

Guidance on the Implementation of Energy Sharing

Eurelectric position paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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Customers & Retail Services Committee
Distribution & Market Facilitation Committee
WG Regulation & Network Customers
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A Eurelectric position paper

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Executive Summary

Key issues to address

Energy sharing, including peer-to-peer energy trading, collective self-consumption and energy communities, is a positive opportunity for small customers to participate more concretely in the energy transition in their local community. It will foster individual involvement and awareness on energy topics while providing an opportunity for new decarbonisation solutions for the energy system.

Proper implementation is key to unlock all the potential benefits that energy sharing has to offer. An inadequate and overly complex framework risks causing serious consequences to the electricity market and system and undermine the advantages energy sharing provides. Energy sharing should not endanger local power grid and supply security, which would in turn put customers at increased risk.

Eurelectric has identified some key issues that Member States and the Commission should address while transposing the changes in the Directive 2019/944 on common rules for the internal market for electricity and drafting implementing acts, namely:

- The impact of energy sharing on retailers' activity, especially in terms of costs allocation, responsibilities and information sharing
- The impact of energy sharing on wholesale and retail markets, as well as network distribution tariffs, as more customers are able to participate more directly in these markets
- The impact on customers regarding service quality, energy prices, and customer protection for both customers participating in energy sharing as well as those benefitting only from traditional supply
- Impact on system operators' activity, including concerns on data management and sharing, investments needed to support the rapid onboarding of energy sharing assets and possible increased congestion on the network

5 asks for implementation

Eurelectric expresses 5 key asks for a fair and functional implementation of energy sharing:

1. Devise a fair cost, tax and network charge allocation and compensation scheme to avoid discrimination among market actors, distortion of competition and cross-subsidisation associated with energy sharing
2. For the same reasons listed above, provide a clear definition of individual parties' rights and obligations while mitigating the administrative burden
3. Ensure the existing consumer protection framework is fit for purpose so that the implementation of energy sharing does not put active customers at increased risk
4. Support investments and create structures so that energy sharing can lead to greater alignment of energy supply and demand in terms of time and location, and thus contribute to more efficient use of the local electricity grid
5. The regulatory framework must take into account what energy sharing has to offer in terms of flexibility, but as indicated in the first point, in a way that does not lead to discrimination among market actors, distortion of competition or cross-subsidisation of costs. This consideration should include a thorough impact assessment looking into how energy sharing can contribute flexibility services to the system

Introduction

Existing regulatory framework

The current regulatory framework for energy sharing is included in two directives: the Renewable Energy Directive 2018/2001 (RED II) and the Electricity Market Directive 2019/944. They define three categories of energy sharing structures: collective self-consumption, energy communities and peer-to-peer trading. Implementation and chosen conditions for energy sharing greatly vary across Member States.

Market design reform

The Electricity Market Design revision and its forthcoming implementation provide a positive opportunity to clarify the European framework for energy sharing, enabling both clearer incentives from regulators for distribution system operators (DSOs) to adjust to and have adequate funding for their evolving role and the development of small-scale renewable installations connected at distribution level¹. However, the new framework is still too vague, and the new definition does not provide a satisfying overarching framework encompassing all the different possible models.

How Eurelectric sees the future of energy sharing

Eurelectric welcomes the new steps to facilitate and simplify energy sharing across the EU as it will positively contribute to the path towards our decarbonisation targets. Energy sharing will promote co-located production within local communities, thus fostering stronger engagement with the energy system among small customers, which constitutes an opportunity for electrification as a part of the path toward decarbonisation. Moreover, energy sharing may show the potential for new, innovative products with real value for these small customers.

For energy sharing to be a new positive element and not a burden that will slow down the energy transition, a level playing field among market participants should be preserved. The upcoming guidance from the Commission, as foreseen in Art. 15a, point 9 in the revised Electricity Market Directive, is an opportunity to ensure that fair rules are applied, neither marginalising and/or impacting suppliers nor burdening the most vulnerable consumers. Moreover, where existing administrative layers and good practices are already implemented by some Member States for configurations such as energy communities and collective self-consumption, these should be considered for energy sharing. Therefore, we recommend the Commission to use them as positive examples when elaborating their implementation guidance.

Regulators must also consider that energy sharing agreements between household customers poses the risk of unequal contracts, where less informed consumers may

¹ Eurelectric's [Connecting the Dots](#) study foresees 70% of renewable generation will be connected at distribution level by 2030

enter into agreements with more knowledgeable consumers. This makes it difficult to impose reporting requirements, disclosure requirements (competitive prices) and invoice design. The financial risk of trading for prosumers will be substantial in energy sharing and their protection must be considered when implementing these measures at national level. Furthermore, the current framework does not consider the delivery responsibility and disconnection protection for vulnerable customers, and this may lead to a disproportionate burden on the “residual supplier”.

A first key element to define the future landscape of energy sharing is to make sure we recognise the differences between systems in the Member States and allow national governments to set the geographic limitations up to bidding zone level. This limitation makes the most sense for Member States’ systems by avoiding unintended effects like increase of physical congestions and needs of system operation services (cf. below) and by promoting energy sharing models targeted to local communities of small consumers. We welcome the fact that the final wording in the new Art. 15a point 1 allows such flexibility.

Market perspective

Administration and billing

Bringing energy sharing to life may require creating a new administrative layer on top of existing practices. Additional guidelines will be needed to manage increasingly complex situations for the electricity value chain and to properly allocate the costs associated with administration and billing.

Eurelectric recommends the creation of sample framework structures for energy sharing arrangements at Member State-level. All energy sharing stakeholders will greatly benefit from clear frameworks helping them to administer over the different schemes. The number of parties involved in a given scheme can make it challenging to manage. For example, collective self-consumption schemes may need to delegate management to a third-party in charge of ensuring general compliance, while some consumers may be involved in complex multi-supplier situations where switching and billing issues arise. We would also recommend the Commission facilitate an exchange of best practices and these sample frameworks between Member States.

Additionally, suppliers should be able to charge cost-reflective administrative and billing charges to energy sharing participants. Without these charges, suppliers will be forced to incorporate an additional risk brick in their charges and offers which will be paid by all customers, including those not benefitting from energy sharing. Moreover, in some Member States, suppliers are likely to incur higher costs due to their role in facilitating information and data sharing. The regulated tariffs need to reflect these effects.

These additional costs will not be limited to suppliers either. Many of these costs will also be borne on system operators. In the case that they have to build additional IT infrastructure to support the data sharing needs of energy sharing, this cost must be recognised in the regulated remuneration and system operators must be allowed to charge an extra part of the tariff to those participating in energy sharing to cover it. Those costs may be partially offset if energy sharing helps lower the pressure on the distribution system.

Balance responsibility

Contrary to administrative topics explained above, balance responsibility must be managed with the current retail and wholesale arrangements (balance responsible parties, suppliers, aggregators). There is no need to add another intermediary in the energy sharing schemes.

Nevertheless, balance responsible parties need clear guidelines to allocate balancing responsibilities and a financial compensation to cover additional costs related to imbalance and risks, considering the current situations of self-consumption, aggregation models and explicit demand response. Widespread energy sharing will have a significant impact on consumers' behaviour and change market dynamics. Therefore, a robust, simple and compatible framework is paramount.

Eurelectric asks for clarification at both EU and national level for how to effectively allocate balance responsibilities in the case of energy sharing. The Electricity Directive clearly states that each entity is responsible for the imbalance it causes to the system. However, energy sharing blurs the distinctions between consumers, prosumers and suppliers, and introduces situations with multiple suppliers or aggregators behind a single connection point. Energy sharing can also cause situations to arise in which the residual supplier (i.e., the supplier who provides the stable electricity contract to complement the variable production provided to a customer through energy sharing) has to bear costs and/or energy flows which are hard to predict or manage and has an outsized cost to the supplier.

Nevertheless, suppliers are best suited to bear balance responsibility on behalf of consumers, provided they are duly compensated for other intervening actors in energy sharing schemes. This responsibility also comes with additional costs, namely those associated with developing the necessary IT infrastructure to manage such balance responsibility and the cost of balancing the system when dealing with irregular flows on behalf of energy sharers. In the case of a regulated supplier, regulators and legislators should assess these additional costs and they should be duly reflected in the charges which suppliers may collect. Consumers sharing energy show a different load curve than the standard profiles and settle their volumes *ex post*, resulting in both higher costs and hedging risks for suppliers. Costs related to

imbalance derive from inaccurate forecasting data or electricity procurement and should not be socialised among other customers not involved in energy sharing schemes.

Finally, for the sake of helping active customers make informed decisions, additional information may be provided about the impact of energy sharing on imbalance costs and how such cost can be efficiently managed, including by means of co-located storage to level active customers' load curves.

Information and data sharing

Eurelectric asks for a legal provision requiring that suppliers are informed *ex ante* when a customer enters an energy sharing agreement, receiving the necessary details of the energy sharing arrangement (e.g., forecasted energy to be provided as far as possible) to forecast the consumption behaviour of the customer and to have access to the necessary consumption data. To facilitate energy sharing, electricity suppliers require tailored forecasting data that will help them meet the needs of this new category of active consumers. In national implementation, the responsibility for who provides this information and which parties are eligible to receive it must be clearly identified and the remuneration of costs associated with developing the necessary IT structures to support this responsibility should be taken into account.

Therefore, the installation of a smart meter at the point at which energy will be shared and sharing of all relevant information must be a prerequisite for those wanting to participate in energy sharing arrangements. This is a challenge for Member States where the complete rollout of smart meters has not yet been achieved. This requires national regulation to put DSOs in the position to complete the roll out or, where the DSO is not in charge of this activity, encourage consumers to install them, so there may be a better harvesting of the benefits of energy sharing specifically, and flexibility offers more broadly.

The rules presented in the implementing act for access to smart metering and consumption data² provide a strong basis that should be further refined to accommodate the specific data flows needed to facilitate energy sharing practices. Consumers' data, managed by the metered data administrator (MDA, usually the DSO) will need to be shared with many stakeholders which can include other system operators, aggregators or suppliers, and these exchanges will keep multiplying as the potential of demand-side flexibility starts being included. While these exchanges will inevitably increase, the MDA will also have the responsibility of determining any commercially sensitive data and ensuring eligible parties receive data they are entitled to without compromising proprietary secrets. The data management figures set up in

² Regulation (EU) 2023/1162

the implementing acts will be key in centralising data exchange, authorisations, and consumers' consent. According to Implementing Regulation (EU) 2023/1162, the MDA's role includes the transmission and management of data which facilitates energy sharing and secure information flows, where this is not already managed by the system operator.

Roles, responsibilities and costs

Eurelectric recommends showing support to energy sharing by facilitating such agreements without socialising the costs associated with the use of public infrastructure through public financial instruments (e.g., tax exemptions). An asymmetric regulation that shifts cost allocation in favour of energy sharers bears significant risks of cost socialisation among other customers (particularly vulnerable ones) as well as risks of inefficient marginalisation of suppliers/an unlevel-playing field. In case of an explicit investment support (not financed by the rest of customers but by the state budget), it should be conditioned to increase the electrification rate. The sharing should not affect the collection of network charges, tariffs and levies related to electricity flows as well.

Additionally, balance responsibility should always be in the hands of a designated entity, whether delegated to the residual supplier or left in the hands of the active customer, to improve clarity and supply security. Each metering point should have clearly delineated parties whose balance responsible party covers the total consumption or the residual consumption after own production and fixed supply agreements.

When considering the impact on retail and wholesale markets, there is a trade-off happening which may have an outsized effect on these markets. On the one hand, depending on how the market structure allows for the participation of energy sharing, there could be increased liquidity with the increased number of participants. On the other hand, if the majority of energy sharing is conducted through bilateral contracts, or in the case of energy communities through a supply arrangement, there is a risk that this will decrease liquidity, particularly in infant local flexibility markets. Policymakers must take care in designing the market participation for energy sharing with this trade off in mind.

Consumer protection

A consumer protection framework should be defined at EU level for energy sharing agreements. The current rules are designed for the default system provisions of professional retailers and are not fit for active customers involved in energy sharing. Energy sharing schemes may not have a stable and sufficient number of participating customers (as they are free to quit). Therefore, the consequences of bankruptcy of an energy community or a peer-to-peer trader are not clear for the parties involved or

the system as a whole. A clear framework which anticipates such complex situations would constitute a positive signal to engage more customers in energy sharing arrangements.

The new rules should aim at limiting the contractual complexity and the burden imposed on small consumers without transferring this burden to electricity suppliers as much as possible. Complex requirements in terms of responsibility or billing process will lead to a professionalisation and a centralisation of the activity, with the possible creation of professional platforms to process the necessary documentation which is currently foreseen with the energy sharing organiser role in the market design reform. The organiser should focus on administrative topics, because balance responsibility is already well managed by the current regulatory framework, as commented above.

Furthermore, customers need to have access to transparent information about the benefits and costs of energy sharing arrangements. Energy sharing promotes local communities, a customer-led transition and increases awareness about electricity production and consumption dynamics. However, it does not automatically translate into lower prices for consumers and adds some specific risks. Customers involved in energy sharing agreements can also become more costly for suppliers in terms of covering their residual demand, ultimately even leading to a higher total cost for their supply.

Finally, Eurelectric stresses the need to help vulnerable and energy-poor consumers have access to energy sharing. These customers are likely to be left out due to limitations in property ownership, capital access and guarantees and could be *de facto* excluded from the possibility to share energy. Some targeted subsidies, grants and innovative financing schemes to support installation costs, or public guarantees, are recommended to make sure that energy sharing is accessible to vulnerable consumers following a comprehensive impact assessment weighing the benefits and costs of such programmes. Beyond being able to participate in energy sharing through home generation assets, Member States could consider how to incentivise the sharing of electricity with vulnerable customers and energy poor through contractual arrangements by other active customers.

System perspective

Metering needs, interoperability & digitalisation

Storing validated historical metering and consumption data and distributing these data to final customers and/or eligible parties is the responsibility of the MDA. They will have to differentiate types of consumption, apply the allocation keys and develop communication with the different stakeholders in the power system, including other DSOs, within a more decentralised and complex environment.

To undertake their new duties, DSOs need adequate support signals to modernise their IT infrastructure. The smooth rollout of smart meters with a high level of accurate and appropriately granular data is also key to unlock energy sharing capabilities, combined with agile licensing requirements and procedures. Eurelectric recommends a market-based settlement schedule unlocked by the presence of smart meters on consumption sites. Moreover, these IT systems will manage a significant amount of data following the increase of the number of parties involved, including aggregators and energy sharers. Necessary DSO investments in data management and Information Technology Communication (ITC) solutions should be properly remunerated.

Implementing this IT infrastructure will be crucial to ensuring the smooth integration of distributed energy resources into the grid and to enable effective energy sharing among active customers. To make it feasible, we believe it is necessary to develop a clear and comprehensive framework for the IT infrastructure which considers the different data management practices across the Member States. This should include clear guidelines on data sharing with eligible parties (suppliers, balance responsible parties, customers, etc.), cybersecurity and technical standards to ensure interoperability and compatibility between systems.

Finally, Eurelectric asks for clarification regarding IT requirements mentioned in recital 24 of the Electricity Market Directive revision to design the adequate investment signals. Lack of clear guidelines will lengthen the decision-making timeframe and slow down the necessary IT updates to accommodate energy sharing (namely changes to data management practices to involve more parties, including allocation keys, allowing for changes in metering systems, implementation of sharing in forecast models [including complex cases where one consumer may be participating in several contractual arrangements covering parts of their consumption]).

Encouraging smart energy behaviour

Energy sharing *per se* cannot be the sole solution to congestions as energy exchanges do not necessarily mean a shift in consumer behaviours. However, energy sharing is a positive opportunity to increase small customers' awareness and direct engagement with the energy system. The solving of congestion needs physical changes and the impact of an energy sharing transactions on physical flows is not yet clear, even if the production site and the consumers are geographically close. It is important that Member States consider the consequences to the system of using energy as close as possible to its production point for all solutions and mechanisms that will be used.

In the market design reform, Member States will be encouraged to set an indicative national objective for non-fossil flexibility, including the respective specific contributions of both demand response and energy storage to that objective. In

addition to these national measures, the Commission is being invited to develop a flexibility strategy with a particular focus on demand response and energy storage. We invite Member States in developing these indicative targets to distinguish between system flexibility, which is achieved through frequency control at extra high voltage and high voltage levels at the transmission level, and distributed flexibility, which is achieved through voltage control, reactive power control, and distribution-level congestion management (where aggregation and distributed energy resources [DERs] can play a more concrete role).

Energy sharers should be allowed to provide flexibility services on a voluntary basis. Energy sharing creates a category of active customers possibly fit to provide local flexibility services and to lower the pressure on the grid, since they might be willing to change their behaviours. Energy communities, as early adopters, could be more interested in this type of activity than more passive customers. Potential storage facilities could further contribute to limiting reactive power and stabilising network frequency if the customers are willing to provide these services to the DSOs and the latter need them. Enabling the sharing of surplus energy among community members (including to their storage devices), energy that would otherwise be wasted or curtailed during times of high production may be utilised effectively. However, it should be noted that without the proper investments to secure grid reinforcements, the limitation of energy distribution will remain, regardless of whether the energy is shared or sold. This redistribution of energy helps to balance the supply and demand within the community,

Energy sharing could contribute to increasing or reducing network congestion by promoting local electricity production and consumption, provided that electricity consumption and generation patterns are coordinated. When developing implementation guidance, the Commission could produce studies or impact assessments which model the physical impacts at different levels of the distribution network (i.e., behind the same or different substations). With increased local production and consumption of electricity, there might be less need for long-distance transportation, which may increase or decrease network congestion on transmission networks and prevent the electricity grid from becoming overloaded. Additionally, local uses of networks may increase or decrease local congestions. Reducing or not long-distance network congestion through local electricity production and consumption, there may be less or more necessity for high-level voltage network reinforcements and expansions and this new use of local networks justifies new local investments.

Energy sharing is a tool which can empower customers to actively manage their energy usage and adjust their consumption patterns, which can help to flatten peak

demand periods. Energy sharing has the potential to contribute to reducing network congestion by stimulating customers to adjust their energy consumption patterns according to the current energy production levels. When customers are aware of the available energy supply, they can adjust their usage to align with energy generation, which helps balance the overall demand and supply within the grid. However, it is currently unclear how energy sharing will impact power networks in reality. In order to make informed decisions around the geographic limitations to be placed on energy sharing and whether there is a need to promote more local generation and consumption, or if there is a case for non-local energy sharing, a comprehensive network assessment must be conducted.

Even when energy sharing involves non-local sources, it could remain beneficial for the grid if customers adapt their energy consumption to match the available supply. By doing so, it may contribute to optimising the utilisation of the network, minimise grid congestion and/or reduce the need for grid reinforcements, the more customers adapt their behaviour. Thus, to avoid congestions due to the growth of generation facilities intended for energy sharing in locations with low consumption, the DSO should be given additional administrative capabilities for assessing the viability of connections and an appropriate system operation framework allowing DSO to manage excess generation in real time.

Energy sharers contributing to congestion relief should be remunerated under market conditions as any other flexibility provider, while considering that flexibility should be financially rewarded on an equal footing with other market participants. Additional incentives can be applied on energy surplus to increase the potential of this flexibility. A possible solution consists of participating in local DSO flexibility market

Compensation for network use

Eurelectric stresses the importance of cost-reflective network tariffs to avoid any hidden subsidies among users. Discounts or exemptions granted to energy sharing participants create a risk of socialisation and cross-subsidies among other customers, including more vulnerable ones, and may constitute a revenue loss for grid operators. Energy sharing may create the need to reinforce the grid and further develop ICT areas, leading to higher costs for all consumers, even if they do not want to engage in such agreements for economic or technical reasons. Finding a way to balance this inevitable cost socialisation is a crucial issue to protect customers from higher energy bills.

Tariffs

Energy sharing also has the power to be a disrupter to revenue recovery for DSOs where there is a volumetric component to the DSO's tariff structure. This needs to be

considered with care by the DSOs and may lead to necessary changes in tariffication in order to ensure continued cost reflectiveness and fairness.

Proper allocation of taxes

Coming with the right tax allocation prevents tax avoidance (in particular, we want to ensure cost socialisation among other consumers is prevented as much as possible). Eurelectric has a strong position that the tax responsibility remains with the supplier of the energy, whether that be a retailer or an active customer. We recommend clear, transparent, and practical tax reporting and collection practices be implemented at national level. The Value Added Tax (VAT) taxation rules for situations where active customers share energy need clarification due to implicit tax exemption. Netting consumption is also essential to allocate taxes: VAT must be based on the actual consumption billed to the consumer. Taxation of shared energy replacing supplied energy must be considered to maintain a level playing field between all forms of supplies. Other levies based on network usage should not be netted. However, taxation by threshold can also be considered to alleviate the administrative burden on small customers, but carries a risk of a windfall effect.

Tax collection, where applicable, may be handled by suppliers or retailers, for small consumers. Easing the administrative burden is crucial to facilitate energy sharing. It is worth noting that taking on this task will require a significant investment on the side of suppliers, and such an investment should be appropriately compensated. Regarding surplus selling, household customers could benefit from a simplified VAT liquidation mechanism instead of using the same mechanism as professional market participants.

Conclusion

Energy sharing offers a wealth of opportunities to more directly engage small customers in the energy transition and foster additional investment in local renewable energy generation facilities. It is without question that there will be some significant challenges associated with ensuring the right regulatory frameworks and national IT infrastructures are in place to allow for schemes like energy sharing to take off. Proper implementation will be key for the successful uptake of energy sharing and Europe's suppliers and system operators stand ready to help both policymakers with this implementation, and consumers to become more active in the energy transition.

For Eurelectric there are five key aspects which must be considered to make sure implementation is done right to minimise risks to the system and bring on as many active customers as possible:

1. There must be a fair cost, tax and network charge allocation and compensation scheme to avoid the discrimination among market actors, distortion of competition and cross-subsidisation associated with energy sharing
2. For the same reasons mentioned above, policymakers must provide a clear definition of individual parties' rights and obligations while mitigating the administrative burden on customers' side
3. Creation of a specific consumer protection framework so that the implementation of energy sharing does not put active customers at increased risk
4. Regulators must support investments and create structures so that energy sharing can lead to greater alignment of energy supply and demand in terms of time and location, and thus contribute to more efficient use of the local electricity grid. The Commission could consider including a network impact study to support a grid-efficient implementation of energy sharing in its guidance on implementation.
5. The regulatory framework must take into account what energy sharing has to offer in terms of flexibility, but as indicated in the first point, in a way that does not lead to discrimination among market actors, distortion of competition or cross-subsidisation of costs. Hence, we suggest performing a dedicated impact assessment to evaluate how energy sharing can contribute to flexibility services in the system as well as its physical impacts.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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