Study on costs involved in accessing markets cross-border for provision of construction services

Final Report

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Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Directorate E, Modernisation of the Single Market

Unit E1 – Service Policy for Consumers

E-mail: GROW-E1@ec.europa.eu

European Commission
B-1049 Brussels

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ABSTRACT

The aim of the study is to understand the practical experiences of providers of construction services in accessing markets cross-border in other EU Member States and to quantify the associated total cost. The study investigates costs associated with horizontal control schemes and building control procedures. Both the provision of construction services in general and more specific segments of construction works (´installation services´) are included in the analysis. The installation services reviewed include installations involving F-gases, energy-efficiency related installations, electrical installations, installation of elevators, hoisting installations, as well as other installation services.

The inventory of control procedures drew upon two separate sources: a previous study for the general control procedures, and an additional inventory for the installation services. In order to assess the costs involved in complying with all of those administrative formalities, interviews with businesses were conducted to obtain real-life information.

Applying the scenarios for extrapolation, a total annualised administrative costs of cross-border construction services is calculated. Depending on the scenario, the study finds the annual costs of cross-border construction services formalities to vary from EUR 35 million to 1.2 billion per year.

EXECUTIVE SUMMARY

Purpose of the study

The aim of the study is to understand the practical experiences of providers of construction services in accessing markets cross-border in other EU Member States and to quantify the associated total cost. The results of the study will support the Commission in exploring options to help Member States improve administrative engagement for cross-border services.

Scope of the study

The study investigates costs associated with:

- Horizontal control schemes, either for provision of construction services in general or for the provision of more specific segments of construction works, referred to in this study as installation services;and
- Building control procedures.

Construction works covered by this study are limited to the **construction of buildings, with the exclusion of construction of civil engineering infrastructures** (roads, bridges, tunnels, etc.).

A **horizontal scheme** for the purposes of this study concerns control schemes, such as authorisation or notification schemes to access the construction services market, i.e., a control imposed on service providers in order to allow them to start providing construction services in that jurisdiction, unrelated to a specific work in a given location.

Horizontal schemes of that nature pertaining specifically to service providers who are natural persons (self-employed service providers) are out of scope.

Construction services covered in this study as "installation services" are services regarding:

1. *Installations involving F-gases*, like refrigerators, heat pumps and air conditioning (regulated by F-Gas Regulation 517/2014/EU, notably Art.3.4);
2. *Energy-efficiency related installations*, like solar panels, heat pumps, stoves and boilers (regulated by Energy Efficiency Directive 2012/27/EU Art.16.1 and Renewable Energy Directive 2009/28/EU, notably Art. 14.3);
3. *Electrical installations;*
4. *Installation of elevators;*
5. *Hoisting installations;*
6. *Other installation services* for which horizontal control schemes are required, like gas installations, alarm installations, telecom installations or the installation of plumbing/sewage systems, as well as asbestos removal (generically referred to as an installation service for the purposes of this study).

The **building control procedures** covered by this study relate to all controls imposed on service providers regarding a specific work in a given location, i.e. from the submission of building plans until completion of the construction works. Prior controls such as building control procedures and building notices are thus included. Site inspections are included to the extent that they are an integral part of controlling a specific construction work in a given location up until its completion (e.g. up until a completion certificate is issued, if applicable). Controls specifically addressing the use of a building, once completed, are therefore excluded. Control procedures which specifically pertain to the location of the construction work but not to the construction work itself (i.e., separate zoning/location controls) are out of scope.

The study investigates the costs of a **specific group of businesses** characterised as follows:

- The businesses must **operate *cross-border***. This can take place as:

  - *temporary cross-border services,* where a primary establishment (in a home Member State) provides a cross-border service in another Member State (a host Member State) for a limited period of time; or
  - *secondary establishment*, a permanent operation in a (host) Member State (an agency, branch, office or subsidiary) of the primary establishment located in the Member State of origin (the home Member State).
- The business is classified as one of four different types of construction service providers:
  - Building contractors;
  - Installation service providers;
  - Property developers;
  - Providers of building plans/Architecture offices.

The study covers 14 countries: Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Greece, Italy, Netherlands, Poland, Portugal, Slovenia, Spain, and the United Kingdom. From a cross-border perspective, these are "host" countries where the services are provided. The "home" country where the service provider has its primary establishment can be any of the EU28 countries.

Inventory of control schemes

The inventory of control procedures within the scope of this study has 2 separate sources:

- A previous study[1] has identified, described and characterised the associated administrative burden of 2 types of control procedures:
  - Horizontal control schemes for provision of construction services in general[2];
  - Building control procedures.
- An additional inventory has been conducted under this study to identify, describe and characterise the associated administrative burden of horizontal control schemes for the provision of those more specific segments of construction works referred to in this study as installation services (with the exception of the horizontal control scheme for electrical, plumbing, sewer and gas installations in Denmark, included in the previous study).

The main method of data collection for the inventory conducted under this study was online search for information. If online search was insufficient or in case of uncertainty, national authorities were interviewed.

This study found that legislation governing horizontal control schemes for installation services takes very limited consideration of cross-border situations, be they secondary establishments or temporary cross-border provisions, with the exception of F-gas installation controls, for which sector-specific EU legislation is in place.

For all other installation services, in the majority of cases, control schemes are almost identical to those imposed on domestic providers. With some exceptions, no procedures for mutual recognition are in place and even fewer procedures specific for temporary provisions were found[3]. While documents originating from other Member States are accepted in some Member States, others still require local certification of either content or source.

In more general terms and also affecting domestic providers, procedures were found to be, in most cases, overly burdensome, characterised by multiple documents to be submitted, some in certified copy or original format, long decision periods, no tacit approval, limited validity in time and even, in some cases, limited

1 Simplification and mutual recognition on the construction sector under the Services Directive, http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8657&lang=en.

2 This study does not take into consideration the Greek horizontal control scheme inventoried in the previous study (register of building design engineers and construction supervising engineers) – as a procedure focusing specifically on natural persons, it is out of scope of this study.

3 Two notable exceptions are those of electrical/water/sewage/gas installations in Denmark and gas intallations in Portugal, for which specific horizontal controls are in place for temporary cross-border provisions.

territorial validity. Online information on the applicable formalities is often hard to find, generally scarce and predominantly in the local language, while e-procedures are available to a very limited extent.

Assessment of costs

In order to assess the costs involved in complying with all of those administrative formalities, interviews with businesses were conducted to obtain real-life information.

As a rule, two service providers per host country were interviewed. The interviews were done both online and over the phone with the interviewer submitting the answers online afterwards. For some countries, specifically Bulgaria and Greece, less than a handful of cross-border operating construction service providers were identified. Moreover, those service providers identified declined to be interviewed. For this reason, interviews were topped up with domestic service providers to cover specific national costs.

Service providers were asked to quantify different types of costs:

- Staff time spent on formalities;
- Expenses on third parties such as notaries, translators and (language) trainers;
- Fees paid to authorities (administrative charges);
- Resubmission costs (for building control procedures only);
- Other costs which do not fall in the aforementioned categories.

Horizontal control schemes (HCS) – Total costs per procedure

Adding up the costs of several steps in the administrative procedures of the Horizontal Control Schemes (for provision of construction services in general and for installation services) gives the total administrative costs (or burden) of the procedure.

Costs are presented separately according to the following categories:

- Familiarisation and communication about the procedure;
- Getting data and documents;
- Arranging insurance and on-site inspections, paying fees;
- Translating documents;
- Certifying documents;
- Submitting documents.

Table A- HCS for General Construction services - total administrative costs (converted to euros)

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
BG	Registration in Builders' Register	1,600	2,250	1,814	600	0	29	6,293
ES	REA	1,600	3,950	0	250	150	15	5,965
IT	DURC	100	50	0	50	0	15	215
IT	ISO EN 9001:2008	4,000	12,050	0	200	0	29	16,279
PT	Registration at IMPIC	1,600	2,000	1,270	0	0	87	4,957

Legend: Fam. = Familiarisation; Getting data + docs = getting data and documents; INS+INS = Insurance and inspection + fees; Trans = Translation; Cert = Certification; Subm. = Submission costs.

Table B Installation HCS total administrative costs (converted to euros)

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
BG	F-gas certification	100	50	0	50	0	20	220
BG	Asbestos removal	2,400	2,450	64	300	0	87	5,301
CZ	F-gas certification	100	13,150	0	50	0	20	13,320

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
CZ	Electrical and gas installation services	100	50	0	50	150	15	365
CZ	Working with pressure or hoisting equipment	100	50	0	50	150	15	365
DE	F-gas certification	100	50	0	50	150	15	365
DE	Asbestos removal	1,600	3,350	3,200	350	200	34	8,734
DE	Sewage, water and gas installations	100	50	0	50	50	20	270
DK	F-gas certification/ electrical/water/ sewage/gas installations	400	6,275	85	25	174	27	6,986
ES	F-gas certification	800	50	300	0	0	34	1,184
ES	Asbestos removal	800	2,950	1,000	0	200	34	4,984
ES	Electrical installations	2,400	950	1,500	0	50	34	4,934
ES	Installation of elevators	1,600	1,350	2,800	0	200	34	5,984
ES	Installation of alarm systems	2,400	1,850	1,200	1,050	200	34	6,734
ES	Installation of heating equipment	1,600	1,300	1,200	250	200	20	4,570
FI	F-gas certification	100	50	0	50	0	15	215
FI	Installation of elevators	100	0	0	50	0	15	165
FI	Electrical and telecom installations	100	50	0	50	0	15	215
FR	F-gas certification	100	50	0	50	150	20	370
GR	F-gas certification	100	50	0	50	0	20	220
IT	F-gas certification	100	50	0	50	0	20	220
IT	Asbestos removal	3,200	2,450	3,500	300	0	34	9,484
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	2,400	50	168	0	0	87	2,705
NL	F-gas certification	800	1,225	1,750	25	0	27	3,827
NL	Asbestos removal	1,600	2,950	2,400	300	200	29	7,479
PL	F-gas certification	100	50	0	50	0	20	220
PT	F-gas certification	1,600	550	2,500	0	0	20	4,670
PT	Gas installations	1,600	500	2,500	0	0	20	4,620
SI	F-gas certification	100	50	0	50	0	20	220
SI	Asbestos removal	800	450	500	0	0	87	1,837
UK	F-gas certification	100	50	0	50	0	15	215
UK	Asbestos removal	1,600	2,050	6,320	0	0	87	10,057

Legend: Fam. = Familiarisation; Getting data + docs = getting data and documents; INS+INS = Insurance and inspection + fees; Trans = Translation; Cert = Certification; Subm. = Submission costs.

The highest costs are allocated to the Czech Republic F-gas control scheme and the Italian ISO certificate requirement for moderately large private-sector projects, due to very specific requirements – examination of all technicians for the Czech F-gas authorisation and the ISO certification fee for the Italian authorisation respectively.

For other procedures, factors that may cause high costs include:

- Lack of online information, especially if the procedure is complex or non-standard documents are required, for example in Bulgaria and Italy;
- The collection of non-standard documents, for example for asbestos removal control scheme in Bulgaria, Germany, Spain, Italy, the Netherlands and the UK;
- Presence at inspections (including travel time and tickets) for asbestos removal authorisations in Germany, Italy and the UK, F-gas certifications in France and Portugal, hoisting installations in Italy and gas installations in Portugal;

- In addition, control scheme fees are high for asbestos removal in Germany (EUR 2,000) and the UK (EUR 3,820).

Building control procedures – Total costs per project

For building control procedures, the reported costs are on average lower for notifications, light procedures and procedures via the main contractor than for regular procedures as a main contractor going cross-border. Therefore, costs are averaged per country and type of procedure.

Table C Regular building control procedure – administrative costs for cross-border service providers (converted to euros) – allocated and unweighted average for imputation

MS	Cost of time	Fees of authorities	Fees for services	Re-subm. authorities	Re-subm. services	Total
BG	4,220	.	1,000	.	.	.
CZ	4,669	1,188	140	0	130	6,127
DE	3,451	1,000	.	0	0	4,451
DK	928	.	.	.	.	.
ES	8,497	.	.	.	.	.
FI	3,654	600	4,450	600	1,000	10,304
FR	3,190	.	.	.	.	.
GR	8,758	263	165	0	0	9,186
IT	3,437	3,250	.	0	0	6,687
NL	.	.	.	.	.	.
PL	3,654	455	180	0	0	4,289
PT	.	.	.	.	.	.
SI	3,016	2,420	2,000	0	500	7,936
UK	.	.	.	.	.	.
Unweighted average	4,316	1,311	1,323	86	233	7,268

For light procedures or situations where only some documents needed to be submitted to the main contractor, administrative costs are considerably lower than for regular procedures.

Table D Light / notification / via main contractor – administrative costs for cross-border service providers (converted to euros) – allocated and unweighted average for imputation

MS	Cost of time	Fees of authorities	Fees for services	Re-subm. authorities	Re-subm. services	Total
BG	.	.	.	.	.	.
CZ	.	.	.	.	.	.
DE	.	.	.	.	.	.
DK	.	.	.	.	.	.
ES	.	.	.	.	.	.
FI	.	.	.	.	.	.
FR	.	.	.	.	.	.
GR	.	.	.	.	.	.
IT	.	.	.	.	.	.
NL	1,291	0	0	0	0	1,291
PL	2,175	0	1,120	0	0	3,295
PT	0	0	0	0	0	0
SI	.	.	.	.	.	.
UK	1,508	0	0	500	0	2,008
Unweighted average	1,243	0	280	125	0	1,648

Extrapolation to the European Union – future scenarios

The cost of cross-border provision of construction services, including horizontal control schemes and building control procedures, have been extrapolated to the European Union based on future scenarios. The scenarios use numbers of firms providing services in other countries and incurring costs associated with horizontal control schemes only once (by assumption only once in the next ten years). In addition, building control procedures must be gone through on a rolling basis, and are incurred every year in which one or more cross-border construction projects start.

The scenarios used are outlined in Table E.

Table E Scenario's for cost calculations

Scenario	HCS		Building controls	
	# of firms	offering services # countries	# of firms	starting # cross-border projects / year
Scenario 1	1%	1	1%	1
Scenario 2	1%	10	1%	2
Scenario 3	10%	10	10%	3

In order toalign one-off costs of control schemes and yearly or project-based administrative costs of building control procedures, the administrative costs of horizontal control schemes are annualised, assuming they take place once in the next ten years.

Applying the scenarios for extrapolation, a total annualised administrative costs of cross-border construction services is calculated.

Table E Estimated total annualised aggregate administrative costs of cross-border construction services in 14 EU countries, three scenarios, in EUR million

Scenario	HCS	Building controls	Total
Scenario 1	2.9	31.7	34.7
Scenario 2	29.5	317.3	346.7
Scenario 3	295.1	951.8	1246.9

The annual costs of cross-border construction services formalities thus vary from EUR 35 million to 1.2 billion per year. This may seem modest at the level of the 14 countries covered by this study. However, over a period of ten years, the total costs run into hundreds of millions up to several billion euro. Discounted at an annual interest rate of 4 per cent, the annual value of EUR 1,246 million in the third scenario over a period of 10 years is equivalent to a net present value of EUR 10.1 billion.

1. INTRODUCTION

1.1. Aim of the study

This study is a follow-up to previous assessments which have found evidence of administrative burden and obstacles faced by service providers active in the EU internal market of construction services (temporary cross-border service provision and secondary establishment by setting-up branches and agencies). It presents a follow-up of the study "Simplification and mutual recognition in the construction sector under the Services Directive".[4]

The study aims to understand the practical experiences of providers of construction services in accessing markets cross-border in other EU Member States. The main objectives[5] are to:

- Better understand service providers' practical experiences and the effort required by them to complete these formalities;
- Quantify the associated total cost.

The results of the study will support the European Commission in exploring options to help Member States improve administrative engagement for cross-border services.

1.2. Definitions and scope

Types of procedures covered by the study

Several types of control procedures have been the subject of investigation.

The following two inventories have been studied in a previous study:[6]

- Horizontal control schemes of construction service provisions in general, i.e., not related to more specific installation services (inventory done in previous study[7]);
- Building control procedures (inventory done in previous study).

A horizontal control scheme for the purposes of this study concerns control schemes (authorisation[8] or notification schemes) of legal persons (companies, not professionals as natural persons) to access the market of certain construction services (i.e. irrespective of a concrete construction work in a given location):

- The construction in general of residential and non-residential buildings;
- Installation services (in residential and non-residential buildings – not covering civil engineering infrastructures).

Provision of certification services by (often accredited) certifying bodies (supply-side) are excluded (although certification may be relevant from the demand-side, if the horizontal control scheme in question is a certification and thus the competent authority is a certifying body).

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4 http://ec.europa.eu/growth/single-market/services/construction/index_en.htm.

5 The study was also launched in the context of the Commission's proposal for a European services e-card.

6 Simplification and mutual recognition on the construction sector under the Services Directive, http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8657&lang=en.

7 The previous study nevertheless covered a horizontal authorisation scheme applicable in Denmark to installation services of electrical, gas, plumbing and sewerage.

8 As under the Services Directive, an "authorisation scheme" for the purpose of this study means any procedure under which a provider or recipient is in effect required to take steps in order to obtain from a competent authority a formal decision, or an implied decision, concerning access to a service activity or the exercise thereof. It implies therefore an action by either the service provider or the service recipient and a subsequent reaction, actual or presumed, from a competent authority, without which the service activity may not legally start or continue.

Access of, for example, architectural firms or project development companies to the construction-related activities such as the activity of submission of building plans (irrespective of controls for the submission of specific building plans regarding a specific location/project) are out of scope of this study. Control schemes for architectural firms are covered in another study.[9] Regulation of professionals and of employment regulations as such, are out of scope.

Building control procedures relate to control of building plans until completion of construction works (building control procedures and building notices[10]). Separate zoning plan procedures (location control procedures) are out of scope. Site inspections after the building permits are issued are included to the extent they are an integral part of the construction approval (from beginning to end of construction works), but random inspections are not. A final inspection before officially signing-off is also included. Requirements and controls on use of a building, once finished, not related to construction work are excluded, as are requirements and controls specifically aimed at governing waste management.

Building control procedures are also limited to the construction of a single residential dwelling or office building, and possibly other private-sector buildings such as a single shop, warehouse or data centre. The main reason for excluding other types of buildings (factories, hospitals, airports) is to avoid contamination of common costs of building control procedures with costs specific to more complex procedures designed to control the construction of more complex buildings. Furthermore often the construction of these more complex buildings (such as hospitals, universities, stadiums and other "public" or "public-interest" buildings) entail public procurement requirements, which are out of scope.

This study extends the inventory of horizontal control schemes of the previous study to installation services[11]. These horizontal control schemes[12] concern six different groups of specialised types of installations:

1. *Installations involving F-gases* as regulated by F-Gas Regulation 517/2014/EU, notably Art.3.4. Here, one can think of refrigerators, heat pumps and air conditioning;
2. *Energy-efficiency related installations* as regulated by Energy Efficiency Directive 2012/27/EU, notably Art.16.1 and Renewable Energy Directive 2009/28/EU, notably Art. 14.3). Here, one can think of the installation of solar panels, heat pumps, stoves and boilers;
3. *Electrical installations* (Member States have regulatory space to regulate since EU legislation specifically referring to electrical installations covers only the products themselves);
4. *Installation of elevators* (Member States have regulatory space to regulate since EU legislation specifically referring to lifts covers only the products themselves);
5. *Hoisting installations* (Member States have regulatory space to regulate since EU legislation specifically referring to hoisting installations covers only the products themselves);
6. *Other installation services* for which horizontal control schemes are required. Here, one can think of gas installations, alarm installations or the installation of plumbing/sewage systems and asbestos removal[13], for example.

Types of businesses

This research investigates the costs of a specific group of businesses characterised as follows:

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9 Administrative formalities and costs involved in accessing markets cross-border for provisions of accountancy, engineering and architecture services, http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=9165&lang=en.

10 As in the previous study, "building permit" means the authorisation scheme which ultimately allows for the construction work of a certain building, its renovation as well as an engineering work to take place in a given location, excluding public works - a "public work" means the execution, or both design and execution, of a work by or for the State, regional or local authorities, bodies governed by public law or associations formed by one or more such authorities or one or more such bodies governed by public law. "building notice" means a declaration in advance for the same purpose.

11 The previous study nevertheless covered a horizontal authorisation scheme applicable in Denmark to installation services of electrical, gas, plumbing and sewerage, which this study also takes into consideration.

12 Please note that these schemes do not include the certification of products but only the use of products in the construction process.

13 Asbestos removal is classified (although improperly) under "installation services" for the purposes of this study, for ease of reference, given that it is one of the few specialised construction services (including refurbishment/renovation) which does not normally involve equipment (installation) to be integrated in the construction work product in question but still is subject to activity-specific horizontal control schemes.

- The businesses must operate *cross-border*. This implies some economic activities of the operating entity must take place in a different Member State than the primary establishment's home country;
- The business is classified as one of four different types of construction service providers:
  - *Building contractors*. The notion of a building contractor refers to the person or company initiating, planning, executing, controlling, and/or closing the construction, reconstruction and maintenance of buildings;
  - *Installation service providers*. This refers to contractors that offer execute the construction of installation services (listed in the previous page) in buildings;
  - *Property developers*. Property developers, for the purposes of this study, are economic operators involved in the purchase of raw land and the sale of developed land or parcels to others, after construction activities take place on the land in question through hiring of building contractors to deliver a product (ultimately the building in question)[14];
  - *Architecture/engineering offices*. Architecture (and in some cases engineering) typically refers to the design of buildings. Although not a construction service providers in itself, in a few countries the supervision of construction works is also reserved for architects and/or engineers.

Modes of cross-border services

The study covers two different modes of cross-border services. Firstly, temporary cross-border services where a primary establishment (in a home Member State) provides a cross-border service in another Member State (a host Member State) for a limited period of time. Secondly, operations conducted by a secondary establishment in another Member State (the host Member State). Here, a secondary establishment is a permanent operation (through an agency, branch, office or subsidiary located in the host Member State) of the primary establishment located in the home Member State.

Country coverage

The study covers 14 countries: Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Greece, Italy, Netherlands, Poland, Portugal, Slovenia, Spain, and the United Kingdom. From a cross-border perspective, these are "host" countries where the services are provided. The "home" country where the service provider has its primary establishment can be any of the EU28 countries.

For four countries a particular region has been the main subject of the investigation: England (United Kingdom), Madrid (Spain), Milan (Italy) and Nordrhein-Westfalen (Germany). These regions have been chosen because the legislation on horizontal control schemes and/or the building codes from which building control schemes derive, varies between regions[15]. The choice for these specific regions was mainly done based on the larger relative size of these regions in the context of the Member State in question.

[14] Some developers are themselves involved, at least partially, in the construction process, as building contractors.

[15] In other Member States legislation on horizontal controls schemes is, in most cases, national, and variations of building control schemes at local level stem from a common national-level building code.

2. METHODOLOGY

2.1. Overview

In order to assess the costs involved with administrative formalities of control schemes to provide construction services, **inventories** were recovered from a previous study or prepared anew in this study, followed by a **survey** in which businesses were interviewed about the associated costs. The results of the survey then allowed for an **analysis of the associated costs**, as reported, and an **extrapolation of those costs**.

Inventory

For horizontal control schemes of construction services in general and for building control procedures as defined in the previous chapter, an inventory is already available in a previous study (which also assessed the relative administrative complexity of those procedures according to indicators of procedural restrictiveness).[16] This study presents again, in a summarised manner, the inventory of formalities in horizontal control schemes for construction services in general, and in building control schemes, as well as, in more detail, the inventories of the horizontal control schemes of installation services This inventory regarding installation services was done by local researchers who were asked to search for horizontal control schemes of specific activities:

- Installations involving F-gases;
- Energy-efficiency related installations (e.g. solar panels and boilers);
- Electrical installations;
- Installation of elevators;
- Use of hoisting equipment;
- Water, sewage, gas, telecom, alarm and possibly other installations;
- Removal of asbestos.

Identification and characterisation of the control procedures includes:

- name and subject matter;
- territorial scope (not relevant for building control schemes);
- time validity and renewal procedure (not relevant for building control schemes);
- number of authorities involved;
- number of administrative procedures (building control procedures only);
- handling deadlines for authorities;
- provision for tacit approval;
- provisions for mutual recognition;
- fees/administrative charges;
- number and categories of documents required;
- form of documents (simple copies/certification demands/cross-border acceptance);
- translation demands.

Characterisation of associated administrative burden to the control procedures refers to:

- availability of online information;
- availability of information in English;
- availability of e-procedures.

[16] Simplification and mutual recognition …, ibid.

Tables summarising the findings of the previous study regarding the control procedures assessed therein are included in Chapter 3 of this study for ease of reference.

Findings of this study on the installation control procedures it covers are outlined in Chapter 4. For this inventory, country researchers were asked to explore possible sources on administrative requirement such as:

- National databases of legislation[17];
- Transpositions/implementations of EU Directives/Regulations providing minimum requirements;
- Websites of national associations of building companies and installation services.

National authorities were interviewed if an online search was insufficient or in case of uncertainty. For instance, in case of the Czech Republic, a spokesman of the relevant ministry has been approached for more information on the regulations concerning control schemes for service activities and in the case of Portugal confirmation was obtained from telecom authorities and other authorities about the (non) applicability of horizontal control schemes to companies providing installation services. All in all, information about schemes regarding installation services is very difficult to obtain and understand. It is very likely that this study was therefore unable to identify several of these procedures for several Member States even though they do exist in practice.

In order to efficiently collect the relevant information, it was determined in advance which data about procedures and formalities needed to be filled in, such as (see further Section 2.2):

- Type of procedure and procedural steps;
- Time validity / renewal requirements;
- Document requirements;
- Mutual recognition[18] provisions;
- Fees;
- Deadlines.

Survey

For the business interviews, two service providers per host country were interviewed. The interviews were done both online and over the phone with the interviewer filling in the answers online afterwards. Businesses were identified by using many sources including:

- The Amadeus database of companies including cross-border establishments in the sectors construction of residential and non-residential buildings, building project development and architecture;
- The TED online database of public procurements. Although public procurement requirements are out of scope of this study, the idea is that companies active in other EU countries in public sector construction, might also be active in private sector construction in the same countries;
- Members of bilateral chambers of commerce which are active in the construction sector, e.g. grossbritannien.ahk.de/en/ and many others;
- Websites of national associations of building companies and installation services which may include news on members that are active in other EU countries;
- A register of foreign companies active in the host country (Denmark only: www.virk.dk);

[17] Such as the Points of Single Contact, put in place in accordance with Article 7 of the Services Directive (2006/123/EC).

[18] In broad terms, meaning the consideration of controls and conditions to which the service providers were previously subjected in another Member State, in order to ascertain which of the generally applicable conditions and controls remain necessary and proportionate to impose upon such providers. It can range from a country of origin approach (the control in the home Member State suffices) to an equivalence assessment, whereby proof of attaining certain public interests is only needed for requirements that are different in the home country. It does not include, however, rules on acceptance of documents in terms of their format, such as demands of certification or translation (notably of documents originating in another Member State) – these are categorised under "document requirements".

- Own search of the national researcher among their personal network and national sector representatives.

There is nevertheless no comprehensive source of information describing cross-border service providers in construction. This also explains why for some countries, specifically Bulgaria and Greece, less than a handful of cross-border operating construction service providers were identified and they declined to be interviewed. For this reason, interviews were topped up with domestic service providers to cover specific national costs. In those cases, information on specific cross-border costs such as for example translation and travel was estimated based on requirements in the host country (e.g. submission of documents in person) and data on costs from other host countries with similar requirements.

The survey results are presented in Chapter 5, in different ways for horizontal control schemes and building control procedures. For horizontal control schemes, national requirements usually apply and the costs of one or two respondents may be considered as indicative of the costs of all other cross-border construction service providers, since they face exactly the same requirements.

For horizontal control schemes, the presentation of reported costs is integrated with indicators of administrative burden regarding formalities required and absence of tools to make formalities easier. This is done to lay the ground for the allocation of costs to administrative requirements in Chapter 6. An indicator of an administrative requirement is for example:

- 1 = absence of online information about the procedure;
- 0 = availability of online information about the procedure.

For building control procedures, the building code is determined at the national level in many countries, however local authorities may have their own administrative requirements on top of national requirements, or may reduce the administrative burden for companies by collecting certain documents themselves on behalf of the applicant. In addition, the administrative costs are different for each construction project, depending on, for example, how many materials are used; or how many buildings are constructed which influences the time to document the planning of activities. As a result, the costs reported for building control procedures cannot be seen as representative for all businesses and cannot even be linked to national requirements, as the local requirements may be different. To make reported costs somewhat comparable between countries, respondents were asked about the type of construction project and building control procedure. Nevertheless, reported administrative costs for building control procedures must be seen as indicative examples.

Analysis of costs

In Chapter 6, regarding horizontal control schemes, price labels are tagged to the indicators of administrative requirements. This is done in such a way that these price labels result on average in the reported costs. This approach ensures that identical requirements result in identical costs and are not influenced by differences in administrative efficiency between respondents. For example, consider a company in Salzburg and a company in Madrid offering the same services in Munich and facing the same administrative formalities. Depending on whether the Austrian or the Spanish company is interviewed, reported translation and travel costs would be very low or quite high. Tagging price labels to requirements ensures consistency of costs related to requirements between host countries.

In Chapter 6, reported administrative costs for building control procedures are averaged per host country and type of building control procedure.

Extrapolation of costs

In Chapter 7, the administrative costs of procedures are extrapolated to the business population according to three scenarios of the future. One reason for future scenarios is that, at least for horizontal control schemes, the costs of operators currently active in other EU countries have been incurred in the past (apart from renewal costs, if any). The cost savings of reducing administrative formalities would only be achieved for

companies newly entering the market of the other EU countries in the future. A second more pragmatic reason is that the exact current number of cross-border operating firms is unknown.

The analysis of Chapters 5-7 is described in more detail in Sections 2.4 and 2.5.

2.2. Inventory of installation service horizontal control schemes (Chapter 4)

A template was developed for the inventory of administrative requirements for horizontal control schemes of installation services, in order to efficiently collect the relevant information. This template is used to collect information on horizontal control scheme procedures for specific installation services in all countries covered by this study. For Denmark, information from the previous study on the procedure for authorisation of electrical, plumbing, sewer and gas installation was put in the new template of this study. In addition, the template of this study was used to collect information on procedures for other installation services in Denmark.

For national requirements of building control procedures, an inventory was made in the same previous study mentioned above, and not repeated in this study.

The template for the horizontal control schemes of installation services consists of sixteen main questions and twenty six sub questions which applicability depends on the main questions.

Questions one to five inquire whether the relevant service activities are separately regulated and, if necessary, which legal / natural persons need it and the source of the information.

Questions six and seven inquire, if necessary, for the particular characteristics of the respective control scheme. For example: is it valid in the whole territory of the Member State?

Question eight to thirteen concern the process of obtaining the authorisation. Number of entities involved, required documents, mode of submission and language are among some of the most relevant topics.

The remaining questions concern the possible mutual recognition of the authorisations, fees and applicable deadlines.

The full template for the inventory of installation service horizontal control schemes is given in Annex A.

2.3. Business survey (Chapter 5)

Identification of cross-border providers

Table 2.1 gives an overview of the number of cross-border operating building contractors and developers that were identified, in the broader segment of building construction ("residential and non-residential construction") and for entire countries (rather than e.g. Nordrhein-Westfalen, Milan or Madrid). Additional screening has further reduced the number of suitable contractors. Ferrovial in Spain, for example, is active throughout Europe but construction activities are limited to the construction of transport hubs, airports and stadiums. The pre-identified companies have been allocated to country researchers. They were asked to complement the list via national associations, their own network and through desk research of their own. They have been instructed to consult the core team before interviewing companies from their country operating in other EU countries. The underlying rationale is twofold. Firstly, they need a specific questionnaire link for that company. Secondly, and more importantly, the core team needs to coordinate the cross-border interviews to ensure at least two interviews per host country are being executed. Table 2.1 gives an overview of the numbers of identified cross-border construction service providers from other EU and EEA countries. For five countries less than 25 relevant companies could be identified: Bulgaria (6), the Czech Republic (9), Slovenia (15), Finland (20) and Greece (23). For these countries additional desk research was done, mostly browsing websites of bilateral chambers of commerce, to find additional cross-border service providers.

Not all of the identified companies proved to be relevant. The main reason is that quite a few building companies in the EU:

- Are active in other EU countries in the construction of roads, subway stations and other construction activities out of scope;
- Are active in the construction of residential and office buildings in their own country and outside Europe (e.g. Israel, Abu Dhabi, Morocco);
- But are *not* active in the construction of residential and office buildings in other EU countries.

Another reason was that some companies registered as construction service providers and operating cross-border specialise in activities that do not require building permits, for example interior design, door or window building.

Table 2.1 Numbers of identified cross-border construction service providers *)

Host	Home countries			
Country	**Previous study**	**Desk res.**	**Amadeus**	**TED**
BG: 6	0	3 a.	3 arch.: ES 1, SE 1, UK 1	0
CZ: 9	FI 1	39 b.	0	DE 1, FI 1, FR 1, SK 1 arch. AT 1, FR 2, UK 1
SI: 15	0	2 through country researcher relations	11 builders IT 3, AT2, DE 2, HR 2, ES 1, RO1, 1 developer: SE	AT 1
FI: 20	CZ 1	6 c.	9 builders EE 4, DE 1, LT 1, NL 1, PT 1, SE 1 2 developers DK1 SE 1, 2 arch.: SE 2	EE 1
EL: 23	0	7 d.	13 builders: IT 10, CY 1, DE 1, ES 1 3 developers: DK 1, UK 2	0
DK: 25+	ES 1	< 300 e.	14 builders: DE 3, ES 3, SE 3, FI 1, LT 1, LV 1, NL 1, UK 1 3 developers: BE 1, IT 1, UK 1, 3 arch.: SE 3	4 arch.: DE 2, HR 1, SI 1
ES: 30	DK 1, PL 1	--	27 (IT 7, PT 6, FR 4, BE 3)	FR 1
UK: 37	DK 1, FR 1,	--	27 (IE 10, IT 4, ES 3, DE 2, NL 2, PT 2)	IE 4, DE 3, BE 1
PT: 44	0	2 through country researcher relations	42 (ES 32, FR 4, IT 3)	0
NL: 45	0	--	38 (8 UK, 7 BE, 6 IT, 5 ES, 3 AT)	DE 5, BE 1, UK 1
PL: 46	CZ 1, ES 1	2 through country researcher relations	34 (ES 15, IT 5, DE 4, BE 3)	ES 5, DE 4, EE 1
IT: 49	DE1, ES 1	2 through country researcher relations	17 builders: BE 4, RO 4, DE 2, IE 2, AT 1, ES 1, FR 1, LT 1, PL 1 22 developers: UK 5, BE 3, DE 3, NL 3, PT 3, AT 2, FR 2, ES 1, 4 arch: UK 4	4 arch.: UK 2, ES 1, FR 1
FR: 67	0	--	42 (BE 11, IT 10, ES 8, PT 7, UK 3)	25 (BE 6, DE 5, IT 5)
DE: 94	CZ 1, DK 1, NL 2, PT 1, ES 1	--	37 (AT 6, NL 5, IT 4, PL 4, ES 3, LU 3)	51 (AT 26, PL 6, IT 5, NL 4, ES 3)

*) If numbers are in brackets, the selection of other EU countries where most companies come from.
a. BG: 1 in http://bulgarien.ahk.de/mitglieder/mitgliederverzeichnis/, 1 in www.bg-nl.com/members.html, 1 through country researcher relations, 0 from other bilateral trade chambers (e.g. UK, RO or GR).
b. CZ: 38 (exclusive from Slovakia) in www.cka.cz/cs/svet-architektury/seznam-architektu (natural person architects), 1 through country researcher relations.
c. FI: 1 in www.yrityssuomi.fi/en/asiantuntijaprofiili/ and 6 in www.dfhk.fi/mitgliedschaft/firmen-und-mitgliederportal/unternehmensliste.
d. GR: 5 in http://griechenland.ahk.de/mitglieder/mitgliederverzeichnis and 2 in www.bhcc.gr/membership/join-bhcc/become-a-member/.
e. DK: 14 in https://arkitektforeningen.dk/find-arkitekt-liste/, 307 in www.virk.dk (exclusive c/o German-Danish Trade Chamber) but this includes temporary services going all the way back to 1993.

Since for some host countries the number of identified construction services providers from other countries is very small, specifically in Bulgaria, the Czech Republic, Slovenia, Finland, Greece, Denmark and Italy, and most construction services providers declined to participate in the survey, domestic construction service providers were interviewed as a means of last resort. There was no need to pre-identify domestic service providers as they were easy to identify for the national researchers.

Business responses

In total, 28 interviews have been fully completed, of which 27 interviews included data on costs (Table 2.2). These interviews were held with 15 cross-border service providers and 12 domestic service providers, mostly in countries where particularly few service providers from other EU countries were identified (Bulgaria, Finland, Greece, Slovenia) but also for France (2) and Italy (1). For Bulgaria four interviews have been completed, while for Denmark, Germany and Spain one instead of two interviews have been completed.

The business survey covers only six respondents who reported about horizontal control schemes. The domestic service providers that we interviewed were established for longer than five years and thus did not go through an control scheme procedure in the past five years.

Only four countries have control scheme procedures for construction services in general: Bulgaria, Italy, Spain and Portugal. The previous study also referred to legislation in preparation for a new national control scheme procedure in Greece. The requirements went beyond professional qualifications and could have been relevant if they had become applicable to managers and/or shareholders (even if they do not provide the services). However, the requirements have become applicable to professionals providing the services only. Hence, we now know that the control scheme does not apply to legal persons and therefore not further considered in this study. These horizontal control scheme procedures are covered for Italy and Portugal by one and two interviews respectively.

For building control procedures, all countries of the study are covered by at least one interview, although only for domestic firms for France and three countries where cross-border activity of companies from other EU countries is minimal: Bulgaria, Finland and Greece.

Table 2.2 Coverage of countries at the time of the analysis including later interview (both domestic and cross-border operating businesses)

	Cross-border		Domestic	
Host country	**HCS**	**Building control procedures**	**HCS**	**Building control procedures**
BG	--	--	--	4
CZ	1	2	--	--
DE	--	1	--	--
DK	--	1	--	--
ES	--	1	--	--
FI	--	--	--	2
FR	--	--	--	2
GR	--	--	--	2
IT	--	1	1	1
NL	--	2	--	--
PL	1	2	--	--
PT	2	2	--	--
SI	--	1	1	1
UK	--	2	--	--
Total	**4**	**15**	**2**	**12**

Business questionnaire

Businesses were interviewed in order to gather information about the costs of administrative procedures. To facilitate these interviews, a questionnaire was developed which covers both horizontal control schemes (HCS) and building control procedures. The questionnaire consists of six sections:

- Introduction;
- General information on company cross-border operations;
- Information about the HCS procedures the company has gone through;
- Data on costs of going through HCS procedures;
- Information about the construction project and building control procedure the company has gone through;
- Data on costs of going through building control procedures.

The introduction consists of a rather brief introduction into the topic. It also includes assurances of anonymity and non-commercial use only. Finally it includes an indicative maximum time needed to complete the survey. Based on Ecorys' historical experience, companies typically start to refuse interviews which take longer than 20 minutes. Hence, 20 minutes is used a guideline for the development of the questionnaire. In reality, response times varied between 14 minutes and one hour.

General company information is asked to differentiate between costs for various types of companies. Most general company information will be known in advance for most companies, e.g. activity of the company and countries in which they are active. Some additional questions were needed for this study, like:

- What cross-border services they have been involved in;
- Mode of cross-border services (via temporary provision or via secondary establishment and whether they work as a main or sub-contractor);
- Which authorisations were needed for the services that have been provided by the business.

In order to apply the standard cost model for making an estimation of the total costs of control schemes, a series of questions targeted on the authorisation procedure was included, like:

- Depending on which control schemes and which host country the service provider is operating, the respondent is asked to check which documents had to be submitted and which formalities were needed in order to obtain those;
- The number of hours that the company spent on identification, collection and submission of data and or documents for all authorisations and notifications combined;
- Total costs of requesting, collecting and submitting documents for all authorisations and notifications combined;
- The mode of submission of documents in order to obtain autorisation;
- Additionally, the questionnaire covers particularly burdensome documents, procedures or steps.

The last segment of the questionnaire focusses on the costs of building control procedures. The following list of topics is included in the questionnaire:

- The existence and possible costs of preliminary contracts with third parties needed to obtain the requested authorisation;
- Types of data or documents that have been submitted together with their costs;
- Additional services that have to be requested or purchased and their costs;
- The mode of submission of documents;
- Possible resubmission costs due to presentation formalities;
- Additionally, the questionnaire covers particularly burdensome documents, procedures or steps.

The full business questionnaire is given in Annex B. In a later stage of the questionnaire was adapted into another questionnaire for domestic businesses, intended for countries such as Bulgaria, Finland, Greece and Slovenia for which notably few cross-border operating companies from other EU Member States were identified, but in the end also used to interview domestic businesses in France and Italy.

2.4. Analysis of costs (Chapter 6)

General calculation of costs

Service providers were asked to quantify different types of costs, such as:

- Staff time spent on formalities;
- Expenses on third parties such as notaries, translators and (language) trainers;
- Fees of authorities;
- Resubmission costs (building permit procedures only);
- Other costs which do not fall in the aforementioned categories.

The first type of cost is expressed in a money equivalent by multiplying the hours involved with the relevant wage rates of different staff involved. The relevant wage rates were based on a mix of interview results and Eurostat data.

Horizontal control schemes

For horizontal control schemes, total costs of various activities to comply with administrative requirements were linked to individual administrative requirements:

- Familiarisation with and communication about the procedure;
- Getting data and documents;
- Arranging insurance and on-site inspections;
- Translating and certifying documents;
- Paying fees and submitting documents.

The estimation of expenses on third parties was based on interview results, but sometimes standard rates based on internet research were used as well. For example, service providers were only asked about total costs charged by translators if any, not about translation costs per document. Hence, translation costs were estimated based on a mix of (1) interview results and (2) translation costs per word times the number of words in typical types of documents. The interview results were used to adjust the assumed number of words per type of document to make the calculated translation costs consistent with the reported translation costs.

For horizontal control schemes, the official (national) fee rates from the inventories were used, however a response from Poland helped assess the costs of inspection fees for other countries where certification is provided by an commercial accredited certification service provider.

For horizontal control schemes, in most countries a national administrative procedure applies, or the procedure of the specific region is chosen (Nordrhein-Westfalen in Germany, Milan in Italy, Madrid in Spain, and England). For horizontal control schemes, the administrative requirements are known from the inventories, for installation services in this report and for general construction activities from the previous study.[19]

[19] Simplification and mutual recognition… Ibid.

In Chapter 5, the administrative requirements are summarised in the form of indicators and in Chapter 6 price labels are tagged to administrative requirements in such a way that they result on average in the reported costs.

The following requirements are assumed to influence costs, with higher numbers indicating a greater degree of complexity:

- Complexity to familiarise with the procedure:
  - Availability of online information: 0 = yes, 0.5 = partially, 1 = not;
  - Information in English: 0 = yes, 0.5 = partially, 1 = not;
  - Non-standard documents required: 0 = no, 1 = yes;
  - Number of authorities involved in the procedure;
  - On-site inspections required: 0 = no, 0.5 = varies, 1 = yes;
  - Mutual recognition:
    - 1 = Notification / requirement to show home Member State certificate at any time;
    - 2 = Authorisation with equivalence assessment for some requirements with procedure and examples (other requirements accepted as per country of origin);
    - 3 = Authorisation with equivalence assessment for some requirements with procedure and no examples (other requirements accepted as per country of origin);
    - 4 = Authorisation with equivalence assessment for some requirements with no procedure (other requirements accepted as per country of origin);
    - 5 = Authorisation with equivalence assessment for all requirements with procedure and examples;
    - 6 = Authorisation with equivalence assessment for all requirements with procedure and no examples;
    - 7 = Authorisation with equivalence assessment for all requirements with no procedure;
    - 8 = Authorisation with recognition of certificates issued by recognised certification providers (under a complex and costly procedure);
    - 9 = No Mutual Recognition.
  - Weight: 1 = for all other EU countries, 0.5 = for some EU countries.
- Obtaining data and documents, translations and certifications:
  - Cost to get data, documents and translations: 21 categories of documents;
  - Certification costs: three types of typical certification service providers for the above categories of documents.
- Insurance and inspections:
  - 0 = not required, 0.5 = varies, 1 = required.
- Electronic procedure:
  - General: 1 = full electronic handling, 2 = partial electronic intake, 3 = only downloadable forms, 4 = no electronic procedure.
- E-identification: 0 = none, 1 = e-signature required, 2 = e-ID required.

Regarding the procedure/mutual recognition, the score "0" means country of origin, i.e., that service providers from other EU countries are automatically assumed to be authorised and no further check is done. Some countries require service providers from other EU countries to notify them that they offer services in the host country and in others service providers from other EU countries can start providing services straight away. Some countries require service providers from other EU countries to apply for horizontal authorisation, and the authorities assess whether the proof submitted or the authorisation in the home country as a whole is equivalent to the proof required in the host country. The most complex situation is that service providers from other EU countries must go through the same procedure as domestic service providers (even if they are authorised in the home country). Some countries automatically accept authorisation of service providers from some other EU countries as equivalent but assess equivalence of submitted proof for service providers from other EU countries. In these cases, a weight of 0.5 is applied to the costs associated with equivalence assessment.

Tacit approval and length of the procedure are not included in the calculation of costs. While there may be business costs associated with the delay in obtaining authorisation, no additional administrative costs are made by the applicant during the waiting time.

The other factors listed above that contribute to the complexity of administrative requirements and the associated costs, speak for themselves and are more fully described in Chapter 5, with associated costs in Chapter 6.

Building control procedures

For building control procedures, the hours, costs and fees reported by cross-border services providers were used directly. For building control procedure fees, the reason is that the amount often depends on the construction value so there is no fixed amount that can be applied.

Because administrative costs (e.g. the number of documents for materials used, the number of planning documents) depend in part on the complexity of the project, a distinction has been made between "normal" and "complex" construction projects. A normal construction project is defined as the construction of a single residential dwelling or office building. A complex construction project is defined as the construction of multiple residential dwellings, office buildings or a mix of those. For certain administrative activities, much higher costs are reported for complex than for normal project. In order to bring administrative costs of complex construction projects "on par" with those of normal construction projects and make comparisons between countries somewhat meaningful, the costs of those specific administrative activities are divided by 10. The specific assumptions are documented in Chapters 5 and 6.

In some cases resubmission was required due to presentation formalities including, but not limited to, scale of drawings, symbols used in drawings, missing stamps and measurement units in technical plans. As for other activities, hours and costs of re-submitting the documents have been reported.

2.5. Extrapolation of costs (Chapter 7)

General: use of future scenarios

Since the current volume of cross-border activity in the specific segment of construction of residential and office buildings is not fully known, and also because potential costs incurred in the future are more relevant than costs sunk in the past, future scenarios are used. The base scenario is likely closest to the current scenario, with two other scenarios assuming increasing cross-border activity in the future.

For horizontal control schemes, the scenarios are based on numbers of firms providing services in other countries and incurring authorisation costs only once (by assumption only once in the next ten years). In addition, building control procedures must be gone through on a rolling basis, and are incurred every year in which one or more cross-border construction projects start.

The scenarios used are outlined in Table 2.3.

Table 2.3 Scenario's for cost calculations

Scenario	Firms seeking permission for cross-border service provision		Building control procedures	
	# of firms	offering services in # countries	# of firms	starting # cross-border projects / year
Scenario 1	1%	1	1%	1
Scenario 2	1%	10	1%	2
Scenario 3	10%	10	10%	3

In addition, we assume that each cross-border project involves the construction of one building. In reality construction projects may involve multiple dwellings or offices with higher associated administrative costs of building control procedures, if only because more planning documents must be submitted and the planning of activities takes more time to arrange. However, only the lower administrative costs of the building control

procedure for one single building is extrapolated, since higher costs would be more project-related than procedure-related.

Horizontal control schemes

In countries where horizontal authorisations are needed for general construction services, all companies offering services in that country must go through the authorisation procedure. However authorisations to provide specific installation services only apply to companies offering those specific installation services. Because the number of cross-border service providers is unknown in general, it is assumed that 10 per cent of the companies offering services cross-border seek authorisation for installation services.

Administrative costs have been allocated to all procedures of all countries covered by this study. These costs are multiplied by the number of companies offering services cross-border in the 14 host countries covered by this study. In the allocation of companies to host countries, the six larger countries (France, Germany, Italy, Poland, Spain and the United Kingdom) are given a five times higher weight than the other countries covered by this study.

The above extrapolation to the business population is done for all three scenarios described above for horizontal control schemes, resulting in a bandwidth of total costs depending on the degree of future cross-border construction services.

Building control procedures

For building control procedures, a distinction must be made between costs of regular procedures and light procedures or the mere submission of documents to the main contractor. For the construction of residential dwellings or office buildings, most countries always require a regular procedure. The administrative costs of light procedures or mere submission of documents to the main contractor may be assumed to be less than for a regular procedure, the possibility of light procedures is ignored in the cost calculations and only costs of going through regular building control procedures have been applied to cross-border construction services.

The administrative costs of regular building control procedures are averaged per country. Although building control procedures are covered in interviews for all 14 countries covered by this study, for some countries only light procedures and/or submission of documents to the main contractor were covered in the interviews. For these countries, an unweighted average cost reported for regular procedures in other EU countries is imputed for the purpose of cost extrapolation.

Combined costs

In order to provide an overall estimate of administrative costs of cross-border construction services, it is noted that administrative costs of horizontal control schemes are incurred only once (apart from renewal costs) and that administrative costs of building control procedures are incurred every year.

Therefore, the administrative costs of horizontal control schemes are annualised by assuming they take place once in the next ten years. The resulting annual costs (total costs divided by ten) are added to the annual administrative costs of building control procedures to obtain an estimate of overall aggregate administrative costs of cross-border construction services for the three future scenarios.

3. INVENTORY OF FORMALITIES FOR GENERAL CONSTRUCTION SERVICE PROVISION AND BUILDING CONTROL SCHEMES

A previous study on control scheme schemes for construction services[20] has inventoried and analysed horizontal control schemes for construction services in general as well as building control procedures. This chapter recaps the findings of that study which, together with the inventory and analysis of controls of installation services conducted by this study (as per its Chapter 4), serves as a basis for the assessment of experiences and costs incurred upon by construction service providers going cross-border. Much of the text accompanying the tables has been directly drawn from the final report of the previous study. For more details on the inventory of formalities for general construction service provision and building control schemes please refer to the previous study[21].

3.1. Horizontal control schemes for construction services in general

In the previous study, a number of different types of horizontal control schemes that apply to the construction services sector were identified. These belong to 2 broad categories:

- Control schemes that grant authorisation/impose notification obligations to construction contractors and developers to enter the construction services market in general segments[22] of the construction services market;
- Mandatory certification schemes relating to contractors, developers and professionals.

Schemes that enable construction professionals (natural persons) to access the construction market in general, by controlling only their professional qualifications and other conditions closely related, as listed in Annex VII of Directive 2005/36/EC, were excluded from that previous study.

There are only a small number of horizontal authorisation schemes that correspond with the definitions for both establishing providers and those wishing to provide temporary cross-border services.

The Bulgarian horizontal authorisation scheme "Registration under the Chambers of Builders Act"[23] is managed by the Bulgarian Construction Chamber[24].

The horizontal authorisation scheme identified in Spain concerns the Register of Accredited Companies. This register supports the authorisation of contractors and subcontractors seeking to offer services to the construction market.

With regard to Italy (Milan), a horizontal authorisation scheme is in operation known as the DURC (Documento Unico di Regolarità Contributiva). DURC certificates are issued by the Cassa Edile (Construction Fund) which has branches across Italy[25]. DURC is not required for non-established providers carrying out construction works lasting less than 3 months in Italy. A second horizontal authorisation scheme is in operation in Italy (Milan) as defined by Decree Law 163/06[26]. This law demands mandatory EN ISO 9001:2008 quality management system certification of construction firms in relation to operators providing services on the basis of private sector contracts with a value equivalent or greater then €500,000.

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20 Ecorys, Simplification and mutual recognition in the construction sector under the Services Directive, 4 February 2016. Available at: http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8657&lang=en.

21 Ibid.

22 As opposed to specific segments of the construction services market, referred to in this study as "installation services".

23 http://register.ksb.bg/normativni_dokumenti/2014/Chamber_of_Builders_Act.pdf.

24 http://www.ksb.bg/en/.

25 http://www.cassaedile.it/.

26 Decree Law 163/06: Codice dei Contratti Pubblici dei lavori, servizi e forniture in attuazione delle direttive 2004/17CE e 2004/18CE. http://www.bosettiegatti.eu/info/norme/statali/2006_0163.htlm.

Service providers established in Portugal intending to provide construction services on a permanent basis should apply for a licence, while those providing temporary services are subject to a prior notification[27]. The Portuguese Institute of Construction and Real Estate (Instituto da Construção e do Imobiliário – InCI) manages the authorisation process.

Identification/characterisation of the control procedures for establishing providers

Key information on the horizontal control schemes for establishing providers is presented in Table 3.1 below.

Table 3.1 Characteristics of the control procedures for establishing providers

MS	HCS	Territ. scope	Time valid and renewal procedure	Nr of auths	Dead-lines	Tacit approval	Mutual recogn.
BG	Registration in Builders' Register	Nationwide	Annual renewal by paying a fee	1	15 days	No	None
ES	REA	Nationwide	Every 3 years – full procedure	1	15 days	Yes	Varies between regions
IT	DURC	Nationwide	Every construction work – full procedure	1	30 days	Yes	N/A
IT	ISO EN 9001:2008	Nationwide	Every 3 years – full procedure	2 (incl. private certifying company)	Not fixed	No	Under Accreditation Regulation[28] rules only
PT	Registration at IMPIC	Nationwide	Limited duration varies – simplified renewal with fee	1	20 days	Yes	Equivalence assessment

Legend: HCS = Horizontal control scheme; Territ. scope =territorial scope; Nr of auths= Number of authorities involved; Mutual recogn. = Mutual recognition.
N/A = Not Applicable

Note: IT_ISO scheme exempts providers carrying out construction works with a value lower than €500,000.
ES REA scheme: varies between regions, subject to national law prescribing a free-of-charge regime with minimum requirements for recognition of services providers from other Member States.

The time validity of an entry in the Portuguese general builders' registry is, as a rule, unlimited since both the permanent licence (Alvará) as well as the certificate (Certificado) are valid for an indefinite period of time. Occasional services, however, are registered per project. The Portuguese registration in the builders' registry for occasional services is the same procedure for each project.

For the listed control schemes, service providers are required to provide documents and pay a fee. Key information on the height of the fee, the number of documents and the format of the documents is presented in Table 3.2.

Table 3.2 Fees and document requirements for control procedures for establishing providers

MS	HCS	Fees	Number of docs	Form of docs (acceptance of foreign docs regarding content or issuance)	Form of docs regarding copy aspects	Translation
BG	Registration in Builders' Register	€613-€15,338	6 (for installation services: 4)	Foreign docs accepted	Simple copies accepted	Certified in BG (original of translation

[27] 'Legal Framework Applicable to Practice of Construction Activity' (Regime jurídico aplicável ao exercício da atividade da construção). This includes Government Ordinance no 18/2004 which indicates the documents required to access categories of construction service activities.
[28] Regulation (EC) 765/2008.

MS	HCS	Fees	Number of docs	Form of docs (acceptance of foreign docs regarding content or issuance)	Form of docs regarding copy aspects	Translation
						must be submitted)
ES	REA	Free	3 (more requirements but some can be combined in 1 document)	Foreign docs accepted	Certified copies required for some docs	Certified in ES
IT	DURC	Free	1	Foreign docs accepted	Simple copies accepted	Simple translation
IT	ISO EN 9001:2008	€4,000-€5,000	2	Foreign docs accepted	Simple copies accepted	Simple translation
PT	Registration at IMPIC	Varies according to complex categories of works	4	Foreign docs accepted	Originals required in case of doubt	Simple translation

Legend: HCS= Horizontal control scheme.

Initial registration in the **Bulgarian** Builders' Registry costs 0.1% of net revenue for the last financial year which is minimised at BGN 1200 (EUR 613) and maximised at BGN 30,000 (EUR 15,339). Extension of or changes in construction categories require payment of 500 BGN (EUR 256).

Identification/characterisation of the control procedures for temporary cross-border providers

As an alternative for permanent establishment, service providers may opt to provide cross-border services on a temporary basis. Key information on the horizontal control scheme for temporary cross-border service provision is presented in Table 3.3 below.

Table 3.3 Characteristics of the control procedures for temporary cross-border providers

MS	HCS	Territ. scope	Time valid and renewal procedure	Nr of auths	Deadlines	Tacit approval	Mutual recogn.
BG	Registration in Builders' Register	Nationwide	For every construction work	1	N/A (prior notification)	N/A (prior notification)	COOP
ES	REA	Nationwide	Every 3 years – full procedure	1	15 days	Yes	No procedure
IT	DURC	Nationwide	Every construction work – full procedure	1	30 days	Yes	N/A
IT	ISO EN 9001:2008	Nationwide	Every 3 years – full procedure	1	Not fixed	No	Under Accreditation Regulation[29] rules only
PT	Registration at IMPIC	Nationwide	Unlimited	1	N/A (prior notification)	N/A (prior notification)	Equivalence assessment

Legend: HCS= Horizontal control scheme; Territ. scope =territorial scope; Nr of auths= Number of authorities involved; Mutual recogn.= Mutual recognition; COOP= country of origin principle (BG: first temporary service only).
Note: IT-DURC scheme exempts providers carrying out construction works lasting less than 3 months in Italy. IT ISO scheme exempts providers carrying out construction works with a value lower than €500,000.
N/A = Not Applicable

[29] Regulation (EC) 765/2008.

Information on the fees and requirements for documents in the case of temporary cross-border service provision is presented in Table 3.4.

Table 3.4 Fees and document requirements for temporary cross-border providers

MS	HCS	Fees	Nr of docs	Form of docs (acceptance of foreign docs regarding content or issuance)	Form of docs copy regarding aspects	Translation
BG	Registration in Builders' Register	€613-€15,338	6	Foreign docs accepted	Simple copies accepted	Certified in BG
ES	REA	Free	3	Foreign docs accepted	Certified copies required for some docs	Certified in ES
IT	DURC	Free	1	Foreign docs accepted	Simple copies accepted	Simple translation
IT	ISO EN 9001:2008	€4,000-€5,000	2	Foreign docs accepted	Simple copies accepted	Simple translation
PT	Registration at IMPIC	Depends on complexity category of works	4	Foreign docs accepted	Originals required in case of doubt	Simple translation

Legend: HCS= Horizontal control scheme; Nr of docs= Number of documents required.

Mitigation of associated administrative burden

Administrative burdens for cross-border service providers may be relieved by a range of measures, which include:

- Availability of online information on the requirement to obtain authorisation or to provide notification, or (discussed in the next section) for the building control scheme;
- Availability of information in English to enable efficient company compliance activities (by eliminating the language barrier);
- Availability of electronic procedures that permit full case handling and uploading of electronic copies of documents to ensure efficient submission of all documents required.

Table 3.5 provides an overview of the presence of measures for establishing providers and cross-border service providers.

Table 3.5 Measures mitigating administrative burdens of control procedures for temporary cross-border providers

MS	HCS	Online Info	Info in EN	E-procedures
BG	Registration in Builders' Register	Yes	Partially	Only electronic intake
ES	REA	Yes	No	Fully
IT	DURC	Yes but info about procedures for providers from other MS: very hard to find	No	Fully
IT	ISO EN 9001:2008	Limited	Partially	Fully
PT	Registration at IMPIC	Yes	Partially	Fully

Legend: HCS= Horizontal control scheme; Online Info = Online information available; Info in EN = (Online) information is available in English.

3.2. Building control schemes

A building control scheme is a legal requirement and procedure which ultimately allows for the construction work of a certain building, its renovation as well as an engineering work to take place in a given location.

Types of building control schemes overall

The building permit application procedures were analysed in the context of the following typology[30]:

- Regular procedure: in relation to building work that requires a building permit, plans are submitted to a relevant authority for assessment against the technical requirements for building works. If approved, construction works may proceed in line with the design specifications agreed;
- Building notice: building work may commence on the basis of a notification to the relevant authority or on the basis of tacit approval if an official response is not given in the comparatively short fixed period. In some cases, the submission demands may relate to a limited set of documentation (which may not include technical drawings);
- Light procedure: compliance of the building design with building regulations is not examined in-depth by building control authorities (as the design has been verified already by a registered third party). Alternatively, an authority may grant a type approval for a building design which can be used for subsequent applications without further approvals required;
- Self-certification: plan approval and designated types of construction works are not subject to public building control procedures if qualified or certified persons self-certify their own work. Self-certification may be combined with any one of the procedures indicated above;
- Exemptions for minor works: construction works can start without any previous building control procedure.

An overview of the types of building control schemes present in the countries investigated in presented in Table 3.6.

Table 3.6 Types of building control schemes overall

Member State	Regular procedure	Building notice procedure	Light procedure	Self-certification	Exemptions for minor works
BG	X	X	X		X
CZ	X	X		The building notice procedure is combined with self-certification of plans.	X
DE (NRWestfalia)	X	X	X		X
DK	X	X		Construction of transportable structures can be self-certified.	X
EL	X	X		The regular procedure is combined with self-certification of plans.	Notification
ES (Madrid)	X	X	X	The building notice procedure (Declaration of Responsibility) enables self-certification of plans.	X
FI	X	X			X
FR	X	X			X
IT (Milan)	X	X		The building notice procedure is combined with self-certification of plans.	X
NL	X				X

[30] This typology was applied in the previous study and was heavily informed by previous research undertaken by Frits Meijer, TU Delft University (OTB).

Member State	Regular procedure	Building notice procedure	Light procedure	Self-certification	Exemptions for minor works
PL	X	X			X
PT	X	X		The regular and building notice procedures are combined with self-certification of plans.	X
SI	X (Smaller works)		X (for complex works)	Self-certification of the plans for smaller works.	X
UK (England)	X	X	X (Type approval)	Installation work can be self-certified.	X

Types of relevant building control schemes

To describe the building control schemes, two types of reference construction works were used as benchmarks (herein referred to as "relevant building control schemes") so that similar situations could be compared: a one-storey two bedroom house (100m2) and a ten-storey office block (2000m2). Table 3.7 presents the applicable building control schemes for the selected benchmark construction works.

Table 3.7 Building control schemes for benchmark construction works

Country	Reference Building	Regular	Building notice	Light	Self-certification of plans	Combined or separate zoning and building control procedures
BG	1-storey house	X		X		Combined
	10-storey office	X		X		
CZ	1-storey house	X	X		X	Separate but can be combined in some cases
	10-storey office	X				
DE (NRWestfalia)	1-storey house	X	X	X		Combined
	10-storey office	X				
DK	1-storey house	X				Combined
	10-storey office	X				
EL	1-storey house	X			X	Separate
	10-storey office	X			X	
ES (Madrid)	1-storey house	X				Separate
	10-storey office	X	X	X	X	
FI	1-storey house	X				Combined
	10-storey office	X				
FR	1-storey house	X				Combined and but can be voluntarily separated
	10-storey office	X				
IT (Milan)	1-storey house	X	X		X	Combined
	10-storey office	X	X		X	
NL	1-storey house	X				Combined
	10-storey office	X				
PL	1-storey house	X				Separate but can be combined in some circumstances
	10-storey office	X				
PT	1-storey house	X	X		X	Combined
	10-storey office	X	X		X	
SI	1-storey house	X			X	Combined
	10-storey office	X		X		
UK (England)	1-storey house	X	X	X (type approval)		Separate
	10-storey office	X				

Characteristics of relevant building control schemes and associated administrative burden

Tables 3.8 and 3.9 provide an overview of the characteristics of relevant building control schemes.

Table 3.8 Characteristics of relevant building control schemes

MS	Number of authorities	Number of procedures	Deadlines	Tacit approval	Mutual recognition
BG	2	> 3	2-4 weeks	No	Yes although only partially performance standards
CZ	> 3	> 3	4 weeks	No	Yes although only partially performance standards
DE (NRWestfalia)	2	> 3	8 weeks (10-storey office) 4 weeks (1-storey house)	No	Yes although only partially performance standards
DK	1	3	Average 11 weeks (10-storey office) Average 9 weeks (1-storey house)	No	Yes although only partially performance standards
EL	1	3	2 days	Yes (no zoning)	Yes – performance standards
ES (Madrid)	1	3	8 weeks (10-storey office) 12 weeks (1-storey house)	Yes (no zoning)	Yes – performance standards
FI	1	3	Average 4-12 weeks (10-storey office) Average 12-20 weeks (1-storey house)	No	Yes although only partially performance standards
FR	2	> 3	12-26 weeks (10-storey office) 8 weeks (1-storey house)	Yes	Yes although only partially performance standards
IT (Milan)	1	> 3	20 weeks	Yes	Yes although only partially performance standards
NL	1	2	Up to 26 weeks (10-storey office) 8 weeks (1-storey house)	Yes	Yes although only partially performance standards
PL	3	> 3	9 weeks	No	Yes although only partially performance standards
PT	1	> 3	15 weeks	No	Mainly prescribed standards
SI	1	> 3	8 weeks (10-storey office) 4 weeks (1-storey house)	No	Yes although only partially performance standards
UK (England)	1	3	5 weeks	No	Yes – performance standards

Table 3.9 Fees and document requirements for building control schemes

MS	Fees	Number of types of documents	Form of documents regarding copy aspects	Translation
BG	€20941 (10-storey office) €1803 (1-storey house)	8	Simple copies	Certified in BG
CZ	€3500 (10-storey office) €35 (1-storey house)	4	Simple copies	Simple translation
DE (NRWestfalia)	€33000 (10-storey office) €2300 (1-storey house)	5	Originals required	Simple translation
DK	€16000 (10-storey office) €800 (1-storey house)	4	Simple copies	Simple translation
EL	€1700 (10-storey office) €400 (1-storey house)	10	Original technical plans required	Simple translation
ES (Madrid)	Tax based system	8	Original technical plans required	Certified in ES
FI	€13259 (10-storey office) €1235 (1-storey house)	6	Simple copies	Simple translation
FR	€30000 (10-storey office) Tax based for housing	7	Simple copies	Simple translation
IT (Milan)	€38661 (10-storey office) €16150 (1-storey house)	9	Originals application forms required	Simple translation
NL	€125000 (10-storey office) €3750 (1-storey house)	3	Simple copies	Simple translation
PL	€1310 (10-storey office) €82 (1-storey house)	6	Original technical plans required	Simple translation
PT	€8690 (10-storey office) €975 (1-storey house)	6 (10-storey office) 5 (1-storey house)	Originals may be required in case of doubt	Simple translation
SI	€1220.8 (10-storey office) €292.8 (1-storey house)	4	Simple copies	Simple translation
UK (England)	€6682 (10-storey office) €2331 (1-storey house)	5 (10-storey office) 4 (1-storey house)	Simple copies	Simple translation

Table 3.10 provides an overview of associated administrative burden, i.e., the presence of measures for reducing administrative burdens for building control procedures.

Table 3.10 Administrative burdens reduction measures for building control procedures

MS	Online Info	Information in EN	E-procedures
BG	No	No	Only download of forms
CZ	Limited	Partially	Only electronic intake
DE (NRWestfalia)	No	No	Only electronic intake
DK	Limited	Partially	Only download of forms
EL	No	No	Only download of forms
ES (Madrid)	No	No	Only electronic intake
FI	Limited	Partially	Fully
FR	No	No	Only download of forms
IT (Milan)	No	No	Only download of forms
NL	Limited	Partially	Fully
PL	No	No	Only download of forms
PT	No	No	Only download of forms

MS	Online Info	Information in EN	E-procedures
SI	No	No	Only download of forms
UK (England)	Yes	Yes	Fully

Types of competent authorities for regular building control procedures

A key objective of the building control process is to ensure construction work complies with the minimum technical standards for buildings. This objective can be realised through a variety of different processes and requirements depending on the type of building control procedure followed. The three key steps in the building control process include:

- Plan approval: the process of building control often commences with assessment of the technical plans and their approval (this activity may not be followed by some procedures);
- Site inspections: this is followed by site inspections by relevant authorities to ensure that the actual building work is compliant. It may be the case that some or all of the inspection duties are allocated to the person undertaking building work or private sector service providers;
- Completion or use: finally, a completion or use process is performed often on the basis of a final inspection (and in some cases submission of documentation) which is normally followed by the issuing of a completion or use certificate by the relevant authority.

Table 3.11 provides an overview of the actors responsible for plan approval in the context of the regular procedure in relation to the two reference works (a one storey two bedroom house and a ten storey office block).

Table 3.11 Actors responsible for plan approval

Member State	Reference works	Local authorities	Other public authorities as part of separate procedures	Private building control services / State registered experts
BG	10-storey office	X		X (optional)
	1-storey house	X		X (optional)
CZ	10-storey office	X	X	
	1-storey house	X		X (optional)
DE (NRWestfalia)	10-storey office	X		X (mandatory)
	1-storey house	X		X (mandatory)
DK	10-storey office	X		
	1-storey house	X		
EL	10-storey office	X		
	1-storey house	X		
ES (Madrid)	10-storey office	X	X (optional)	X (optional)
	1-storey house	X	X (mandatory)	
FI	10-storey office	X		X (potentially requested by the local authority)
	1-storey house	X		X (potentially requested by the local authority)
FR	10-storey office	X		X (mandatory)
	1-storey house	X		
IT (Milan)	10-storey office	X	X (optional)	
	1-storey house	X	X (optional)	
NL	10-storey office	X		
	1-storey house	X		X (a mandatory system has been proposed)
PL	10-storey office	X	X	

Member State	Reference works	Local authorities	Other public authorities as part of separate procedures	Private building control services / State registered experts
	1-storey house	X		
PT	10-storey office	X		
	1-storey house	X		
SI	10-storey office	State authority		X (potentially mandatory)
	1-storey house	State authority		
UK (England)	10-storey office	X		X (optional)
	1-storey house	X		X (optional)

Municipal authorities in Bulgaria issue building permits for both types of reference works (a one storey house and a ten storey office block) and the approach is similar in each case. The technical design must be signed by a registered architect and assessed initially by a municipal or a private building control body. The next step is to coordinate the application for a building permit with the municipal authority with a view to seeking approval. If, however, a private building control body has not been used for the initial plan assessment, the design is reviewed again by other officials as part of an internal procedure in the municipal authority (for example after the Chief Architect from the municipal authority has approved the plans a subsequent approval is required by the Municipal Expert Council on Spatial Planning).

In the Czech Republic, the technical plans need to be prepared and authorised by a registered architect or engineer for both types of reference works. The application for both types of reference works requires approval from the municipal authority but the plans are not checked against technical requirements for a one storey house. In the case of a ten storey office block, multiple authorisations from several authorities are required as part of the building permit application. According to practice, the services of an authorised inspector (private sector building control) are requested for small building works (e.g. a one storey house) and correspond to about 10% of building permit applications. Under this system, the authorised inspector will give a certificate to the municipal authority to indicate compliance of the plans. As part of plan approval, the authorised inspector and chief designer may be invited for interview by the municipal authority (at the expense of the authority).

In Denmark, plan approval conducted by a local authority is required for both types of reference works. The person submitting the plans is responsible for complying with the legal requirements. In the case of a ten storey office block, given that failure of the load bearing structure is a major safety hazard, a signed declaration is required from a certified structural engineer accompanying the structural plans. During plan approval, local authorities examine plans submitted against zoning, aesthetic and technical requirements.

Plans must be submitted for approval to a local authority in Finland by the owner of the building or a legally authorised representative for both types of reference works. The activities of plan preparation and submission are not reserved to a regulated profession. During the plan approval phase, the local authority examines the submission demands against the zoning, aesthetic and technical requirements. However, if there is uncertainty, the local authority may require an expert opinion on whether the suggested building design meets the legal requirements (if this possibility arises, the costs are borne by the applicant).

The legal framework in France dictates that it is not mandatory to request the services of a qualified architect for the development of the technical plans for buildings with a net floor area of less than 170m² (such as a one storey house). In this case, free technical advice is available to applicants from public bodies (and it is recommended that this service is used as plan approval may take longer if the services of an architect are not employed). Buildings that are 170 m² or greater (such as a ten storey office block) are required to be designed and the plans signed-off by a qualified architect. In addition, with regard to very tall buildings (e.g. ten storey office blocks), as part of comprehensive schemes for building control, the services of a registered building surveyor are required to cross examine the design. During the plan approval process, under the regular procedure, the municipality checks whether the application complies with submission, zoning and aesthetic requirements. However, the municipality only examines compliance with the technical requirements for buildings open to the public and very tall buildings (e.g. ten storey office blocks) and such

checks are limited to fire safety and access to disabled persons. As part of an internal procedure, other authorities are consulted on the application in relation to their official competencies.

The plan approval process in Germany operates according to two steps. Firstly, plans must prepared and certified by a registered architect or engineer and then assessed and approved by a state registered expert. Secondly, the relevant architect or engineer is needed to submit the plans to a local authority to seek approval. With regard to one storey houses, the local authority will not check the plans if designers certify compliance with the building regulations. However, in relation to ten storey office blocks, the local authority will check the plans against aesthetic, zoning and technical requirements. If the application is determined as compliant, a building permit will be issued which may be subject to certain conditions.

In Greece, the technical plans for both types of reference works are required to be certified by a registered engineer or architect. Municipal building authorities undertake an assessment of the completeness of the building permit application but they do not undertake a detailed assessment of the technical plans as it is the responsibility of registered architects or engineers to ensure compliance with the technical requirements. If the submission dossier is accurate, approval is granted automatically.

The process of plan approval in Italy initially relies upon a registered designer certifying that the plans meet the technical requirements. The plans are submitted to a local authority for approval against the technical requirements. An internal procedure with subordinate authorities (i.e. historical and environmental protection) takes place to examine compliance with the full arrange of relevant legal requirements. Alternatively, the applicant may choose to receive approval from these authorities in the first instance as part of separate procedures. The process of plan approval is similar for both reference works.

The activities of plan preparation and submission are not reserved to a regulated profession in the Netherlands. Municipal authorities are responsible for plan approval relating to both reference works (but it is expected that a mandatory private building control system will be introduced in the future initially for smaller scale construction works such as one storey houses). An assessment is made against all technical requirements including zoning requirements.

Registered designers are required to certify technical plans for both reference works as part of building permit applications in Poland. Country Governor's issue building permits after an assessment of the application against the technical requirements is made by the District Inspector. The General Inspector supervises and controls the work of lower ranking officials and occasionally this may lead to examination of building permit applications initially assessed by the District Inspector. In addition, in relation to a ten storey office block, as part of separate procedures, plan approval is required from the sanitary and fire safety authorities.

Design liability declarations are required to be submitted by designers as part of building permit applications in Portugal. As a result, while this is not always the case, there is a trend for the municipal authority not to perform a detailed assessment of the plans against the technical requirements (rather the approval process focuses on the zoning aspects). Coordination takes place with other relevant authorities (e.g. cultural heritage) that may be called upon to provide an assessment of the application if it falls into their field of competency. 146.

In Slovenia, plan approval is initially subject to the design being prepared and authorised by a registered architect or engineer. With regard to complex structures, (this may relate to a ten storey office block) a certified auditor may be required to assess the building permit application. The application is subsequently submitted to the State Authority for approval. This public body has the role of examining the submission dossier and planning requirements but does not perform a detailed assessment of the plans against the technical requirements.

Responsibility for drawing-up technical plans is designated to registered architects in Spain. A seal of approval ('visado colegial') confirming the technical compliance of the plans needs to be submitted with the application for a building permit. In Madrid, in terms of the construction of new office buildings, a 'visado colegial' can be obtained either from the municipality or from a collaborating institute composed of registered architects (Entidades Colaboradoras Urbanisticas). With regard to the construction of houses, a 'visado colegial' is obtainable from the municipality. The building permit application is submitted to the municipal

authority that has the role of examining the completeness of the submission dossier (but a subsequent detailed assessment of the technical plans is not undertaken).

In the UK (England), local authorities are responsible for building control but applicants may opt to receive building control services from a private sector third party (known as an Approved Inspector). The activities of plan preparation and submission are not reserved to a regulated profession. Local authorities are responsible for the assessment of technical plans against the building regulations and will either give building permission if they are found to be compliant or will request changes to the plans to be made. Alternatively, if private building control is opted for, an Approved Inspector will notify the local authority regarding the commencement of building work and submit plans (however, the local authority will not undertake a detailed technical assessment of the plans as Approved Inspectors are responsible for their accuracy). Local authorities and Approved Inspectors engage with other authorities such as fire safety (where relevant) and sewer management bodies but these steps are managed internally as part of the same approval process.

Types of competent authorities for site inspections

The actors involved in the site inspection process in relation to the two reference works are indicated in table 3.12.

Table 3.12 Competent authorities responsible for site inspections

Member State	Reference works	Local authorities	Other public authorities	Private building control services / State registered experts	Architects / Engineers	Technical advisor / contractor
BG	10-storey office	X	X	X –mandatory		
	1-storey house	X	X	X –mandatory		
CZ	10-storey office	X				
	1-storey house	X				
DE (NRWestfalia)	10-storey office	X		X –mandatory		
	1-storey house	X		X -mandatory		
DK	10-storey office	X	X			
	1-storey house	X	X			
EL	10-storey office			X –mandatory		X
	1-storey house			X -mandatory		X
ES	10-storey office	X			X	
	1-storey house	X			X	
FI	10-storey office	X			X – potentially	X
	1-storey house	X			X - potentially	X
FR	10-storey office	X		x		
	1-storey house	X		x		
IT	10-storey	X	X		X	

Member State	Reference works	Local authorities	Other public authorities	Private building control services / State registered experts	Architects / Engineers	Technical advisor / contractor
	office					
	1-storey house	X -potentially			X	
NL	10-storey office	X				
	1-storey house	X				
PL	10-storey office	X		x	X	
	1-storey house	X		x	X	
PT	10-storey office	X		x	X	
	1-storey house	X				
SI	10-storey office		X	x		
	1-storey house		X	x		
UK (England)	10-storey office	X		X (optional)		X
	1-storey house	X		X (optional)		X

The approach in Bulgaria dictates that in relation to both of the reference works, site inspections are performed by a private building inspector appointed by the investor. This is on the basis of five inspections phases (relating to both reference works). In addition, at appropriate intervals, site inspections are carried out by municipal and state authorities namely the Regional Construction Control Directorate and the District Directorate "Fire Safety and Civil Protection".

In the Czech Republic, the municipal authority performs site inspections. Site inspections are only conducted by the authority on small constructions works (e.g. one storey houses) if complaints are made e.g. with regard to noise, dust etc. Site inspections are carried out on large construction works (e.g. ten storey office blocks) at fixed construction phases and at regular inspection points by several authorities (including the municipal authority, traffic authority, fire safety and sanitation).

In Denmark, the local building authority has the role of supervising all construction work and may carry out site inspection of individual sites at random without previous notification (although this does not apply to all construction works). Moreover, the building control authority may specify the timing of site inspections in line with certain project intervals or conduct an inspection on an unannounced basis. If deeded necessary, inspections may be conducted by fire or sewerage authorities. Ongoing building control is carried out by the principal contractor or alternatively a building surveyor may be appointed to perform this task. The principal contractor or building surveyor normally conduct site inspections upon completion of key construction phases.

It is the responsibility of local authorities in Finland to carry out site inspections and these can take place at any point during the construction works as deemed appropriate. However, on the basis of a legally designated start-up meeting (attended by the local authority, the owner of the building or a representative, the principal designer and the site manager), building control may be delegated to the principal designer depending on the complexity of the construction works and providing that sufficient expertise to meet the legal requirements can be demonstrated (this does not include the final inspection). If the building control activities are delegated, reporting obligations are placed on the parties undertaking building work on the

basis of a reporting logbook to be submitted to the local authority. Other inspections may need to be conducted by technical specialists e.g. for heating, plumbing and air-conditioning etc.

The approach to site inspections differs in France regarding the two types of reference works. In relation to tall buildings (e.g. a ten storey office block) a registered private building control service provider is required to perform site inspections e.g. for structural safety, fire safety and installation. A building control plan is agreed with the developer at the outset of the project. Compliance may also be examined for non-statutory requirements (e.g. mechanical and engineering services, sound insulation etc.). On a voluntary basis, with regard to construction work associated with fewer risks (e.g. a one storey two bedroom house) the developer may choose to hire a registered building control service provider. Local building authorities have the legal power to stop construction work where there are indications of non-compliance. Normally, site inspections conducted by local authorities examining legal compliance are conducted randomly either during the performance of the construction works or up to 3 years after the building has been completed.

The site inspection process in Germany requires the applicant to appoint a contractor and a site manager. The contractor must carry out the construction work in line with the technical requirements and the site manager should ensure this objective is met. Site inspections are conducted by the local authority to ensure compliance of the building work in relation to two legally designated points (after the building shell is completed and upon completion). However, the local authority may enter the site at any point during the construction works. Moreover, inspections of structural stability are normally delegated to a state registered expert. Building surveyors are required to examine sound insulation and energy conservation.

Site inspections in Greece are conducted on two or three occasions depending on the size of the building. This includes an initial inspection (of the foundations and cellar walls) and a final inspection of the whole building. In relation to buildings larger than 2,000 m2 (e.g. a ten storey office block), an interim inspection takes place of the load bearing structure and masonry. Prior to the designated inspection phase, the contractor must submit notification to the municipal authority. Site inspections are conducted by a registered private building control inspector selected randomly by the municipal authority. Different private building control inspectors are selected for each of the inspection phases. An inspection of the energy performance of the building is conducted by a qualified energy inspector.

There is a private system of building control in terms of site inspections in Italy. The applicant appoints a building surveyor (normally the designer or someone from the design team) to ensure that on an ongoing basis the building work is compliant with the conditions of the building permit. The building surveyor is not responsible for any non-compliance identified if s/he informs the local authorities. In addition the local building authority can perform site inspections at any time, but normally this only relates to large construction works (such as ten storey office blocks) i.e. when the concrete/steel structure is in place and when the construction is completed. Building authorities conduct site inspections on structural safety, energy conservation and installations. Other authorities are required to perform inspections according to their competencies e.g. fire safety.

Only municipalities in the Netherlands carry out site inspections with regard to all aspects of technical compliance. The intensity of the inspection regime is determined on the basis of a risk assessment and clearly this will lead to a different number of site inspections required in relation to a one storey house and a ten storey office block. There are no legal obligations imposed on the applicant to appoint a service provider to oversee ongoing compliance with the technical requirements.

The approach to building control in terms of the site-inspection process in Poland is multi-layered. There is a legal requirement to establish a number of designated persons with corresponding qualifications and duties as part of the process ensuring compliance of the construction works i.e. the investor, the investors supervisory representative (a private building control representative) a designer and a construction site manager. In terms of complex building work (e.g. in some cases this may relate to a ten storey office block), it may be necessary for the investor to appoint private building control supervision of the designer. In addition, the District Inspector is required to perform site inspections of the construction works at random intervals corresponding with the completion of key phases e.g. foundations, load bearing walls, external structure and installations.

In Portugal, site inspections may be performed by public authorities (e.g. the municipality, sanitation, labour and real estate and construction authorities) to verify compliance with the legal requirements where deemed appropriate (construction sites are selected randomly for inspection and when complaints have been made but the sanitation authority performs a mandatory final inspection). In addition, a technical director is required to be appointed by the service provider. With regard to small construction works, such as one storey houses, the technical director is often a representative of the contractor. Regarding large construction works, such as a ten storey office building, there is usually a separation of responsibilities between the technical director, a building surveyor (appointed by the applicant to assess if the construction works complies with the approved building design) and a designer (appointed to provide technical assistance).

In Slovenia, during the construction phase, the investor is legally required to appoint a registered construction site manager and a registered supervisor to perform site inspections. The Construction Inspectorate performs site inspections at random but does not investigate all construction projects. The Construction Inspectorate has the powers to halt construction work if non-conformity with the legal requirements is identified.

In terms of the situation in Spain, support with ensuring ongoing compliance of the construction works with the technical requirements is provided by a registered architect. During the construction phases, a 'building book' is assembled indicating how technical compliance has been attained. A single site inspection is carried by the local authority at the end of the project.

Recent adaptations to the regulations in the UK (England) empower local authorities to determine the frequency and timing of site inspections on the basis of a risk based approach relevant to the nature of the construction work. Inspections can correspond to various stages of the building project from the initial foundations being prepared to the finalisation of the building. If private sector building control is opted for, inspections may be carried out by an Approved Inspector. Similarly, the Approved Inspector will determine the nature of the inspection regime. There are no legal obligations imposed on the applicant to appoint a service provider to oversee ongoing compliance with the technical requirements. In relation to a ten storey office block, a fire safety officer may examine the site but these are conducted as part of risk based market wide surveillance. An energy assessment must be conducted by an approved energy assessor and the assessment made must be approved by a local authority or an Approved Inspector. Moreover, in relation to technical installation activities (e.g. electrical installation), these are not subject to site inspections if the work is conducted by a Competent Person as compliance with the technical requirements is self-certified.

Types of competent authorities for completion controls

Table 3.13 provides an overview of the bodies responsible for issuing completion certification.

Table 3.13 Competent authorities responsible for completion controls

Member State	Reference works	Local authorities	Other public authorities	Private building control services / State experts
BG	10-storey office	x		
	1-storey house	x		
CZ	10-storey office	x		
	1-storey house			
DE (NRWestfalia)	10-storey office	x		
	1-storey house	x		
DK	10-storey office	x		
	1-storey house	x		
EL	10-storey office			X (mandatory)
	1-storey house			X (mandatory)
ES	10-storey office	X		
	1-storey house	X		
FI	10-storey office	X		
	1-storey house	X		
FR	10-storey office	X		X (optional)

Member State	Reference works	Local authorities	Other public authorities	Private building control services / State experts
	1-storey house			
IT	10-storey office	X		
	1-storey house	X		
NL	10-storey office	X (this applies to the user of the building only)		
	1-storey house	X		
PL	10-storey office	X		
	1-storey house	X		
PT	10-storey office	X		
	1-storey house	X		
SI	10-storey office		X	
	1-storey house			X
UK (England)	10-storey office	X		
	1-storey house	X		

In Bulgaria, 10 storey office buildings are commissioned by obtaining a use permit issued by the National Construction Control Directorate (within the Ministry of Regional Development and Public Works). Dwellings are commissioned on the basis of a use permit issued by the body that has approved the construction works (normally a municipal authority). To obtain a use permit, a final examination is conducted and a technical passport and drawing of the building are prepared for approval.

In the Czech Republic, the completion process relates to large construction works only (e.g. a ten storey office building) with completion certificates issued by the municipal authority. This is subject to a final inspection being made by several authorities (municipal, traffic authority, sanitation, the fire authority) determining compliance with the regulatory requirements.

The approach in Denmark dictates that as soon as the construction work is completed the applicant submits a completion notification to the local building authority. The applicant must confirm to the local authority that the construction works has been conducted in accordance with the building permit. Technical documentation is submitted to prove that the building is compliant with the building regulations. Interestingly, the local building authority does not have to carry out a final inspection and often relies on the building control results indicated in the documentation provided by the contractor or building surveyor.

Completion certificates are issued by local authorities in Germany (NRW). The site manager is required to notify that the building work is ready for a final inspection. The local authority examines whether the building work is compliant with the technical requirements and zoning plan, and provides the certificate if the building is deemed fit for use.

In Greece, a completion certificate is issued by the private building control inspector after the final inspection is performed and legally compliant results are identified. Receipt of the certificate enables the owner of the building to submit an application to the municipal authority for a connection to the public utility networks.

The approach is similar in Finland. The activity of issuing a completion certificate is an obligatory task of local authorities providing the construction work complies with the legal requirements (this is determined through a final inspection).

However, the approach is slightly different in France. In relation to both reference works, within 30 days after the completion of the construction works, a declaration attesting that compliance with the building permit application must be submitted to a local authority. This should be complemented by a certificate indicating compliance with the building regulations regarding access to disabled persons, seismic safety and thermal performance issued by a designer (but not the designer of the building) or a building surveyor.

However, with regard to tall buildings (e.g. a ten storey office block), a use permit is also required which is issued on the basis of the successful completion of a final site inspection conducted by the local authority. Normally, to support the process of final site inspection, a building surveyor is hired to prepare a safety report.

The completion process in Italy (Milan) dictates that the building surveyor must notify the local authority that the construction work has been carried out in accordance with the building permit. Subsequently, a final site inspection is carried out by the local building authority and other building authorities for public buildings (potentially this could apply to a ten storey office block, if it is a public works). The building surveyor should request a use permit and this application should contain supporting documents such as land registry documentation, installation certificates, a structure certificate, a declaration attesting conformity with the technical requirements, energy performance certification etc. An approval from the Public Health Agency certifying the sanitation requirements have been satisfied is required or alternatively this can be self-certified (although self-certification may delay the issuing of the use permit up to 60 days as oppose to up to 30).

In the Netherlands, after satisfactorily complying with the inspection regime, the applicant must notify the local authority upon completion of the construction works. After this notification is made, the relevant official closes the file on the building permit application. It should be noted that final inspections are not mandatory and completion certification is not issued. However, with regard to a ten storey office building, a request for a use permit should be made by the user of the building (and therefore this requirement does not apply directly to the construction service provider). This permit requires demonstration of compliance with fire safety requirements.

Utilisation of a building in Poland requires the construction team to notify the District Inspector that the construction work is finalised (this is subject to the authority not raising any objections 21 days after the receipt of the notification). However, if the building falls under certain categories including office buildings, it is required to obtain a final utilisation permit. In this case, the applicant/investor must also notify the State Sanitation Inspectorate and the State Fire Service. The utilisation permit is issued by the District Inspector of Building Control.

In Portugal, an occupancy permit must be issued by the municipality before the building can be used legally by the applicant. There is a statutory list of submission demands required including an updated set of design documents (if the design has been amended since the submission of the building permit), the construction log book and a liability declaration prepared by the construction director. A liability declaration by the designer may also be submitted. Within 10 days, the municipal authority informs the applicant whether the permit will be granted or if deemed necessary, a final site inspection will be performed (which may result in demands for modification work to be made).

In Slovenia, residential buildings such as a one storey house are not subject to completion certification requirements but the designer or supervisor must confirm that the building has been completed in accordance with the building permit (but the option is available to the investor to apply for a completion certificate). With regard to office buildings, the State Authority makes a technical inspection attended by representatives of those organisations which gave prior consent to the project, and representatives of other Inspection Authorities (if applicable) after which a certificate of completion is issued.

In Spain (Madrid), all buildings are subject to a use permit inspection, including office buildings that have been built on the basis of a Declaration of Responsibility (for which no building permit is required). This is the only external inspection that is carried out. In terms of residential houses, this is performed by the municipality. With regard to office buildings, this is either the municipality or a collaborating institute depending on the body selected to perform building control by the applicant. Receipt of the use permit is also dependent on submission of the 'building book' to the municipal authority.

With regard to the UK (England), completion certificates are issued by local authorities when they have been notified that the building work has been completed and the requirements are satisfied. There is no legal requirement for a final inspection but the local authority may consider this as necessary. If a private sector building control body (Approved Inspector) has managed the building control process, this third party service provider notifies the local authority that the technical requirements have been met when the appropriate stage is reached.

4. INVENTORY OF HORIZONTAL CONTROL SCHEME FORMALITIES FOR INSTALLATION SERVICES

4.1. Identification/Characterisation

Governments may require installation service providers to obtain authorisation to access the market of the service provision in question, i.e. before being allowed to provide services on a specific construction site (which are then often controlled through building control schemes). Usually such an authorisation is required in the interest of the general public, ensuring the service providers meet set minimum requirements. As a lighter form, notification may be used. Notification allows government to keep track of service providers and the requirements they must comply with, without controlling compliance prior to legal commencement of activities. Finally, government may also decide to regulate installation service provision by means of other measures, for example by only setting rules and controls (such as building permits) on the actual provision of services (even as exercise requirements, such as completion controls), and not imposing any *ex ante* control scheme for market access.

To be noted that, unlike most horizontal control schemes for construction services in general, the horizontal control schemes put in place for installation services analysed in this study make in general no distinction between providers wishing to establish and providers active temporarily in the jurisdiction in question, as cross-border providers established in another Member State, which by itself points to the disregard of the internal market freedom of free provision of services and to the likely lack of proportionality of the regimes in question when applied to temporary cross-border providers. Notable exceptions are those horizontal controls of gas installations in Portugal, for which a specifically devised prior notification scheme is in place, and of electrical/water/sewage/gas in Denmark, for which roughly the same procedure applies to temporary providers but with reduced underlying requirements.

Territorial scope of the procedure

For the majority of procedures for which authorisation or notification is required, authorisation or notification is valid at the national level. In each of the Member States included in this research, authorisation for installations involving F-Gases is issued at the national level. Please note that in Poland, in order to obtain these authorisations, conditions must be met by both the headquarters as well as each of its branches. In Denmark, authorisation for placement of electrical/water/sewage/gas installations is only valid within Denmark proper, so excluding overseas territories.

One authorisation which is not valid for the whole territory of the Member State is authorisation for asbestos removal in Bulgaria, which is limited to the territory of the Regional Health Inspectorate that has issued the authorisation. In Germany, the registries for sewage, water and gas installations are managed completely by the regional or local utility company. In Nordrhein-Westfalen, these registries are managed by EWR GmbH. Authorisations for the installations of elevators, for electrical installations, and for asbestos removal are not valid for the whole of Spain but only on regional basis, while in Italy the authorisation for asbestos removal is only valid for the area of competence of the Supervisory Entity.

Table 4.1 Coverage of the authorisation or notification

MS	Whole Member State	Not the whole Member State
BG	Installations involving F-Gases	Asbestos removal (Regional authorisation only)
CZ	Installations involving F-Gases; electrical and gas installation; pressure or hoisting equipment	
DE	Installations involving F-Gases; asbestos removal	Sewage, water and gas installations (managed by regional / local utility company)
DK	Installations involving F-Gases; water and sewage; electrical installations; gas installations	
ES	Installations involving F-Gases; installation of alarm systems; heating equipment	Electrical installations; installation of elevators; asbestos removal
FI	Installations involving F-Gases; installation of elevators; electrical and telecom installations	

MS	Whole Member State	Not the whole Member State
FR	Installations involving F-Gases	
GR	Installations involving F-Gases; installations of alarms	
IT	Installations involving F-Gases; electrical, heating, airco, refrigeration, radio/TV, plumbing, gas, elevator and fire protection system installations	Asbestos removal (only valid for area of competence of the Supervisory Entity)
NL	Installations involving F-Gases; asbestos removal	
PL	Installations involving F-Gases	
PT	Installations involving F-Gases; gas installations[31]	
SI	Installations involving F-Gases; asbestos removal	
UK	Installations involving F-Gases; asbestos removal	

Time validity

The time validity for the authorisation or notification varies between the type and Member State. There are some specific situations in Denmark, Italy, Portugal, Spain and the United Kingdom. In Denmark, authorisation for placing electrical installations as well as plumbing, sewer and gas installations is, regarding establishment, dependent on obtaining a certification which in turn is valid for 2 years, requiring reapplication for renewal. But mutual recognition of authorisations in other Member States is also available, and a decision acknowledging equivalence of an authorisation obtained elsewhere has, in principle, an unlimited validity in time. However, in case the technical responsible person is replaced or absent for more than six consecutive weeks, the company must inform the authorities. Authorisation of installations involving F-Gases in Italy are issued for five years with a documentary check on a yearly basis. Regulations concerning authorisation of installations involving F-Gases in the United Kingdom are less equivocal: online guidance indicates a validity of three years while for fire protection services related to F-Gases a period of five years applies. Authorisation for asbestos removal in Italy is not explicitly constrained by a time validity while start and conclusion dates of the work must be clearly indicated in the Work Plan and checked during on-site inspections (see Table 4.2).

Table 4.2 Time validity of the authorisation or notification

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Time validity
BG	3 years	only for the specific task		
CZ	unlimited		*electrical and gas installation*	5 years
			pressure or hoisting equipment	5 years
DE	unlimited	No information available	*sewage, water and gas installations*	2 years
DK	unlimited under conditions		*Electrical/water/ sewage/gas installations*	unlimited under conditions
ES	unlimited	No information available	*installation of alarm systems*	1 year
			heating equipment	5 year
			electrical installations	one year
			installation of elevators	depends
FI	unlimited		*installation of elevators*	unlimited
			electrical and telecom installations	unlimited
FR	5 years			
GR*	3 years			

[31] Mere notification in advance in the case of temporary cross-border gas installation services

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Time validity
IT	5 years + documentary check every year	not specified	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	10 years
NL	2 years	3 years		
PL	unlimited			
PT	7 years		*gas installations*[32]	unlimited
SI	unlimited	unlimited		
UK	online guidance 3 years, 5 years for fire protection	3 years		

Notes:
GR - authorisation for installation of alarms must be requested for a five year term; this procedure is not specified in further detail and hence excluded from the remainder of this chapter.

Simplicity of renewal procedure

For the simplicity of the renewal procedure for authorisation or notification four general categories have been identified.

- A – the same procedure applies;
- B – simpler but still with on-site inspection or supporting documents;
- C – simpler without on-site inspection or supporting documents;
- D – occurs automatically on application.

Please refer to Table 4.3 for an overview of the simplicity of the renewal procedures per type and country. Note that for authorisations or notifications with an indefinite period of time the simplicity of the renewal procedure is denoted as "not applicable", while "NA" indicates that no explicit mentioning of the renewal procedure has been found.

Some specific situations exist in France, Portugal and the United Kingdom. In France, renewal of authorisation of installations involving F-Gases is simpler only if issued by the same accredited authority. In the United Kingdom, licences for asbestos removal are renewed with the same procedure as the original issuance. However, previous performance is also taken into consideration. The British authorisation procedures for placement of installations involving F-Gases are managed by accredited certification and evaluation bodies. Renewal can be done automatically and requires less application form information than the initial application procedure.

Table 4.3 Simplicity of renewal procedure

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Simplicity
BG	A	A		
CZ	not applicable		*electrical and gas installation*	A
			pressure or hoisting equipment	A
DE	not applicable	No information available	*sewage, water and gas installations*	C
DK	not applicable		*electrical/water/*	not applicable under

[32] Mere notification in advance in the case of temporary cross-border gas installation services

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Simplicity
			sewage/gas installations	conditions
ES	not applicable	No information available	*installation of alarm systems*	C
			heating equipment	C
			electrical installations	A
			installation of elevators	A
FI	not applicable		*installation of elevators*	not applicable
			electrical and telecom installations	not applicable
FR	B			
GR	C			
IT	B	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available
NL	B	A		
PL	not applicable			
PT	B		*gas installations*[33]	not applicable
SI	not applicable	not applicable		
UK	D	A		

Legend:
A = the same;
B = simpler but still with on-site inspection or supporting documents;
C = simpler without on-site inspection or supporting documents;
D = occurs automatically on application.

Exemption for businesses that already have voluntary certifications

Voluntary pre-certified or otherwise pre-qualified service providers are rarely exempt from the regular application procedure. Only in Spain and the Czech Republic these service providers do not need to apply for authorisation for placement of installations involving F-Gases. In Italy, companies that already are ISO 9001 certified are able to obtain the F-gas certificate more easily.

Number of authorities involved

The number of authorities involved in the authorisation or notification process ranges between one and three. In only a handful of cases the number of authorities involved is more than one. Please refer to Table 4.4 for a general overview of the numbers.

In Bulgaria, both the Regional Health Inspectorate and Regional Inspectorate on Protection of the environment and waters are involved in issuing authorisation for asbestos removal. F-gas certification in France is only done by one entity, although several accredited entities can deliver that certificate. In Greece, both the accredited commercial certification company and EPSEM, the authority keeping the record of certified installation service providers, are involved in issuing F-gas certification. British legislation lists multiple certification and evaluation bodies. Individual company F-gas approvals are managed by one body. The certification procedure is offered on a market based approach given that companies can choose which body to gain the approval from.

[33] Mere notification in advance in the case of temporary cross-border gas installation services

Italy is the only Member State where three authorities are involved in issuing certification. For F-gas certification, the chamber of commerce, an accredited certification provider and Ispra are involved. The chamber arranges the provisional certificate, while the latter two provide the final certificate that must be obtained within 6 months of the provisional certificate. For certification for placement of elevators, ACCREDIA (National accreditation Entity) carries out the accreditation of conformity assessment bodies (Organismi di valutazione della conformitá). The Ministry of Economic Development authorises the notified bodies to make the assessment. Finally, the Notified Body is accredited for issuing the conformity assessment.

Table 4.4 Number of administrative authorities involved

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Number
BG	1	2	*registration in Builders' Register*	1
CZ	1		*electrical and gas installation*	1
			pressure or hoisting equipment	1
DE	1	1	*sewage, water and gas installations*	1
DK	1		*Electrical/water/ sewage/gas installations*	1
ES	2	1	*installation of alarm systems*	1
			heating equipment	1
			electrical installations	2
			installation of elevators	1
FI	1		*installation of elevators*	1
			electrical and telecom installations	1
FR	1			
GR	2			
IT	3	1	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	1
NL	1	1		
PL	1			
PT	1		*gas installations*[34]	1
SI	1	1		
UK	1	1		

Deadlines for handling by authorities

The deadlines for handling horizontal authorisations differ substantially from ten days to a couple of months. Please refer to Table 4.5 for a complete overview of the handling deadlines per type and country.

Danish authorities typically use two different handling deadlines: one of 60 days for domestic parties and one of three months for foreign companies operating in Denmark.

[34] Mere notification in advance in the case of temporary cross-border gas installation services

In France and the United Kingdom F-gas certification deadlines differ between the different accredited entities. In France the legal maximum processing time amounts to four months. In Greece, the handling deadlines for F-gas certification are not explicitly regulated. However, getting an ISO9001 certificate may take 10-15 weeks for micro enterprises and 6-12 months for companies with over 100 employees. The Dutch deadlines for similar certification is eleven weeks: eight weeks for the inspection, two weeks for the report and one week for the decision.

In Italy, businesses must obtain an F-gas certificate from an accredited certification provider within 6 months, based on a certification plan. The certification provider must enter the certification data on an online portal of Ispra within 10 days. Ispra must register a certificate within 10 days.

Table 4.5 Handling deadlines for authorities

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Handling deadline
BG	14 working days after training / on-site inspection	30 days		
CZ	30 days		*electrical and gas installation*	30 days
			pressure or hoisting equipment	30 days
DE	2 to 3 weeks	4 weeks	*sewage, water and gas installations*	No information available
DK	Domestic: 60 days, cross-border: 3 months		*electrical/water/ sewage/gas installations*	Domestic: 60 days, cross-border: 3 months
ES	1 month	No information available	*installation of alarm systems*	No information available
			heating equipment	No information available
			electrical installations	No information available
			installation of elevators	No information available
FI	30 days		*installation of elevators*	30 days
			electrical and telecom installations	30 days
FR	depends			
GR	depends			
IT	10 days	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	30 days
NL	11 weeks	Directly after examination		
PL	No information available			
PT	4 weeks		*gas installations*	30 days I N/A[35]
SI	30 days, in complex cases 60 days	30 days, in complex cases 60 days		
UK	depends	8 weeks		

Notes:
FR - The law sets a 4 months maximum. In practice, times differ from an accredited entity to another.
GR - No regulation.
UK - The legislation does not specify a fixed period. The period is fixed by the 'certification and evaluation bodies'.
Legend:
N/A = Not Applicable

Possible extensions of handling deadlines

[35] for temporary cross-border gas installation services (mere notification in advance)

While authorities have specific deadlines for handling horizontal authorisations, as described above, some countries offer the possibilities for authorities to obtain an extension of the deadline. This excludes postponement of the control scheme process due to incomplete information provided by the applicant.

Countries offering the authorities possibilities to extend the deadline for handling of an authorisation request are Denmark (for authorisations related to services in the field of electrical/water/sewage/gas installations), Spain (F-Gas installations), the Netherlands (F-Gas installations), Portugal (gas installations in establishment situations) and Slovenia (F-Gas installations and asbestos removal). In the other cases, either no extension is allowed or no information is available.

Table 4.6 Possible extensions of handling deadlines

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Extension deadline
BG	No	No		
CZ	No information available		*electrical and gas installation*	No
			pressure or hoisting equipment	No
DE	No information available	No information available	*Sewage, water and gas installations*	No information available
DK	No information available		*electrical/water/ sewage/gas installations*	Yes, once. No limitations to the new deadline
ES	1 month	No information available	*installation of alarm systems*	No information available
			heating equipment	No information available
			electrical installations	No information available
			installation of elevators	No information available
FI	No		*installation of elevators*	No
			electrical and telecom installations	No
FR	No			
GR	No			
IT	No information available		*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available
NL	7 weeks	No		
PL	No information available			
PT	No		*gas installations*	30 days I N/A[36]
SI	30 days, in complex cases 60 days	30 days, in complex cases 60 days		
UK	No information available	No		

Legend:

N/A - not applicable

Tacit approval

Table 4.7 lists the presence of tacit approval for installation services.

[36] For temporary cross-border provisions (mere notification in advance)

Table 4.7 Tacit Approval

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Tacit approval
BG	No	No		
CZ	No	No	*electrical and gas installation*	No
			pressure or hoisting equipment	No
DE	No information available	No information available	*sewage, water and gas installations*	No information available
DK	No information available		*electrical/water/ sewage/gas installations*	Yes
ES	No	No	*installation of alarm systems*	No
			heating equipment	No
			electrical installations	No
			installation of elevators	No
FI	No	No	*installation of elevators*	No
			electrical and telecom installations	No
FR	Yes			
GR	No			
IT	No information available	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available
NL	No	No		
PL	No information available			
PT	No		*gas installations*	Yes l N/A[37]
SI	No	No		
UK	No information available	No		

Legend:

N/A - not applicable

Failure by authorities to meet the deadline or extended deadline does not mean the authorisation is deemed to be granted. This is only the case in Denmark for electrical/water/sewage/gas installation, in France for F-Gases and in Portugal for gas installations (in establishment situations). For Denmark, the [2] Ordinance on authorisation and operations on the electrical, plumbing and sewer installation area (Bekendtgørelse om authorisation og drift af virksomhed på el-, vvs- og kloakinstallationsområdet) states that:

- Applications for authorisation in the electrical, sewage and sewage installation area and application for company approval in the gas area must be submitted to the Danish Security Agency (art. 1);
- The Agency shall make a decision on authorisation within 60 days of receipt of the application and all necessary documents (art. 5, section 1) – there is a three months deadline in case of foreign providers, in order to conduct mutual recognition;
- The Agency can extend the deadline once and only before the expiry of the initial time limit (without any limitation to the new deadline);

[37] For temporary cross-border provisions (mere notification in advance)

- If the Agency has not taken a decision before the expiry of the initial or extended deadline, the authorisation or approval may be deemed to be notified.

In the Netherlands, tacit approval does not apply for F-Gases, but non-critical non-compliance is inspected in the next biennial inspection.

Mutual recognition

Internal market freedoms oblige Member States to consider controls and conditions to which service providers were previously subjected in another Member State, in order to ascertain which of the generally applicable conditions and controls remain necessary and proportionate to impose upon such providers.

Mutual recognition can adopt various forms, depending on the regulatory approach of the Member State in question as it can range from a country of origin approach (under which the control in the home Member State suffices and thus the control of the host Member State does not apply to providers form other Member States) to an equivalence assessment, whereby proof of attaining certain public interests of the host Member State is only needed for requirements that are different in the home country.

Given the extraordinary nature of controls imposed on temporary cross-border provisions, the most common form of mutual recognition for such providers should be a country of origin approach or a mere perfunctory check of legal establishment in the home Member State, through a notification scheme. In reality Member States rarely distinguish between temporary cross-border providers and establishing ones; this undifferentiated treatment is certainly the case for most control schemes for installation services, as already mentioned above.

For installations involving F-Gases, most countries take into account controls complied with by service providers in other EU countries. Ten countries (Bulgaria, the Czech Republic, Finland, France, Germany, Greece, Italy, Poland, Slovenia, and the United Kingdom) merely require that the company notify the authority of the host country of a valid certificate from another EU Member State. In the Czech Republic waste containing F-Gases may only be recovered or disposed after proof of consent by a regional authority to operate facilities to that end, but this is not specifically an installation service. In Greece, the certificate must be issued by a certification service provider accredited by the Greek authorities (major international certification service providers such as TÜV have such an authorisation). The United Kingdom requires companies to have this certificate ready at all times, which is considered as equivalent to a notification requirement. In Table 4.8, the notification procedure is coded as NT if a translation is required, and as NE if English is accepted (no country accepts any other EU language).

However, this notification procedure with a mere check of that the certificate of the home country is valid, only applies to branches and temporary services. If a service provider establishes a subsidiary, then in all Member States of this study the subsidiary must follow the same procedure as a domestic company.

Two countries accept certificates from other countries but only if some additional requirements are met:

- For Denmark, the authorisation from another EU Member State must be based on a "similar" management information system as required in Denmark;
- For the Netherlands, the authorisation from another EU Member State must be based on inspections that guarantee a "similar" level of protection as in the Netherlands.

For Denmark and the Netherlands, this implies that service providers from some countries may need to prove that the management information system or inspections are "similar" but certificates from other countries are, nevertheless, automatically accepted. In Greece, the certification requirements for domestic providers of installation services involving F-Gases is the same as those for providers from other EU Member States. This is coded in Table 4.8 as CCO (conditional country of origin principle, no translation required but only data on certifying body and registration number) or as CCE (the same, a translation of a certificate is required but English is accepted).

In two countries covered by this study (Finland and Portugal), service providers from other EU Member States must submit the documents required in the F-Gas Regulation 517/2014/EU to the authorities of the host country. These may be documents of the home country, but the authorities of the host country check their content. However in Finland the documents are not checked and merely archived which is considered to be mere notification. In Spain, the nationwide law states that "minimum conditions of mutual recognition" shall apply but according to regulations in at least one region, applicants have to fill in a form to declare that they will comply with Spanish regulations on qualification and numbers of personnel and on equipment, as well as some other declarations. In Table 4.8, this is coded as AN (assessment of equivalence, no fixed procedure) for Spain and as AP (assessment with fixed procedure) for Portugal.

For installation involving F-gases, the mutual recognition provisions are the same for branches and temporary services in almost all countries covered by this study, except for Denmark where significantly fewer conditions apply to temporary cross-border services than for cross-border branches.

For asbestos removal, mutual recognition is not observed for any of the countries covered by this study. This means that service providers from other EU Member States must go through the same procedure of the host country as domestic firms of the host country, regardless of authorisation in the home country. In Germany and Italy regional authorities are responsible for authorisation and no information was found on mutual recognition principles.

For other types of installation services, mere notifications are required in the Czech Republic and Finland. In Denmark, a notification is required for temporary electrical/water/sewage/gas installation services with subsequent checks (turning the procedure into an authorisation scheme, albeit adapted to temporary provisions by not imposing local requirements), however for branches, companies must comply with Danish management system requirements or prove that their authorisation in the home country is based on a similar management system requirement (the Danish authorities assume this automatically for some home countries). In Spain and Portugal equivalence of requirements is typically checked (the relevant Portuguese act for gas installations prohibits duplication of requirements and controls of an equivalent purpose regarding secondary establishment, but the online procedure of the competent authority has no separate information or procedure for gas installation companies from other EU Member States – temporary cross-border providers are subject to a mere notification in advance, with checks *a posteriori*), while for Germany and Italy no information was found due to requirements being regionally regulated.

Table 4.8 Mutual recognition provisions (permanent establishment | temporary services)

MS	Installation involving F-Gases	Asbestos removal	Other procedures	
			Type	Mutual recognition provision
BG	NT | NT	No | No		
CZ	NT | NT		*electrical and gas installation*	NT | NT
			pressure or hoisting equipment	NT | NT
DE	NT | NT	No information available	*sewage, water and gas installation services*	No information available
DK	CCE | NE		*Electrical/water/ sewage/gas installations*	CCE | NE
ES	AN | AN	No | No	*installation of alarm systems*	AE | AE
			heating equipment	AN | AN
			electrical installations	No | No
			installation of elevators	AN | AN
FI	NE | NE		*installation of elevators*	NE | NE
			electrical and telecom installations	NE | NE
FR	NT | NT			
GR	NT | NT			
IT	NT | NT	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available

MS	Installation involving F-Gases	Asbestos removal	Other procedures	
			Type	Mutual recognition provision
NL	CCO | CCO	No | No		
PL	NT | NT			
PT	AN | AN		*gas installation services*	AN | NT
SI	NE | NE	No | No		
UK	NT | NT	No | No		

Legend:
AE = Assessment with procedure and examples.
AN = Assessment without procedure.
AP = Assessment with procedure.
CCE = CCO with translation in English accepted.
CCO = conditional country of origin principle.
NE = Notification with translation, English translation accepted.
NT = Notification with translation.

Payment of fees

Amount of the fees

Table 4.9 presents an overview of the rates charged by authorities for authorisations or notifications. These fees vary widely between different Member States and different types of authorisations. Typically, fees also depend on the size of the company, its revenue, number of employees or the type of activities.

In **Germany**, the fee for F-gas certification depends on the number of employees who will be working with the equipment. For a small company of 10 employees, for example, the fee is around EUR 300. Costs for a French F-gas accreditation depend on the activity categories. For category one, for example, the price is EUR 323.

In **Greece**, fees for companies are not explicitly regulated by law. The fees for an ISO9001 certificate always consists of 3 parts: a stage 1 audit fee (checking documents), a stage 2 audit fee (on-site inspection) and an annual audit. The price varies between countries, complexity of the regulations the company must comply with, the size of the company and the number of office locations. Minimum prices for one-person firms are around EUR 900 for stage 1 and 2 audits combined and the annual fee starts from EUR 600.

Italian F-gas certification fees are not regulated on a national level. ST&T in Torino, for example, charges EUR 230 for companies in Torino and EUR 280 for companies outside Torino for 1) the verification of the requirements of the company, 2) the testing of the instruments and equipment in your possession, 3) in reviewing business processes installation / repair / maintenance facilities, and 4) in the preparation of the Quality Plan demanded by the Accreditation Body in support to obtain certification. Ispra charges EUR 21 for the provisional certificate of a domestic business and EUR 25 for the provisional certificate of a foreign business plus a stamp fee of EUR 16. For filing the data of the certificate on the online portal of Ispra EUR 5 is charged.

In the **Netherlands**, commercial certification providers charge fees for inspections which are not regulated. The requirements of the inspections are laid down in national regulations. For F-gas certification, one interview is required for a company with fewer than 10 workers and two interviews for a company with more than 10 workers. In reality the applicant and the certification provider may agree to a procedure to avoid multiple inspections until the documentation of installation procedures and the understanding of workers of those procedures are approved. All in all this may involve a full day of work for the certification provider at an estimate rate of EUR 1,000. For asbestos removal, the regulations specify that half a day may be charged per inspection for each location (local office and/or construction site), exclusive travel costs. Thus for two travels and two half-days, the costs are estimated at EUR 1,200.

In **Poland**, the F-gas certification fee of PLN 1768.43 (EUR 420) only applies to companies with a separate legal personality. To gain a company certificate in the **United Kingdom**, the fees are set independently by

the certification and evaluation bodies. As an example, the fee for a company certificate for a sole-trader is GBP 99 (EUR 112) and for a company with over fifty certified employees it amounts to GBP 499 (EUR 570).

Table 4.9 Amount of the fees

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Fee
BG	BGN 150-170 (onsite auditor) + BGN 740-790 (certificate)	BGN 125 (EUR 64)		
CZ	CZK 1000 (EUR 40)		*electrical and gas installation*	No information available
			pressure or hoisting equipment	No information available
DE	around EUR 300 (for 10 workers)	up to EUR 2000	*sewage, water and gas installations*	EUR 78.50 to EUR 320
DK	DKK 1250 (EUR 170)		*electrical/water/ sewage/gas installations*	DKK 1250 (EUR 170)
ES	No information available	No information available	*installation of alarm systems*	No information available
			heating equipment	No information available
			electrical installations	No information available
			installation of elevators	No information available
FI	EUR 150		*installation of elevators*	EUR 150
			electrical and telecom installations	EUR 150
FR	EUR 323 (category 1)			
GR	around EUR 900 for 1 person stage 1 and 2			
IT	± EUR 300 in Torino	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available
NL	likely around EUR 1000	around EUR 1,200		
PL	PLN 1768.43 (EUR 420)			
PT	None		*gas installations*	No information available
SI	EUR 22.60	Around EUR 500		
UK	GBP 99 (EUR 112) to GBP 499 (EUR 570).	GBP 3,365 (EUR 3,820)		

Document submission demands

Types of required documents

For all procedures in all countries which have been included in this research application forms have to be filled in. Table 4.10 summarises the types of documents that are required:

- An application form is required in all countries for F-Gas authorisation and also for most other authorisations;
- As proof of staff qualifications, for F-Gas authorisations nine countries require qualification documents for all qualified staff (regardless of cross-border services), with three countries only requiring numbers of qualified staff (BG, DE and FR) and two countries requiring other data than number of qualified staff or qualification documents (GR and NL);
- A list of equipment is required for F-Gas authorisation in eight countries (BG, DK, FI, FR, IT, NL, PT, SI), and for asbestos removal in four countries (BG, DE, IT, SI) and occasionally for some other authorisations (BG, ES, FI, IT, PT);
- For F-Gas authorisation, documents on installation procedures are required in three countries (NL, PL and UK). For asbestos removal, documents on health and safety procedures are required in (BG, DE, ES, IT, UK);

- In some countries, requirements are implicit in a certificate (for example issuing organisation and certificate number in Greece, copy of certificate in IT and NL and an eco-audit report in Germany).

In Poland, only statements need to be checked on an application form. However, the issuing authority must check the underlying documents at the company premises before issuing a certificate. Therefore, we include the underlying documents as requirements even though only the application form needs to be submitted.

Table 4.10 Summary of required documents

MS	Authorisation	Application Form	Staff Qual. Nr/Docs	List of equipment	Health & Safety / Procedures	Other
BG	F-gas certification	AF	QN	LE		GR
	Asbestos removal	AF	QN	LE	HS	
CZ	F-gas certification	AF	QD-all			
	electrical and gas installation	AF	QD-some	LE		
	pressure or hoisting equipment	AF	QD-some	LE		
DE	F-gas certification	AF	QN			AR
	Asbestos removal	AF	QN	LE	HS	ATT
	Sewage, water and gas installations	AF	QN			POL
DK	F-gas certification/ Electrical/water/ sewage/gas installations	AF	QD-all	LE	PR	
ES	F-gas certification	AF	QD-some			
	Asbestos removal	AF			HS	POL
	Electrical installations	AF	QN			POL
	Installation of elevators	AF		LE		ATT
	Installation of alarm systems		QN			CA, CS, SR, POL
	Installation of heating equipment		QN	LE		CA, ATT, SS
FI	F-gas certification	AF	QD	LE		LA
	installation of elevators		QN			
	electrical and telecom installations		QN	LE	HS	No information available
FR	F-gas certification	AF	QN	LE		
GR	F-gas certification	AF				CA, DH
IT	F-gas certification	AF	QD-some	LE		CA
	Asbestos removal	AF	QN	LE	HS	
	electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations	AF	QN*			
NL	F-gas certification	AF		LE	PR	CA, AR, LA
	Asbestos removal	AF			PR	ATT, TA,DH
PL	F-gas certification	AF	QD-some		PR	DH,GR
PT	F-gas certification	AF	QD-all	LE		THome/TA
	Gas installations		QD-all	LE		THome/TA
SI	F-gas certification	AF	QD Host	LE		CHost
	Asbestos removal	AF		LE		
UK	F-gas certification	AF	QD-all		PR	
	Asbestos removal		QD-some		HS	GR, LA

Legend:

Application Form
AF = Application Form
Staff Qual. Nr/Docs
QD-all = Qualification documents for all staff
QD-some = Qualification documents for some staff
QD Host = Certificates issued to staff by a host country entity (SI: the Ministry for Environment)
QN = Number of qualified staff
QN* = Number of qualified staff, qualification documents needed for only one technically responsible person
List of equipment
LE = List of equipment
Health & Safety / Procedures
HS = Docs on health and safety procedures
PR = Docs on installation procedures
Other
AR = audit report (Germany: eco audit, Netherlands F-Gas Balance)
ATT = Attest proving insurance or financial guarantees
CA / CHost = Installation certificate issued by any EU Member State authority / only the host country (in Slovenia: notification of the equipment at the Ministry for Environment)
CR = proof that confident information is stored in a restricted area
CS = Company statutes
DH = Declaration on honour
FR = Financial annual report
GR = Good repute (e.g. proof of no conviction)
GR2 = ID for all legal representatives of the company and an extract of the criminal record for each of them
LA = List of company activities or relevant projects
POL = Insurance policy proving insurance or financial guarantees
SS = Social security statement
TA / THome = extract of trade register in any country / of the home country (in Portugal: extract from commercial register in home Member State required)

Form of documents (Certification demands regarding content/source or regarding copies)

Under internal market principles, documents from other Member States should be accepted without any added formality in the host Member State regarding their content or source (no certification requirement to attest their content, outside of translation issues, and or the identity and credentials/capacity of the issuing entity).

Documents should also be accepted in simple copy format, without a need for certified copies or originals to be submitted.

- *Certification costs regarding content or source of documents may be affected by unwritten (and not identified) administrative practice*

This study collected few information regarding certification requirements imposed by a host Member State upon documents originating in another Member State aiming at controlling their content and or source. Foreign documents seem to be generally accepted in the same manner as national documents (in terms of their content and or source), without certification requirements to attest facts regarding the content of the documents in question (content corresponds to the truth, content registered somewhere) and or to attest the identity and credentials/capacity of their issuing entity.

For installations involving F-gases, most countries accept foreign certificates obtained by service providers in other EU countries (an obligation of the F-gas Regulation[38]). Ten countries (Bulgaria, the Czech Republic, Finland, France, Germany, Greece, Italy, Poland, Slovenia, and the United Kingdom) merely require that the company notify the authority of the host country of a valid certificate from the other EU Member State.

Still, and in particular for other installation services with no harmonised rules at EU level, the lack of information collected on the presence of requirements of this nature does not necessarily mean they are completely absent from everyday practice, especially considering these formalities often derive from general rules of administrative procedure, applied to specific control procedures under differing (and unwritten) administrative practices.

[38] See Article 10(10) second subparagraph of Regulation (EU) 517/2014.

Two examples of unidentified requirements concern certificates for F-gas installation in Greece and asbestos removal in the Netherlands:

- Greece requires some documents for F-gas installation to be certified and to present certificate numbers by private certifying companies. Private certifying companies are accredited by the Hellenic Accreditation System (Εθνικό Σύστημα Διαπίστευσης - ΕΣΥΔ) to issue certificates based on management systems complying with European Technical Standards. The list of accredited certifying companies is fairly long and includes international certifying companies;
- The Netherlands requires certification of documents for asbestos removal by an accredited private certifying company, which amongst others must performs checks at the premises of the applicant. The list consists of a handful of Dutch certifying companies.

The accredited certifying companies may each have their own certification requirements for documents submitted by applicants, which they do not publicly disclose and are thus not identified. Interestingly, the differences in the lists of accredited companies also suggest a difference in difficulty for certifying companies to become accredited, which in turn are likely to result in differences in competition between certifying companies and ultimately fee costs.

- *Simple copies/Certification of copies/presentation of originals*

Requirements on the form of documents pertaining to whether and how copies are accepted are, however, fairly common.

In Germany, for F-gas certification, certification demands are treated differently by different authorities (also within the same region). In France and Greece, these requirements also depend on the accredited entities that issue the certificate. Since Polish legislation only requires statements for F-gas certification, with no supporting documents, the notion of simple or certified copies is not applicable. For Czech Republic, Portugal, Spain and Slovenia the option of requesting to view the original documents by the authorities is explicitly mentioned.

For Czech Republic, Portugal, Spain and Slovenia simple copies are accepted, although the option of requesting to view the original documents by the authorities is explicitly mentioned.

For France and Germany, where some local authorities may require certified copies and others not, for the cost calculations certification is assumed. For France the reason is that (originals) and certified copies are the administrative default, and for Germany because certified documents must be demanded for most other authorisation procedures.

Table 4.11 Certification demands regarding copies

MS	Whether simple copies suffice			
	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Simple copies suffice
BG	NA	Yes		
CZ	Yes		*electrical and gas installation*	No
			pressure or hoisting equipment	No
DE	Depends on local authority	Partially	*sewage, water and gas installations*	Partially
DK	Partially		*electrical/water/ sewage/gas installations*	Partially
ES	Partially	No	*installation of alarm systems*	Partially
			heating equipment	Partially
			electrical installations	No
			installation of elevators	No
FI	Yes		*installation of elevators*	Yes

MS	Whether simple copies suffice			
	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Simple copies suffice
			electrical and telecom installations	Yes
FR	Depends on issuing entity			
GR	Depends on issuing entity			
IT	Yes	Yes	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	NA
NL	Yes	No		
PL	Not applicable			
PT	Yes		*gas installations*	Yes
SI	Yes	Yes		
UK	Yes	Yes		

Notes:
CZ, PT, SI, ES / F-gases - The inspection can ask to see the originals.
ES / F-gases - The document identifying the company must be legally constituted, no certification required for other information (Madrid).

Translation demands

For various authorisations or notifications translation demands are not explicitly mentioned ("No information available" in Table 4.12) and assumptions will be made (in Section 5.6). In various countries, translation demands depend on the type of document or the situation. In Denmark, the application form and documents related to compliance with technical standards are accepted in English, while professional and technical capacity have to be translated into Danish by a certified translator. French evaluation of documents is conducted in French, implying that documents should be delivered in French. However, equivalent certificates of ability can be issued by other EU member states in other languages.

In Greece, translation demands for F-gas certification fully depend on the issuing entity. In Portugal, the application and the documents should be submitted in Portuguese. However, if documents were originally written in English, their translation can be demanded only if they are too technical or complex. For documents written in other languages, a translation into Portuguese should be submitted.

Table 4.12 Translation demands

B	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Translation Demands
BG	CT	RT		
CZ	CT		*electrical and gas installation*	No information available
			pressure or hoisting equipment	No information available
DE	CT	No information available	*sewage, water and gas installations*	No information available
DK	CT, EN		*Electrical/water/ sewage/gas installations*	CT, EN
ES	CT	No information available	*installation of alarm systems*	No information available
			heating equipment	No information available
			electrical installations	NT
			installation of elevators	EN
FI	EN		*installation of elevators*	EN
			electrical and telecom installations	EN
FR	CT, NT			

B	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Translation Demands
GR	Depends on issuing entity			
IT	CT	No information available	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No information available
NL	EN	CT		
PL	CT			
PT	CT, EN		*gas installations*	CT, EN
SI	EN	EN		
UK	EN	EN		

Legend:
CT = Certified translation only.
RT = Regular translation suffices.
NT = No translation needed.
EN = English accepted.

On-site inspections

For some installation services, on-site inspection requirements apply on top of horizontal control schemes.

On-site inspections for F-gases installations take place in eight countries (CZ, FR, GR, IT, NL, PL, PT, UK), with varying needs for on-site inspections in two of those countries. In Greece, inspection takes place for ISO9001 certification with a validity of 3 years. In the United Kingdom, the guidance indicates that 'certification and evaluation bodies' can choose to audit applicants as part of the application / subsequent assessments. However, it seems some certification and evaluation bodies do not mandate this as part of their own application process.

For asbestos removal, on-site inspections take place in Italy and in the United Kingdom, while they are not required in Bulgaria, Germany, Spain, the Netherlands and Slovenia.

Among the other procedure, on-site inspections take place in Czech Republic (for electrical and gas installation, and pressure of hoisting equipment), Spain (for elevators), and Portugal (gas).

Table 4.13 On-site inspections

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	On-site inspections
BG	Yes	No		
CZ	Yes		*electrical and gas installation*	Yes
			pressure or hoisting equipment	Yes
DE	No	No	*sewage, water and gas installations*	No
DK	No		*Electrical/water/ sewage/gas installations*	No
ES	No	No	*installation of alarm systems*	No
			heating equipment	No
			electrical installations	No
			installation of elevators	Yes
FI	No		*installation of elevators*	No
			electrical and telecom installations	No
FR	Yes			
GR	Varies			

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	On-site inspections
IT	Yes	Yes	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No
NL	Yes	No		
PL	Yes			
PT	Yes		*gas installations*	Yes
SI	No	No		
UK	Varies	Yes		

4.2. Availability of tools to make formalities easier

Introduction

The availability of online information and online procedures are not formalities themselves, of course, but rather tools to facilitate going through the procedures in place and therefore essential to characterised the administrative burden associated with those formalities. As confirmed in this study, in some countries a substantial part of the burden of administrative formalities consists of finding the relevant practical information about the procedure as this information has not been made easily accessible. Also, as demonstrated earlier, procedures can take many months to complete and online procedures are essential for providers originating in other Member States, avoiding costly displacements to the host Member State before actually starting to provide services there; e-procedures may even help reduce the length of the procedure.

Availability of online information

Firstly, the points of single contact set up under the Services Directive (2006/123/EC) in most Member States offer little or no information on these types of procedures. However, in various cases, the information is available on other websites – usually, the website of the national association – with the point of single contact referring to that site. In these cases, information is considered to be available online.

For authorisations in **Germany**, the information found on the respective website only applies to natural persons. For the other countries, five of them (Bulgaria, France, Greece, Italy, Slovenia) do not have online information on authorisation for services related to F-Gases installations available. The authorities in Slovenia have announced that it they are currently working on it. For asbestos removal in **Slovenia**, legal information is only partially explained. Meanwhile, in **Italy**, no online information is available for asbestos removal, or electrical, heating, airco (etc.) installations.

Table 4.14 Availability of online information

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Availability of online information
BG	No	Yes		
CZ	Yes		*electrical and gas installation*	Yes
			pressure or hoisting equipment	Yes
DE	Partially	Partially	*sewage, water and gas installations*	Partially
DK	Yes		*electrical/water/ sewage/gas installations*	Yes
ES	Yes	Yes	*installation of alarm systems*	Yes
			heating equipment	Yes
			electrical installations	Yes
			installation of elevators	Yes

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Availability of online information
FI	Yes		*installation of elevators*	Yes
			electrical and telecom installations	Yes
FR	No			
GR	No			
IT	No	No	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	No
NL	Yes	Yes		
PL	Yes			
PT	Yes		*gas installations*	Yes
SI	No	Partially		
UK	Yes	Yes		

Availability of information in English

For companies seeking to offer services cross-border, availability of information in another language than the language of the host country, in particular availability of information in English, may be highly useful.

Five countries (in addition to the UK) provide information in English in F-gases: Denmark, Spain, Finland, the Netherlands, and Poland. **Germany** does offer information in English and forms are in the German language. In Slovenia, only part of the information is available in English. For the other countries, no information in English is available. For asbestos removal, Spain offers information in English, while Denmark (for electrical/water/sewage/gas) and Finland (for elevators and telecom) offer information in English for other services.

Table 4.15 Availability of information in English.

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Availability of information in English
BG	No	No		
CZ	No		*electrical and gas installation*	No
			pressure or hoisting equipment	No
DE	Partially	Partially	*sewage, water and gas installations*	Partially
DK	Yes		*electrical/water/ sewage/gas installations*	Yes
ES	Yes	Yes	*installation of alarm systems*	No
			heating equipment	No
			electrical installations	No
			installation of elevators	No
FI	Yes		*installation of elevators*	Yes
			electrical and telecom installations	Yes
FR	No			
GR	Depends on issuing entity			
IT	No	No	*electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system*	No

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Availability of information in English
			installations	
NL	Yes	No		
PL	Yes			
PT	No		*gas installations*	No
SI	Partially	Partially		
UK	Yes	Yes		

Availability of online procedures

An important possible tool to make formalities easier in this age of digitalisation is the availability of online procedures to submit an authorisation request or a notification. The extent to which a request can be processed online can be classified in four (main) categories:

A. full online handling is possible;
B. electronic intake is partially available;
C. downloadable forms only;
D. no online facilities.

For F-Gases, full online handling of a request is possible only in Finland and the United Kingdom, with no signature required in both cases. A further six countries (CZ, DE, DK, ES, PL, PT) offer downloadable forms, while in the remaining countries of the panel, no online facilities are offered.

For asbestos removal, more countries offer the option for a full online handling: Bulgaria, Slovenia and the United Kingdom offer full online handling, requiring e-signatures, while in the Netherlands, no e-signature is required. Germany and Spain offer downloadable forms only, while Italy offers no online facilities at all.

For other installation services, Italy (for electrical, heating, airco, etc.) and Finland (for energy-efficiency related installations, elevators and hoisting installations, and telecommunications installations) offer full electronic handling. The Czech Republic has made a partial electronic intake available (for electrical installations, and elevators), while downloadable forms are offered in Germany, Denmark, Spain, and Portugal.

Table 4.16 Availability of online procedures and need for e-ID and/or e-signatures.

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Online procedures and e-ID/e-sign
BG	D	A, e-sign.		
CZ	C, no sign.		*electrical and gas installation*	B, no sign.
			pressure or hoisting equipment	B, no sign.
DE	B, no sign.	C, no sign.	*sewage, water and gas installations*	C, no sign.
DK	C, no sign.		*electrical/water/ sewage/gas installations*	C, no sign.
ES	C, no sign.	C, no sign.	*installation of alarm systems*	C, no sign.
			heating equipment	C, no sign.
			electrical installations	C, no sign.
			installation of elevators	C, no sign.
FI	A, no sign.		*installation of elevators*	A, no sign.
			electrical and telecom installations	A, no sign.
FR	D			

MS	Installations involving F-Gases	Asbestos removal	Other procedures	
			Type	Online procedures and e-ID/e-sign
GR	D			
IT	D	D	*Electrical, radio/TV, heating, air conditioning, refrigeration, plumbing, gas, elevator and fire protection system installations*	A, E-id.
NL	D	A, no sign.		
PL	C, no sign.			
PT	C, no sign.		*gas installations*	C, no sign.
SI	D	A, e-sign		
UK	A, no sign.	A, e-sign		

Legend:
Online procedure
A = Full online handling;
B = Electronic intake partially available;
C = Downloadable forms only;
D = None;
Digital signatures (only for online procedures A, B and C):
e-sign. = e-signature required,
E-id. = electronic identification required,
no sign. = no digital signing is needed.

5. SURVEY RESULTS

5.1. Introduction

To gather information about the costs of administrative procedures, businesses were interviewed. The results of these interviews are presented in this chapter, separately for horizontal control schemes and building permits.

For horizontal control schemes, the administrative costs are broken across different (national) administrative requirements. Survey respondents were asked about the costs they incurred for each of these administrative requirements.

For building permits, a different approach is taken given that national requirements are often minimum requirements and local authorities may impose additional requirements. This difference in national versus local requirements is reflected in the approach taken to breakdown reported costs. For building control procedures, reported costs are merely used as examples of costs that cross-border construction service providers incur.

Reported hours in this chapter are multiplied with the following average EU28 wage rates taken from a study on formalities and costs of accessing markets cross-border[39]:

- Managers and professionals: EUR 58 per hour;
- Support staff: EUR 29 per hour.

It should be noted that in the tables in this and the next chapter, the requirements of domestic service providers of the host country are listed. The extent to which these requirements are applied to service providers from other Member States is reflected in the score for "mutual recognition". The host country procedure does not apply to cross-border service providers if they are only required to submit proof of authorisation in the home country (mutual recognition code 1).

Furthermore as explained in chapter 4, Member States rarely distinguish between temporary cross-border providers and establishing ones. No further distinction between "establishment" and "temporary cross-border provision" is therefore made in this chapter and the following ones, as a simplification.

5.2. HCS – overview of reported costs

Six interviews in total were carried out with service providers that underwent horizontal authorisation schemes.

Four of them were cross-border service providers: one for the Czech Republic and Poland each (both for F-Gas authorisations) and two for Portugal (general authorisation). The remaining two were domestic service providers: one for Italy (F-Gas authorisation and general authorisations) and one for Slovenia (F-Gas authorisation).

The interview results are presented per service provider in Table 5.1. The table shows both the time spent by service providers to complete the administrative procedure as well as the fees paid to authorities. As a double-check on double-counted or non-reported hours and fees, respondents were not only asked about hours and fees per step, but also the total hours and fees for the procedure.

[39] Administrative formalities and costs involved in accessing markets cross-border for provisions of accountancy, engineering and architecture services, https://publications.europa.eu/en/publication-detail/-/publication/5c8a6c62-44e3-11e7-aea8-01aa75ed71a1.

Table 5.1 Reported hours and fees for horizontal authorisation procedures (fees in EUR)

Step	Hours						Fees					
Host MS	CZ	IT	PL	PT1	PT2	SI	CZ	IT	PL	PT1	PT2	SI
Type HCS	F-G	F-G Gen	F-G	Gen	Gen	F-G	F-G	Gen	F-G	Gen	Gen	F-G
CB/Home	CB	H	CB	CB	CB	H	CB	H	CB	CB	CB	H
Data & docs – manager / authority	160	24	8	30	20	.	.	10,000	.	0	0	.
Data & docs – support / intermediary	160	80	16	0.5	5	.	.	15,000	.	0	1,000	.
Insurance	.	8	0	40	0	.	.	.	0	0	0	.
Inspections	.	.	0	0	0	.	.	.	0	0	0	.
Translation certification	.	.	8	0	5	.	.	.	350	0	100	.
Other services	.	.	0	0	.	.	.	.	0	0	0	.
Paying fees	.	3	8	0	0	.	.	.	.	0	0	.
Submission of docs	.	.	.	.	.	.	.	.	.	.	.	.
Other steps if any	.		40	0	0	.	.	.	2,375	0	0	.
Total	320	.	80	150	20	5	.	.	3,000	.	3,000	.

PL: F-Gas authorisation, PT1 and PT2: class 1 and 2 construction services authorisation;
. = not reported.

For the Czech Republic (procedure for F-gas), the high number of hours were caused by the requirement that all technicians of the company need to be individually qualified even if they do not provide the actual services in the host country.

For Poland, a cross-border service provider was interviewed who reported horizontal authorisation costs, a Czech company for F-gases. The Czech company had established a subsidiary in Poland and had to go through the same requirements as domestic firms for authorisation to work with F-gases. The translation and travel costs were revealing about some of the additional costs for cross-border service providers compared to domestic ones.

For Portugal discrepancies between the total and the sum of individual items are observed. From the hours (company PT1) and fees (company PT2) we conclude that an uncategorised cost of roughly either 80 hours or 2,000 EUR in fees is incurred. Given that the information on the procedure on the website of the relevant authority is not available in Portuguese and there is no link to this website from the Portuguese Point of Single Contact website, the difference is allocated to time spent on familiarisation with and communication about the procedure.

For Italy a domestic firm reported combined costs for general control scheme procedures (D.U.R.C. and the mandatory ISO EN 9001:2008 certificate for private works above EUR 500,000) and a specific authorisation for working with elements involving F-gases. The comparison of administrative requirements for installation services in this report and general construction services in the previous report suggest that the largest part of these costs were incurred for the mandatory ISO certificate.

For Slovenia, a domestic firm reported 8 hours for identifying and collecting data and documents related to a procedure to obtain a licence for work with elements involving F-gases. For cross-border firms, the time required is likely to be higher.

Based on the reported hours and costs, five main categories of costs related to different administrative steps are distinguished, which will be further explained in the following sections:

- Familiarisation with and communication about the procedure;

- Getting data and documents;
- Arranging insurance and on-site inspections;
- Translating and certifying documents;
- Paying fees and submitting documents.

On the basis of the number of interviews carried out with regard to horizontal authorisation schemes (6) it is difficult to come to accurate cost estimates. Their results will therefore be used as an indication of costs that these different administrative steps could entail for cross-border service providers. At the same time, also other sources of evidence will be used to estimate these costs.

5.3. HCS – Familiarisation and reported costs

A. Cost elements taken into account

Before being able to complete certain formalities in the host Member State, service providers need to understand the different procedural steps that are required. It is common sense that most firms incur costs to get information about the procedure and internal communication about how to comply with the information requirements ("familiarisation").

Based on the information of the previous chapters, the various factors that contribute to the costs of familiarisation are summarised in Table 5.2 (general HCS) and Table 5.3 (installation services HCS).

Table 5.2 Factors contributing to the complexity of getting information about procedures, general HCS

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt
BG	Registration in Builders' Register	0	1	1	0	1	9	1
ES	REA	0	1	1	0	1	6	1
IT	DURC	1	1	0	0	1	1	1
IT	ISO EN 9001:2008	1	1	1	1	2	7	1
PT	Registration at IMPIC	0	1	1	0	1	5	1

Mutual Recognition Provision codes (fully used in Table 5.3):
1 = Notification / requirement to show home Member State certificate at any time;
2 = Authorisation with equivalence assessment for some requirements with procedure and examples (other requirements accepted as per country of origin);
3 = Authorisation with equivalence assessment for some requirements with procedure and no examples (other requirements accepted as per country of origin);
4 = Authorisation with equivalence assessment for some requirements with no procedure (other requirements accepted as per country of origin);
5 = Authorisation with equivalence assessment for all requirements with procedure and examples;
6 = Authorisation with equivalence assessment for all requirements with procedure and no examples;
7 = Authorisation with equivalence assessment for all requirements with no procedure;
8 = Authorisation with recognition of certificates issued by recognised certification providers (under a complex and costly procedure);
9 = No Mutual Recognition or No information (then no mutual recognition is assumed).

Table 5.3 Factors contributing to the complexity of getting information about procedures, installation services HCS

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt
BG	F-gas certification	1	1	0	1	1	1	1
BG	Asbestos removal	0	1	1	0	2	9	1
CZ	F-gas certification	0	1	0	1	1	1	1
CZ	Electrical and gas installation services	0	1	0	1	1	1	1
CZ	Working with pressure or hoisting equipment	0	1	0	1	1	1	1

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt
DE	F-gas certification	0.5	0.5	1	0	1	1	1
DE	Asbestos removal	0.5	0.5	1	0	1	9	1
DE	Sewage, water and gas installations	0.5	0.5	1	0	1	1	1
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	0	1	0	1	9	0.5
ES	F-gas certification	0	0	0	0	2	4	1
ES	Asbestos removal	0	0	1	0	1	9	1
ES	Electrical installations	0	1	1	0	2	9	1
ES	Installation of elevators	0	1	0	1	1	4	1
ES	Installation of alarm systems	0	1	1	1	1	5	1
ES	Installation of heating equipment	0	1	0	1	1	4	1
FI	F-gas certification	0	0	0	0	1	1	1
FI	Installation of elevators	0	0	0	0	1	1	1
FI	Electrical and telecom installations	0	0	1	0	1	1	1
FR	F-gas certification	1	1	0	1	1	1	1
GR	F-gas certification	1	1	0	0.5	2	1	0.5
IT	F-gas certification	1	1	0	1	3	1	1
IT	Asbestos removal	1	1	1	1	1	9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	1	1	0	1	1	9	1
NL	F-gas certification	0	0	1	1	1	8	0.5
NL	Asbestos removal	0	1	1	0	1	9	1
PL	F-gas certification	0	0	1	1	1	1	1
PT	F-gas certification	0	1	0	1	1	7	1
PT	Gas installations	0	1	0	1	1	7	1
SI	F-gas certification	1	1	0	0	1	1	1
SI	Asbestos removal	0.5	0.5	0	0	1	9	1
UK	F-gas certification	0	0	1	0.5	1	1	1
UK	Asbestos removal	0	0	1	1	1	9	1

Mutual Recognition Provision codes: see Table 5.2.

Factors that increase the cost of getting information about procedures include the following:

- Absence of online information or information in English;
- The requirement to submit "non-standard documents (or data)";
- A requirement of inspections before the authorisation is granted;
- The number of authorities involved in the procedure;
- Absence of mutual recognition.

Absence of online information (in English) means more efforts are needed to find or interpret information about procedures. The need to present non-standard documents or data means that service providers have to invest more time to collect information about what is exactly required. Inspections and the involvement of multiple authorities complicate the procedure as well. For example, one respondent remarked about the Polish F-Gas control scheme procedure that the deadline for applications is tight and it is a challenge to arrange inspections in time. Finally, absence of mutual recognition implies that the situation of the service provider in its home Member State is not or not fully taken into account, and thus information about compliance with specific requirements in the host country must be collected. These factors were assigned values with higher values indicating greater complexity or higher frequency.

In Table 5.2 and Table 5.3, the values of the column "No info" and "No EN info" indicate whether online information is available and whether information is available in English, respectively (0 = available, 1 = not available and 0.5 = partly available). This information is for most procedures based on Section 4.2 (Availability of online information and information in English).

Regarding the requirement of non-standard documents (or data), the values in the column "NS docs" are 0 or 1 depending on whether one or more of the following documents must be submitted, based on Table 4.10 (regarding installation services):

- Documents on health and safety (HS);
- Documents on management of procedures (PR);
- Insurance policies (INS);
- Audit reports (AR);
- Proof that confidential information is stored in a restricted area (CR).

These documents are considered non-standard because they are often not available in a standard format that provides the necessary information. For example, insurance policies often do not include mere statements from the insurance provider that the applicant is covered also in the host country.

Regarding the requirement of inspections before authorisation is granted, column "Insp." indicates if an on-site inspection is required (see Table 4.13 for installation services).

Regarding the number of authorities involved in the procedure, the column "Nr. auth." indicates the number of authorities involved in the control scheme procedure (Table 4.4).

Regarding mutual recognition, the column "Mut. Rec." indicates the degree of mutual recognition of service providers from other EU Member States, based on Table 4.8. A value of 0 indicates that there is no procedure. This means that a service provider from another EU Member State is automatically allowed to provide services without even a notification requirement. A value of 1 indicates a notification requirement, whereby a service provider is required to submit a notification to the host Member State before providing services there, possibly accompanied by certain supporting documents (such as a copy of a licence certificate or registration from the home country). The values 2-7 indicate an authorisation scheme with varying degrees of equivalence assessment, for some or all requirements, with or without an equivalence assessment procedure, and with or without examples of what is considered as equivalent. A value of 8 indicates that certificates issued by certification providers of some other EU Member States are fully recognised (often under a complex and costly procedure), but not for all EU Member States. A value of 9 indicates absence of mutual recognition and the cross-border service provider must follow exactly the same procedure as domestic service providers of the host country.

The column "Wgt" is a weight with default value 1 but value 0.5 if conditions met in some other EU Member States are automatically accepted as equivalent (Denmark for F-gas certification and electrical/water/sewage/gas installations) or if certificates from some certification bodies are automatically recognised (Greece and the Netherlands for F-gas certification). For example, for Denmark officials highlighted that requirements of some countries are recognised as equivalent to Danish standards. Greece accepts certificates of certain international certifying companies regardless of the home country of the installation service provider. In the Netherlands the law specifies that a specific certificate that is known to prove equivalent requirements can be accepted without further formalities.

B. Cost range taken into account

As noted in the previous section, the uncategorized costs allocated to familiarisation are on average EUR 2,000 for Portugal. This seems to be a good reference point for "average costs" of familiarisation. Therefore, a range of 0 to 4,000 EUR for the estimation of these costs will be used as a basis for the cost assessments in the following chapter 6.

5.4. HCS - Getting data and documents and reported costs

A. Cost elements taken into account

Service providers are required to obtain data and documents in order to complete the necessary formalities in the host Member State. The costs of getting data and documents increase with the amount of data/information that needs to be obtained and the types of related administrative steps that need to be completed (see Table 5.4 and Table 5.5). These submission demands build on the information presented in section Table 4.10 regarding installation services. They are exclusive translation and certification costs, which are presented in section 5.6.

Table 5.4 Data and documents to be submitted, general HCS, category installation services

MS	Authorisation	Appl. Form	Qual. Staff Nr/ Docs	List of Eq.	H&S / Procs	Other	Mut. Rec.	Wgt
BG	Registration in Builders' Register	AF	QN	LE		POL, FR	9	1
ES	REA	AF	QD-some		HS	THome, FT	6	1
IT	DURC	AF				SOC	1	1
IT	ISO EN 9001:2008	AF	QD-some		PR		7	1
PT	Registration at IMPIC	AF				GR2, POL, THome, FR	5	1

Codes for required documents (data in some cases, codes fully used in Table 5.5):

1. AF = application form;
2. QN = numbers of qualified staff, QD-all = qualification documents of all staff regardless of whether they provide services in the host country, QD-some: only for professionals actually providing the services in the host country;
3. LE = List of equipment;
4. HS = Documents relating to health and safety, PR = documents about installation procedures.

Others:

AR = audit report (Germany: eco audit, Netherlands F-Gas Balance).
ATT = Attest proving insurance or financial guarantees.
CA / CHost = Installation certificate issued by any EU Member State authority / only the host country (in Slovenia: notification of the equipment at the Ministry for Environment).
CR = proof that confident information is stored in a restricted area.
CS = Company statutes.
DH = Declaration on honour.
FR = Financial annual report.
FT = social security statement on the volume of full-time employment.
GR = Good repute (e.g. proof of no conviction).
GR2 = ID for all legal representatives of the company and an extract of the criminal record for each of them.
LA = List of company activities or relevant projects.
POL = Insurance policy proving insurance or financial guarantees.
SS = Social security statement.
TA / THome = extract of trade register in any country / of the home country (in Portugal: extract from commercial register in home Member State required).

Table 5.5 Data and documents to be submitted, installation services HCS

MS	Authorisation	Appl. Form	Qual. Staff Nr/ Docs	List of Eq.	H&S / Procs	Other	Mut. Rec.	Wgt
BG	F-gas certification	AF	QN	LE		GR	1	1
BG	Asbestos removal	AF	QN	LE	HS		9	1
CZ	F-gas certification	AF	QD-all				1	1
CZ	Electrical and gas installation services	AF	QD-some	LE			1	1
CZ	Working with pressure or hoisting equipment	AF	QD-some	LE			1	1
DE	F-gas certification	AF	QN			AR	1	1
DE	Asbestos removal	AF	QN	LE	HS	ATT	9	1
DE	Sewage, water and gas installations	AF	QN			POL	1	1
DK	F-gas certification/	AF	QD-all	LE	PR		9	0.5

MS	Authorisation	Appl. Form	Qual. Staff Nr/ Docs	List of Eq.	H&S / Procs	Other	Mut. Rec.	Wgt
	electrical/water/ sewage/gas installations							
ES	F-gas certification	AF	QD-some				4	1
ES	Asbestos removal	AF			HS	POL	9	1
ES	Electrical installations	AF	QN			POL	9	1
ES	Installation of elevators	AF		LE		ATT	4	1
ES	Installation of alarm systems		QN			CA, CS, SR, POL	5	1
ES	Installation of heating equipment		QN	LE		CA, ATT, SS	4	1
FI	F-gas certification	AF	QD	LE		LA	1	1
FI	Installation of elevators		QN				1	1
FI	Electrical and telecom installations		QN	LE	HS	?	1	1
FR	F-gas certification	AF	QN	LE			1	1
GR	F-gas certification	AF				CA, DH	1	0.5
IT	F-gas certification	AF	QD-some	LE		CA	1	1
IT	Asbestos removal	AF	QN	LE	HS		9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	AF	QN				9	1
NL	F-gas certification	AF		LE	PR	CA, AR, LA	8	0.5
NL	Asbestos removal	AF			PR	ATT, TA, DH	9	1
PL	F-gas certification	AF	QD-some		PR	DH	1	1
PT	F-gas certification	AF	QD-all	LE		THome/TA	7	1
PT	Gas installations		QD-all	LE		THome/TA	7	1
SI	F-gas certification	AF	QD-some	LE		CHost	1	1
SI	Asbestos removal	AF		LE			9	1
UK	F-gas certification	AF	QD-all		PR		1	1
UK	Asbestos removal		QD-some		HS	GR, LA	9	1

Codes: see Table 5.4.

B. Cost range taken into account

The costs of getting data and documents reported in the interviews are derived from Table 5.1 with hours multiplied with the wage rates given at the end of Section 5.1.

Table 5.6 Reported costs for getting data and documents (hours and costs in other currencies converted to euros)

Step	CZ	IT	PL	PT1	PT2	PT avg.	SI
	F-Gas	F-Gas + General	F-Gas	General	General	General	F-Gas
	CB	Home	CB	CB	CB	CB	Home
Getting data & docs – manager/professional	8,874	1,392	464	1,740	1,160	1,450	290
Getting data & docs – support staff	4,437	2,320	464	15	145	80	0
Total	13,311	3,712	928	1,755	1,305	1,530	290

Leaving aside the costs of getting qualification documents for all technicians for the F-gas authorisation in the Czech Republic, the hours of getting documents multiplied with the wage rate are in the range of EUR 300 for the F-Gas procedure in Slovenia up to EUR 3,700 for three authorisations in Italy combined.

Assumptions need to be made in order to estimate costs per type of document or data that needs to be obtained by the service provider.

In Slovenia the main documents to be supplied for the F-gas control scheme are an application form and a list of equipment. The hours multiplied with the wage rate are reported at EUR 300 by a domestic company. On this basis, the following assumptions are made:

- For filling in an **application form** one hour by a manager or professional at EUR 50 (rounded) is assumed;
- Since for cross-border providers it may be slightly more costly to compare equipment in the company with the required equipment in the host Member State, EUR 400 is assumed for compiling a **list of equipment**.

For the F-gas control scheme in Poland, the main documents to be supplied are an application form and documentation on procedures. The reported hours times the wage rate equal EUR 1,000 (rounded). For Italy, these costs are EUR 3,700 for three procedures, of which EUR 450 is allocated for F-gas control scheme (only an application form and a list of equipment) and EUR 250 for the DURC authorisation (4 times per year the submission of a social security extract), so EUR 3,000 remains for the submission of documents for the ISO certificate. On this basis, the following assumption is made:

- On average, the costs of compiling **documentation on company procedures or on health and safety arrangements** in the company is assumed to be EUR 2,000.

For the general authorisation in Portugal, proof of good repute, a copy of an insurance policy and a financial report are the main document requirements and the hours involved times the wage rate are on average EUR 2,000. The good repute requirement is a photocopy of the criminal record of each representative of the company. Such a document on good repute can be considered as a "standard document". In another study[40], the submission of such standard documents is estimated to cost 3 hours of time which would be EUR 150 (rounded). For the control schemes in other countries, just one company proof of good repute is required if any at all. With regard to non-standard documents, the previously mentioned study reported 20 to 40 hours to meet such document requirements of the host country. On this basis, the following assumption is made:

- EUR 50 is allocated for **proof of good repute**;
- An average cost of EUR 900 is allocated to both the **insurance policy** and the **financial report documents**.

Additionally, the following assumptions are also made:

- **Company statutes** can also be considered as a "standard document", requiring about one hour (or 50 EUR);
- Compiling **qualification documents of all staff** regardless of whether they provide services in the host country requires about two hours (or 100 EUR), as a conservative estimate.

For other documents and data such as numbers of qualified personnel, an extract from the trade register or a company certificate, an ecological report or F-gas report, a list of company activities and a declaration on honour (a form that only needs to be signed) no additional costs are allocated as a simplification.

Finally, the following additional costs are taken into account which are specific to different Member States:

- For the Czech F-gas authorisation, examination of all technicians is required regardless of who provides the services cross-border for which EUR 13,000 in manpower costs is reported;

[40] Administrative formalities and costs etc., Ibid.

- For Italy a fee of EUR 10,000 for authorities is reported for obtaining documents, which is allocated to the ISO EN 9001:2008 certificate. These costs are classified under "other". Also, for the fact that for DURC an application form or extract from the social security register must be submitted four times per year, an additional EUR 200 is allocated to the category "other";
- A special requirement for the REA registration in Spain is that a certified proof needs to be submitted that 30% or above of the total number of staff have a permanent contract. This is assumed to fall in the same category as a financial report or insurance policy, valued at EUR 900 in manpower costs to collect;
- For Denmark, a management information system is required for F-gas certification and electrical/water/sewage/gas installations (although in this case only for secondary establishment and not for temporary provisions) that is similar to ISO requirements in Italy and therefore the same costs of EUR 10,000 is added for preparing all documents of the management information system.

5.5. HCS – Insurance, inspections and reported costs

A. Cost elements taken into account

To obtain an authorisation, cross-border companies may need to prove that they meet the applicable insurance requirements of the host country even if they are already insured in their home country. This entails administrative costs. Costs of the insurance itself is regarded as costs of a regulatory requirement which is out of scope in this study about administrative requirements. The inventory of insurance builds on Table 4.10 (other documents required = ATT or POL: attest of insurance or the full insurance policy).

In addition, preparing for on-site inspections (making appointments and being present at the inspection) costs time. Only hours and tickets for travel to be present at inspections are taken into account. For costs that authorities or commercial certificate providers charge for on-site inspections the information about the fees from the inventory of the procedures will be used (in the next chapter). The inventory of inspection requirements builds on Table 4.13.

B. Cost range taken into account

For arranging additional insurance, one cross-border service provider operating in Portugal reported no costs and another reported 40 hours. In another study[41], arranging professional indemnity insurance was reported to cost an architect in Austria 30 hours, most of which was spent on comparing insurance policies of different insurers, but others reported 4-8 hours to contact an insurance company to obtain an attest confirming specific requirements. Therefore, a cost of 20 hours (or 1,200 EUR) to **arrange insurance** is taken as a basis for the costs assessments in chapter 6.

Costs of being present at **on-site inspections** were reported at EUR 4,695 for Poland by a cross-border service provider establishing a subsidiary. For Italy, a domestic service provider reported 8 hours to be present at an inspection which is valued at EUR 500 (rounded). However, the costs can be substantially higher for cross-border service providers compared to domestic service providers, due to travel time and travel ticket costs. The assumption is made that a cross-border service provider needs to incur on average 12 hours travel time (for two persons) and travel ticket costs of EUR 500. This comes to a cost of about EUR 2,500 (half that reported for Poland) which is taken as a basis for the costs assessments in chapter 6.

Table 5.7 Insurance and inspection requirements, general HCS

MS	Authorisation	Insurance	Inspections	Mut. Rec.	Wgt
BG	Registration in Builders' Register	1	0	9	1
ES	REA	0	0	6	1
IT	DURC	0	0	1	1
IT	ISO EN 9001:2008	0	1	7	1
PT	Registration at IMPIC	1	0	5	1

[41] Administrative formalities and costs involved in accessing markets cross-border for provisions of accountancy, engineering and architecture services, Ibid.

Table 5.8 Insurance and inspection requirements, installation services HCS

MS	Authorisation	Insurance	Inspections	Mut. Rec.	Wgt
BG	F-gas certification	0	1	1	1
BG	Asbestos removal	0	0	9	1
CZ	F-gas certification	0	1	1	1
CZ	Electrical and gas installation services	0	1	1	1
CZ	Working with pressure or hoisting equipment	0	1	1	1
DE	F-gas certification	0	0	1	1
DE	Asbestos removal	1	0	9	1
DE	Sewage, water and gas installations	1	0	1	1
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	0	9	0.5
ES	F-gas certification	0	0	4	1
ES	Asbestos removal	0	0	9	1
ES	Electrical installations	1	0	9	1
ES	Installation of elevators	0	1	4	1
ES	Installation of alarm systems	1	0	5	1
ES	Installation of heating equipment	1	0	4	1
FI	F-gas certification	0	0	1	1
FI	Installation of elevators	0	0	1	1
FI	Electrical and telecom installations	0	0	1	1
FR	F-gas certification	0	1	1	1
GR	F-gas certification	0	Varies	1	0.5
IT	F-gas certification	0	1	1	1
IT	Asbestos removal	0	1	9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	0	0	9	1
NL	F-gas certification	0	1	8	0.5
NL	Asbestos removal	1	0	9	1
PL	F-gas certification	0	1	1	1
PT	F-gas certification	0	1	7	1
PT	Gas installations	0	1	7	1
SI	F-gas certification	0	0	1	1
SI	Asbestos removal	0	0	9	1
UK	F-gas certification	0	Varies	1	1
UK	Asbestos removal	0	1	9	1

5.6. HCS – Certification, translation and reported costs

A. Cost elements taken into account

In many cases, service providers are asked to translate supporting documents accompanying their application. These often need to be certified, culminating in further administrative costs.

Certification and translation costs vary between types of documents. Certification costs differ between types of certifying authorities, for example a notary typically charges more than a Ministry, and hence certification of documents that must be certified via a notary tends to be more costly. Translation costs increase with the number of words that must be translated, hence a document with a typical length of 10 pages is more costly to translate than a document with only a few statements.

Tables 5.9-5.12 summarise the types of documents that must be submitted by categories that are relevant for the cost calculations. The codes for mutual recognition and their weights are the same as in the previous table. Desk research on costs charged by **certification** providers resulted in a typology of four types of documents:

- Documents that are typically certified already such as an extract of the trade register, proof of good conduct or of payment of taxes and social security, as well as documents that typically only need to be signed such as an application form or a declaration on honour, or data such as number of staff or a list of company activities (which are typically filled in in an application form);
- Non-standard documents that typically need to be certified by a notary. In this study these include a list of equipment, documents on health and safety procedures, documents on management information procedures and an audit report on matters such as use of F-gas;
- Financial report or insurance documents which an accountant or an insurance provider can certify;
- Qualification documents which are certified by a Ministry or an educational institute. They are out of scope of the study if they are needed only for professionals providing the service, but in scope if required for all technicians and/or management of the company even if they do not provide the services cross-border.

Translation costs are estimated for each individual type of document, based on both reported total costs (only total translation costs were asked, not translation costs per document) and estimates of the number of words in types of documents based on examination of (templates of) such documents.

If translations are required to be certified, these certification costs are assumed not to depend on the number of documents, since translators have their translations typically certified in one transaction (the transaction even includes translations for multiple clients). If no information on translation certification demands could be identified, the demands are assumed to be the same as for other control scheme procedures in the host country covered by this study. If documents in English are accepted, it is assumed (for simplification purposes) that no translation and hence no translation certification is required, because even if translation costs are incurred they could be argued to be caused by home countries not issuing documents in the English language. For example, in the Netherlands companies can order an extract from the trade register in either the Dutch or the English language.

The following typology of documents is made:

- Documents requiring no or limited translation, either because the documents are issued in the host country (and thus in the language of the host country already), or because only data need to be filled in standard templates, even if the data need to be filled in the language of the host country (as a simplification): application form, list of activities and declaration on honour;
- Documents with typically only a few statements: proof of good repute, extract from a trade register or a copy of a company licence in the home country (or any EU Member State), proof of payment of social security contributions and taxes in the home country;
- Documents with typically a full page of text: qualification documents (if required for all staff even if they do not provide the services cross-border), a list of equipment, or a financial report;
- Documents with typically a few pages full of text: health and safety procedures, management information procedures, an ecological report or an F-Gas audit report;
- Insurance policies with up to 20 pages of technical language.

B. Cost range taken into account

Regarding **certification** costs, the following assumptions are taken:

- Costs of certifying documents are not allocated to individual documents but to typical authorities providing the certification. For qualification documents this may be the school or the Ministry of Education. For a financial report this is typically an accountant or auditor. For other documents certification by a notary is assumed if certification is required;
- Fees of notaries vary a lot between Member States. A notary typically charges a fee per visit/hour during which multiple documents can be certified. In the abovementioned study notary fees were reported in the range of EUR 150-500. The fee of EUR 500 was exceptionally high and justified by the difficulty to assess a document in an unfamiliar language, but as in that study an average notary fee of EUR 150 is assumed here;

- For qualification documents, no costs are allocated if they are only required for professionals providing the service cross-border because qualifications of professionals are out of scope. However, if qualification documents are also required for staff not providing the service cross-border it becomes a cost at company level rather than the professional only;
- The following certification costs are assumed for each of the following categories of documents:
  - Qualification documents (QD): EUR 12 (documents for 2 persons are assumed, e.g. the Dutch Ministry of Education charges EUR 6 per certified document);
  - Financial report and proof of insurance (FR/INS): EUR 50 (the costs reported for certification of documents for registration at IMPIC in Portugal);
  - Non-standard documents (NS): Lists of equipment, Health & Safety at work, documents installation procedures and eco-audit, F-Gas or similar reports: EUR 150.
- Other documents are assumed to be automatically certified (e.g. an extract of a trade register or a certificate of authorisation) or a simple signature typically suffices (e.g. an application form or a declaration on honour);
- Certification of translation is assumed to be included in the translation costs, except for Italy where translations must be sworn before a court in Italy or at an Italian embassy at fixed costs for each type of document. The costs of swearing translations before an Italian court is calculated at EUR 350, based on a previous study;
- If service providers from other any other EU country are automatically recognised (with or without notification because a certificate of authorisation should not need to be certified), zero certification costs are allocated. The certification costs are multiplied by 0.5 if installation service providers from some EU countries are automatically recognised and equivalence is assessed for those from other EU countries.

Regarding **translation** costs, the following assumptions are taken:

- For translations, costs are allocated for each type of document. For application forms (AF), declarations on honours (DH), and numbers of qualified staff (QN) no translation costs are allocated (as a simplification). Application forms are usually in the language of the host country already and some of the information to be completed on these application forms (e.g. names and numbers) should not need translation. For a declaration on honour the statements are often already stated in the language of the host country and just require a signature from a person representing the company;
- No translation costs are allocated if English is accepted (as a simplification). The reason is that authorities of some countries already issue standard documents in the English language;
- For a number of documents that are typically less than one-page documents, EUR 50 is allocated for the translation of each of these documents, if English is not accepted:
  - GR: Certificate of good repute of the company;
  - Certificate of authorisation of the company of the home country or any EU country (CHome or CA) but not for a certificate of the host country (CHost);
  - Extract from a trade register of the home country or any EU country (THome or TA) but not for an extract of the host country;
  - List of activities (LA).
- Some documents contain several hundreds of words, or more than one of these are typically required and to these documents EUR 100 translation costs are allocated:
  - Qualification documents (QD) of all qualified staff (even if they do not provide the services cross-border);
  - List of equipment (LE);
  - Financial Report (FR).
- Two types of documents are assumed to typically contain 2,000 words and EUR 200 translation costs are allocated to each of these:
  - Documents relating to Health & Safety at work (HS);
  - Documents describing installation procedures (PR);
  - Eco-audit or F-Gas audit reports (AR).
- Lastly, EUR 400 is allocated to proof of insurance. It is assumed that in practice an insurance policy is required which typically contains 4,000 words. This may overstate translation costs for countries that

in practice accept a short statement from the insurance company, but there is no guarantee that an insurance company is willing to issue such a statement.

For Bulgaria no information about certification requirement could be found for one procedure (F-gas installations) and for Italy for two procedures (asbestos removal and a procedure that applies to nine installation services. Since for both countries no certification is required in all other construction related procedures, the same is assumed for the procedures with missing information on this.

No translation costs are incurred if service providers from other EU countries are recognised without even a notification requirement. If a mere notification is required, EUR 50 translation costs for the certificate of the home country is assumed. As for other costs, if service providers from some EU countries are automatically recognised (with a notification) and equivalence is assessed for providers from other EU countries, then full translation costs are assumed for one half of the cross-border service providers from other EU countries, and EUR 50 translation costs (for the certificate of the home country) are assumed for the other half of the cross-border service providers from other EU countries.

Table 5.9 Documents to be submitted and certification costs, general HCS

MS	Authorisation	Non-standard	Financial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt
BG	Registration in Builders' Register	NS	POL+FR		0	1	9	1
ES	REA	NS		QD-some	1	1	6	1
IT	DURC				0	0	1	1
IT	ISO EN 9001:2008				0	0	7	1
PT	Registration at IMPIC		POL+FR		0	0	5	1

Codes for required documents (data in some cases): see Table 5.4.

Table 5.10 Documents to be submitted and certification costs, installation services HCS

MS	Authorisation	Non-standard	Financial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt
BG	F-gas certification	NS			0	1	1	1
BG	Asbestos removal	NS			0	0	9	1
CZ	F-gas certification			QD-all	0	1	1	1
CZ	Electrical and gas installation services	NS		QD-some	1	1	1	1
CZ	Working with pressure or hoisting equipment	NS		QD-some	1	1	1	1
DE	F-gas certification	NS			1	1	1	1
DE	Asbestos removal	NS	ATT		1	1	9	1
DE	Sewage, water and gas installations		POL		1	1	1	1
DK	F-gas certification/ electrical/water/ sewage/gas installations	NS		QD-all	1	0	9	0.5
ES	F-gas certification			QD-some	1	1	4	1
ES	Asbestos removal	NS	POL		1	0	9	1
ES	Electrical installations		POL		1	0	9	1
ES	Installation of elevators	NS	ATT		1	0	4	1
ES	Installation of alarm systems	NS	POL		1	1	5	1
ES	Installation of heating equipment	NS	ATT		1	1	4	1
FI	F-gas certification				0	0	1	1
FI	Installation of elevators				0	0	1	1
FI	Electrical and telecom				0	0	1	1

MS	Authorisation	Non-stan-dard	Finan-cial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt
	installations							
FR	F-gas certification	NS			1	1	1	1
GR	F-gas certification				1	0	1	0.5
IT	F-gas certification	NS		QD-some	0	1	1	1
IT	Asbestos removal	NS			0	1	9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations				0	1	9	1
NL	F-gas certification	NS			0	0	8	0.5
NL	Asbestos removal		ATT		1	1	9	1
PL	F-gas certification				0	1	1	1
PT	F-gas certification	NS		QD-all	0	0	7	1
PT	Gas installations	NS		QD-all	0	0	7	1
SI	F-gas certification	NS		QD-some	0	0	1	1
SI	Asbestos removal	NS			0	0	9	1
UK	F-gas certification	NS		QD-all	0	0	1	1
UK	Asbestos removal	NS		QD-some	0	0	9	1

Codes for required documents (data in some cases): see previous table.

Table 5.11 Documents to be submitted and translation costs, general HCS

MS	Authorisation	Few lines	One page	Few pages	Ins. policy/ Company Statutes	Trans lation Req.	Mut. Rec.	Wgt
BG	Registration in Builders' Register	0	2	0	1	1	9	1
ES	REA	1	0	1	0	1	6	1
IT	DURC	1	0	0	0	1	1	1
IT	ISO EN 9001:2008	0	0	1	0	1	7	1
PT	Registration at IMPIC	2	1	0	1	0	5	1

Table 5.12 Documents to be submitted and translation costs, installation services HCS

MS	Authorisation	Few lines	One page	Few pages	Ins. policy/ Company Statutes	Trans lation Req.	Mut. Rec.	Wgt
BG	F-gas certification	1	1	0	0	1	1	1
BG	Asbestos removal	0	1	1	0	1	9	1
CZ	F-gas certification	0	4	0	0	1	1	1
CZ	Electrical and gas installation services	0	1	0	0	1	1	1
CZ	Working with pressure or hoisting equipment	0	1	0	0	1	1	1
DE	F-gas certification	0	0	1	0	1	1	1
DE	Asbestos removal	1	1	1	0	1	9	1
DE	Sewage, water and gas installations	0	0	0	1	1	1	1
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	5	1	0	0	9	0.5
ES	F-gas certification	0	0	0	0	1	4	1
ES	Asbestos removal	0	0	1	1	0	9	1
ES	Electrical installations	0	0	0	1	0	9	1
ES	Installation of elevators	1	1	0	0	0	4	1
ES	Installation of alarm	1	1	0	2	1	5	1

MS	Authorisation	Few lines	One page	Few pages	Ins. policy/ Company Statutes	Trans lation Req.	Mut. Rec.	Wgt
	systems							
ES	Installation of heating equipment	3	1	0	0	1	4	1
FI	F-gas certification	0	1	0	0	0	1	1
FI	Installation of elevators	0	0	0	0	0	1	1
FI	Electrical and telecom installations	0	1	1	0	0	1	1
FR	F-gas certification	0	1	0	0	1	1	1
GR	F-gas certification	1	0	0	0	0	1	0.5
IT	F-gas certification	1	1	0	0	1	1	1
IT	Asbestos removal	0	1	1	0	1	9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	0	0	0	0	1	9	1
NL	F-gas certification	1	1	2	0	0	8	0.5
NL	Asbestos removal	2	0	1	0	1	9	1
PL	F-gas certification	1	0	1	0	1	1	1
PT	F-gas certification	1	5	0	0	0	7	1
PT	Gas installations	1	5	0	0	0	7	1
SI	F-gas certification	0	1	0	0	0	1	1
SI	Asbestos removal	0	1	0	0	0	9	1
UK	F-gas certification	0	4	1	0	0	1	1
UK	Asbestos removal	1	0	1	0	0	9	1

5.7. HCS – Reported time to pay fees and submit documents

A. Cost elements taken into account

When documents need to be submitted this causes additional costs. With regard to the submission mode, the information of Section 4.2 is presented again in the table below.

Sometimes fees have to be paid as well, either for obtaining the authorisation and being registered, or more specifically for inspections. This costs time as well. With two exceptions for Portugal (gas installations and installations involving F-Gases), fees need to be paid for horizontal authorisations of installation services. In some cases no information on the need to pay fees was found, mainly when fee requirements differ between regions within a country (e.g. Italy and Spain). The assumption is made that fees are required in all these cases.

B. Cost range taken into account

Respondents tend to under-report time to pay fees except when it was especially cumbersome. The same applies to submission of documents, whether by post, upload or e-mail. For Poland substantial hours to pay fees were reported (8 hours, or EUR 232 after multiplying with wage rate 29), but also for Italy a domestic service provider reported 3 hours to pay fees, of which one hour is allocated to the F-Gas authorisation and 2 hours for the ISO EN 9001:2008 certification. For F-Gas authorisation in Italy fees must be paid to different authorities while the ISO certification takes place in different phases with each their own costs.

The following assumptions are made:

- Payment of fees: half an hour for support staff at a wage rate of EUR 29;
- Submission of documents electronically or by post: the submission of documents electronically is in principle easier for service providers and allows for more transparency and often easier follow-up of applications or notifications done. Nevertheless, these simplification effects are difficult to quantify.

Therefore, as a matter of simplification half an hour for support staff at an hourly wage rate of EUR 29 is assumed for both electronic and non-electronic submission;

- E-identifying (e-signature or e-ID): an hour for a manager at an hourly wage rate of EUR 58;
- Postal costs: EUR 5.

None of the above costs are incurred if cross-border service providers are automatically recognised without notification requirement. If notification is required, no cost is allocated to the payment of fees but costs are still allocated to submit a certificate of authorisation, e-identification if required and postal costs if required.

Table 5.13 Fee payment, document submission requirements, general HCS

MS	Authorisation	Fee Req.	Subm. Mode	E-sign.	Mut. Rec.	Weight
BG	Registration in Builders' Register	1	2	0	9	1
ES	REA	0	1	0	6	1
IT	DURC	0	1	0	1	1
IT	ISO EN 9001:2008	1	1	0	7	1
PT	Registration at IMPIC	1	1	2	5	1

Submission mode: 1= full electronic case handling, 2 = partial electronic intake, 3 = downloadable forms only, 4 = no electronic procedure.
E-signatures: 0 = none, 1 = e-signature required, 2 = e-ID required.

Table 5.14 Fee payment, document submission requirements, installation services HCS

MS	Authorisation	Fee Req.	Subm. Mode	E-sign.	Mut. Rec.	Wgt
BG	F-gas certification	1	4	0	1	1
BG	Asbestos removal	1	1	1	9	1
CZ	F-gas certification	1	3	0	1	1
CZ	Electrical and gas installation services	1	2	0	1	1
CZ	Working with pressure or hoisting equipment	1	2	0	1	1
DE	F-gas certification	1	2	0	1	1
DE	Asbestos removal	1	3	0	9	1
DE	Sewage, water and gas installations	1	3	0	1	1
DK	F-gas certification/ electrical/water/ sewage/gas installations	1	3	0	9	0.5
ES	F-gas certification	1	3	0	4	1
ES	Asbestos removal	1	3	0	9	1
ES	Electrical installations	1	3	0	9	1
ES	Installation of elevators	1	3	0	4	1
ES	Installation of alarm systems	1	3	0	5	1
ES	Installation of heating equipment	0	3	0	4	1
FI	F-gas certification	1	1	0	1	1
FI	Installation of elevators	1	1	0	1	1
FI	Electrical and telecom installations	1	1	0	1	1
FR	F-gas certification	1	4	0	1	1
GR	F-gas certification	1	4	0	1	0.5
IT	F-gas certification	1	4	0	1	1
IT	Asbestos removal	1	4	0	9	1
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	1	1	2	9	1
NL	F-gas certification	1	4	0	8	0.5
NL	Asbestos removal	1	1	0	9	1
PL	F-gas certification	1	3	0	1	1
PT	F-gas certification	0	3	0	7	1
PT	Gas installations	0	3	0	7	1

MS	Authorisation	Fee Req.	Subm. Mode	E-sign.	Mut. Rec.	Wgt
SI	F-gas certification	1	4	0	1	1
SI	Asbestos removal	1	1	1	9	1
UK	F-gas certification	1	1	0	1	1
UK	Asbestos removal	1	1	1	9	1

Submission mode: 1= full electronic case handling, 2 = partial electronic intake, 3 = downloadable forms only, 4 = no electronic procedure
E-signatures: 0 = none, 1 = e-signature required, 2 = e-ID required.

5.8. Building control schemes – reported costs

Based on data from 27 interviews with companies that underwent a building permit control, the hours and costs involved with a building permit have been analysed. The costs and time of going through building control scheme procedures depend on the number of buildings for which the permit is requested. Respondents were asked whether the construction services involved a single or multiple residential dwellings or office buildings. In addition respondents were asked after the project value. Out of the 27, 17 companies reported for the construction of a single dwelling or office building, with project values between EUR 350,000 and EUR 1,500,000. Ten companies reported for the construction of multiple dwellings, office buildings or a mix of these, with values between EUR 700,000 and EUR 50,000,000.

Activities to comply with administrative formalities related to building permits include the following:

- Concluding preliminary contracts before the building permit is issued;
- Collecting documents;
- Purchasing various services such as for example translation of documents;
- Submitting data and documents;
- Re-submitting data and documents, if needed.

The activities are explained in more detail below.

Concluding preliminary contracts

It could be argued that a preliminary contract saves work when the actual contract is concluded after the building permit is issued, however preliminary contracts cause costs because they are verified, cause double work and even lost work if the building permit application is rejected. Hence, hours and costs of concluding preliminary contracts are included in full. Types of preliminary contracts that may be required vary a lot between countries as explained in the previous report and include preliminary contracts with:[42]

- Providers of water, electricity and other such utilities;
- Supervisor of the construction work;
- Construction work insurance provider;
- Work accidents insurance provider;
- Health and safety service provider;
- Lease seller of equipment with or without operator;
- Remover of construction waste and/or provisional structures;
- A professional checking technical plans (if the building permit authority does not check these, for example in a light procedure);
- An inspector certifying the quality of previous work;
- Others (when asked to specify which, respondents reported preliminary contracts for the purchase of materials, with the client and for renting of storage facilities).

[42] Simplification and mutual recognition, Ibid.

Collecting documents – company documents

Up to 30 documents may need to be submitted and the types of documents vary between countries. Because there are so many, they are grouped in three categories: company documents, technical documents and clearance and planning documents. Types of company documents include:

- Application forms;
- Proof of solvency / tax / social security payment;
- Proof of authorisation to submit building plans;
- Proof of civil (tort) liability insurance of the company;
- Proof of professional / contractual liability insurance of the company;
- Proof of ownership;
- Extract from the business register;
- Other general company information or documents (when asked to specify which, two respondents reported documents on safety procedures).

Collecting documents – technical documents

Types of technical documents include the following, where it should be kept in mind that multiple documents of the same type may be required (e.g. multiple design parts or multiple technical calculations):

- Documents from the cadastre;
- Environmental / soil conditions report;
- Building position maps, artist impressions etc.;
- Maps on construction equipment storage, driveways etc.;
- Sewage system plans;
- Design parts (technical drawings);
- Technical parameters / calculations;
- Other technical data and documents (when asked to specify which, two respondent reported documents on materials to be used).

Collecting documents – clearance and planning documents

Clearance and planning documents include the following types:

- Authorisation of subcontractors for general construction services;
- Authorisation of subcontractors for installation services;
- Design clearances (e.g. by the firefighting department);
- Clearances for utility connections (water, electricity, gas, etc.);
- Heritage / aesthetics related approvals;
- Proof of project professional / contractual liability insurance of workers;
- Construction work time planning;
- Construction work quality monitoring plan;
- Other data or documents related to clearances and planning (when asked to specify which, one respondent reported an extract of the planning instrument (municipal authorisation for the construction)).

Purchasing services

The following services may need to be purchased to meet administrative requirements. These services include activities to meet administrative requirements that are outsourced, for example not only translation of documents but also the submission of the building plans (in which case the respondent is asked to estimate the percentage of the cost involved with administrative formalities). The purchases that may need to be purchased include:

- Certification of documents;
- Translation of documents;
- A professional to submit the building plans;
- Additional professional / contractual indemnity insurance coverage;
- On-site inspection before obtaining a building permit;
- Other services (when asked to specify which, one respondent reported assistance from a local legal professional to deal with differences in the roles and liability in the home and host country given the legal form of the company).

Submitting documents

These activities may include payment of fees and travelling.

Re-submitting documents

Respondents were asked if documents had to be re-submitted for administrative reasons, excluding re-submissions where any substantive content change was needed. The administrative reasons include:

- Scale of drawings;
- Size of drawings;
- Symbols of drawings;
- Use of measurement units;
- Missing stamp.

Service providers were asked to report both time spent (Table 5.15) as well as costs incurred (Table 5.16) related to these administrative requirements.

The administrative requirements and therefore the activities to comply with these not only vary hugely between countries as discussed in the previous report, but also between municipalities within countries. Also, the costs of some administrative formalities depend on the size of the project. To make costs comparable, it was assumed that certain administrative formalities to obtain permits for multiple dwellings or office buildings take 10 times as much time as the same formalities for a single dwelling or office building.

Hours to obtain permits for the construction of multiple buildings are divided by 10 for the following types of activities:

- Concluding preliminary contracts;
- Collecting documents (for example costs of documents on the materials to be used and the planning of activities correlate positively with the project size);
- Re-submitting documents for formality reasons.

Hours are assumed to be comparable for multiple or single buildings for two types of activities:

- The purchase of services;
- The (first) submission of documents.

The highest hours caused by administrative requirements are hours for the conclusion of preliminary contracts reported for Spain (150 hours for manager and support staff combined) and the Czech Republic (82 hours). Hours to submit documents were expected to be in the range up to 20 hours including travel time. However, one respondent reported 80 hours to submit documents in Poland and explained these hours as follows:

- "*Organising fire brigade, occupational health and safety inspections in time before the deadline for document submission is sometimes problematic*."

For a light procedure or if only a few documents need to be submitted to the main contractor, the time needed to submit documents can be very small, as reported by some companies for the Netherlands, Portugal and the United Kingdom. Thus, hours (and fees) should only be compared between countries for the same type of procedure.

From Table 5.13 it can be noted that all domestic service providers reported hours of a regular procedure. This is not surprising because (domestic and cross-border) companies were asked to report costs of a regular procedure if they had gone through any. Hence, if a company reports costs of an alternative procedure (including submission of documents to the main contractor only), this means the company has never gone through a main procedure.

Table 5.15 Reported hours for steps in building control procedures

			Prelim. Contracts		Collect docs		Purchase services		Doc subm and other		Doc Resubm.		Total
MS	Proc.	CB/ Dom	Mn.	Su.	Mn.	Su.	Mn.	Su.	Mn.	Su.	Mn.	Su.	
BG	Regular*	Dom, M	0	0	10	15	.	.	.	.	8	15	.
BG	Regular	Dom, M	5	10	10	20	.	.	24	40	10	20	.
BG	Regular	Dom, M	40	80	8	16	.	.	8	24	4	8	.
BG	Regular	Dom, M	10	10	16	5	.	.	4	2	1	1	.
CZ	Regular*	CB,A	50	32	1	0	.	.	40	0	2	2	.
CZ	Regular*	CB,M	32	32	.	.	1	1	1	1	0	0	.
DE	Regular	CB,A	1	1	10	15	.	.	20	30	5	1	.
DK	Regular*	CB,M	1	1	1	1	0	0	10	6	0	0	.
ES	Regular*	CB,M	30	120	2	12	.	.	24	48	0	1	.
FI	Regular	Dom, M	16	16	15	8	.	.	24	14	20	12	.
FI	Regular	Dom, M	1	1	15	6	.	.	6	1	0	0	.
FR	Regular	Dom, M	0	24	24	0	0	0	1	24	.	.	.
FR	Regular	Dom, M	0	0	60	0	0	0	1	0	0	0	.
GR	Regular	Dom, S	8	0	24	16	0	32	47	68	0	0	.
GR	Regular	Dom, M	5	0	100	0	32	0	25	0	3	0	.
IT	Regular	CB,A	.	.	71	0	8	.	12	3	.	.	.
IT	Regular	Dom, M	8	8	8	0	0	0	4	4	0	0	.
NL	Light	CB,S	.	.	1	16	.	.	1	1	.	.	.
NL	To main contractor	CB,S	1	1	1	24	.	.	1	34	1	1	.
PL	Regular*	CB,M	.	.	.	.	.	.	40	40	2	2	.
PL	Notification*	CB,S	6	6	3	3	0	0	0	0	16	16	.
PT	Not needed	CB,S	0	0	0	0	0	0	0	0	0	0	0
PT	Not needed	CB,S	0	0	0	0	0	0	0	0	0	0	0
SI	Regular	CB,A	0	0	5	8	.	.	8	4	40	60	.
SI	Regular	Dom, P	0	0	2	8	.	.	2	8	1	4	.
UK	To main contractor	CB,S	1	1	1	24	.	.	1	34	1	1	.
UK	To main contractor	CB,S	1	25	1	1	.	.	1	1	1	1	.

*: Project involving multiple dwellings and/or offices.
CB = cross-border, D = Domestic.
M = main contractor, S = subcontractor, A = architect, P = Project developer.
Mn. = manager or professional, Su. = support staff.

The costs (including fees) reported by service providers are shown in Table 5.16.

Building control scheme fees are also divided by 10 for projects involving multiple dwellings or offices, except for Poland where the fee would otherwise be implausibly low. Other costs in the building control procedure are assumed to be independent of the number (or value) of buildings to be constructed.

The most striking observation from the reported costs is perhaps that domestic service providers report the highest fees for issuing documents (reported up to EUR 16,000 in Bulgaria) and for building permits (reported up to EUR 15,000 in Finland), with in general much lower fees reported by cross-border service providers. These differences should not be interpreted as differences between countries, but rather as a difference between main contractors and subcontractors, since cross-border construction services are typically provided by subcontractors. The subcontractor may need to submit many documents to the main contractor which can be time consuming as the hours tabulated above indicate. But in the end the main contractor pays the fee for approvals and the building permit and passes the costs on to the customer.

The second striking observation is that in Bulgaria the highest fees are paid for documents before they are submitted (reported up to EUR 16,000) and in Finland the highest fees are paid when documents are submitted (reported up to EUR 15,000). These differences merely reflect differences in the timing of formalities. In Bulgaria, a building company must collect various approvals including the technical assessment, after which the municipality charges only EUR 10 for approval to open the construction site.[43] In Finland, the technical assessment of documents is included in the cost of the building permit.[44]

A third striking observation is that authorities sometimes charge substantial fees when documents must be re-submitted, even if only for formality reasons (one in four respondents reported to have to re-submit documents due to a missing stamp). If a subcontractor is the cause of the main contractor having to re-submit all documents, the main contractor usually passes the fees for the re-submission on to the subcontractor.

The highest costs for collecting documents reported by a cross-border service provider is EUR 5,000 in Italy, compared to only EUR 1,000 reported by a domestic service provider in Italy. The cross-border service provider mentioned the following reasons for the high costs:

- *"Meeting with local authorities and discussing local building codes;*
- *Information related to a given planning or construction issue, scattered among different services sometimes not coordinated;*
- *Travelling is involved;*
- *Difficulties in arranging meetings with local authorities;*
- *Difficulties in obtaining immediate and clear answers."*

Another observation is that most respondents could not indicate specific costs of third parties for certification or translation of documents, except for one domestic company in Finland (EUR 300 for certification of documents) and one cross-border service provider in Italy (EUR 4,000) for legal assistance, explained as follows:

- *"Local professional help with a different legal or professional approach due to a different building code. The appointment/role and liability arising from the legal form of a given professional is different and I had to change the legal form of my company."*

For the submission of documents, only one domestic service provider (in Greece) reported travel costs. In most countries the reason is that documents can be submitted electronically or by post. In Poland documents must be submitted in person, but the services were provided through a local office so the staff submitting documents was already in the host country.

In Table 5.16, the following abbreviations are used:

- Column "Proc" indicates the type of procedure: whether the respondent reported on a regular procedure, a light procedure or whether he submitted documents via the main contractor;

[43] See also http://www.doingbusiness.org/data/exploreeconomies/bulgaria#dealing-with-construction-permits.
[44] See also http://www.doingbusiness.org/data/exploreeconomies/finland#dealing-with-construction-permits.

- The column "CB/D" (Cross-border/Domestic) indicates whether the respondent reported on a cross-border or domestic procedure, and whether as a main contractor, as a sub-contractor or as an architect or project developer;
- The column "Issue / coll. docs" presents the reported costs for the issuance and/or collection of documents. This includes fees of authorities to provide or certify documents and fees to have an intermediary service provider (for example, an architect or a notary) collect the documents;
- The column "BP fees" refers to reported building control scheme fees, as well as fees for the initial and/or later inspections and other costs (for Slovenia: costs to obtain approvals from various authorities as part of the building control procedure);
- The column "3rd party Serv." refers to reported costs of third-party service providers for example for legal advice (to be discussed in the next chapter how to include them in the cost calculations);
- The column "Doc subm. /other" refers to reported costs to submit documents. This can include fees of the authority and cost of time to submit the document, fees of an architect to submit documents, and costs of travel tickets;
- The column "Resubm." refers to reported costs paid to authorities and/or intermediary service providers to re-submit documents in case the first application was rejected;
- Lastly, the column "Total" refers to reported total costs. It was meant as a check on the quality of the other reported costs, however no respondent really reported total costs except to indicate there were no costs (the inconsistency for one Polish respondent has been noted).

Table 5.16 Reported costs/fees for authorities and intermediary service providers in building control procedures

			Issue / coll. docs		BP fees				3rd party	Doc subm. /other			Resubm.		Total
MS	Proc.	CB/D	Au.	IS.	Permit	Ins1	Ins2	Other	Serv.	Au.	IS.	Travel	Au.	IS.	
BG	Reg.*	D, M	5000	250	.	.	.	.	.	.	.	.	.	.	.
BG	Reg.	D, M	600	400	.	.	.	.	.	.	.			.	.
BG	Reg.	D, M	.	.	.	.	.	.	.	.	.	.	.	.	.
BG	Reg.	D, M	16000	1100	.	.	.	.	.	.	1250	.	.	.	.
CZ	Reg.*	CB,A	259	140	929	.	.	.	.	.	0	0	.	130	.
CZ	Reg.*	CB,M	.	.	.	.	.	.	.	.	.	.	.	.	.
DE	Reg.	CB,A	0	0	1000	.	.	.	.	.	.	0	0	0	.
DK	Reg.*	CB,M	.	.	.	.	.	.	.	.	.	.	.	.	.
ES	Reg.*	CB,M	0	0	.	.	.	.	.	.	0	0	0	0	.
FI	Reg.	D, M	600	400	15000	2000	8000	.	300	.	3750	0	25000	1000	.
FI	Reg.	D, M	.	.	.	.	.	.	.	.	.	.	.	.	.
FR	Reg.	D, M	.	.	.	.	.	.	.	.	.	.	.	.	.
FR	Reg.	D, M	.	.	.	.	.	.	.	.	.	.	.	.	.
GR	Reg.	D, S	60	110	.	.	400	5	.	.	.	.	.	.	.
GR	Reg.	D, M	.	120	.	.	.	.	.	60	.	100	.	.	.
IT	Reg.	CB,A	5000	0	.	.	.	.	4000	.	.	.	.	.	.
IT	Reg.	D, M	1000	0	.	.	.	.	.	500	0	0	0	0	.
NL	Light	CB,S	0	0	0	.	.	.	.	.	0	0	.	.	.
NL	Via main	CB,S	.	.	0	.	.	.	.	.	0	0	0	0	.
PL	Reg.*	CB,M	380	180	75	.	.	.	.	.	0	0	0	180	.
PL	Notif.*	CB,S	0	0	.	.	.	.	.	.	1120	0	0	0	0
PT	None	CB,S	0	0	0	0	0	0	.	.	0	0	0	0	0
PT	None	CB,S	0	0	0	0	0	0	.	.	0	0	0	0	0
SI	Reg.	CB,A	.	0	340	0	0	3500	.	.	0	0	0	0	.
SI	Reg.	D, P	1000	1000	.	.	.	.	.	.	3000	.	.	1000	.
UK	Via main	CB,S	0	0	.	.	.	.	.	.	.	0	0	0	.
UK	Via main	CB,S	0	0	0	.	.	.	.	.	0	0	1000	0	.

*: Project involving multiple dwellings and/or offices.
CB = cross-border, D = Domestic.

M = main contractor, S = subcontractor, A = architect, P = Project developer.
Mn. = manager or professional, Su. = support staff.

6. ALLOCATION OF COSTS TO FORMALITIES

6.1. Introduction

In this chapter, costs are allocated to formalities for both horizontal authorisations and building control procedures. For horizontal authorisations, price labels are tagged to individual requirements or factors contributing to costs, in such a way that they are consistent with the complexity of documents or aspects of the procedure. The fees from the inventory were used and reported fees were only used as a quality check.

For building control procedures, administrative costs may be expected to depend on the value of the construction project and on the type of procedure. With regard to the value of the construction project, a correction has already been applied in the previous chapter to the reported costs by dividing some types of costs by 10 for projects involving multiple buildings. Building control procedures differ in the number of administrative requirements, with light procedures typically having few administrative procedures than regular procedures. A special situation applies to subcontractors. Usually, some documents are required from subcontractors, but the subcontractor typically sends those to the main contractor who submits all documents together for the building permit application. In this situation the main contractor takes care of most formalities and the "procedure" from the subcontractor's point of view can be very light. In fact, some respondents mentioned the fact that the main contractor takes care of most formalities as the main reason to work as a subcontractor or to collaborate with locals. For this reason, "via main contractor" is treated as a light procedure in the cost comparisons.

The specific assumptions and resulting allocation of costs are given in the remainder of this chapter.

6.2. HCS – Familiarisation and allocated costs

In order to quantify the costs of familiarisation involved in the different schemes, the cost range of 100-4000 EUR (identified in chapter 5) is used as a reference to represent the costs incurred to understand the necessary procedures in the host Member State. A cost of EUR 100 is assumed if proof of authorisation in the home country suffices (Mut.Rec. =1). In that case, the cross-border service provider does not need to familiarise with the authorisation procedure in the host country and it takes only a half to two hours to confirm that the home country authorisation is the only requirement.

In case the cross-border service provider needs to familiarise with host country procedures, the cost of familiarisation depends on the complexity of the host country procedure. In this case, costs are assumed to be on average 2000 EUR and ranging up to 4000 EUR. Lastly, if certificates from some other Member States are recognised but not from all other Member States, a weight Wgt = 0.5 is applied. To estimate these costs depending on the level of complexity of the scheme, the following formula is used:

Cost = 800*Wgt*(No Info + No EN Info + NS Docs + (Nr auth.-1) + Insp.)

The variables (No Info) and (No EN Info) have value 1 if online information is not available and online information is not available in English, respectively. They have value 0 if the online information is fully available and have value 0.5 if the online information is partially available.

The variables (NS Docs) and (Insp.) have value 1 if non-standard documents and on-site inspections are required, respectively, have value 0 if not required and have value 0.5 if the requirement varies between regions or certifying authorities. Lastly, the variable (Nr auth.) indicates the number of authorities involved in the administrative procedure.

Table 6.1 and Table 6.2 show the outcome of the above formula for the general HCS (category installation services). It builds on the information presented in tables 5.2 and 5.3.

Table 6.1 Factors contributing to the complexity of getting information about procedures and allocated costs involved, general HCS

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt	All. costs
BG	Registration in Builders' Register	0	1	1	0	1	9	1	1,600
ES	REA	0	1	1	0	1	6	1	1,600
IT	DURC	1	1	0	0	1	1	1	100
IT	ISO EN 9001:2008	1	1	1	1	2	7	1	4,000
PT	Registration at IMPIC	0	1	1	0	1	5	1	1,600

Table 6.2 Factors contributing to the complexity of getting information about procedures and allocated costs involved, installation services HCS

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt	All. costs
BG	F-gas certification	1	1	0	1	1	1	1	100
BG	Asbestos removal	0	1	1	0	2	9	1	2,400
CZ	F-gas certification	0	1	0	1	1	1	1	100
CZ	Electrical and gas installation services	0	1	0	1	1	1	1	100
CZ	Working with pressure or hoisting equipment	0	1	0	1	1	1	1	100
DE	F-gas certification	0.5	0.5	1	0	1	1	1	100
DE	Asbestos removal	0.5	0.5	1	0	1	9	1	1,600
DE	Sewage, water and gas installations	0.5	0.5	1	0	1	1	1	100
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	0	1	0	1	9	0.5	400
ES	F-gas certification	0	0	0	0	2	4	1	800
ES	Asbestos removal	0	0	1	0	1	9	1	800
ES	Electrical installations	0	1	1	0	2	9	1	2,400
ES	Installation of elevators	0	1	0	1	1	4	1	1,600
ES	Installation of alarm systems	0	1	1	1	1	5	1	2,400
ES	Installation of heating equipment	0	1	0	1	1	4	1	1,600
FI	F-gas certification	0	0	0	0	1	1	1	100
FI	Installation of elevators	0	0	0	0	1	1	1	100
FI	Electrical and telecom installations	0	0	1	0	1	1	1	100
FR	F-gas certification	1	1	0	1	1	1	1	100
GR	F-gas certification	1	1	0	0.5	2	1	0.5	100
IT	F-gas certification	1	1	0	1	3	1	1	100
IT	Asbestos removal	1	1	1	1	1	9	1	3,200
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	1	1	0	1	1	9	1	2,400
NL	F-gas certification	0	0	1	1	1	8	0.5	800
NL	Asbestos removal	0	1	1	0	1	9	1	1,600
PL	F-gas certification	0	0	1	1	1	1	1	100
PT	F-gas certification	0	1	0	1	1	7	1	1,600
PT	Gas installations	0	1	0	1	1	7	1	1,600
SI	F-gas certification	1	1	0	0	1	1	1	100
SI	Asbestos removal	0.5	0.5	0	0	1	9	1	800
UK	F-gas certification	0	0	1	0.5	1	1	1	100

MS	Authorisation	No info	No EN info	NS Docs	Insp.	Nr auth.	Mut. Rec.	Wgt	All. costs
UK	Asbestos removal	0	0	1	1	1	9	1	1,600

6.3. HCS – Obtaining data and documents and allocated costs

The different types of data and documents that need to be obtained by the service provider in the different procedures have been identified in Chapter 4 (regarding installation services). In order to quantify the administrative costs involved with this, specific cost estimates for different document/data requirements have been outlined in section 5.4. On this basis, costs for required data/documents can be allocated for the different procedures across the Member States (see Table 6.3 and Table 6.4). The different codes in the table used are explained in Section 5.4. If only proof of authorisation in the home country is required (Mut.Rec.=1), this is a standard document that administrative staff can obtain in a half to two hours and EUR 50 is assumed. If a certificate from some other Member States is recognised but not for all, a weight Wgt = 0.5 is applied.

Table 6.3 Documents to be submitted and allocated costs of getting documents (general HCS)

MS	Authorisation	AF, GR, CS	QD-all	List of Eq.	H&S/ Proc	Ins., fin. rep.	Other	Mut. Rec.	Wgt	All. costs
BG	Registration in Builders' Register	50	0	400	0	1,800		9	1	2,250
ES	REA	50	0	0	2,000	0	1,900	6	1	3,950
IT	DURC	50	0	0	0	0	200	1	1	50
IT	ISO EN 9001:2008	50	0	0	2,000	0	10,000	7	1	12,050
PT	Registration at IMPIC	200	0	0	0	1,800		5	1	2,000

Table 6.4 Documents to be submitted and allocated costs of getting documents, HCS installation services

MS	Authorisation	AF, GR, CS	QD-all	List of Eq.	H&S/ Proc	Ins., fin. rep.	Other	Mut. Rec.	Wgt	All. costs
BG	F-gas certification	100	0	400	0	0		1	1	50
BG	Asbestos removal	50	0	400	2,000	0		9	1	2,450
CZ	F-gas certification	50	100	0	0	0	13,000	1	1	13,150
CZ	Electrical and gas installation services	50	0	400	0	0		1	1	50
CZ	Working with pressure or hoisting equipment	50	0	400	0	0		1	1	50
DE	F-gas certification	50	0	0	0	0		1	1	50
DE	Asbestos removal	50	0	400	2,000	900		9	1	3,350
DE	Sewage, water and gas installations	50	0	0	0	900		1	1	50
DK	F-gas certification/ electrical/water/ sewage/gas installations	50	100	400	2,000	0	10,000	9	0.5	6,275
ES	F-gas certification	50	0	0	0	0		4	1	50
ES	Asbestos removal	50	0	0	2,000	900		9	1	2,950
ES	Electrical installations	50	0	0	0	900		9	1	950
ES	Installation of elevators	50	0	400	0	900		4	1	1,350
ES	Installation of alarm systems	50	0	0	0	900	900	5	1	1,850
ES	Installation of heating equipment	0	0	400	0	900		4	1	1,300
FI	F-gas certification	50	0	400	0	0		1	1	50
FI	Installation of elevators	0	0	0	0	0		1	1	0
FI	Electrical and telecom installations	0	0	400	2,000	0		1	1	50

MS	Authorisation	AF, GR, CS	QD-all	List of Eq.	H&S/ Proc	Ins., fin. rep.	Other	Mut. Rec.	Wgt	All. costs
FR	F-gas certification	50	0	400	0	0		1	1	50
GR	F-gas certification	50	0	0	0	0		1	0.5	50
IT	F-gas certification	50	0	400	0	0		1	1	50
IT	Asbestos removal	50	0	400	2,000	0		9	1	2,450
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	50	0	0	0	0		9	1	50
NL	F-gas certification	50	0	400	2,000	0		8	0.5	1,225
NL	Asbestos removal	50	0	0	2,000	900		9	1	2,950
PL	F-gas certification	100	0	0	2,000	0		1	1	50
PT	F-gas certification	50	100	400	0	0		7	1	550
PT	Gas installations	0	100	400	0	0		7	1	500
SI	F-gas certification	50	0	400	0	0		1	1	50
SI	Asbestos removal	50	0	400	0	0		9	1	450
UK	F-gas certification	50	100	0	2,000	0		1	1	50
UK	Asbestos removal	50	0	0	2,000	0		9	1	2,050

6.4. HCS – Insurance, inspections, fees and allocated costs

This chapter will allocate administrative costs to the following three elements: (1) on-site inspections; (2) arranging insurance; and (3) fees.

Requirements related to on-site inspections and arranging insurance coverage have been identified in Table 4.13 and Table 4.10 (other documents required = ATT or POL: attest of insurance or the full insurance policy). In order to quantify the administrative costs involved with this, specific cost estimates for these requirements have been outlined in section 5.5. On this basis, administrative costs can be allocated for the different procedures across the Member States (see Table 6.5 and Table 6.6). Costs for insurance and inspections do not apply to service providers from all or some other EU countries (weighted by 1 and 0.5 respectively) if only proof of authorisation in the home country is required as indicated by code Mut.Rec.=1. Note that if a fee needs to be paid or if regardless of authorisation in the home country a cross-border service provider needs to take out insurance, the code Mut.Rec. would not be 1.

In addition, fees required in the different procedures (as outlined in Table 4.9) are added to the costs identified in Table 6.4 and Table 6.5 as well. The fees charged for inspections may vary between regional or local authorities for some countries and procedures such as Spain and Italy. The following missing values were imputed:

- Spain, F-Gas, electrical and elevators: EUR 300 based on fees for F-Gas installations in Bulgaria, France, Germany and Italy (all around EUR 300);
- Spain and Italy, asbestos removal: EUR 1,000 based on fees for asbestos removal in the Netherlands (EUR 1,000), Germany (EUR 2,000) and the United Kingdom (EUR 3,820). The Dutch value is used because the general price level in Spain and Italy is lower than in the northwest of Europe;
- Italy, ISO EN 9001:2008: EUR 0, the fee of private certification providers and the cost of their inspections for this certificate are already included in the cost of getting documents;
- Italy, procedure for nine types of installation services: EUR 168 based on the standard fee of registering with the chamber of commerce;
- Czech Republic, electrical, gas, pressure and hoisting equipment: EUR 40 based on the fee of EUR 40 for F-Gas in this country;
- Portugal, gas: EUR 0 based on the fee of EUR 0 for F-Gas in this country.

Table 6.5 Insurance and inspection requirements and reported costs of arranging these and being present at inspections and fees, general HCS

MS	Authorisation	Insurance	Inspections	Fees	Mut. Rec.	Wgt	All. Costs incl. fees
BG	Registration in Builders' Register	1	0	614	9	1	1,814
ES	REA	0	0	0	6	1	0
IT	DURC	0	0	0	1	1	0
IT	ISO EN 9001:2008 [a)]	0	1	?	7	1	0
PT	Registration at IMPIC	1	0	70	5	1	1,270

a) IT, ISO EN 9001:2008: costs already included in the costs of getting documents.

Table 6.6 Insurance and inspection requirements and reported costs of arranging these and being present at inspections and fees, installation HCS

MS	Authorisation	Insurance	Inspections	Fees	Mut. Rec.	Wgt	All. Costs incl. fees
BG	F-gas certification	0	1	463	1	1	0
BG	Asbestos removal	0	0	64	9	1	64
CZ	F-gas certification	0	1	40	1	1	0
CZ	Electrical and gas installation services	0	1	?	1	1	0
CZ	Working with pressure or hoisting equipment	0	1	?	1	1	0
DE	F-gas certification	0	0	300	1	1	0
DE	Asbestos removal	1	0	2,000	9	1	3,200
DE	Sewage, water and gas installations	1	0	80	1	1	0
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	0	170	9	0.5	85
ES	F-gas certification	0	0	?	4	1	300
ES	Asbestos removal	0	0	?	9	1	1,000
ES	Electrical installations	1	0	?	9	1	1,500
ES	Installation of elevators	0	1	?	4	1	2,800
ES	Installation of alarm systems	1	0	?	5	1	1,200
ES	Installation of heating equipment	1	0	0	4	1	1,200
FI	F-gas certification	0	0	150	1	1	0
FI	Installation of elevators	0	0	150	1	1	0
FI	Electrical and telecom installations	0	0	150	1	1	0
FR	F-gas certification	0	1	323	1	1	0
GR	F-gas certification	0	0.5	900	1	0.5	0
IT	F-gas certification	0	1	300	1	1	0
IT	Asbestos removal	0	1	?	9	1	3,500
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	0	0	?	9	1	168
NL	F-gas certification	0	1	1,000	8	0.5	1,750
NL	Asbestos removal	1	0	1,200	9	1	2,400

MS	Authorisation	Insurance	Inspections	Fees	Mut. Rec.	Wgt	All. Costs incl. fees
PL	F-gas certification	0	1	420	1	1	0
PT	F-gas certification	0	1	0	7	1	2,500
PT	Gas installations	0	1	?	7	1	2,500
SI	F-gas certification	0	0	23	1	1	0
SI	Asbestos removal	0	0	500	9	1	500
UK	F-gas certification	0	0.5	112	1	1	0
UK	Asbestos removal	0	1	3,820	9	1	6,320

6.5. HCS – Translation, certification and allocated costs

In this chapter, administrative costs are allocated with regard to costs of translation and certification.

Requirements on translation and certification have been outlined in Chapter 4.1. Administrative costs related to these steps have been estimated in chapter 5.6. On this basis, costs can be allocated to the administrative requirements identified in the inventory. This is done in Tables 6.7 and 6.8 (translation requirements) and 6.9 and 6.10 (certification requirements).

If proof of authorisation in the home country suffices, typically a one-page document needs to be submitted and costs of translation are assumed to be EUR 50, even if documents in English are accepted. The underlying assumption is that proof of authorisation in the home country is not standard in English. Proof of authorisation in the home country is typically issued by the relevant authority. Hence in this case no further certification is required and no costs are allocated for certification. If certificates from only some countries but may be in English, the cost are assumed to be EUR 25.

Table 6.7 Documents to be submitted and allocated translation costs, general HCS

MS	Authorisation	Few lines	One page	Few pages	Insurance policies	Trans lation Req.	Mut. Rec.	Wgt	All. costs
BG	Registration in Builders' Register	0	2	0	1	1	9	1	600
ES	REA	1	0	1	0	1	6	1	250
IT	DURC	1	0	0	0	1	1	1	50
IT	ISO EN 9001:2008	0	0	1	0	1	7	1	200
PT	Registration at IMPIC	2	1	0	1	0	5	1	0

Table 6.8 Documents to be submitted and allocated translation costs, installation services HCS

MS	Authorisation	Few lines	One page	Few pages	Company statutes/ Insurance policies	Trans lation Req.	Mut. Rec.	Wgt	All. costs
BG	F-gas certification	1	1	0	0	1	1	1	50
BG	Asbestos removal	0	1	1	0	1	9	1	300
CZ	F-gas certification	0	4	0	0	1	1	1	50
CZ	Electrical and gas installation services	0	1	0	0	1	1	1	50
CZ	Working with pressure or hoisting equipment	0	1	0	0	1	1	1	50
DE	F-gas certification	0	0	1	0	1	1	1	50
DE	Asbestos removal	1	1	1	0	1	9	1	350
DE	Sewage, water and gas installations	0	0	0	1	1	1	1	50
DK	F-gas certification/ electrical/water/ sewage/gas installations	0	5	1	0	0	9	0.5	25
ES	F-gas certification	0	0	0	0	1	4	1	0

MS	Authorisation	Few lines	One page	Few pages	Company statutes/ Insurance policies	Trans lation Req.	Mut. Rec.	Wgt	All. costs
ES	Asbestos removal	0	0	1	1	0	9	1	0
ES	Electrical installations	0	0	0	1	0	9	1	0
ES	Installation of elevators	1	1	0	0	0	4	1	0
ES	Installation of alarm systems	1	1	0	2	1	5	1	1050
ES	Installation of heating equipment	3	1	0	0	1	4	1	250
FI	F-gas certification	0	1	0	0	0	1	1	50
FI	Installation of elevators	0	0	0	0	0	1	1	50
FI	Electrical and telecom installations	0	1	1	0	0	1	1	50
FR	F-gas certification	0	1	0	0	1	1	1	50
GR	F-gas certification	1	0	0	0	0	1	0.5	50
IT	F-gas certification	1	1	0	0	1	1	1	50
IT	Asbestos removal	0	1	1	0	1	9	1	300
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	0	0	0	0	1	9	1	0
NL	F-gas certification	1	1	2	0	0	8	0.5	25
NL	Asbestos removal	2	0	1	0	1	9	1	300
PL	F-gas certification	1	0	1	0	1	1	1	50
PT	F-gas certification	1	5	0	0	0	7	1	0
PT	Gas installations	1	5	0	0	0	7	1	0
SI	F-gas certification	0	1	0	0	0	1	1	50
SI	Asbestos removal	0	1	0	0	0	9	1	0
UK	F-gas certification	0	4	1	0	0	1	1	50
UK	Asbestos removal	1	0	1	0	0	9	1	0

Table 6.9 Categories of documents to be submitted and allocated certification costs, general HCS

MS	Authorisation	Non-stan-dard	Finan-cial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt	All. costs
BG	Registration in Builders' Register	NS	POL+FR		0	1	9	1	0
ES	REA	NS		QD-some	1	1	6	1	150
IT	DURC				0	0	1	1	0
IT	ISO EN 9001:2008				0	0	7	1	0
PT	Registration at IMPIC		POL+FR		0	0	5	1	0

Codes for required documents (data in some cases): see previous table.

Table 6.10 Categories of documents to be submitted and allocated certification costs, installation services HCS

MS	Authorisation	Non-stan-dard	Finan-cial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt	All. costs
BG	F-gas certification	NS			1	1	1	1	0
BG	Asbestos removal	NS			0	0	9	1	0
CZ	F-gas certification			QD-all	1	1	1	1	0
CZ	Electrical and gas installation services	NS		QD-some	1	1	1	1	150
CZ	Working with pressure or hoisting equipment	NS		QD-some	0	1	1	1	150

MS	Authorisation	Non-stan-dard	Finan-cial	QD – some or all	Cert Req.	Tr. Cert. Req.	Mut. Rec.	Wgt	All. costs
DE	F-gas certification	NS			1	1	1	1	150
DE	Asbestos removal	NS	ATT		1	1	9	1	200
DE	Sewage, water and gas installations		POL		1	1	1	1	50
DK	F-gas certification/ electrical/water/ sewage/gas installations	NS		QD-all	1	0	9	0.5	174
ES	F-gas certification			QD-some	1	1	4	1	0
ES	Asbestos removal	NS	POL		1	0	9	1	200
ES	Electrical installations		POL		1	0	9	1	50
ES	Installation of elevators	NS	ATT		1	0	4	1	200
ES	Installation of alarm systems	NS	POL		1	1	5	1	200
ES	Installation of heating equipment	NS	ATT		1	1	4	1	200
FI	F-gas certification				0	0	1	1	0
FI	Installation of elevators				0	0	1	1	0
FI	Electrical and telecom installations				0	0	1	1	0
FR	F-gas certification	NS			1	1	1	1	150
GR	F-gas certification				1	0	1	0.5	0
IT	F-gas certification	NS		QD-some	0	1	1	1	0
IT	Asbestos removal	NS			0	1	9	1	0
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations				1	1	9	1	0
NL	F-gas certification	NS			0	0	8	0.5	0
NL	Asbestos removal	NS	ATT		1	1	9	1	200
PL	F-gas certification				0	1	1	1	0
PT	F-gas certification	NS		QD-all	0	0	7	1	0
PT	Gas installations	NS		QD-all	0	0	7	1	0
SI	F-gas certification	NS		QD-some	0	0	1	1	0
SI	Asbestos removal	NS			0	0	9	1	0
UK	F-gas certification	NS		QD-all	0	0	1	1	0
UK	Asbestos removal	NS		QD-some	0	0	9	1	0

Codes for required documents (data in some cases): see previous table.

6.6. HCS – Allocated submission costs

When documents are submitted, it takes time to pay fees, do the submission and to e-identify as required. In addition, postal costs are incurred if documents must be submitted by posts. The fees themselves are already included in the inspection fees discussed in Section 6.4. Also, costs to be present at inspections including travel tickets and costs of travel time are already included in the costs discussed in Section 6.4.

None of the above costs are incurred if cross-border service providers are automatically recognised without notification requirement. If notification is required, no cost is allocated to the payment of fees but costs are still allocated to submit a certificate of authorisation, e-identification if required and postal costs if required.

Table 6.11 builds on the information presented in the inventory (in particular Chapter 4) and the cost estimates presented in Section 5.7.

Table 6.11 Fee payment, document submission requirements and reported cost of time (converted to euros), general HCS, category installation services

		Cost of time to...						
MS	**Authorisation**	**pay fees**	**subm. docs**	**e-id**	**Postal costs**	**Mut. Rec.**	**Wgt**	**All. costs**
BG	Registration in Builders' Register	15	15	0	0	9	1	29
ES	REA	0	15	0	0	6	1	15
IT	DURC	0	15	0	0	1	1	15
IT	ISO EN 9001:2008	15	15	0	0	7	1	29
PT	Registration at IMPIC	15	15	58	0	5	1	87

Table 6.12 Fee payment, document submission requirements and reported cost of time (converted to euros), installation services HCS

		Cost of time to...						
MS	**Authorisation**	**pay fees**	**subm. docs**	**e-id**	**Postal costs**	**Mut. Rec.**	**Wgt**	**All. costs**
BG	F-gas certification	15	15	0	5	1	1	20
BG	Asbestos removal	15	15	58	0	9	1	87
CZ	F-gas certification	15	15	0	5	1	1	20
CZ	Electrical and gas installation services	15	15	0	0	1	1	15
CZ	Working with pressure or hoisting equipment	15	15	0	0	1	1	15
DE	F-gas certification	15	15	0	0	1	1	15
DE	Asbestos removal	15	15	0	5	9	1	34
DE	Sewage, water and gas installations	15	15	0	5	1	1	20
DK	F-gas certification/ electrical/water/ sewage/gas installations	15	15	0	5	9	0.5	27
ES	F-gas certification	15	15	0	5	4	1	34
ES	Asbestos removal	15	15	0	5	9	1	34
ES	Electrical installations	15	15	0	5	9	1	34
ES	Installation of elevators	15	15	0	5	4	1	34
ES	Installation of alarm systems	15	15	0	5	5	1	34
ES	Installation of heating equipment	0	15	0	5	4	1	20
FI	F-gas certification	15	15	0	0	1	1	15
FI	Installation of elevators	15	15	0	0	1	1	15
FI	Electrical and telecom installations	15	15	0	0	1	1	15
FR	F-gas certification	15	15	0	5	1	1	20
GR	F-gas certification	15	15	0	5	1	0.5	20
IT	F-gas certification	15	15	0	5	1	1	20
IT	Asbestos removal	15	15	0	5	9	1	34
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	15	15	58	0	9	1	87
NL	F-gas certification	15	15	0	5	8	0.5	27
NL	Asbestos removal	15	15	0	0	9	1	29
PL	F-gas certification	15	15	0	5	1	1	20
PT	F-gas certification	0	15	0	5	7	1	20
PT	Gas installations	0	15	0	5	7	1	20
SI	F-gas certification	15	15	0	5	1	1	20
SI	Asbestos removal	15	15	58	0	9	1	87
UK	F-gas certification	15	15	0	0	1	1	15
UK	Asbestos removal	15	15	58	0	9	1	87

6.7. HCS – Total costs per procedure

Adding up the costs of several steps in the analysed administrative procedures gives the total administrative costs (or burden) of the procedure. The highest costs are allocated to the Czech Republic F-gas authorisation and the Italian ISO certificate requirement, due to very specific requirements documented in Section 5.4 for which high costs are reported – examination of all technicians for the Czech F-gas authorisation and the ISO certification fee for the Italian authorisation respectively.

For other procedures, factors that may cause high costs include:

- Lack of online information, especially if the procedure is complex or non-standard documents are required, for example in Bulgaria and Italy;
- The collection of non-standard documents, for example for asbestos removal control schemes in Bulgaria, Germany, Spain, Italy, the Netherlands and the UK;
- Presence at inspections (including travel time and tickets) for asbestos removal authorisations in Germany, Italy and the UK, F-gas certifications in France and Portugal, hoisting installations in Italy and gas installations in Portugal;
- In addition, authorisation fees are high for asbestos removal in Germany (EUR 2,000) and the UK (EUR 3,820);
- Specifically for the Czech Republic, the requirement that all professionals of the company must do an examination in the Czech Republic even if qualified in their home country and even if only one employee actually works in the Czech Republic, is considered as an administrative formality for the company, in line with reported costs (EUR 13,000).

Table 6.13 Installation HCS total administrative costs (converted to euros), general HCS

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
BG	Registration in Builders' Register	1,600	2,250	1,814	600	0	29	6,293
ES	REA	1,600	3,950	0	250	150	15	5,965
IT	DURC	100	50	0	50	0	15	215
IT	ISO EN 9001:2008	4,000	12,050	0	200	0	29	16,279
PT	Registration at IMPIC	1,600	2,000	1,270	0	0	87	4,957

Table 6.14 Installation HCS total administrative costs (converted to euros), installation services HCS

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
BG	F-gas certification	100	50	0	50	0	20	220
BG	Asbestos removal	2,400	2,450	64	300	0	87	5,301
CZ	F-gas certification	100	13,150	0	50	0	20	13,320
CZ	Electrical and gas installation services	100	50	0	50	150	15	365
CZ	Working with pressure or hoisting equipment	100	50	0	50	150	15	365
DE	F-gas certification	100	50	0	50	150	15	365
DE	Asbestos removal	1,600	3,350	3,200	350	200	34	8,734
DE	Sewage, water and gas installations	100	50	0	50	50	20	270
DK	F-gas certification/ electrical/water/ sewage/gas installations	400	6,275	85	25	174	27	6,986
ES	F-gas certification	800	50	300	0	0	34	1,184
ES	Asbestos removal	800	2,950	1,000	0	200	34	4,984
ES	Electrical installations	2,400	950	1,500	0	50	34	4,934

MS	Authorisation	Fam.	Getting data + docs	INS+ INS	Trans	Cert	Subm.	Total
ES	Installation of elevators	1,600	1,350	2,800	0	200	34	5,984
ES	Installation of alarm systems	2,400	1,850	1,200	1,050	200	34	6,734
ES	Installation of heating equipment	1,600	1,300	1,200	250	200	20	4,570
FI	F-gas certification	100	50	0	50	0	15	215
FI	Installation of elevators	100	0	0	50	0	15	165
FI	Electrical and telecom installations	100	50	0	50	0	15	215
FR	F-gas certification	100	50	0	50	150	20	370
GR	F-gas certification	100	50	0	50	0	20	220
IT	F-gas certification	100	50	0	50	0	20	220
IT	Asbestos removal	3,200	2,450	3,500	300	0	34	9,484
IT	Electrical, radio/TV, heating, airco, refrigeration, plumbing, gas, elevator and fire protection system installations	2,400	50	168	0	0	87	2,705
NL	F-gas certification	800	1,225	1,750	25	0	27	3,827
NL	Asbestos removal	1,600	2,950	2,400	300	200	29	7,479
PL	F-gas certification	100	50	0	50	0	20	220
PT	F-gas certification	1,600	550	2,500	0	0	20	4,670
PT	Gas installations	1,600	500	2,500	0	0	20	4,620
SI	F-gas certification	100	50	0	50	0	20	220
SI	Asbestos removal	800	450	500	0	0	87	1,837
UK	F-gas certification	100	50	0	50	0	15	215
UK	Asbestos removal	1,600	2,050	6,320	0	0	87	10,057

6.8. Building control schemes – Allocated and imputed costs

The administrative costs for building control procedures consist of the costs of hours to go through procedures and costs incurred. The latter include fees charged by authorities and fees for intermediary services such as for example for hiring a professional to submit documents (saving in-company time to collect and submit documents), translation, certification, travel tickets, etc.

For building control schemes, costs cannot be linked to individual administrative requirements at the national level. The first reason is local authorities may have additional administrative requirements or different handling procedures. For example, a municipality may offer to collect approvals from public authorities (for a fee). The second reason is that some costs of administrative requirements (e.g. for a greater number of planning documents) depend on the project size. This is why some costs of projects with multiple buildings (and millions of euros) have been divided by 10 to compare with costs of single-building projects, as discussed in the previous chapter. Hence, the costs of building control procedures for cross-border service providers calculated in this study must be regarded as examples of costs that they incur.

For each respondent, the reported hours of going through procedures are multiplied with hourly wage rates (EUR 58 for managers and EUR 29 for support staff). The results are shown in Table 6.15.

Table 6.15 Costs of hours of going through building control procedures (hours times wage rates)

MS	Proc.	CB/ Dom	Total
BG	Regular*	Dom, M	1,914
BG	Regular	Dom, M	5,452
BG	Regular	Dom, M	7,192
BG	Regular	Dom, M	2,320
CZ	Regular*	CB,A	6,380
CZ	Regular*	CB,M	2,958
DE	Regular	CB,A	3,451

MS	Proc.	CB/ Dom	Total
DK	Regular*	CB,M	928
ES	Regular*	CB,M	8,497
FI	Regular	Dom, M	5,800
FI	Regular	Dom, M	1,508
FR	Regular	Dom, M	2,842
FR	Regular	Dom, M	3,538
GR	Regular	Dom, S	7,946
GR	Regular	Dom, M	9,570
IT	Regular	CB,A	5,365
IT	Regular	Dom, M	1,508
NL	Light	CB,S	609
NL	Via main	CB,S	1,972
PL	Regular*	CB,M	3,654
PL	Notification*	CB,S	2,175
PT	Not needed	CB,S	0
PT	Not needed	CB,S	0
SI	Regular	CB,A	5,162
SI	Regular	Dom, P	870
UK	Via main	CB,S	1,972
UK	Via main	CB,S	1,044

The reported costs incurred, including fees charged by authorities and intermediary services were already presented in Table 5.16.

The following fees are not included since they are regarded as regulatory rather than administrative costs:

- Bulgaria: the fees for design clearances;
- Finland: the fees for the building permit and on-site inspections;
- Italy: legal advice about the local building code.

For Bulgaria and Finland, the interpretation of these fees as regulatory costs is partly the amount of the fees (up to EUR 16,000 in Bulgaria and EUR 25,000 in Finland). Such costs are obviously not limited to handling costs only. For Italy, understanding the local building code also goes beyond understanding the procedure. However, for Italy the costs of EUR 5,000 for getting documents including the building permit from local authorities are fully included.

Using the fees from Table 5.16 gives the final fee estimates in Table 6.16. Unreported costs are indicated by "." and if fees were reported to have been absent, the value is 0. For the fees, a distinction is made between fees of authorities and fees of intermediary service providers such as for example an architect for the submission of documents. Also, a distinction is made between fees incurred the first time and fees incurred if documents need to be re-submitted for the sole reason of administrative formalities (in most cases a missing stamp).

If a respondent reported only zeros, the plausibility is checked. If a regular building control procedure was followed and fees need to be paid according to authorities, values are set to missing (Spanish case). However, if a respondent reported that the main contractor paid the fees (Netherlands, UK) or if absence of fees is confirmed by authorities (Portugal), zero costs are applied. For re-submission, if some fees are reported and others not, it is assumed that the non-reported fees were zero (first Czech case).

Table 6.16 Fees of authorities and intermediary service providers

			Initial procedure		Re-submission	
MS	Proc	CB/D	Authorities	Intermediary service providers	Authorities	Intermediary service providers
BG	Regular	D, M	.	250	.	.

			Initial procedure		Re-submission	
MS	Proc	CB/D	Authorities	Intermediary service providers	Authorities	Intermediary service providers
BG	Regular	D, M	.	400	.	.
BG	Regular	D, M	.	.	.	.
BG	Regular	D, M	.	2,350	0	0
CZ	Regular	CB,A	1,188	140	0	130
CZ	Regular	CB,M	.	.	.	.
DE	Regular	CB,A	1,000	0	0	0
DK	Regular	CB,M	.	.	.	.
ES	Regular	CB,M	.	.	.	.
FI	Regular	D, M	600	4,450	600	1,000
FI	Regular	D, M	.	.	.	.
FR	Regular	D, M	.	.	.	.
FR	Regular	D, M	.	.	.	.
GR	Regular	D, S	465	110	.	.
GR	Regular	D, M	60	220	.	.
IT	Regular	CB,A	5,000	0	.	0
IT	Regular	D, M	1,500	0	0	0
NL	Light	CB,S	0	0	.	.
NL	Via main	CB,S	0	0	0	0
PL	Regular	CB,M	455	180	0	180
PL	Notification	CB,S	0	1,120	0	0
PT	Not necessary	CB,S	0	0	0	0
PT	Not necessary	CB,S	0	0	0	0
SI	Regular	CB,A	3,840	0	0	0
SI	Regular	D, P	1,000	4,000	.	1,000
UK	Via main	CB,S	0	0	0	0
UK	Via main	CB,S	0	0	1,000	0

The reported costs are on average lower for notifications, light procedures and procedures via the main contractor than for regular procedures as a main contractor going cross-border. Therefore, as a next step, costs are averaged per country and type of procedure.

The costs of cross-border administrative formalities for regular building procedures are quite similar between countries, even though fees were not always reported. The calculated cost of hours going through procedures is less than average for Denmark and higher than average for Spain and Greece. However, as noted at the start such differences could also be attributed to differences between municipalities and projects. However, the total costs are in the same order of magnitude of EUR 4,000 – EUR 10,000 for all countries for which all types of costs have been reported (although for Italy the costs of services were not used). Hence, it seems reasonable to use the (unweighted) average of EUR 7,300 as an estimate of administrative costs of a typical cross-border regular building control procedure. This will be used as a basis in section 7 (extrapolation of costs).

Table 6.17 Regular building control procedure – administrative costs for cross-border service providers (converted to euros) – allocated and unweighted average for imputation

MS	Cost of time	Fees of authorities	Fees for services	Re-subm. authorities	Re-subm. services	Total
BG	4,220	.	1,000	.	.	.
CZ	4,669	1,188	140	0	130	6,127
DE	3,451	1,000	.	0	0	4,451
DK	928	.	.	.	.	.
ES	8,497	.	.	.	.	.
FI	3,654	600	4,450	600	1,000	10,304
FR	3,190	.	.	.	.	.
GR	8,758	263	165	0	0	9,186

MS	Cost of time	Fees of authorities	Fees for services	Re-subm. authorities	Re-subm. services	Total
IT	3,437	3,250	.	0	0	6,687
NL	.	.	.	.	.	.
PL	3,654	455	180	0	0	4,289
PT	.	.	.	.	.	.
SI	3,016	2,420	2,000	0	500	7,936
UK	.	.	.	.	.	.
Unweighted average	4,316	1,311	1,323	86	233	7,268

For light procedures or situations where only some documents needed to be submitted to the main contractor, administrative costs are considerably lower than for regular procedures. In particular no fees were reported, which the main contractor paid. The exception is a fee of authorities for re-submitting documents in the United Kingdom, which the main contractor passed on to the subcontractor. The main cost for subcontractors is associated with the time needed to compile the documents to be sent to the main contractor.

For Portugal, two cross-border construction service providers were interviewed (both subcontractors, one from Germany and one from Ireland) and both reported zero costs for building control procedures. One said that no building permit was needed and another said that the main contractor already had obtained the building permit.

Table 6.18 Light / notification / via main contractor – administrative costs for cross-border service providers (converted to euros) – allocated and unweighted average for imputation

MS	Cost of time	Fees of authorities	Fees for services	Re-subm. authorities	Re-subm. services	Total
BG	.	.	.	.	.	.
CZ	.	.	.	.	.	.
DE	.	.	.	.	.	.
DK	.	.	.	.	.	.
ES	.	.	.	.	.	.
FI	.	.	.	.	.	.
FR	.	.	.	.	.	.
GR	.	.	.	.	.	.
IT	.	.	.	.	.	.
NL	1,291	0	0	0	0	1,291
PL	2,175	0	1,120	0	0	3,295
PT	0	0	0	0	0	0
SI	.	.	.	.	.	.
UK	1,508	0	0	500	0	2,008
Unweighted average	1,243	0	280	125	0	1,648

In the next chapter, a cost of EUR 1,700 will be used for a typical cross-border alternative building control procedure. The average is rounded up because time to submit documents to the main contractor may be reported as absent, but still a certain amount of time must have been involved.

7. EXTRAPOLATION

7.1. Introduction

This study covers two types of administrative procedures for which the costs per occurrence have been estimated in the previous chapter: horizontal control schemes and building control procedures. In this chapter, both types of costs are extrapolated to the level of the 14 countries covered by this study. However, due to the different nature of horizontal control schemes vs. building permits, the method to extrapolate the costs to the relevant business population also differs.

Horizontal control schemes must be obtained once and may need to be periodically renewed, for example annually or every five years. For simplicity, only the costs of first-time authorisations or notifications are included in the calculations, incurred by hypothetical numbers of new cross-border entrants in the next ten years. The average cost of horizontal authorisations multiplied by the number of new entrants then gives the extrapolated costs, as described in Section 7.2.

Building permits must be obtained for every construction project. However, no accurate statistics could be found about the number of cross-border construction projects, let alone by type of building control procedure. Therefore, hypothetical scenarios about the number of cross-border projects per year and the type of building control procedure are developed in Section 7.3.

7.2. Horizontal authorisations

In applications of the Standard Cost Model for administrative burdens, periodic administrative costs are usually extrapolated to the Member State level by multiplying the average costs with the current number of firms. However, for horizontal control schemes of cross-border operating companies this makes less sense for two reasons:

- The costs to access markets partially consist of one-off costs at the start for most of the countries covered by this study. This means that this part of the costs have been sunk in the past and are only relevant for new market entrants;
- The number of cross-border operating companies is difficult to identify although figures from Eurostat, Amadeus and scarce registration data do not suggest a strong current presence of cross-border service providers for the services covered by this study.

Hence, as an alternative, the average costs were multiplied with hypothetical numbers of firms potentially interested in providing cross-border services in the future. According to the latest Eurostat figures of 2016, in the EU28 there are close to 705,000 companies whose main activity is the construction of residential or non-residential buildings. As a simplification, the number of service providers active in the segment "specialised construction activities" are not taken into account, even though they face many of the identified procedures related to installation services as well.

As the number of firms potentially interested in provision of cross-border services in the future cannot be exactly determined, this study uses three different scenarios to estimate these numbers:

1. The current population of cross-border operating firms seems to be small. Therefore, the base assumption is that 1 per cent would operate cross-border. This would be equivalent to 7,050 firms. In addition, for this base scenario / lower range estimate, it is assumed that each of these firms operates in just one cross-border country;
2. A second scenario where ten per cent of the construction service providers would operate in one country each;
3. Finally, a third scenario / high range estimate is calculated where ten per cent of the construction firms would operate in ten countries each.

Certainly, the future remains uncertain and the number of companies that go cross-border may be even higher or lower than in these three scenarios. The scenarios should only be used to gain a sense of the magnitude of the potential gain of simplifying formalities.

The following additional assumptions are made:

- In the construction sector, and particularly for installation services, the horizontal authorisation procedures often apply in the same way for permanent establishment of a branch and for temporary services. The same administrative costs are therefore assumed regardless of the mode of cross-border services (temporary, via a branch or agency or via a subsidiary);
- General horizontal authorisation procedures for construction service providers are assumed to apply to all of them (100%). In addition, each authorisation procedure for specific installation services is assumed to apply to 10% of the companies;
- All firms face language issues in case of translation requirements when documents in English are not accepted. For example, translation costs for services in Germany are applied to all companies from other EU countries offering services in Germany, including companies from Austria (as a simplification);
- Lastly, the host countries are weighted by the approximate size of the economy and population. France, Germany, Italy, Poland, Spain and the UK were each given five times larger weights than the other countries of this study. This results in weights of 13.2% for the six largest countries and of 2.6% of the eight other countries of this study.

These assumptions result in the following table that serves as the basis for cost extrapolation for horizontal authorisations. For example, to Bulgaria 2.6% of 7,050 (= 186) construction service providers working in another EU country are allocated in the base scenario. There is one general authorisation procedure in Bulgaria (registration in the Builders' Register) which all must go through (the exception for first-time temporary services in Bulgaria is not factored in because for the second-time temporary service the full authorisation procedure must be followed). In addition, in Bulgaria companies need authorisation for two types of installation services: for installation of equipment containing F-gases and for asbestos removal. With the assumption that 10% of the cross-border service providers provide any specific installation service, 10% of 186 work with F-gases and again 10% of 186 remove asbestos. This means that installation procedures are applied 37 times in total in Bulgaria (Table 7.1).

For the Czech Republic, the control schemes for electrical and gas installations and for working with pressure or hoisting equipment are regarded as one procedure because the authorisations are obtained from the same authority through one combined procedure; and hence the number of administrative procedures is counted as 2 instead of 3. For the other countries, the number of procedures is directly taken from the previous chapters.

Table 7.1 Numbers of cross-border companies (base scenario), of HCS procedures and of times that companies go through procedures (number of companies x procedures)

Host		Procedures		Nr x Procs	
MS	Nr companies	General	Installation	General	Installation
BG	186	1	2	186	37
CZ	186	0	2	0	37
DE	928	0	3	0	278
DK	186	0	1	0	19
ES	928	1	6	928	557
FI	186	0	3	0	56
FR	928	0	1	0	93
GR	186	0	1	0	19
IT	928	2	3	1,855	278
NL	186	0	2	0	37
PL	928	0	1	0	93
PT	186	1	2	186	37
SI	186	0	2	0	37

Host		Procedures		Nr x Procs	
MS	Nr companies	General	Installation	General	Installation
UK	928	0	2	0	186
Total	7,050	5	31	3,155	1,764

Multiplying the number of companies with the average cost per host country gives the total cost of horizontal authorisation procedures in the 14 countries covered by this study. The average cost is directly calculated from Table 6.13 and Table 6.14. For example, for Bulgaria the average cost of EUR 6,293 for the general procedure is directly taken from the last column of Table 6.13. The average cost of EUR 2,760 for installation service authorisations in Bulgaria is the average of EUR 220 and EUR 5,301 in the last column of Table 6.14.

Adding up the costs per country gives an aggregate cost of EUR 22.9 million for general control scheme procedures and of EUR 6.5 million for installation service authorisations. The aggregate costs for the general control schemes are higher than the costs for the installation service control schemes despite general authorisations being required in only four of the 14 countries of this study. The main reason is that if a general control scheme procedure is in force, all (cross-border) construction service providers must go through a general control scheme procedure, but only part of them provide installation services for which authorisation is required.

Table 7.2 Number of cross-border companies going through HCS procedures (base scenario), average and total costs of going through HCS procedures

Host	Nr companies		Avg. Cost		Total Cost		
MS	General	Inst.	General	Inst.	General	Inst.	Total
BG	186	37	6,293	2,760	1,170,498	102,129	1,272,627
CZ	0	37		6,843	0	253,191	253,191
DE	0	278		3,123	0	868,194	868,194
DK	0	19		6,986	0	132,734	132,734
ES	928	557	5,965	4,732	5,535,056	2,635,492	8,170,548
FI	0	56		198	0	11,079	11,079
FR	0	93		370	0	34,410	34,410
GR	0	19		220	0	4,171	4,171
IT	1,855	278	8,247	4,136	15,297,721	1,149,854	16,447,576
NL	0	37		5,653	0	209,156	209,156
PL	0	93		220	0	20,414	20,414
PT	186	37	4,957	4,645	922,002	171,847	1,093,849
SI	0	37		1,028	0	38,045	38,045
UK	0	186		5,136	0	955,250	955,250
Total	3,155	1,764			22,925,277	6,585,966	29,511,244

In the second scenario, the costs become ten times as large as in the lower-end scenario because the same number of firms incur costs to operate in ten host countries each (besides the home country). In the third scenario, both the number of additional firms and the number of countries in which they operate are ten times as large as in the first scenario. Table 7.3 summarises the outcomes for the above three scenarios.

Table 7.3 Total costs of going through HCS procedures, three scenarios, in EUR million

	Total
Scenario 1	29.5
Scenario 2	295.1
Scenario 3	2,951.1

Depending on the scenario, the cost of additional cross-border operating firms varies between EUR 29 million (lower-end scenario) and EUR 2.9 billion (upper-end scenario).

7.3. Building control procedures

From Table 6.17 and Table 6.18, the costs of a regular building control procedure is on average around EUR 7,300 for a regular building control procedure and around EUR 1,700 for a light building control procedure (often subcontractors).

Statistics about numbers of building permits are available from national statistical offices, although not with a breakdown by country of origin (domestic or foreign). Country of origin would also be difficult to determine if the main contractor is domestic and some subcontractors are foreign. In addition, numbers of building permits are difficult to compare between countries. For example, for a project of 100 residential dwellings, in some instances 100 permits would be issued (if separate homes), and in another instance, only 1 permit (e.g. for a flat). Hence, just multiplying administrative costs with the number of building permits would result in distortions caused by differences in definitions.

For this reason, a different approach to extrapolating administrative costs is followed. Firstly, assumptions are made about the number of companies providing services cross-border in any year. It is assumed that companies that go cross-border into a specific host country for the first time, will have one cross-border project in that country for each of the next ten years. The number of cross-border companies is assumed to be the same as in the first two HCS scenarios.

As a third scenario, the number of companies of the second scenario is assumed to have three cross-border projects per year. This scenario is assumed to correspond with the third HCS scenario. Implicit in this assumption is that cross-border firms do not every year have cross-border projects in all ten countries in which they are sometimes active.

Thus, the scenarios for the aggregate cost of administrative formalities of cross-border building permits are:

1. The number of companies of HCS scenario 1 have one cross-border project each every year;
2. The number of companies of HCS scenario 2 have one cross-border project each every year;
3. The number of companies of HCS scenario 2 have three cross-border projects each every year.

In addition, an assumption needs to be made about the types of procedures that cross-border service providers go through. Not all countries have alternatives for a regular building control procedure. However, service providers can provide services cross-border as a subcontractor throughout the EU. Out of the 15 cross-border service providers interviewed, 8 have gone through a regular procedure and 7 through an alternative procedure (including submission of documents to the main contractor only). Hence, it is assumed that half of the cross-border service providers go through a regular procedure (themselves) and half through an alternative procedure. The average cost per cross-border building control procedure are thus the average of EUR 7,300 for regular procedures and EUR 1,700 for alternative procedures, namely EUR 4,500.

For the base scenario, the number of 7,050 companies is taken from Table 7.1 and not from Table 7.2. The reason is that not all companies need to go through horizontal control scheme procedures, but they all need to go through some kind of building control procedure to build a residential dwelling or office building. In this scenario, they go through one cross-border building control procedure every year.

In the second scenario, ten times the number of companies of the base scenario is assumed: 70,500 going through one cross-border procedure per year each.

In the third scenario, companies go through three cross-border procedures each and the total number of cross-border procedures that all cross-border companies go through is three times the number of the second scenario.

Table 7.4 Estimated total annual aggregate administrative costs of cross-border construction services in 14 EU countries, three scenarios

Scenario	Number procedures	Average cost (in EUR)	Aggregate cost (in EUR mln.)
Scenario 1	7,050	4,500	31.7
Scenario 2	70,500	4,500	317.3
Scenario 3	211,500	4,500	951.8

The total administrative cost of cross-border building control procedures that is incurred every year is thus assumed to range from EUR 32 million in the base scenario to EUR 952 million in the third scenario.

7.4. Total administrative costs of cross-border construction services

Construction service providers incur two types of costs when providing services cross-border:

- Costs of horizontal control schemes;
- Costs of building control schemes.

These costs cannot just be added up to one total because the former costs are incurred only once (except in certain cases where authorisation must be periodically renewed) and the latter costs are incurred annually. In order to estimate total costs, the assumption is made that every year one-tenth of the business population of the scenario goes through a procedure for horizontal authorisations. The total annualised administrative costs of cross-border construction services is then one-tenth of Table 7.3 plus the annual costs of Table 7.4, as presented in Table 7.5.

Table 7.5 Estimated total annualised aggregate administrative costs of cross-border construction services in 14 EU countries, three scenario, in EUR million

Scenario	HCS	Building control schemes	Total
Scenario 1	2.9	31.7	34.7
Scenario 2	29.5	317.3	346.7
Scenario 3	295.1	951.8	1246.9

The annual costs of cross-border construction services formalities thus vary from EUR 35 million to 1.2 billion per year. This may seem modest at the level of the 14 countries covered by this study. However, over a period of ten years the total costs run into hundreds of millions up to several billion euro.

Discounted at an annual interest rate of 4 per cent, the annual value of EUR 1,246 million in the third scenario over a period of 10 years is equivalent to a net present value of EUR 10.1 billion.

At the same time, since no two projects are the same and local authorities may have different building control procedures, these administrative costs must be seen as rough estimates based on limited data.

ANNEX A: AUTHORITIES TEMPLATE INSTALLATION SERVICES HORIZONTAL AUTHORISATIONS

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
Relevant EU law			F-Gas Regulation 517/2014/EU Art.3.4	Energy Efficiency Directive 2012/27/EU Art.16.1; Renewable Energy Directive 2009/28/EU Art. 14.3	Only with regard to products, not installation services	Only with regard to products, not services	Only with regard to products, not services	None found
Q1. Are the following service activities (installation of equipment with F-gases … Hoisting) separately regulated in your country?	Yes / No							
Q2. What is the name, number and date of the regulation in your country regarding these activities?	As in relevant EU law							
Q3. Do natural persons (i.e. professionals) carrying out installations in these areas need authorisation or notify authorities and if yes what article regulates this? -> Out of scope below	E.g. Authorisation: Art. 1.A							
Q4. Do legal persons (i.e. companies) in these areas need authorisation or notify authorities and if yes what article regulates this?	E.g. Authorisation: Art. 2.A							
Q5. Please provide a hyperlink to the relevant source(s) describing the formalities (e.g. national regulation, website of relevant	Yes / No							

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
authority, …)								
If Q4 = No, Disregard the questions below for the relevant activities								
Q6A. Does the authorisation or notification give access to the whole territory of the Member State?	Yes / No							
Q6B. Is authorisation / notification valid for a limited period of time and if yes for what period?	E.g. Yes, 5 years							
If yes, is the renewal procedure [A] the same, [B] simpler but still with on-site inspection or supporting documents, [C] simpler without on-site inspection or supporting documents, [D] occur automatically on application?	[A] / [B] / [C] / [D]							
Q7. Are voluntarily pre-certified or otherwise pre-qualified service providers exempted from this scheme?	Yes / No							
Q8. How many administrative authorities are involved in approving the application for authorisation / checking the admissibility of the notification?	Any number from 1 or higher							
If more than 1, is there a coordinating authority and if yes which one?	E.g. Yes, Chamber of installers							
Q9. What is the source on numbers of supporting documents to be submitted, in relation to each of the following categories of documents?								
[A] Application form/letter								
[B] Compliance with technical								

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
standards								
[C] Professional and technical capacity (number of persons with required qualifications or experience)								
[D] Health and safety requirements								
[E] Equipment requirements								
[F] Insurance coverage or other financial guarantee arrangements								
[G] Economic and financial capacity (including e.g. equity capital and absence of insolvency/liquidation proceedings)								
[H] Good repute (Criminal, administrative or disciplinary offences, but not civil wrongs such as breach of contract or tort liability)								
[I] Other								
[J] On-site inspection is required (Yes / No)								
Q10. Are simple copies (not in certified form) accepted and if yes for all or some documents?	No / All / Some							
If some, please indicate the categories of documents of Q9 for which simple forms are accepted	E.g. A, C, E							
If simple copies are accepted, are further formalities required?								
" If yes, which formalities?								
E.g. a declaration by the service provider attesting to the accuracy of the copies and/or to holding the originals (to be submitted in case of doubt)"								
Q11. If "No" or "some" to Q10, are certified or authenticated	No / All / Some							

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
documents (including translations) issued in another Member State accepted for some or all documents?								
If some, for which categories of documents of Q9 are certified or authenticated documents issued in another MS are accepted?								
Do translations need to be certified?								
Q12. Are submissions and documents in English accepted for some or all documents?								
If some, for which categories of documents of Q9 is English accepted?								
Q13. In the website of the Point of Single Contact (PSC), or in a website linked to the PSC:								
Is legislation identified above under question 1 available or explained?	Yes / No							
Is the following available: [A] Yes full case handling, [B] Yes electronic intake partially available, [C] Yes paper forms downloadable only, [D] None	[A] / [B] / [C] / None							
If Yes, are [A] e-ID and/or [B] e-signatures required or no?	E.g. A, B, or "No"							
If Yes, are cross-border e-ID and/or e-Signatures accepted from no, all or some other Member States?	No / All / Some							
Is the information not, fully or	Not / Fully /							

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
partly available in English?	Partly							
Q14. Mutual recognition								
Is a "country of origin principle"[1] in place for cross-border providers [A] Yes fully available, [B] Yes subject to mere notification, [C] Yes for insurance and financial guarantees only, [D] No?								
[1] A general rule or principle in national Law by which the above Member State's requirements do not apply to cross-border service providers"	[A] / [B] / [C] / No							
If "Yes", is the principle applicable to [A] secondarily established providers and/or [B] Temporary cross-border providers?	E.g. A, B							
Is an "equivalence assessment"[1] in place for cross-border providers [A] Yes for all requirements, [B] Yes for some requirements, [C] Yes for insurance and financial guarantees only, [D] No?								
[1] A general rule or principle in national Law by which the above Member State's requirements do not apply to cross-border service providers"	[A] / [B] / [C] / No							
If "Yes", is the principle applicable to [A] secondarily established providers and/or [B] Temporary cross-border providers?	E.g. A, B							
If Yes, is any specific procedure laid-out to guide the equivalence assessment?								
If Yes, please describe if examples								

Questions	Example answers	General	F-gases (refrigerators, heat pumps, electrical, fire safety, air conditioning)	Energy-efficiency related (e.g. solar panels, boilers)	Electrical installation	Elevators	Hoisting	Other
are given of alternative documents								
If Yes, please describe if conditions under which insurance from other countries are accepted								
Q15. What is the fee charged for authorisation of secondary establishment?								
What is the fee charged for authorisation of temporary service providers?								
Q16. What is the (initial) fixed period in which authority must decide about granting the authorisation?								
How many times can the initial fixed period be extended?								
Is there a maximum total period for the decision and if yes how long is it?								
Are applicants notified of extensions before the original period has expired?								
If the period for decision has expired, is the authorisation deemed to have been granted?								

ANNEX B: BUSINESS QUESTIONNAIRE

Preliminary note: routing codes have been suppressed

Thank you for agreeing to participate. The survey could take 15 minutes to complete. All of your answers are private and confidential.

1. Are you or is your company active in one of the following segments for residential and/or office buildings?

a. Construction services as a main contractor General construction services as a subcontractor
b. Installation services as a subcontractor (gas, electricity, telecom,
c. water/sewage, climatisation, lifts, etc.)
d. Project development
e. Architecture Engineering
f. None of the above

2. In the past five years, have you or your company done any of the following in the field of residential and/or office buildings?

More than one answer possible

Building plans may include notification or self-certification schemes

a. Applied for or renewed authorization/notification of the company for construction (general construction services and/or specialised construction services, including installation services) in another EU country
b. Submitted a building plan in another EU country
c. Hired a professional to submit a building plan in another EU country
d. Assisted a foreign parent company to submit a building plan
e. Assisted a foreign service provider to submit a building plan
f. Only submitted building plans in my own country
g. None of the above

3. **If authorization/notification was applied for or renewed, and/or a building plan was submitted across the border in any of the following countries, please answer the questions for one of these countries of your choice**

   Note: both direct applications across borders and applications via a subsidiary, branch, agency, office or third party in that country are relevant

   Please select a country where you or your company went through a regular building permit procedure if possible

   a. Bulgaria
   b. Czech Republic
   c. Denmark
   d. Finland
   e. France
   f. Germany
   g. Greece
   h. Italy
   i. Netherlands
   j. Poland
   k. Portugal
   l. Slovenia
   m. Spain
   n. UK – England
   o. None of the above

4. **Is your main office located in any of the following countries?**

   a. Austria
   b. Belgium
   c. Bulgaria
   d. Croatia
   e. Cyprus
   f. Czech Republic
   g. Denmark
   h. Estonia
   i. Finland
   j. France
   k. Germany
   l. Greece
   m. Hungary
   n. Ireland
   o. Italy
   p. Latvia
   q. Lithuania
   r. Luxembourg
   s. Malta
   t. Netherlands
   u. Poland
   v. Portugal
   w. Romania
   x. Slovakia
   y. Slovenia
   z. Spain
   aa. Sweden

bb. UK
cc. None of the above

5. If a building plan was submitted in Nordrhein-Westfalen, Milano or Madrid, please tick off this region and answer the questions for that region

Otherwise, please answer the questions for any other region in the country you have chosen

a. Germany - Nordrhein Westfalen
b. Italy – Milano
c. Spain – Madrid
d. Not in that specific region

6. Please indicate in which way your company provides construction services in that country

a. Through a subsidiary
b. Through a branch
c. Through an agency
d. Through an office
e. Temporary / occasional cross-border services as main contractor
f. Temporary / occasional cross-border services as subcontractor

7. You indicated that you or your company has submitted a building plan on behalf of a foreign company.

Please select the country of origin of the foreign company for which you will answer the questions.

Note: countries outside the EU and the EEA are out of scope

a. Austria
b. Belgium
c. Bulgaria
d. Croatia
e. Cyprus
f. Czech Republic
g. Denmark
h. Estonia
i. Finland
j. France
k. Germany
l. Greece
m. Hungary
n. Ireland
o. Italy
p. Latvia
q. Lithuania
r. Luxembourg
s. Malta
t. Netherlands
u. Norway
v. Poland
w. Portugal
x. Romania
y. Slovakia
z. Slovenia
aa. Spain
bb. Sweden
cc. Switzerland
dd. UK
ee. None of the above

8. You indicated you or your company applied for or renewed company authorizations / notifications in [Country]. Which ones?

More than one answer possible

Note 1: we refer to authorization of companies, not of professionals
Note 2: general business registration is out of scope
Note 3: requirements that are not checked in advance are out of scope
Note 4: company certificates for energy auditing are out of scope
Note 5: building permits are not covered in this question, but in later questions
Note 6: elements involving F-gases: any of refrigerators, heat pumps, electrical switches, fire safety systems, air conditioning or similar

a. [Country list]
b. Installation of elements involving F-gases
c. Other, please specify …
d. None of the above (that authorization is out of scope)

[Country list]

- Bulgaria:
  - Registration in the Central Professional Builders' Register
  - Asbestos removal
- Czech Republic:
  - Installation of energy-efficiency related elements (e.g. solar panels, boilers)
  - Work in electrical, plumbing and sewer installation
  - Installation of elevators
  - Hoisting installations
- Denmark
  - Work in electrical, plumbing and sewer installation
  - Asbestos removal
- Finland:
  - Heat and cold installation
  - Work in electrical, plumbing and sewer installation
  - Hoisting installations
  - Installation of elevators
  - Smoke/fire system installation
  - Telecommunication installation
  - Natural gas installation
- France: (no further types of authorizations)
- Germany:
  - Asbestos removal
  - Installation of gas installations
  - Installation of sewage and water systems
- Greece:
  - Installation of alarms
- Italy:
  - Installation of energy-efficiency related elements
  - Installation of lifts
  - Hoisting installations
  - Electrical installations

    - Asbestos removal
- Netherlands:
    - Asbestos removal
- Poland: (no further types of authorizations)
- Portugal:
    - Registration of class 1 or 2 construction activity with InCI or IMPIC
    - Registration of class 3 or higher construction activity with InCI or IMPIC
    - Gas installations
- Slovenia:
    - Asbestos removal
- Spain:
    - Registration in the Register of Accredited Companies
    - Energy-efficiency related installations
    - Installation of elevators
    - Asbestos handling
    - Electrical installations
- England:
    - Lift installations
    - Asbestos removal

9. What documents and/or data did you or your company have to collect for these authorizations / notifications in [Country] combined?

More than one answer possible

a. [Country list]
b. … All of the above
c. Other, please specify: …
d. None of the above

Country list:
- Bulgaria:
    - Application form
    - Extract of general business register in Bulgaria
    - Extract of general business register in home country
    - Proof of authorization for construction or installation in home country
    - Proof of compliance with technical standards
    - An extract of an F-gas registration in the home country
    - Proof of paying taxes and social security contributions
    - Proof of absence of insolvency or liquidation procedures
    - Proof of economic and financial capacity
    - Good repute (absence of fines or cautions)
    - Proof of insurance against damages
    - Data on qualifications and/or experience of workers
    - Equipment requirements
    - Proof of compliance with health and safety requirements
- Czech Republic:
    - Application form
    - Proof / demonstration of compliance with technical standards
    - Professional and technical capacity

    - Health and safety requirements
    - Equipment requirements
    - Insurance coverage or other financial guarantee arrangements
    - Economic and financial capacity
    - Good repute
- Denmark:
    - Application form (containing statement of honour on absence of fine or caution in last 3 years and absence of bankruptcy/liquidation proceedings)
    - An extract of an F-gas registration in the home country
    - Proof of quality management system approved by a recognised certification agency
    - Data/Document on responsibilities, tasks and skills
    - Data/Document on company procedures
    - Data on document management
    - Data/Documents on qualifications of managers
    - Data/Documents on qualifications of technically responsible persons and proof of affiliation of those persons for at least 30 hours per week
    - Data/Documents on qualifications of other employees
- Finland:
    - Application form
    - Information on qualifications of personnel
    - Competence/ Information on activities related to health and safety requirements
    - Documents concerning equipment requirements
    - Company registration
    - Insurance coverage
    - Good repute
- France:
    - Application form/letter
    - Professional and technical capacity
    - Equipment requirements
- Germany:
    - ChemKlimaschutz form Application form/letter
    - Demonstration of compliance with technical standards
    - Professional and technical capacity
    - Health and safety requirements
    - Equipment requirements
    - Insurance coverage or other financial guarantee agreements
    - Note on eco-management or report of eco-audit
- Greece:
    - Application form/letter (including self-declaration on awareness of the importance of safe work with f-gases and certificate)
    - Compliance with technical standards
    - Equipment requirements
    - Professional and technical capacity
    - Health and safety requirements
    - Insurance coverage or other financial guarantee arrangements
    - Economic and financial capacity
    - Good repute

- Italy:
  - Application form
  - An extract of the general business register in Italy
  - An extract of the general business register in the home country
  - An extract of an F-gas registration in the home country
  - The single document of regular contributions (D.U.R.C.)
  - Risk assessment document (D.V.R.)
  - Operational safety plan (P.O.S.)
  - Compliance with technical standards
  - Professional and technical capacity (energy-related elements)
  - Professional and technical capacity (lifts)
  - Professional and technical capacity (hoisting)
  - Professional and technical capacity (electrical installations)
  - Proof of appointment of person responsible for safety measures
  - Proof of appointment of a representative for the workers' safety
  - Statement regarding the preparation of the representative for the workers' safety
  - A list of employees
  - Declaration of not being subject to suspension or disqualification on ground of worker safety
  - An attest of the applicable collective worker agreement
  - Good repute
  - Insurance coverage
  - Economic and financial capacity
  - Work plan
- Netherlands:
  - Application form
  - An extract of the general trade register in the home country
  - An extract of the general trade register in the Netherlands
  - An extract of an F-gas registration in the home country
  - An extract of the F-gas balance in the last year
  - Insurance coverage or other financial guarantee arrangements
  - Data on names and qualifications of personnel
  - Copies of qualification certificates
  - Data on company procedures
  - Data on work instructions
  - An overview of relevant projects
  - An overview of equipment
  - Declaration of no withdrawn asbestos removal certificate in last 12 months
- Poland:
  - Application form/letter
  - Statement of professional and technical capacity
  - Good repute
  - Statement about procedures of conducting business and their use
  - Statement about having implemented a system for documenting activities
- Portugal:
  - Application form
  - Declaration of commitment to respect the laws

    - Extract of commercial register in Portugal
    - Extract of commercial register in the home country
    - Extract of an F-gas registration in the home country
    - Tax identification number (CIF)
    - Proof of authorization of the company for construction or installation in the home country
    - Declaration of insurer on work accident insurance
    - Declaration of civil liability insurance
    - Copy of work accident insurance policy
    - Monthly map of personnel delivered to the social security
    - Proof of equity capital
    - Declaration of an accountant on the financial standing of the company
    - Liability insurance policy
    - Copy of approved financial documents
    - Proof of non-insolvency/bankruptcy
    - Copy of ID documents of the company's representative persons
    - Certificate of criminal record of the company and the company's legal representatives
    - Company card or Collective Card (permit)
    - List of certified technicians
    - Copies of all certificates of qualified personnel
    - List of tools and equipment
    - Billing statement
- Slovenia:
    - Application form/letter
    - Description of professional and technical capacity
    - Description of equipment requirements
    - Compliance with technical standards
    - Compliance with health and safety requirements
    - Registration at the Court Register of Companies for maintenance of equipment
- Spain:
    - Application form/letter
    - Compliance with technical standards
    - An extract of an F-gas registration in the home country
    - Proof of prevention measures against occupational risks
    - Qualification certificates of construction workers in the prevention of occupational hazards
    - Qualification certificates of managers in the prevention of occupational hazards
    - REA registration number
    - Insurance coverage or other financial guarantee agreements
    - Proof of economic and financial capacity
- England:
    - Application form/letter
    - Compliance with technical standards
    - Individual qualification certificates of all qualified persons
    - Health and safety requirements
    - Business organogram

10. Please indicate totals hours spent on identification and collection of data / documents for all authorizations / notifications combined.

If (part of) the collection was outsourced, please include hours spent on finding a third party

a. Managers/professionals: … Hours
   - Less than one hour

b. Support Staff: … Hours
   - Less than one hour

11. In which currency do you prefer to state costs?

a. Euro
b. Bulgarian lev (2 for 1 euro)
c. Croatian kuna (8 for 1 euro)
d. Czech koruna (28 for 1 euro)
e. Danish krone (7 for 1 euro)
f. Hungarian forint (300 for 1 euro)
g. Norwegian krone (8 for 1 euro)
h. Polish zloty (4 for 1 euro)
i. Romanian leu (4 for 1 euro)
j. Swedish krona (9 for 1 euro)
k. Swiss franc (1.2 for 1 euro)
l. UK pound sterling (0.8 for 1 euro)
m. Other, please specify …

12. What were the total fees charged for issuing / collecting documents for all authorizations / notifications combined?

a. Total fees authorities for issuing documents: … Costs
   - N/A

b. Total fees third parties for collecting documents: … Costs
   - N/A

13. Were any data or documents particularly burdensome to collect. And if yes what data/documents, for which authorization / notification and why?

…

14. To get authorization / to submit the notification, some services may need to be requested or purchased such as certification of documents or insurance.

Certification of documents means a stamp, a document attesting authenticity, a sworn statement, submission by a notary, or anything else required to certify truthfulness or any other fact related to the content of documents.

We do not refer to certification of professional qualifications or of the company.

Please, which of the following services needed to be purchased?

a. Certification of documents
b. Translation
c. On-site inspections
d. Additional insurance against worker accidents
e. Additional insurance against civil liability (tort)
f. Additional insurance against professional / contractual liability
g. Other, please specify …
h. None of the above

15. Please indicate the hours and expenses spent on the above services

a.	Additional insurance coverage (not : covering the insurance premium itself)	… Hours spent by staff … Costs charged by others N/A
b.	On-site inspections (including time to Prepare for it but excluding training hours)	… Hours spent by staff … Costs charged by others N/A
c.	Translations/certifications	… Hours spent by staff … Costs charged by others N/A
d.	Other services	… Hours spent by staff … Costs charged by others N/A

16. Was any of the above services particularly burdensome. And if yes what service, for which authorization / notification and why?

…

17. Can you please indicate how you or your company submitted the application?

a. Electronically

b. By post
c. In person
d. None of the above

18. Please indicate what types of documents were submitted:

a. Simple copies
b. Originals (e-signed if procedure is electronic)
c. Certified copies (e-signed if procedure is electronic)
d. None of the above

19. Can you please indicate any other steps or expenses not covered so far?

…

20. Please indicate the hours and costs of the application and other steps not covered so far

a. Time spent on payment and the authorization / notification fee staff	… Hours spent by staff/ … Expenses N/A
b. Travel time and costs of travel tickets	… Hours spent by staff … Expenses N/A
c. Other steps and expenses not covered So far	… Hours spent by staff … Expenses N/A

21. Please, what are roughly the total hours and costs spent on all above authorizations / notifications combined?

We ask this to avoid double counting or not including unknown specific costs

Total	… Hours spent by staff … Expenses N/A

22. You indicated that you or your company submitted or hired a professional to submit a building plan cross-border.

What type of procedure did you go through?

Only one answer possible.

If you went through more than one procedure (even if for the same project):
regular procedure is most preferred, self-certification is least preferred
Regular procedure means a standard procedure to get permission to build
Light procedure means the authority does not check technical plans because a third party (private entity) has done so already
Notification means the authority needs to be informed but no ex ante assessment of technical documents is done
Self-certification means the authority did not check technical plans but rather an authorized designer declared compliance

a. Regular procedure
b. Light procedure
c. Notification
d. Self-certification
e. Other, please specify …

23. Please indicate for which type of project you will answer the questions

A single residential dwelling or office is most preferred, mixed buildings the least

a. Single residential dwelling
b. Single office
c. Multiple residential dwellings
d. Multiple offices
e. Mixed residential and offices

24. Please give the name of the municipality where you submitted a building plan and will answer the questions for

If you prefer to answer for an "average" municipality, please type "Average"

…

25. Please provide the name of the procedure if possible. If anything was unusual about the local procedure, please describe this briefly.

…

26. Please give the approximate value of the construction project, in the local currency

Local currency: currency of the country where the construction took place

…

27. The remainder of the questionnaire is about the costs of building permit / notification / self-certification formalities

In which currency do you prefer to state the costs?

a. Euro
b. Bulgarian lev (2 for 1 euro)
c. Croatian kuna (8 for 1 euro)
d. Czech koruna (28 for 1 euro)
e. Danish krone (7 for 1 euro)
f. Hungarian forint (300 for 1 euro)
g. Norwegian krone (8 for 1 euro)
h. Polish zloty (4 for 1 euro)
i. Romanian leu (4 for 1 euro)
j. Swedish krona (9 for 1 euro)
k. Swiss franc (1.2 for 1 euro)
l. UK pound sterling (0.8 for 1 euro)
m. Other, please specify …

28. Sometimes it is mandatory to conclude preliminary contracts before submitting a building plan. Please indicate to whom of the following you had to conclude a preliminary contract

a. Providers of water, electricity etc.
b. Supervisor of construction work
c. Construction work insurance provider
d. Work accidents insurance provider
e. Health and safety service provider
f. Lease of equipment with or without operator
g. Removal of construction waste / provisional structures
h. Services of checking technical plans (in the context of a light procedure)
i. Services of self-certification of a professional
j. Other provider(s), please specify …
k. None of the above

29. How many hours were spent in total on concluding preliminary contracts?

a. Managers/professionals: … Hours
   - Less than one hour
b. Support Staff: … Hours
   - Less than one hour

30. Was any of the preliminary contracts particularly burdensome to conclude and if yes why?

31. Several steps are required to collect data and documents, apart from translations and certifications.

Can you please indicate which of the following data or documents you or your company submitted?

General company information

a. Application forms
b. Proof of solvency / tax / social security payments
c. Proof of authorization to submit building plans
d. Proof of civil (tort) liability insurance of the company
e. Proof of professional / contractual liability insurance of the company
f. Proof of ownership
g. Extract from business register
h. Other general company information or documents, please specify …
i. No general company information or documents

32. Can you please indicate which of the following data or documents you or your company submitted (continued)?

Technical data and documents

a. Documents from the cadaster
b. Environmental / soil conditions report
c. Building position maps / artist impressions etc.
d. Maps on construction equipment storage, driveways etc.
e. Sewage system plans Design parts (technical drawings)
f. Technical parameters / calculations
g. Other technical data and documents, please specify …
h. No technical data or documents

33. Can you please indicate which of the following data or documents you or your company submitted (continued)?

Clearances and planning / monitoring of works.

a. Authorization of subcontractors for general construction services
b. Authorization of subcontractors for installation services
c. Design clearances (e.g. by the fire department)
d. Clearances for utility connections (gas, electricity, water etc.)
e. Heritage / aesthetics related approvals
f. Proof of project professional / contractual liability insurance
g. Construction work time planning
h. Construction work quality monitoring plan
i. Other clearances or activity related data / documents, please specify
j. No clearances or activity related data / documents

34. Please indicate totals hours spent on getting the data / documents or finding a party to outsource this to

Please do not include hours spent on:
- design and planning
- getting documents certified (covered in the next question)

a. Managers/professionals: … Hours
   - Less than one hour
b. Support Staff: … Hours
   - Less than one hour

35. What were the total fees charged by authorities for documents, and/or the third party that collected documents?

a. Total fees authorities to provide documents: … Costs
   N/A
b. Total fees third parties to collect documents: … Costs
   N/A

36. Were any data/documents particularly burdensome to collect and if yes why?

…

37. To get authorization, some services may need to be requested or purchased such as certification of documents or insurance

Certification of documents means a stamp, a document attesting authenticity, a sworn statement before a notary or a court of law, or anything else required to certify truthfulness or any other fact related to the content of documents.

We do not refer to certification of professional qualifications or of the company

Please, which of the following services needed to be purchased?

a. Certification of documents
b. Translation
c. A professional to submit the building plans
d. Additional professional / contractual indemnity insurance coverage
e. On-site inspection before obtaining a building permit
f. Other purchase(s) of services, please specify …
g. None of the above

38. After construction works have started or once they have finished (e.g. to obtain a completion certificate), does an on-site inspection need to be requested or purchased?

a. Yes, from authorities
b. Yes, from third parties
c. None of the above

39. You indicated at the start that you or your company hired a professional to submit the building plan

Please what fee did this professional charge for the services?

Fee of professional submitting the building plan: … Costs
N/A

40. Please estimate what percentage of the above amount the professional needed to collect / certify / submit documents

Please do not include work you estimate was needed for design and planning

…

41. You indicated that besides submission of the building plan, you or your company also used other services. What were the costs of these other services?

a. Building permit fees: … Costs
N/A
b. Fees charged by authorities for on-site inspections before obtaining the building permit (if not included in building permit fees) … Costs
N/A
c. Fees charged by authorities for on-site inspection after obtaining the building permit (if not included in building permit fees) … Costs
N/A
d. Fees charged by authorities for other services (if not included in building permit fees) … Costs
N/A
e. Fees charged by other third parties (besides the one that submitted the building plan) … Costs
N/A

42. Please indicate the total hours spent on the purchase of services and/or third parties to outsource this to

a. Managers/professionals: … Hours
   - Less than one hour
b. Support Staff: … Hours
   - Less than one hour

43. Please indicate the fees charged by authorities and/or third parties to provide those services

a.	Building permit fees:	… Costs N/A
b.	Fees charged by authorities for on-site inspections before obtaining the building permit (if not included in building permit fees)	… Costs N/A
c.	Fees charged by authorities for on-site inspection after obtaining the building permit (if not included in building permit fees)	… Costs N/A
d.	Fees charged by authorities for other services (if not included in building permit fees)	… Costs N/A
e.	Fees charged by other third parties (outsourced)	… Costs N/A

44. Was any service particularly burdensome to purchase and if yes why

…

45. Can you please indicate how the documents were submitted (the first time)?

a. Electronically
b. By post
c. In person
d. None of the above

46. Please indicate what type of documents were submitted:

a. Simple copies
b. Originals (e-signed if procedure is electronic)
c. Certified copies (e-signed if procedure is electronic)
d. None of the above

47. Can you please indicate any other building permit steps or expenses not covered so far?

…

48. Please indicate the total hours spent on first-time submission of documents or any other steps not covered so far

Please include travel time if applicable
Please do not (yet) include time involved with re-submission of documents, this will be covered in the next question

a. Managers/professionals: … Hours
   - Less than one hour

b. Support Staff: … Hours
   - Less than one hour

49. If any, please indicate the fees of authorities or third parties for submission of documents, including for example travel tickets if any

Please provide estimates if not certain

a. Submission of documents: … Fees for authorities (for building permit)
… Fees for third parties (if outsourced, or travel tickets)
N/A
b. Travel expenses: … Fees for authorities (for building permit)
… Fees for third parties (if outsourced, or travel tickets)
N/A
c. Other steps or expenses: … Fees for authorities (for building permit)
… Fees for third parties (if outsourced, or travel tickets)
N/A

50. Was any of the submission demands or other steps particularly burdensome and if yes why?

…

51. Sometimes documents need to be submitted again simply due to presentation formalities

Was this the case for any of the following reasons?

Please do not include re-submissions where any substantive content change was needed

a. Scale of drawings
b. Size of drawings
c. Symbols used in drawings
d. Use of measurement units
e. Missing stamp
f. Other presentation formalities that were initially not complied with, please specify …
g. None of the above

52. Please indicate the total hours of in-house staff involved with changing technical documents for formality reasons

a. Managers/professionals: … Hours
   - Less than one hour
b. Support Staff: … Hours
   - Less than one hour

53. Please indicate the costs of re-submitting documents

a. Fees of authorities/suppliers of documents: … Costs
N/A
b. Fees of third parties if outsourced: … Costs
N/A

54. Was any formality to re-submit technical documents particularly burdensome and if yes why?

…

55. Has your company been able to avoid or significantly reduce the costs of any formality?

a. Yes
b. No
c. Do not know / will not answer

56. Please explain how your company avoided or significantly reduced the costs of formalities

…

57. Please, what were roughly the total hours and costs spent on the whole procedure?

We ask this to avoid double counting or not including unknown specific costs

Total: … Hours spent by staff
… Costs
N/A

58. What percentage of the cost of a regular procedure do you estimate is the cost of other procedures in the country you responded for?

Please indicate the relative cost of staff time plus expenses for a typical project where both procedures could have been followed

… % - Light procedure
… % - Notification
… % - Self-certification

59. The next question is about the hourly average salary rate of the categories of staff managing the procedures.

In which currency do you want to provide the salary rates?

a. Euro
b. Bulgarian lev (2 for 1 euro)
c. Croatian kuna (8 for 1 euro)
d. Czech koruna (28 for 1 euro)
e. Danish krone (7 for 1 euro)
f. Hungarian forint (300 for 1 euro)
g. Norwegian krone (8 for 1 euro)
h. Polish zloty (4 for 1 euro)
i. Romanian leu (4 for 1 euro)
j. Swedish krona (9 for 1 euro)
k. Swiss franc (1.2 for 1 euro)
l. UK pound sterling (0.8 for 1 euro)

m. Other, please specify …
n. I do not want to provide salary rates

60. Can you please estimate the hourly average salary rate of the categories of staff managing the procedure?

a. Managers/professionals: …
b. Support Staff: …

61. Please provide any final comments on the questionnaire or the topic if you wish to

…

Your responses have been registered!

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