Permitting procedures for biogas plants in Bulgaria, Croatia, Czech Republic, Greece, Latvia, Romania and Slovenia

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BiogasIN website: www.biogasin.org
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1 Introduction

This report was prepared in the framework of the BiogasIN project. The BiogasIN project is supported by the European Commission in the "Intelligent Energy Programme". The project aims to create a sustainable biogas market in the following Central and Eastern European countries: Bulgaria, Croatia, Czech Republic, Greece, Latvia, Romania and Slovenia. Core of BiogasIN is to reduce present framework barriers for biogas projects in Central and Eastern Europe, namely high administrative barriers and lacking access to financing.

In order to reduce the administrative barriers for permitting procedure of biogas plants, local partners of the BiogasIN elaborated reports on the permitting procedures in the target countries. Surveys were implemented by using interviews with authorities and questionnaires with (potential) investors to identify bottlenecks and problems in getting permits for biogas plants. The used questionnaire is presented in the ANNEX. During the implementation of this assessment, several partners faced the problem of not getting enough feedback and replays to the questionnaire. This is a result of the still very small biogas markets in all the target countries, except Czech Republic which has experienced a considerable boom in biogas installations in the last years. It is still difficult to identify relevant stakeholders such as existing or future biogas plant operators. Experience in permitting procedures is furthermore lacking, since the number of installed biogas plants in the target countries are in the order of single- or double digit numbers (except Czech republic with about 250 installations in 2011). Detailed descriptions of the permitting procedures and results of the assessments in the target countries are provided in dedicated country reports prepared by the BiogasIN project partners. These reports are available at the BiogasIN website.

The present report summarizes the results of these reports and provides a comparative overview on the bottlenecks and problems in the target countries. Thereby, as mentioned above, the limitations and difficulties of getting input from the stakeholders during the surveys have to be considered when interpreting the results. However, independently from the actual numbers, resulting from the surveys, even more important are the general trends. It can be concluded that all countries are stepwise introducing a suitable framework for renewable energies, but that in most countries the permitting procedure is still too complicated and long lasting.
2 Bulgaria

In Bulgaria the use of biogas is still undeveloped despite there is a high potential for the future. Bulgaria’s national energy target for 2020 is a 16% share of energy from renewable sources in the gross final consumption of energies. Thus a higher use of biogas will be necessary to reach this national target. So far, only a handful of biogas plants were installed in Bulgaria. However, the newly introduced Renewable and Alternative Energy Sources and Biofuels Act (RESBA) with very good feed-in tariffs (ranging between 433 and 119 BGN per kWh) has led to an increased number of permitting applications for biogas plants in the last few month.

2.1 Legal Basis for permitting of biogas projects

According to Directive 2009/28/EC Bulgaria supports the use of renewable energy sources (RES) in their legislation. Thus in 2007 the Bulgarian government implemented the so called Renewable and Alternative Energy Sources and Biofuels Act (RESBA) which was latest updated in May 2011. The Act promotes the increasing use of renewable energy sources concerning the energy production. Additionally the act regulates the implementation of renewable energy projects and guarantees their feed into the public grid¹. Consequently the grid operator is obliged to purchase and transmission all the renewable generated electricity (§ 18 par. 1 item 2 RESBA). Furthermore in Bulgaria a feed-in tariff system for electricity generated using renewable energy sources exists. The amount of the feed-in is decided by the State Energy and Water Commission each year (art. 32 par. 1 RESBA).

2.2 Present permitting procedure

For building a biogas plant several permits and licences are necessary to be obtained in Bulgaria.

Terms and conditions for joining the electricity grid:

The permit for joining the electricity grid is a necessary permit to be obtained for every future biogas plant operator. It is necessary to provide a written request following article 49, § 1 of the Ordinance about the connection of producers and consumers of electric energy to electric transmission and distributions networks. According to article 50 of this Ordinance for each power plant with an installed capacity equal or less than 5 MWel the written request has to be sent to the local distribution company. For each plant with an installed capacity above 5 MWel the request has to be sent to the National Electric Company. All the generated costs during this procedure are paid by the National Electric Company.

Building permit:

For obtaining the building permit for a biogas plant a written request of the investor and several documents under article 144; §1 of SPA has to be sent to the chief architect of the municipality who coordinates and approves the requested projects. The building permit is issued within 7 days after all necessary documents have been sent in. However, the building

¹ http://www.reslegal.de/
permit loses its legal status if the construction of the biogas plant is not started within 3 years or not finished after 5 years after obtaining the building permit (Article 153 §2 SPA).

**Accession contract:**

The Accession contract can be requested after the approval of the investment for the project and obtaining the building permit. Core of the accession contract is the connection of producer and consumers of electricity to the electric transmission- and distribution network. This contract has to be signed within 60 days (Article 57 §2 SPA). All the related costs and fees of the distribution company have to be paid by the investor. A similar procedure is used for the purchase of the waste heat of the biogas plant.

### 2.3 Bottlenecks

In the report about the present permitting procedure for biogas plants in Bulgaria several bottlenecks were found. These bottlenecks were identified by the public authorities, project developers and future biogas plant operators.

**From the viewpoint of the authorities:**

- The permitting procedure is long and complicated.
- The Ministries and other authorities are not aware of biogas potential and its benefits.
- The departments often are overloaded with different projects and thus the work is not done properly.
- Too less biogas skilled personal is available at the authorities.
- Too many different authorities are responsible for the permitting procedure of biogas plants leading to misunderstandings during the communication between them.

**From the viewpoint of project developers:**

The questionnaire has been distributed to several representatives of potential biogas investors and farmers. However, it must be noticed that 37% of the respondents have no experience with the authorities at all. Thus all the presented results are only a tendency and not fully objective. During the survey several bottlenecks were found which are following presented:

- 63% of the respondents disagree to the statement “The permission procedure for biogas is a barrier” (58% of them strongly disagree).
- 42% of the respondents think that it is more difficult to find external financing than to get permission for a biogas plant project.
- 37% think that it is more difficult to obtain all necessary permits than to find external financing.
- Permits from the municipality are easiest to obtain. Despite 48% of the respondents think that the connection to the grid is the permit which is most difficult to obtain. Additionally 37% of the respondents think that a sales contract to the local electricity company is most difficult to obtain.
- Only 32% of the respondents were sure to know which authority is responsible for permitting a biogas project.
- 42% of the respondents could not benefit from the help of the authorities.
• 79% of the respondents disagree with the statement “The capacity of the authorities is very good” (26% of them strongly disagree).

• 63% of the respondents disagree with the statement “The efficiency of the authorities is very good” (42% of them strongly disagree).

• 21% of the respondents do not know about a guideline concerning the permitting process. However, there are some provided by NCER.

Further aspects:
Furthermore some additional aspects were identified concerning the permitting procedure for biogas plants:

• It is not clear which authority is responsible for which permit.

• It is not clear which person at the authority is responsible for biogas.

• Too many authorities are involved in the permitting process. Thus obtaining permits is too long.

• There are no suitable laws for biogas plants.

• Too less information about the permitting procedure in general is available.

3 Croatia

The use of biogas for electricity and heat production is promoted by the Croatian government. However by the end of 2010, there were only two operating biogas plants and 19 biogas plants in some stage of development, totalling 33 MW. Consequently, the Croatian biogas market is still in its early states. However, there is a large potential for using biogas in Croatia and so Croatia plans to use at least 20% of the total gross livestock units for energy production by 2020. Thus an increasing use of biogas facilities will be necessary to fulfill these future targets.

3.1 Legal basis for permitting of biogas projects

In Croatia the Energy Law recognises biogas as renewable energy source (RES). Thus legal frameworks about biogas that define the natural gas market, electricity market and thermal energy market and biofuels, already exist. The following list presents an overview about the legal basis for permitting biogas projects:

• **Law on Electricity Market** (OG 177/04): This law provides the legal basis for describing RES and CHP use. Electricity produced from RES has priority to purchase into the power grid.

• **Law on production, Distribution and Supply of Thermal Energy** (OG 42/05, 20/10)

• **Law on Natural Gas Market** (OG 40/07; 152/08, 83/09): Concerning biogas; stipulates technical requirements and safety standards for the gas transportation pipe system.

• **Law on Biofuels in Transport** (OG 65/09): This law recognises biogas as a type of biofuels and provides the basic regulations concerning this topic.
3.2 Present permitting procedure

In the permitting procedure for biogas plants in Croatia two parallel sets of laws are mainly involved: (1) Electricity market and (2) Building. The following Figure 1 provides an overview about the present permitting procedure in Croatia.

In the Republic of Croatia the permitting procedure is divided in required “Location, Construction and Operation Permits” and in “Energy Permits”. The permitting process is highly centralised. Consequently, the responsible public authorities are located in the capital, Zagreb.

In Table 1 an overview about the needed location-, construction- and operation permits is presented:

![Permitting procedure for a biogas project in Croatia (Jelavic et al. 2011)](image-url)
### Table 1: Needed permits for a biogas project in Croatia

<table>
<thead>
<tr>
<th>Required permit</th>
<th>Responsible authority</th>
<th>Based on (Required documents)</th>
<th>Needed time till obtaining</th>
<th>Validity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decision on environmental acceptability</td>
<td>MoEPPPC²</td>
<td>EIA Study/process</td>
<td>Up to 3 months</td>
<td>2 years (can be prolonged for 2 more years)</td>
</tr>
<tr>
<td>Decision on integrated environmental protection requirements</td>
<td>MoEPPPC</td>
<td>Request and Technical study for integrated environmental protection requirements</td>
<td>Up to 3 months</td>
<td>2 years (can be prolonged for 2 more years)</td>
</tr>
<tr>
<td>Decision on acceptability for ecological network</td>
<td>MoEPPPC or MoC³</td>
<td>Nature impact study</td>
<td>3-4 months</td>
<td>2 years (can be prolonged for 2 more years)</td>
</tr>
<tr>
<td>Location permit</td>
<td>MoEPPPC or county or city administration</td>
<td>Preliminary design and other documents</td>
<td>Up to 60 days</td>
<td>2 years (can be prolonged for 2 more years)</td>
</tr>
<tr>
<td>Construction permit</td>
<td>MoEPPPC or county or city administration</td>
<td>Final design, location permit, proof of land ownership or permit for use</td>
<td>Up to 60 days</td>
<td>2 years (can be prolonged for 2 more years)</td>
</tr>
<tr>
<td>Operation permit</td>
<td>MoEPPPC</td>
<td>Construction permit, report on construction and technical inspection</td>
<td>Up to 30 days</td>
<td>5 years</td>
</tr>
</tbody>
</table>

In Croatia an EIA⁴ is necessary if:

- The total capacity of the biogas plant is higher than 10 MWₑₑ.
- The biogas plant is assessed as an energy production plant → if more than 100,000 tonnes of biofuel equivalent are produced per year.
- Waste of animal origin is used as feedstock in the biogas plant.
- The biogas plant is assessed as a waste treatment plant → if more than 50 tonnes of non-hazardous waste is treated per day.

The following Energy Permits in Table 2 are necessary to get the eligible producer status.

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² Ministry of Environmental Protection Physical Planning and Construction (MoEPPPC)  
³ Ministry of Culture (MoC)  
⁴ Environmental Impact Assessment
Table 2: Needed permits for a biogas project in Croatia

<table>
<thead>
<tr>
<th>Required Energy permit</th>
<th>Conditions</th>
<th>Responsible authority</th>
<th>Needed time till obtaining</th>
<th>Validity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preliminary energy approval (PEA)</td>
<td>Plants with installed capacity &lt; 30 MW do not need to acquire PEA</td>
<td>MoELE&lt;sup&gt;5&lt;/sup&gt;</td>
<td>Up to 1 month</td>
<td>18 months (if Location permit is not needed) 48 months (if Location permit is needed)</td>
</tr>
<tr>
<td>Provisional Grid Connection Authorisation</td>
<td></td>
<td>TSO/DSO</td>
<td>Up to 2 months</td>
<td>2 years (depending on location permit)</td>
</tr>
<tr>
<td>Grid connection contract</td>
<td></td>
<td>TSO/DSO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy Approval for building the plant</td>
<td></td>
<td>MoELE</td>
<td>Up to 30 days</td>
<td>12 months (obtaining Building Permit within that period is also a condition)</td>
</tr>
<tr>
<td>Preliminary Status of Eligible Producer</td>
<td></td>
<td>HERA&lt;sup&gt;7&lt;/sup&gt;</td>
<td>Up to 30 days</td>
<td>2 years (can be prolonged for 12 more months)</td>
</tr>
<tr>
<td>Power Purchase Agreement</td>
<td></td>
<td>HROTE&lt;sup&gt;8&lt;/sup&gt;</td>
<td>Up to 60 months</td>
<td>12 years</td>
</tr>
<tr>
<td>Grid Connection Authorisation</td>
<td></td>
<td>TSO/DSO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grid usage contract</td>
<td>For larger plants it is mandatory to have a test period in order to verify the supply of electricity to the grid.</td>
<td>TSO/DSO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy Licence</td>
<td>In case of a biogas plant &gt; 1 MW it is necessary to prove of experts, technical and financial competence.</td>
<td>HERA</td>
<td>Up to 30 days</td>
<td>5 years</td>
</tr>
<tr>
<td>Decision on Acquiring Eligible Producer Status</td>
<td></td>
<td>HERA</td>
<td>Up to 30 days</td>
<td>12 years</td>
</tr>
</tbody>
</table>

3.3 Bottlenecks

Bottlenecks - from the viewpoint of the public authorities:

During the survey several bottlenecks of the permitting procedure for biogas plants in Croatia were found and further analysed.

- There is a great lack of capacity by the public authorities; only three persons work at the responsible RES & EE Department. Additionally working at the RES & EE Department is quite unattractive because of low income in the public service.
- Consequently the public authorities are overloaded with work and projects. So the permitting procedure is a quite slow and inefficient process.

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<sup>5</sup> Ministry of Economy, Labour and Entrepreneurship  
<sup>6</sup> Transmission System Operator  
<sup>7</sup> Energy Regulatory Agency  
<sup>8</sup> Energy Market Operator
• Too many public authorities are involved in the permitting procedure. Also the communication between them is quite weak.

Bottlenecks - from the viewpoint of the project developers and investors:

The persons of the survey belonged to different groups. 26% of them were farmers, 13% biogas project planners, 14% belonged to the food industry, 14% to the waste industry and the rest to other parts of the industry. For the interpretation of the results, it has to be considered that 95% stated that they have not yet implemented a biogas plant.

• 95% of the respondents provided their opinion on the statement “The permission procedure for biogas projects in Croatia is no barrier for the implementation of biogas projects: 76% of them consider the present permitting procedure for biogas plants as a barrier for implementing a biogas project. Only 24% agreed to the statement.

• 55% of the respondents responded on the question “which permit(s) are easiest to obtain”: 42% of them indicated that the preliminary energy approval is easiest to obtain.

• 36% responded on the question: “Which permit(s) are most difficult to obtain?” → 43% of them find the connection to the grid the most difficult permit to obtain.

• 73% of the respondents know which public authority is responsible for permitting biogas plants.

• 55% of the respondents disagree (18% of them strongly disagree) with the statement “The capacity of the authorities is very good”. Only 18% agreed to this statement.

• 86% of the respondents commented the statement “The efficiency of the authorities is very good”: 73% of the respondents also see the work of the authorities as inefficient. Only 11% think that the authorities work efficient.

• 68% of the respondents answered the question “How many negotiation meetings they had?” → 53% of them had at least more than 5 negotiation meetings with the authorities.

• 64% responded to the question: 50% of the respondents expect to get permission for a biogas plant within one year.

Further aspects:

The whole permitting process for building a biogas plant in Croatia is a complicated and a long lasting procedure - especially because three different ministries (Ministry of Environmental Protection Physical Planning and Construction, Ministry of Culture, and Ministry of Economy, Labour and Entrepreneurship) are involved in the permitting procedure. Additionally the responsible authorities suffer a lack of capacity, also resulting in the little focus on specific problems within the field of biogas projects. Also the communication between the authorities is weak causing even more trouble to get the needed permits.

• The quality of the project applications to be registered at the Registry and is very low.

• Project developers are reluctant to employ a professional consultant to prepare the necessary documents which end up with weakly prepared studies about the technology and economics of the future biogas plant.

• The procedure for obtaining the permits is too long.

• Too many authorities are involved in the permission process.
4 Czech Republic

In the Czech Republic biogas is recognized as one Renewable Energy Source (RES) in the Energy Law. As already mentioned the Czech Republic experienced a boom in biogas plants project implementations. Between 2008 and 2009 for example the output from biogas facilities rose by 65%. Thus the Czech Republic is one of the top 10 biogas producers in the European Union. In 2009 the Czech biogas plants generated electricity for the electricity consumption of 100,000 four-person households. However, currently the set-up of new biogas installations is stopped due to political decisions. In general, there are also bottlenecks included in the current permitting procedure for biogas projects in the Czech Republic. The permitting procedure and its possible bottlenecks are presented in the following chapters.

4.1 Legal basis for permitting biogas projects

Concerning the implementation of a biogas plant project several national laws and regulations of the Czech Republic are relevant. Additionally, the European Renewable Energy Directive (RED) and thereby especially the use of biogas are integrated in these Czech laws and regulations. The following list presents laws, regulations and directives concerning biogas in the Czech Republic:

- **Act No. 180/2005**: Coll. on use of energy from renewable sources.
- **Act No. 100/2001**: Coll. on the environmental impact assessment (EIA).
- **Act No. 183/2006**: Coll. of territorial planning and building regulations.
- **Act No. 76/2002**: Coll. on Integrated Pollution Prevention Control (IPPC).
- **Act No. 86/2002**: Air pollution.
- **Act No. 156/1998**: Coll. on fertilizers.
- **Act No. 458/2000**: Coll. on business conditions and public administration in the energy sector and amending certain acts (so called **Energy Act**).
- **Act No. 100/2001**: Coll. on the environmental impact assessment and amending certain related acts.
- **Act No. 258/2000**: Coll. on the public health.
- **Directive 91/676/EEC**: on the protection of waters against pollution caused by nitrates from agricultural sources.

Furthermore the Czech Republic currently is preparing the so called TDG 983 01. Core of TDG 983 01 will be the injection of biogas into the gas network. In the TDG 902 2002 the technical rules relating to the gas quality have been published in the year 2008. These technical standards are included in the existing **Energy Act No. 458/2000** §19a (1).
4.2 Present permitting procedure

The average time of the whole permitting procedure for biogas plants is currently 20 months. If the Environmental Impact Assessment (EIA) has to be included, the permitting time increases up to 34 months. In Figure 2 the permitting procedure is presented. Table 3 shows the average time needed to complete the individual project phases.

![Permitting procedure diagram](image)

**Figure 2: Permitting procedure for a biogas project in the Czech Republic (Stambaski et al. 2011)**

<table>
<thead>
<tr>
<th>Project phase</th>
<th>Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preliminary assessment of the project, feasibility study</td>
<td>1 month</td>
</tr>
<tr>
<td>Geological survey; Process of the notification or EIA; Development of preliminary design; Expert opinion about air pollution; Processing of energy audits and grant application</td>
<td>2-10 months</td>
</tr>
<tr>
<td>Project for building permission</td>
<td>2-3 months</td>
</tr>
<tr>
<td>Implementation structure</td>
<td>4-6 months</td>
</tr>
</tbody>
</table>

The duration of the project can also be influenced by local conditions and other factors such as:

- Clarification on property related issues for needed land.
- The need for changes in land-use planning documents (min. 10 months)
- The use of none standardized biomass (Feedstock tests and characterization may be needed; min. 2-3 months)
- The negative attitude of the municipality (e.g. the need to undergo a full EIA procedure which takes about 6-10 months)
4.3 Bottlenecks

Bottlenecks - from the viewpoint of public authorities:
Several bottlenecks during the project implementation were found by the public authorities. First of all the permitting procedure is quite complex and needs a long period of time. Additionally the civil servants have no special knowledge about the permitting procedure of biogas plants and they often have too many different tasks to do, so that they are not able to spend enough time for the permitting procedure of biogas plants.

Bottlenecks - from the viewpoint of the project developers and investors:
Also some bottlenecks during the permitting procedure were identified by the project developers and the investors.
The interviewees belong to different occupational groups. 50% of them were farmers, 20% were biogas project planners, 10% were representatives of the food industry and 20% had some other profession. During the survey following statements were given:

• 28% of respondents do not know which public authority is responsible for the needed permits → additionally 33% are not sure about it.
• 39% of respondents disagree with the statement “The efficiency of the authorities is very good” and 44% neither agree nor disagree with this statement.
• 26% of respondents think that there are too much responsible authorities involved in the permission process causing trouble that more than 20 negotiation meetings are necessary (4 are required) before getting the permission.
• The EIA (Environmental Impact Assessment) is the permit which is most difficult to obtain.
• 23% of respondents also think that the needed time for obtaining permits is much too long.
• 13% think that the required information for permits is to demanding.

Further aspects:
In conclusion, the main bottlenecks are based on too less information about the permitting procedure in general. Often changes in the support scheme for biogas cause a long lasting permitting procedure. Both the public authorities and the biogas project planner should cooperate together to optimize the way of proceeding the present permitting procedure.

5 Greece

The Greek policy is supporting the use of biogas for several years. So that Greece has a developing biogas market. In 2008 there was an installed capacity of 39.4 MWel available in Greece. However, there still is high potential for increasing biogas utilization especially using animal manure or organic waste. Therefore the current permitting procedure and its bottlenecks are presented in the following chapters.

5.1 Legal basis for permitting of biogas projects
Greece is supporting the use of biogas with different legislations. In Greece there are several laws which provide the legal basis for using biogas. The first law concerning renewable
energies including biogas was the Law 1559/1985 in the year 1985. After that several more laws followed.

- **Law 2773/99**: Part of this law was the introduction of the so-called **“Electricity generation licence”**. This licence was the first licence concerning renewable energies directly and nowadays has still to be obtained first for each project in the field of renewable energies.

- **Law 3010/2002**: This law was the first law based on the Directive 97/11/EC which was implemented by the European Union.

- **Law 3423/2006**: The so-called **“Efficiency cogeneration of electricity and heat”** law was following. This law consists of three main aspects:
  
  a) Simplifying the licencing procedure
  
  b) New pricing system for electricity
  
  c) The national renewable energy target of 29% electricity production in 2020

- **JMD 49828/2008**: This law includes general criteria to exclude some areas or land used for biogas exploitation schemes.

- **Law 3428/2005**: The so-called **“Liberalisation of the Natural Gas Market”** law allows the feed-in of bio-methane in the national gas grid. However, certain quality requirements concerning the bio-methane have to be fulfilled. This law is based on the named targets of the Directive 2003/55/EC which was implemented by the European Union in the year 2003.

- **Law 3734/2009**: This is the so-called **“Promotion of cogeneration of two or more useful forms of energy”** law. This law transposes the Directive 2004/8/EC into the national legislation of Greece.

- **Law 3851/2010**: Core of this law is accelerating the use of RES to deal with the climate change.

### 5.2 Present permitting procedure

The first step in the permitting procedure for a biogas plant in Greece is to obtain the so-called **Electricity Generation Licence** (production licence). The present permitting procedure for a biogas project in Greece is shown in Figure 3.

The complete permitting procedure in Greece is shown in the Table 4. This includes aspects such as the name of the needed permit, the responsible authority, needed time for obtaining the permit, and possible costs and the validity of the permit.
Figure 3: Permitting procedure for a biogas project in Greece (Sioulas 2011)

Table 4: Needed permits for a biogas project in Greece

<table>
<thead>
<tr>
<th>Name of permit</th>
<th>Responsible authority</th>
<th>Time till obtaining</th>
<th>Costs [€]</th>
<th>Validity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity Generation Licence</td>
<td>Regulatory Authority for Energy (RAE)</td>
<td>2 months</td>
<td>25 years (can be prolonged 25 more years)</td>
<td></td>
</tr>
<tr>
<td>Connection offer</td>
<td>Managers grants</td>
<td>4 months</td>
<td>25 years (can be prolonged 25 more years)</td>
<td></td>
</tr>
<tr>
<td>Approval of Environmental Conditions</td>
<td>Respective region</td>
<td>4 months</td>
<td>10 years (can be prolonged 10 more years)</td>
<td></td>
</tr>
<tr>
<td>Installation licence</td>
<td>Regulatory Authority for Energy Source and saving Environment C.R.E.S</td>
<td>45 days</td>
<td>Permanent</td>
<td></td>
</tr>
<tr>
<td>Operation licence</td>
<td>Regulatory Authority for Energy Source and saving Environment C.R.E.S</td>
<td>20 years (can be prolonged 20 more years)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
5.3 Bottlenecks

In the report about the present permitting procedure for biogas plants in Greece several bottlenecks were identified.

Bottlenecks - from the viewpoint of the public authorities:

- Lack of specific biogas legislation.
- Relatively negative public perception, experience and awareness about RES in general and biogas projects.
- Long lasting bureaucracy during the permitting procedure.
- Lack of properly working energy networks and public grids.
- Lack of experienced staff (skilled with knowledge about biogas) in the administration of the public authorities in the field of biogas.
- The number of negotiation meetings is much too large and includes bad communication.

Bottlenecks - from viewpoint of project developers and investors:

The questionnaire was answered by 24 persons, although it was sent to 300 stakeholders. Only 64\% of the respondents already implemented a biogas plant. Thus the survey is not fully representative and shows only a tendency.

- 66\% of respondents consider that the permitting procedure is a barrier for the implementation of a biogas plant project.
- The permitting procedure is seen as difficult as the project financing.
- 63\% of the respondents answered the question “Which permit is easiest to obtain?” → 35\% of respondents think that the “Generation licence” is the permit which is easiest to obtain.
- 79\% of the respondents answered the question “Which permit is most difficult to obtain?” → 45\% of respondents find that the “Environmental permit” is most difficult to obtain.
- 70\% of respondents think that they know which authority is responsible for the permits.
- 83\% of the respondents gave their opinion about the public authorities: 64\% of respondents find the work of the authorities not very helpful.
- 92\% commended the statement: “The capacity of the authorities is very good!” → 65\% of respondents disagree (35\% of them strongly disagree) with this statement.
- 65\% of the respondents do not agree with the statement “The efficiency of the authorities is very good” (96\% responded to this question).
- 67\% of the respondents answered the question “How many negotiation meetings they needed?” → 68\% of all respondents needed more than 4 negotiation meetings with the authorities to get one single permit.
- 54\% of the respondents explained their experience with the public authorities: 39\% of them proclaimed that the authorities have no knowledge about biogas.
- 38\% of the respondents said that for them the permission phase to obtain one single permit took between 19 and 24 months.
Further aspects:
With the implementation of law 3851/2010, which includes high feed-in tariffs, the popularity of biogas may increase. Several biogas projects are already in the pipeline and in the implementation phase.

- There is no guideline about the permission process provided by the authorities.
- Too many different authorities are involved in the permitting procedure.
- It is not definitively clear which authority is responsible for which permit.
- The required information for getting a permit is too demanding.
- The benefits of using biogas shall be promoted more intensively to create a friendly environment for biogas investments.
- “One stop shop” shall be improved to simplify and to shorten the permitting procedure by reducing the responsible authorities. Additionally the co-operation between the authorities shall be improved to get a more effective work flow.
- The framework for the promotion of biogas shall be improved and simplified.
- Stakeholder and administrative body training courses are recommended.

6 Latvia
The Latvian biogas sector is still in its early states. Altogether the energy output from biogas plants were 45 GWh$_{el}$ in 2009. This was enough to supply 10,000 four-person households with electricity. Besides the overall energy output from biogas plants increased by 16.6% compared to 2008. Consequently there is a high potential for increasing use of biogas for energy utilisation in Latvia. Following the current permitting procedure and its legal basis is presented.

6.1 Legal basis for permitting biogas projects
The legal basis for permitting a biogas plant consists of three main parts, namely the legal basis for connection to the electricity grid, for bio-methane injection into the natural gas grid, and for building and construction works.

Legal basis for connection to the electricity grid
Therein the Electricity Market law guarantees the use for electricity producers to use the transmission and distribution system based on the by the Public Utilities Commission (Regulator) fixed tariffs. The electricity trading in Latvia is regulated by the Grid code providing different trading and distribution mechanism. The new system participant (e.g. biogas plant operator) has to pay a connection fee to get access to the public grid. All these conditions can be found in the Regulation No.280 which was implemented in September 2008.

Legal basis for bio-methane injection into the natural gas grid
The entire national natural gas network including the transportation and distribution system is operated by JSC Latvijas Gaze (independent energy company in Latvia9). JSC has

9 http://www.energy-business-review.com/companies/jsc_latvijas_gaze
guaranteed exclusive rights all over the gas market (storage, transmission, distribution and trading) in Latvia until 2017. Thus no other third party has guaranteed access to the national natural gas grid by Latvian law.

**Legal basis for building and construction works**

- Spatial Planning Law
- Construction Law
- Protection Zone Law
- Law on Regulators of Public Utilities
- Energy Law

**Cabinet Regulations:**

- No.236 “Regulations for the Spatial Planning of a Planning Region” (adopted 22 April 2005).
- No.112 “General Construction Regulations” (adopted 1 April 1997).
- No.1227 “Regulations Regarding Types of Regulated Public Utilities” (adopted 27 October 2009).

**Latvian Building Codes:**

- LBN 005-99 “Regulations for the Civil Engineering Investigations” (approved by the Cabinet Regulation No.168 from 2 May 2000).
- LBN 006-00 “Essential requirements to construction works” (approved by the Cabinet Regulation No.142 from 27 March 2001).
- LBN 304-03 “Regulations for the authorship supervision” (approved by the Cabinet Regulation No.342 from 26 June 2003).
- LBN 303-03 “Regulations for supervision of construction” (approved by the Cabinet Regulation No.75 from 10 February 2004).
- LBN 201-07 “Construction Fire Protection” (approved by the Cabinet Regulation No.866 from 11 December 2007).

**Feed-in tariff scheme:**

The *Electricity Market Law* is the main law concerning the feed-in of renewable generated electricity in Latvia. The Electricity Market Law defines a certain amount of electricity which has to be generated using renewable energy sources. The legal basis for biogas electricity feed-in and payment for installed electrical capacity is guaranteed by the Cabinet of Ministers
using the Regulation No.221 and Regulation No.262. These two regulations and their differences are described in Figure 4.

**Figure 4: Biogas support mechanisms under the Electricity Market Law (Dzene 2010)**

### 6.2 Present permitting procedure

All the needed permits during the permitting procedure for a biogas plant in Latvia are presented in Table 5.

**Table 5: Needed permits for a biogas project in Latvia**

<table>
<thead>
<tr>
<th>Needed permit</th>
<th>Responsible authority</th>
<th>Needed time for obtaining [Days]</th>
<th>Validity [years]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit for introduction of new capacities</td>
<td>The Ministry of Economics</td>
<td>30</td>
<td>3-5</td>
</tr>
<tr>
<td>Licence for energy generation, transmission, distribution or supply</td>
<td>The Public Utilities Commission</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Permit for the grid connection</td>
<td>System operator</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>Decision – conclusion about the necessity of environmental impact assessment</td>
<td>The Environmental State Bureau</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>Technical regulations</td>
<td>The Regional Environmental Board of the State Environmental Service</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>Integrated pollution permit</td>
<td>The Regional Environmental Board of the State Environmental Service</td>
<td>A category – 150</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>B category – 60</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>C category – 30</td>
<td></td>
</tr>
</tbody>
</table>

10 Explanation for the Integrated Pollution permit:

A category: including energy production with the rated thermal input of more than 50 MW.

B category: including energy production plants with the rated thermal input between 5 and 50 MW.

C category: including biogas production plants with the rated thermal input between 0.2 and 5 MW.
### Needed permit

<table>
<thead>
<tr>
<th>Needed permit</th>
<th>Responsible authority</th>
<th>Needed time for obtaining [Days]</th>
<th>Validity [years]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greenhouse gas emission permit</td>
<td>The Regional Environmental Board of the State Environmental Service</td>
<td>90</td>
<td></td>
</tr>
<tr>
<td>Decision about granting the right to sell the electricity within the framework of the mandatory purchase/the right to receive the guaranteed payment for the installed electrical capacity</td>
<td>The Ministry of Economics</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Approval of the heat energy and/or electricity tariff</td>
<td>The Public Utilities Commission</td>
<td>90</td>
<td></td>
</tr>
<tr>
<td>Construction permit</td>
<td>Building authority of the local government</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 6.3 Bottlenecks

Several bottlenecks during the permitting procedure for a biogas project were found in Latvia. These bottlenecks were identified by the public authorities, project developers and future biogas plant operators.

#### From the viewpoint of the public authorities:

During a survey involving the **Environmental State Bureau** and the **Ministry of Economics** of the Republic of Latvia different bottlenecks in the permitting procedure of biogas projects were identified. First of all the main problems during the permitting procedure are related to mistakes and miscalculations which are often included in the applications. Additionally problems are related to the land use contract. Because the land use contract has to be valid for at least 10 years. Otherwise the building permit will not be obtained. Additionally the selected location has to comply with the land use plan. Furthermore lack of knowledge about the legislative framework of the biogas plant developer and future operator often causes misunderstandings between the involved Ministries and the project applicants, even after improvement of the framework in 2009. However, the overall decision about the procedure for biogas project permitting is good.

#### From viewpoint of project developers:

The questionnaire was send to 160 interviewees. 23 of them answered and completed the questionnaire in total. It must be noted that 13% of the respondents have no experience with the public authorities regarding biogas implementation. In the following list a summary about the responses is presented:

- 96% of the respondents provided their opinion on the statement “The permitting procedure for biogas projects in Latvia is no barrier for the implementation of biogas projects”: 59% of them disagreed to this statement (27% of them strongly disagreed); only 23% agreed to the statement.
- 57% of the respondents think that it is as difficult to obtain permission as to get external financing.
- 78% of the respondents answered to the question “Which permit is easiest to obtain?” → 33% of the respondents think the permit for introduction of new capacities is easiest to obtain.
• Furthermore 52% of the respondents think that the “Decision about granting the right to sell the electricity within the framework of mandatory purchase is most difficult to obtain.

• 48% of the respondents know who is responsible for the biogas permits; 22% did not know and 30% were not sure about it.

• 68% of the respondents said that the public authorities could not help them further.

• 91% of the interviewees commented the statement “The capacity of the authorities is very good”: 62% of them disagreed with this statement (24% of them strongly disagreed); only 5% of the respondents agreed that the capacity of the authorities is very good.

• 96% of the interviewees responded to the statement “The efficiency of the authorities is very good”: 68% of the respondents disagreed to this statement (27% of them strongly disagreed); again, only 5% of the respondents agreed to the statement that the efficiency of the authorities is very good.

• 73% of all respondents answered the question “How many negotiation meetings they needed”: 39% of them needed more than 4 negotiation meetings with the public authorities to get permission.

• 61% of the respondents think that there is no guideline about the permitting procedure provided by the public authorities.

• 57% answered: 46% of them are sceptical about the involvement and the professionalism of the responsible authorities.

• 43% answered: 60% of the respondents who already got in touch with the public authorities said that it took more than 4 months to get a permit for their biogas project. Additionally for 20% it took more than one year.

• 40% answered: 45% of the respondents think it takes between 1 and 6 months to get permission for a biogas project. Furthermore 22% of them think it even takes between 19 and 24 months to get the permission for a biogas project.

• 52% answered: 42% of them think the permits cost between 700 and 7000 Euro.

• 23% of the respondents said that the procedure for obtaining the permits is too long.

• 20% of the respondents proclaim that there are too many public authorities involved in the permitting process.
7 Romania

The biogas market in Romania is one of the least developed in Europe. In 2009 only 1 GWh el, equal to the supply of approximately 200 four-person households, was generated using biogas utilisation. However, in Romania the policy makers support the use of the renewable energy sources (RES) including biogas. The use of biogas is also promoted in the present legislation and policy of Romania. Consequently the amount of produced electricity using biogas more than doubled between 2008 and 2009. Following the current permitting procedure and its legal basis in Latvia is presented.

7.1 Legal basis for permitting of biogas projects

The permitting procedure for biogas plants in Romania is based on several basic laws. The laws set the target for 2020 of up to 24% of renewable energy supply from the total energy consumption of Romania.

- The Directive 2001/77/EC was stipulated first by Romanian legislation into the own laws.
- Law 443/2003 and law 13/2007 promoted the use of renewable energies for energy production in general. In the year 2005 these were modified by the Government Decision 958/2005 (GD 958/2005).
- In 2010 the new Law 139/2010 on renewable energies was implemented. This law is a modification of the former law 220/2008 which core was the support system for renewable energies.
- The new law 139/2010 includes the following aspects:
  a) Biogas
  b) Gas resulted from processing waste (food industry, etc.)
  c) Fermentation gas resulted in sewage treatment facilities

Also part of the law 139/2010 is the renewable energy target of Romania, namely 24% renewable energy use regarding the final energy consumption in 2020. Additionally the law sets the basis for the Green Certificates (GC) distribution. Thus for each MWh of electricity produced in a biogas facility, 3 GC are given; additionally one more is given if the electricity is generated in cogeneration also using the waste heat.

7.2 Present permitting procedure

In Romania there are several authorities responsible for permitting of biogas plants. A good example of all steps which have to be made during the present permitting procedure is shown in the following Figure. However, it remains to notice that the permitting authorities in Romania are not dealing specifically with biogas- or other renewable energy projects.
7.3 Bottlenecks

In the report about the present permitting procedure for biogas plants in Romania several bottlenecks were found. These bottlenecks were identified by the public authorities, project developers and future biogas plant operators.

**Bottlenecks - from the viewpoint of the public authorities:**

- The demanding complexity of the permitting procedure for a biogas plant needs lots of time.
- Caused by overloading the public servants with too many different tasks the permitting procedure for a biogas plant needs a lot of time.
- Additionally the public servants are not skilled properly about the field of using biogas. Thus there is a lack of competence which is necessary for the proper implementation of permitting procedure for a biogas plant.

**Bottlenecks - from viewpoint of project developers:**

The questionnaire was distributed via e-mail, presented on the partners’ website, and on biogas events and conferences. During this survey several bottlenecks from the viewpoint of project developers and future biogas plants operators were identified. However, due to the fact that only 8% of the respondents already implemented a biogas plant project themselves
thus the survey is less objective and shows only a tendency. Additionally, only 16% of the respondents said that they already have experience with the responsible authorities. This fact is also influencing the results of the survey. Thus, there is a high tendency of answers concerning “neither agree nor disagree to a statement”. A summary about the most important aspects and statements is provided in this chapter.

- 64% of the respondents find obtaining permission as difficult as to get financing. However, 36% of the respondents also think that it is more difficult to get permission for a biogas project, than to get external financing.
- 36% of the respondents see the environmental permit as most difficult to obtain.
- Only 20% of the respondents did say that they know who is responsible for the permits. More than twice the number (44%) said that they do not know who is responsible for the permits. The rest (36%) said that they are not sure.
- 46% of the respondents disagree (4% of them strongly disagree) to the statement “The capacity of the authorities is very good”. No one agrees to this statement and 54% neither agree nor disagree. This 54% are resulted because of the lack of experience with the public authorities which was already explained above.
- Again 36% of the respondents disagree (12% of them strongly disagree) to the statement “The efficiency of the authorities is very good”. Again a huge number of respondents, 64%, neither agree nor disagree.
- 12% of respondents proclaim that they needed more than 4 negotiation meetings to get one single permit. Again a huge number of respondents, 84%, did not answer this question because of no experience with the authorities.
- 16% of the respondents think that there is no suitable law concerning biogas plants.
- 18% of the respondents do not know which person at the authority is responsible for the biogas sector and for 17% it is even not clear which authority is responsible for which permit.

Further identified bottlenecks:

- There is no specific guideline for permitting a biogas plant provided by the authorities.
- The expected cost to get a permit varies between 1,000 and 15,000 Euro. This assumption is mainly caused because of the lack of experience in biogas plant implementation.
- Nearly all the respondents see a huge lack of concrete information about the permitting procedure for a biogas plant.

Further aspects:

Despite the support of the Romanian government the biogas market is still not developed. Thus the questionnaire is presenting a future perspective and not the current situation on the biogas market in Romania. Therefore some more biogas projects have to be implemented to get concrete statements.

- The results show a great need for communication between the responsible authorities and all over the permitting procedure.
- Problems with the grid connection and conflicts with local policies should be removed for a more effective permitting procedure.
• The regular changes of laws, grant conditions and supporting schemes concerning renewable energy projects and especially biogas projects make the permitting procedure even more difficult.

• During this survey most of the respondents have been farmers, representatives of the food or waste industry.

• There are huge problems with the grid connection.

• The required time for permitting procedure is much too long (more than one year).

• Additionally there are conflicts with the local policies especially in constructing a biogas plant.

• The communication between the authorities is not very well and therefore much misunderstandings happens which unnecessarily extend the permitting procedure.

8 Slovenia

A Slovenian target is to create a sustainable biogas market for the future energy supply of Slovenia. Between 2008 and 2009 the Slovenian electrical energy output from biogas increased already by 59%. Thus more than 15,000 four-person households, equal to 68.8 GWh$_{el}$, can be supplied by biogas generated electricity. However, the Slovenian permitting procedure still needs some improvement to fasten the implementation of new biogas projects. Therefore an overview of the permitting procedure including the legal basis for permitting biogas plants in Slovenia is presented in the following chapters.

8.1 Legal basis for permitting biogas projects

The Slovenian energy policy supports the use of biogas by different national strategy documents:

• Resolution on the National Energy Programme (Official Gazette of the Republic of Slovenia, No. 57/2004): aiming to increase the share of renewable energies in the primary energy balance of Slovenia.

• Energy Act (Official Gazette of RS No. 79/1999; final amendment No 22/2010): This law ensures the stimulation of RES exploitation, replacing the fossil fuels by an effective use of RES.

• Regulations on the requirements to be met for obtaining the status of a qualified electricity producer (Official Gazette of RS No. 29/2001; final amendment No. 71/2007): Types of qualified electricity producers are set in this law.

• Environmental Protection Act (Official Gazette of RS No.41/2004; final amendment No 108/2009): This act includes the CO$_2$ tax an emission trading.

• Regulation on supports for the electricity generated from renewable energy sources (Official Gazette of RS No. 37/2009; final amendment No 94/2010): This regulation includes the feed-in tariffs of the Republic of Slovenia.

• Regulation on issuing of the Declarations for the production units and of the Guaranties of Origin (Official Gazette of RS No. 8/2009; final amendment 22/2010): This law offers the biogas plant operators to choose between two possibilities: (1) Guaranteed purchase prices or (2) Operating support (to close the possible gap between production costs and market price of the generated electricity).
Feed-in tariff:

Biogas plants are supported with a feed-in tariff scheme, whereas, smaller biogas plants are preferred. The basic tariff can be increased if some of the following conditions are fulfilled:

- Using more than 15% of the waste heat per year → 10% extra operating support (heat for the biogas production is not counted).
- Manure and slurry input is more than 30% → 10% extra operating support.
- Manure and slurry input is more than 70% → 20% extra operating support.

8.2 Present permitting procedure

For the building and operating of a biogas plant in Slovenia several permits are required.

Table 6: Needed permits for a biogas project in Slovenia

<table>
<thead>
<tr>
<th>Needed Permit</th>
<th>Responsible authority</th>
<th>Time till obtaining</th>
<th>Costs [€]</th>
<th>Validity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building permit</td>
<td>Administrative unit</td>
<td>5-6 months (sometimes longer)</td>
<td>350 (up to 5,00)</td>
<td>permanent</td>
</tr>
<tr>
<td>Energy permit</td>
<td>Ministry of the Economy</td>
<td>1-2 months</td>
<td>19,37</td>
<td>permanent</td>
</tr>
<tr>
<td>Energy licence</td>
<td>Energy Agency of the Republic of Slovenia</td>
<td>About one week</td>
<td>Free of charge</td>
<td>5 years</td>
</tr>
<tr>
<td>Environmental Consent (IPPC)</td>
<td>Environmental Agency of the Republic of Slovenia</td>
<td>6 months (or more)</td>
<td>550</td>
<td>5-10 years (depending on used feedstock)</td>
</tr>
<tr>
<td>Veterinary Administration Consent</td>
<td>Veterinary Administration of the Republic of Slovenia</td>
<td>3 weeks (or more)</td>
<td>19,37</td>
<td>permanent</td>
</tr>
<tr>
<td>Operating permit</td>
<td>Administrative unit</td>
<td>3 months</td>
<td>Free of charge</td>
<td>permanent</td>
</tr>
<tr>
<td>Consent for connection to the distribution grid</td>
<td>Distribution company of electricity</td>
<td>30-60 days</td>
<td>Free of charge</td>
<td>permanent</td>
</tr>
<tr>
<td>Declaration for the production units and support</td>
<td>Energy Agency and Slovenian power market operator Borzen</td>
<td>Up to 1 month</td>
<td>Free of charge</td>
<td>5 years</td>
</tr>
</tbody>
</table>
8.3 Bottlenecks

Bottlenecks - from the viewpoint of the public authorities:

During five interviews with representatives of the public authorities several bottlenecks included in the permitting procedure were found.

- Biogas is seen as a potential danger. Consequently it takes some months to get all necessary licences and permits.
- Too less employees of public authorities work for the issue of permission for biogas plants. Additionally the staff of the public authorities is not enough skilled on the topic of biogas.
- Required information and documents submitted by biogas investors are often not complete causing trouble in the further proceeding.

Bottlenecks - from the viewpoint of the project developers and investors:

The interviewees belonged to different businesses. 45% of them were biogas plant planners, 20% were representatives of the food industry, 20% were representatives of the waste industry and 15% were farmers. During the survey, several bottlenecks regarding the current permitting procedure were identified:

- In the process of obtaining permits it is difficult to get external financing (bank loans).
- Too many negotiation meetings with the public authorities are needed. 65% needed more than 15 negotiation meetings before they got the permission for building a biogas plant.
- Too many public authorities are involved in the permission process.
- Existing civil initiatives against biogas plants need a lot of time.
- 53% of all respondents do not know which authority is responsible for the needed permits→ additionally 33% are not sure about it.
- However, 41% say, that the authorities were very helpful and cooperative. At the same time 26% say, that the authorities were very cooperative but could not help further with their issue.
- 70% disagree (45% of them strongly disagree) with the statement “The capacity of the authorities is very good”.
- 65% disagree (30% of them strongly disagree) with “The efficiency of the authorities is very good” and 25% neither agree nor disagree.
- Only 10% know about an existing guideline for the permission process of a biogas plant which is provided by the Energy Agency.
- The so-called Environmental consent (comparable with the EIA) is the permit which is most difficult to obtain.
- The consent for connection to the distribution grid is the permit easiest to obtain.

Further aspects:

In conclusion the permitting process for a biogas plant is a complicated and long lasting procedure in Slovenia. For a complete permission of a biogas plant project 1-1.5 years are needed. Also 15-20 negotiation meetings with responsible authorities are necessary based on the fact that the responsible authorities are too less skilled in the permitting procedure for
biogas plants. To remove all these bottlenecks an improved cooperation between the responsible authorities and future biogas operators and investors is necessary.

9 Conclusion

In conclusion there are still several bottlenecks included in all the permitting procedures for biogas plants of the seven target countries. However, regarding that only a small amount of the asked interviewees already has implemented a biogas plant, the used questionnaire is presenting a future perspective and not the current situation on the biogas market in the seven target countries. Therefore, some more biogas projects have to be implemented to get more experience on the real bottlenecks and challenges in the permitting procedures. Altogether the main bottlenecks can be summarized in three statements:

- There is too less information and knowledge about biogas in general at the public authorities.
- The communication between the public authorities is quite weak causing a long lasting and complicated permitting procedure.
- There are too many different authorities involved in the permitting procedure so that the biogas project developers often do not know which authority has to be addressed to get permission.

To remove these bottlenecks an improved cooperation between the public authorities as well as specific biogas training courses for the authorities are necessary and highly recommended. This is implemented in the framework of the BiogasIN project. A checklist for biogas aspects relevant for authorities is provided by Rutz and Güntert (2011).

Furthermore, the future biogas developer should be also provided with more knowledge about biogas in general and the permitting procedure for a biogas project implementation. Consequently the complete permitting procedure for biogas plants could be improved and future biogas project implementation could be easier to handle.
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ANNEX: Questionnaire
IEE Project ‘BiogasIN’

Survey on Permitting Procedures for Biogas Projects in XXXCountry

Questionnaire Q1
D.4.3., WP4

- Your Organisation name -
Include also your company logo!

date
The BiogasIN Project

The BiogasIN project “Development of sustainable biogas markets in Central and Eastern Europe” (Contract No. IEE/09/848) is supported by the European Commission in the “Intelligent Energy for Europe” Programme. The objective of BiogasIN is to effectively improve the framework conditions for the installation of new biogas plants in 7 Eastern European countries: Bulgaria, Croatia, Czech Republic, Greece, Latvia, Romania and Slovenia.

BiogasIN consists of 10 European partner organisations. The project is coordinated by the Croatian Energy Institute “Hrvoje Pozar”. The responsible partner for XXX Country is XXXYour Organisation Name.

More information on the BiogasIN project is available on the website: www.biogasin.org

Aim of the Survey

Simple and transparent permission procedures for the installation of biogas plants are an important prerequisite for the implementation of new biogas projects. In order to improve and simplify the permission procedures in XXX Country, a survey is made with current and future biogas project developers and operators. The results of this survey will be presented to the responsible authorisations involved in biogas permission procedures in XXX Country.

The completion of the questionnaire takes only about 5 minutes.

This Questionnaire was elaborated by WIP Renewable Energies, Germany, in cooperation with XXX Your organisation Name.

Contact

Please send the Questionnaire back by email/fax/post as soon as you complete it but not later than 30 November 2011 to:

Company name
Name of person in charge
Address
Telephone:
Telefax:
Email:

You can also complete this Questionnaire directly at the web site: www.biogasin.org

Thank you for your Contribution to Support the Biogas Development in XXX Country!
1. General satisfaction with the procedures to get permits for biogas plants in XXXCountry

1.1. Please judge about the following statement: “The permission procedure for biogas projects in XXXCountry is no barrier for the implementation of biogas projects!”

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

1.2. In a biogas project in XXXCountry it is …:

- …more difficult to obtain external financing (e.g. bank loans) than to get permissions
- …more difficult to obtain permissions than to get external financing
- …as difficult to obtain permissions as to get external financing

2. Access to permits

2.1. Please include the permit(s) that are the easiest to obtain:

1. __________________________
2. __________________________
3. __________________________

2.2. Please include the permit(s) that are the most difficult to obtain:

1. __________________________
2. __________________________
3. __________________________

3. Responsibilities for permission procedures

3.1. Do you know who is responsible for issuing permits for biogas plants in XXXCountry?

- Yes
- No
- I’m not sure

3.2. Who is responsible for issuing permits for biogas plants in XXXCountry?

- Regional authorities: Who? __________________________
- National authorities: Who? __________________________
- Regional and national authorities: Who? __________________________
4. Experience with responsible authorities

4.1. How was your experience with responsible authorities for biogas projects?
- They were very helpful and cooperative.
- They were not very helpful and cooperative.
- They were very cooperative but could not help further.
- I could not find the responsible person for biogas plants.
- I do not have any experience with the authorities so far.

4.2. Please judge about the following statement:
“The capacity of the authorities (e.g. number of staff, knowledge about biogas and permitting) is very good.”
- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

4.3. Please judge about the following statement:
“The efficiency of the authorities (e.g. time to get feedback, quality of feedback) is very good.”
- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

4.4. How many negotiation meetings did you have with the responsible partners?
Number of negotiation meetings /discussions: _______________

4.5. Is a guideline for the permission process provided by your authority?
- Yes; issued by: _______________
- No

4.6. Please explain your experience with responsible authorities
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
5. Duration of the permission procedure

5.1. If you have already implemented a biogas project:
How long did it take to get a permit?
Number of Month: ________________

5.2. If you have not yet implemented a biogas project:
How long do you assume that it takes to get the permission?
Number of Month: ________________

6. Costs of the permission procedure

6.1. If you have already implemented a biogas project:
How much did it cost you to get a permit?
Euro: __________________________

6.2. If you have not yet implemented a biogas project:
How much do you assume that the costs are to get the permission?
Euro: __________________________

7. Reasons for unfavourable permission procedures

7.1. What are the main problems for permission procedures in XXXCountry?
(You can also choose several options)
- The procedure for obtaining the permit is too long.
- It is not clear which authority is responsible for which permit.
- It is not clear which person at the authority is responsible for biogas projects.
- Too many authorities are involved in the permission process.
- The required information (documents/proofs) for obtaining the permit is too demanding.
- The legal basis for biogas plants is not given.
- There are too many assessments (e.g. environmental impact assessments) required.
  Please specify how many: __________________________
- There are no suitable laws for biogas plants.
- There is no information about the permission procedure for biogas plants in XXCountry available.
- There are no problems regarding the permission procedure in XXXCountry.
- Other: Please describe in 6.2

7.2. Please explain your experience

___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
8. Access to the electricity grid

8.1. Is it difficult to connect a biogas plant to the electricity grid due to non-technical reasons?

☐ No, it is no problem
☐ Yes, it is a problem since it is not regulated by law
☐ It is regulated by law, but it is difficult to connect it due to the following reason:
___________________________________________________________________________
___________________________________________________________________________
☐ I do not know

9. General Issues

9.1. What is your main business?

☐ Biogas project planner
☐ Farmer
☐ Food Industry
☐ Waste Industry
☐ Energy Utility
☐ Other; Please specify: __________________

9.2. Have you already implemented a biogas plant?

☐ No
☐ Yes

9.3. Do you have any other message for responsible authorities and policy makers?
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________

9.4. If you wish, please provide your contact details for further clarifications
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
Thank you for your Contribution to support the Biogas Development in XXXCountry!