



WHITE PAPER · PERMITTING & PROJECT DELIVERY

Europe set the clock. The file is *still national*.

What RED III and the Net-Zero Industry Act changed for energy developers, why a statutory ceiling and a real project duration are still different numbers, and what it takes to close the gap.

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SUBJECT

MitOS, by Ariadne Labs

JURISDICTIONS

Greece · Italy · Switzerland

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IN BRIEF

Six things a developer now has to be able to prove

- **The deadline is real, and it is not yours to start.** The revised Renewable Energy Directive put maximum durations on renewable permitting and required member states to designate acceleration areas where those durations are shorter still. The clock runs from the day the authority holds a complete application, not from the day you file.
- **Strategic projects got their own track.** The Net-Zero Industry Act, Regulation (EU) 2024/1735, did something adjacent for manufacturing and strategic projects: recognition, priority status, bounded procedures.
- **A directive sets an outcome, not a route.** The same technology, in the same year, under the same European instrument, moves through three visibly different machines in Greece, Italy and Switzerland.
- **Transposition does not stand still.** It arrives in tranches, is amended, is corrected in the official gazette on a Tuesday, and applies to projects already in flight.
- **The lost year is rarely the authority’s.** It goes into establishing which regime applies, into completeness rules that live in four documents, into a supplementary request that arrived while someone was on leave. That is an information problem, not a legal one.
- **Which is the problem software can actually solve.** A permitting path derived from the law itself, every requirement cited to its article, every step naming who decides it and the clock that governs it, kept current against the regulators’ own published texts.

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01 · EUROPE SET THE CLOCK

Permitting used to be a matter of patience

It is now a matter of law with a deadline attached, and that changes what a developer has to be able to prove.

The Renewable Energy Directive as revised in 2023 put maximum durations on renewable permitting and required member states to designate acceleration areas where those durations are shorter still. The Net-Zero Industry Act, Regulation (EU) 2024/1735, did something adjacent for manufacturing and strategic projects: recognition, priority status, bounded procedures. Taken together, Brussels stopped asking member states to be faster and started telling them by when.

For anyone developing projects, this is genuinely good news. It is also more complicated than it looks, and the complication is where projects are still lost.

02 · THREE THINGS THE DEADLINE DOES NOT DO

It does not start when you file

It starts when the authority holds a complete application. Completeness is defined nationally, sometimes regionally, and it is the developer's problem. A twelve-month statutory ceiling is not twelve months from your submission; it is twelve months from the day nobody can any longer send the file back.

The single most expensive document in a project is the one nobody realised was missing.

It does not harmonise the procedure

A directive sets an outcome and leaves the route to the member state. The result is that the same technology, in the same year, under the same European instrument, moves through three visibly different machines.

It does not stand still

Transposition is not one event. It arrives in tranches, is amended, is corrected in the official gazette on a Tuesday, and applies to projects already in flight.

03 · THE SAME DIRECTIVE, THREE MACHINES

Three jurisdictions, one European instrument

Greece

Greece transposed through L.5151/2024 (ΦΕΚ Α' 173) and then legislated acceleration areas in L.5299/2026 (ΦΕΚ Α' 67, 5 May 2026). Inside an acceleration area the ambition is explicit: total permitting to the operating licence within twelve months. Outside it, the ordinary Greek sequence still governs, with its own filing windows and its own clocks.

Italy

Italy consolidated in D.Lgs 190/2024, the Testo Unico. Its logic is not a single procedure at all but four, selected by what you are building and how large it is: *attività libera* at the smallest scale, the simplified *PAS* above it, *Autorizzazione Unica* at regional competence for the broad middle, and the state *Autorizzazione Unica* through PAUR for the largest. The regime is not a preference. It is a consequence of the project's own facts, and getting it wrong is not a delay, it is a restart.

Switzerland

Switzerland is outside the Union and worth reading precisely for that reason. The Energy Act (EnG, SR 730.0) Art. 14a gives solar and wind of national interest a concentrated cantonal plan approval: one decision that fixes land use and carries every cantonal and communal permit plus expropriation rights, and the cantonal government decides within 180 days of a complete filing. It is the same idea Europe is reaching for, expressed as one door rather than as a ceiling on many.

GREECE

12 months

to the operating licence, inside
an acceleration area

ITALY

4 regimes

selected by what you build and
how large, not by preference

SWITZERLAND

180 days

for the cantonal decision, from a
complete filing

THE THREE MACHINES, SIDE BY SIDE

	GREECE	ITALY	SWITZERLAND
INSTRUMENT	L.5151/2024 (ΦΕΚ Α ' 173); acceleration areas in L.5299/2026 (ΦΕΚ Α ' 67, 5 May 2026)	D.Lgs 190/2024, the Testo Unico	Energy Act (EnG, SR 730.0) Art. 14a
SHAPE OF THE PROCEDURE	A sequence, with a shorter regime inside acceleration areas and the ordinary sequence outside	Four regimes, selected by technology and size: attività libera, PAS, regional AU, state AU through PAUR	One concentrated cantonal plan approval
STATED CLOCK	Inside an acceleration area: permitting to the operating licence within twelve months	Set per regime by the Testo Unico	180 days from a complete filing, decided by the cantonal government
WHAT ONE DECISION CARRIES	The step it grants, within the national sequence	Depends on the regime the project falls into	Land use, every cantonal and communal permit, and expropriation rights
VALIDITY	Three years for a Final Connection Offer	Per regime	Per decision
CHOOSING WRONG	Wrong filing window, wrong clock	Not a delay. A restart	Federal and cantonal thresholds decide eligibility

Drawn from the national instruments named above. The official publication alone is authoritative; this table is an orientation, not legal advice.

A developer with projects in two of these three is not running one permitting process with local variations. They are running two different bodies of law that happen to share a vocabulary.

04 · WHERE THE TIME ACTUALLY GOES

Ask a permitting manager where a year went

The answer is rarely the authority.

It went into establishing which regime applies. Into assembling a file whose completeness rules live in four documents. Into a supplementary-information request that arrived while someone was on leave, with a clock already running. Into discovering that the environmental study circulating internally was not the version filed. Into a lender asking, at financial close, for evidence that every permit was valid on a given date, and a team opening folders to reconstruct it.

None of that is a legal problem. All of it is an information problem, and it is the reason a statutory ceiling and a real project duration are different numbers.

05 · WHAT WE BUILT, AND WHAT IT DOES

A permitting and project-controls system for energy infrastructure

MitOS, by Ariadne Labs, is live today in Greece, Italy and Switzerland, each on its own law and its own authorities, and it is built to add more.

— The path is derived, not templated.

A project's permitting sequence comes from the law itself. Change one project fact, the technology or the capacity, and the whole path re-derives. Every requirement carries the article it comes from. This is the difference between a checklist that encodes what someone remembered and a route that can be interrogated.

— Every step names who decides it, and the clock that governs it.

Or it states plainly that the law sets no time limit. Silence is not an answer a permitting system should give, because a step with no stated deadline and a step whose deadline nobody entered look identical.

— Legal texts are the official publications.

ΦΕΚ, Gazzetta Ufficiale, Fedlex, frozen with a content hash and re-verified mechanically. The official publication alone is authoritative and MitOS is not legal advice; what the product guarantees is that what you are reading is what was published.

— When the law moves, projects do not move silently.

An in-flight project keeps the legal basis it adopted, sees a reviewable diff of what changed, and adopts the change explicitly, with the amending act cited. Nothing already completed is retroactively unticked. The alternative is a system that quietly rewrites a project's requirements and leaves the team to discover it at a hearing.

— Ninety days of forward view, and a live flag feed.

What is due and what is at risk surfaces while there is still time to act on it, which is the only window in which a permitting risk is still a decision rather than a fact.

06 · THE REST OF THE PROJECT, ON THE SAME RECORD

Permitting does not fail in isolation

So the system does not stop there.

Land.

A parcel register with securing status and live spatial checks against government open data.

Contracts, guarantees and invoices.

Registers with beneficiaries, amounts, VAT and expiry, because a guarantee that lapses unnoticed is a permitting problem wearing a finance costume.

Documents.

Versioned on the step they belong to, with a data room for external parties and an executive binder on demand.

Financing.

Progress, milestones and a full-life model, connected: NPV, IRR, break-evens, debt capacity, so the consequence of a slipped date is visible in the number the board actually asks about.

The portfolio, on one screen.

Every alarm lands on the project that raised it.

Output that is decision-grade.

Status reports, financing memos and evidence packs exported to PDF and Word, generated from live data rather than retyped, each carrying a tamper-evident fingerprint.

It runs as a desktop edition where nothing leaves your machine, or as a cloud workspace for teams. One product, the same engine.

ONE CONTINUOUS LINE, FROM FIRST APPLICATION TO GRID CONNECTION



Every one of them versioned, dated and attributable to the step it belongs to, which is what turns a project archive into evidence.

07 · WHAT IT DOES NOT DO

The honest boundary

It does not file for you, and it does not tell you that a submission will be accepted. It is not legal advice, and it does not replace your lawyer or your consultant. It will not shorten a statutory clock, because nothing can.

What it does is make the path explicit, current and evidenced, so the time a project loses is the time the law actually requires rather than the time an organisation spends finding out what the law requires.

Europe has set the clock. Whether a project meets it is still decided by how well the file is kept.

ABOUT

Ariadne Labs

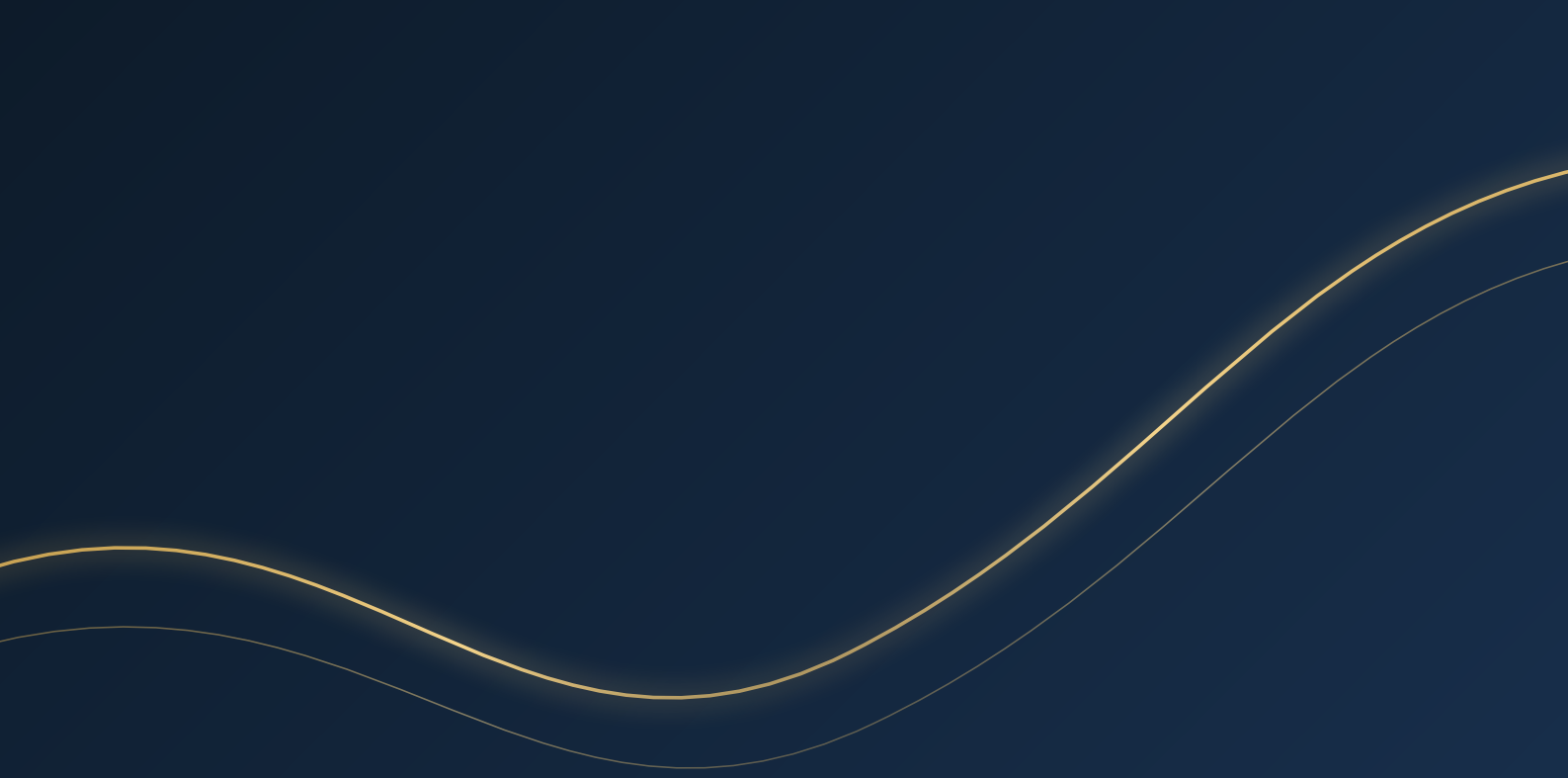
Ariadne Labs is a software company with its roots in the field. MitOS is built on more than twelve years of EPC project controls across combined-cycle power, transmission, pipeline and renewable projects, by people who have lived with the cost of permitting that slips.

MitOS keeps every project on one continuous line from first application to grid connection. Permits, land, contracts, guarantees, documents and financing sit on the same record, so nothing falls between the steps. Greek, Italian and Swiss law are built in from the regulators' own texts, and the product is built to add more.

NOTICE

MitOS is not legal advice and does not replace a lawyer or a permitting consultant. Legal texts referenced in the product are the official publications: ΦΕΚ, Gazzetta Ufficiale, Fedlex. The official publication alone is authoritative.

This paper describes national instruments in substance rather than by citation to every article. Verify against the consolidated text in force on the day you rely on it.



Permitting energy projects is a labyrinth.
MitOS is the thread.

