

12 ADDITIONAL MONTHS FOR ALL PORTUGUESE RENEWABLE ENERGY PROJECTS

SUMÁRIO

The Portuguese Government has now granted an additional 12 months also to projects holding production licenses issued under Decree-Law No. 15/2022, as well as to certificates for generation units of up to 1 MW capacity.

With this extension, the total deadlines for entry into operation now reach:

- 52 months for projects not subject to EIA/AlncA;
- 55 months for projects subject to EIA/AlncA;
- 54 months for generation units \leq 1 MW.

The Portuguese Government has stated that no further extensions will be granted.

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On September 30, 2025, through [Order No. 71/SEAEEn/2025](#), the Portuguese Secretary of State for Energy decided to extend by a further 12 months the deadlines established in paragraph 1 of Joint [Order No. 1/SEAMB/SEENC](#) of February 22, 2024. This extension applies to projects holding production and operation licenses issued under Decree-Law No. 15/2022, as well as to certificates of operation for generation units with an installed capacity of up to 1 MW, not already covered by [Order No. 170/MAEN/2025](#) of May 14. According to the Portuguese Government, the measure was adopted to ensure equal treatment and legal certainty.

With the publication of the new order, the deadlines for the entry into operation of generation units have now been extended as follows:

- 52 months for projects not subject to Environmental Impact Assessment (EIA) or Environmental Incidence Analysis (AlncA);
- 55 months for projects subject to EIA or AlncA;
- 54 months for units with an installed capacity of up to 1 MW.

The sequence of ministerial orders leading to the above is already extensive. For reference:

- Order of the Portuguese Secretary of State for Environment and Energy, June 21, 2021: extension of 10 months for deadlines to obtain production and/or operation licenses (later clarified on May 20, 2022, to include the expiry period of preliminary registrations for units \leq 1 MW);
- Order of the Director-General for Energy and Geology, July 2, 2021: extension of 10 months for the expiry of preliminary registrations for units \leq 1 MW;
- Order of the Portuguese Secretary of State for Environment and Energy, May 20, 2022: extension of 11 months for production and/or operation licenses and 6 months for preliminary registrations and operation certificates (\leq 1 MW);
- Order of the Portuguese Secretary of State for Energy and Climate, March 17, 2023: extension of:
 - (i) 9 months for projects not subject to EIA/AlncA;
 - (ii) 12 months for projects subject to EIA/AlncA; and
 - (iii) 6 months for preliminary registrations and operation certificates (\leq 1 MW).

- Order of the Portuguese Secretary of State for Energy and Climate, February 22, 2024: extension of 10 months for all licensing and operation certificate deadlines;
- Order of the Portuguese Minister for Environment and Energy, May 14, 2025: extension of 12 months for the same deadlines.

The Portuguese Government has stated that no further extensions will be granted, and that all granted licenses and certificates will lapse in accordance with the applicable law.

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