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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: AOB for the meeting of the Council (Environment) on 17 March 2026  
Accelerating permitting procedures: Call for a comprehensive cross-sectoral approach within the environmental omnibus  
- Information from Belgium, Czechia, France, Ireland, Latvia and Slovakia, supported by Luxembourg

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Permitting procedures are often too lengthy. We support the objective of simplifying and accelerating permitting procedures, particularly in the environmental field, and calls for a cross-sector initiative in the form of an ‘environmental permitting’ omnibus aimed at accelerating procedures and ensuring their consistency.

Indeed, the proliferation of sectoral rules across numerous texts in recent years (RED 3, NZIA, CRMA), as well as in recently presented or forthcoming texts (IAA, directive within the framework of the networks and TEN-E package, CMA) has created legal confusion for businesses and administrations, which are struggling to determine which regime applies to them. This increases compliance costs and the risk of procedural errors and, ultimately, litigation, delaying the completion of projects, which runs counter to the objective of simplification.

The definition of cross-cutting principles and the consolidation of existing provisions into a single text will enable a harmonised approach, leading to a reduction in the number of applicable regimes and avoiding successive interventions due to loopholes. Furthermore, a cross-cutting approach within a single framework will make it easier to assess compliance with the principle of subsidiarity in relation to the proposed provisions.

In this regard, it is necessary to: better assess and justify the added value of European intervention; give Member States as much freedom as possible to set their own deadlines and procedures adapted to their administrative structures, particularly with regard to the distribution of powers between national and local authorities; avoid setting mandatory time limits for permit granting procedures; avoid provisions aimed at creating tacit authorisations. Finally, since the provisions on permitting mainly concern environmental legislation and simplification seems more likely to be achieved quickly within the framework of a text already under discussion, the environmental omnibus appears to be the ideal vehicle.

Thus, Belgium, Czechia, France, Ireland, Latvia and Slovakia, supported by Luxembourg, **consider that the omnibus environment bill is the vehicle that would make it possible to consolidate into a single text and harmonise the provisions relating to permitting, particularly in environmental matters:**

- (i) those from existing texts (Directive 2023/2413, known as RED III, Regulation 2024/1735, known as NZIA, Regulation 2024/1252, known as CRMA);
- (ii) those introduced by texts currently under negotiation (directive and regulation as part of the ‘networks package’, Critical Medicines Act, Biotech Act, Industrial Accelerator Act).

This text should also define cross-cutting principles for permitting in a consistent manner. Thus, future initiatives and texts for which permitting provisions are envisaged should in future be brought into line with the cross-sectoral approach to be defined in this Omnibus.