territory
3	Croatia	Project of state importance. State plan for special development is necessary	yes	Yes	Yes if violation of right of self-government
4	Czech Republic	Amendments of the area plans are necessary. Can be initiated by the investor	yes	Yes	Has a right to a favorable environment. Can use all types of legal action
5	Estonia	Preparation of new or amendment of special planning (county-wide land use plan)	yes	Yes	Yes for protection of its rights or if the performance of duties is complicated
6	Denmark	Infrastructure project onshore must be in accordance with physical planning – SEA only applies if new planning is needed – but will be based on new legislation in the future Problems exist on offshore projects because different authorities and different regimes – e.g. windmill farms	Yes (in the future)	Yes -	No - with some exceptions
7	France				
8	Germany	Integrated special planning (some privileges for large infrastructures: prevail over local zoning plans)	Yes but separate for 3 transport modes	Yes	Yes if right of self-government is affected
9	Greece	Revision of regional framework for special planning	yes	Yes (but not for station services, etc)	Yes (according to the Council of State if they are hosts of if citizens in the territory are affected)
10	Hungary	Yes...	yes	Yes (not divided into pieces)	Yes
11	Ireland	Mandatory variation of development plan	Yes, in some circumstances	Yes, an Bord Pleanála is competent authority to carry out EIA in this case	Yes, if can demonstrate “sufficient interest”
12	Italy	Amendment of plans necessary	Yes, but derogations if “national interest”	Yes, , but derogations if “national interest”	Yes
13	Latvia	Adjustment to a land use plan are necessary but can be dispensed if “object of national interest”	Yes	Yes in any case, incl. for “objects of national interest”	Yes, but rather as ‘exception.’ The main principle – it is derived public person

					representing the same/common 'state interests' as other public authorities. + if concerned 'as private person' e.g. addressee of an act.
14	Poland	Strategic documents (all subject to SEA) set the location of motorways	yes	Yes	Yes
15	Portugal	Territorial plans and rad plans have to include the new road	yes	Yes	Yes, interested parties and actio popularis for their property
C. INFRASTRUCTURE		Plan	SEA	EIA	Local gov. standing
16	Slovenia		SEA and EIA can be one single procedure		Can file a constitutional complaint
17	Spain	Depends on regional legislation and nature of the road	No mere modifications of existing plans do not require SEA	Yes	Yes, general criteria of locus standi but local governments cannot oppose infrastructure of national interest
18	Sweden	National development plan for infrastructural projects changed every 4 years	yes	Yes	Yes, since the 60's
19	Switzerland	Cantonal planning process	Multilevel EIA Level 1 EIA of proposal of location and setting Level 2 EIA of general project Level 3 EIA of execution		Yes, to ask for compensations for restriction of property, conformity with planning zones, exemption permissions. Have to prove that they are affected in the same way as a private person. No right of appeal for pure financial interests.
20	United Kingdom	No plan required, but a "National policy statement" (NPS) will be in place (that is subject to SEA assessment). No environmental permit but only a planning permission because a highway is a "Nationally significant infrastructure development".	Sustainability assessment and public consultation and participation of the NPS	Yes although EIA process could be modified if Parliament approve the project	No standing unless an error of law in the permitting process.

D	LEGISLATION	Date	Drivers	Simplification and speeding up measure	Assessment
1	Austria	In the 90's	Business requirements to speed up EIA, IPPC directives	Standardization and centralization measure Concentrated permit procedure for EIA and industries Condensated expertise	Presented as a success story. Fear of lowering standards and limiting standing rights. Difficult to go further due to Federal structures. Real reasons for delay must be analysed
2	Belgium	2014	Avoid conflicts, support developers	Integrated permitting system, Special licensing system for complex projects (public or private)	Only one project, too early to assess
3	Croatia	2013	Promoting investments	Special licensing system for Strategic investment projects Disciplinary sanctions for civil servants (fines, de-promotion) (no positive silence)	Only 4 projects not yet completed. Too early to assess
4	Czech Republic	2002 2009	IPPC, high level of environmental protection	Integrated permit	Yes, it contributed to acceleration. Acceleration is beneficial but quality of the expertise should not be forgotten
5	Estonia	2014	Chapter of the Environmental Code (not in force yet)	Single environmental permit 90 days Identification of circumstances having significance (critical) for the decision Possibility of partial permit	More integrated means more effective environmental protection (take into account different impacts, cumulative effects, no salami slicing)
6	Denmark			A new legislation integrating EIA and SEA has been adopted this spring – but at the same time a special regime on EIA and SEA regarding the Ministry of Transport was adopted – main difference is that the public has no access to the Nature And Environment Complain Board but need to go to normal courts	
7	France				
8	Germany	80-90's	Facilitating investment	List of 16 facilitation elements (9 raise environmental concerns, 7 don't, the rest are neutral)	In some occasions delaying investments proven to be good for the developer (reprocessing plant for nuclear waste) Speed procedures is not the main priority for investors
9	Greece	2010 2012 2013 2014	Create a business friendly environment	Fast track legislation for strategic investment (contribute to the development of national economy and to the strengthening of entrepreneurship and innovation) Simplification, acceleration (shorter deadlines)	13 large scale touristic and energy projects Public consultation is reduced (issues of compatibility with Aarhus)
10	Hungary	2006	Significant investments	In some specified projects	

		2012	for the national economy	there is a special procedure and special time frames	
11	Ireland	2006	Critical infrastructure projects	Centralised decision Short time frames (18 weeks), following a minimum 6 week period for public participation	Not realistic time-frames. Must there be public participation before decision is taken by An Bord Pleanála on whether a project is strategic infrastructure? (pending case)
D	LEGISLATION	Date	Drivers	Simplification and speeding up measure	Assessment
12	Italy	2001 2016	Infrastructure of national interest	Derogations to SEA, to special planning requirements and plans. Special regime for renewables, waste management (“necessary for env.reasons”)	Simplification trend is not negative but combined with speeding may hinder environmental assessment and public participation.
13	Latvia	2004 2013 2014	No gold plating EU; Improve rank in World bank index “doing business”	Construction – intention to exclude public participation (“installed” back in 2014) Forest transformation (no separate authorization) No limit for pollution permits Tighter time limits within EIA procedure Nature protection (on-going reform)	Till so far, no negative trend as regards changes in environmental law, rather positive (abandoning redundant stages of procedures, stricter time limits)
14	Poland	2009	Speed up investments	Integrating procedures Facilitating expropriation	Quite efficient. Level of protection was safeguarded because it is a precondition for benefiting from EU funding.
15	Portugal	2005 2015	Suppress regulatory burdens Attract investments	Single environmental licensing Digital platform Shorter deadlines Certified entities <b>Projects of national interest</b>	Seems very effective but not tested yet
16	Slovenia	201	Speed up procedures and remove administrative burdens	Suppress duplicated procedures for public infrastructures while not affecting public participation No suspensive effect in case of expropriation	Acceleration was necessary. So are expropriations (avoid blackmail by the owner)
17	Spain	2013	Alleviate regulatory burdens to re-boost economy, and create jobs	Act on environmental assessment interconnects EIA and SEA. Shorter time limits but no tacit positive EIA.	No revolutionary changes. Integration is more nominal than real. It is not true that the measures have saved thousands of million €
18	Sweden	1999?		Permit obligations replaced by notification requirements. Public participation has been respected	Effect uncertain. Poor quality of EIA
19	Switzerland	1997 2000	State efficiency, time pressure for economic activities, international location competition	Program on the renewal of the market economy Deadlines for different stages, better coordination,	General assessment is difficult but streamlining has been beneficial for planning procedures

					Culture of cooperative procedures (between public entities and with private actors).
20	United Kingdom	2007 / 2012	Improve the quality of legislation and cutting red tape. Rationalize and navigate a complex and fragmented legislative landscape. Pressure from industry to simplify permitting processes.	Integrated environmental permitting through EPRs (2007) Parallel tracking of permitting and planning permission processes where considerable risks (EA policy 2012)	Constructive but transparency concerns. Separated (not integrated) procedures can also be more flexible.