

## Request for harmonisation of licensing and passporting requirements for trading activities

With this communication, Energy Traders Europe would like to kindly request clarifications on some asymmetries observed in the licensing and passporting requirements for natural gas trading activities in Romania. As a pan-European Association representing 170 member companies active in energy trading, our mission is to promote competitive continent-wide markets. In this context, we believe that harmonising requirements for trading activities is key to facilitate market development and foster the integration with other EU energy markets, which in turn ensure higher security of supply and lower costs for consumers.

Among the key differences in the regulatory treatment between legal entities registered in an EU Member State and legal entities established in Romania, we have noted a substantial disparity in the validity periods of the licenses. While the maximum validity of passporting for EU-based legal entities being set to 5 years, trading licenses for both Romanian and EU-based entities can be valid for up to 25 years.

Moreover, it is our understanding that the €1 million (equivalent in lei) guarantee that is imposed on entities established outside of Romania, whether for passporting or licensing purposes, is not required for entities established within Romania. Should you confirm our understanding, we would appreciate an explanation of the rationale behind such a requirement, which according to us, would constitute an undue and unjustified burden on foreign-based operators.

Other, less significant differences in the requirements prevail and we have attempted to summarize these in a table annexed to this letter. The annex also includes the draft provisions, which, in our understanding, are now pending approval. These asymmetries create entry barriers for foreign companies, leading to reduced competition and liquidity in the Romanian gas market, and therefore potentially higher prices for consumers in the face of lower security of supply.

**We believe that aligning the regulatory requirements for all market participants is essential for the Romanian gas market to flourish.** We therefore encourage ANRE to review the existing rules and consider steps toward harmonisation of licensing and passporting requirements and making them less strict to encourage new companies to enter the market. We also note that, with reporting obligations harmonized and reinforced under REMIT, some EU Member States have decided not to introduce additional requirements on the wholesale trading entities at all, with no harm to end consumers. **We would welcome the opportunity to discuss these concerns further and are available to meet at your convenience.**

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## Annex

	<b>Passporting in Romania of EU trading - gas/power licenses of legal entities having their registered office in a member state of the European Union</b>	<b>Licensing in Romania for natural gas trading activity of legal entities with registered office in a member state of the European Union, other than Romania</b>	<b>Licensing in Romania for natural gas trading activity of legal entities with registered office in the Romania</b>
<b>Regulatory acts</b>	<b>ANRE Order no. 14/2024 regarding the approval of the Procedure for confirming the right to participate in the electricity/natural gas markets in Romania of foreign legal entities having their registered office in a member state of the European Union</b>	<b>ANRE Order 199/2020 for the approval of the Regulation for the granting of establishment authorizations and licenses in the natural gas sector</b>	
		<b>[Draft order for the approval of the Regulation for the granting of establishment authorizations and licenses in the natural gas sector - phase III]</b>	
<b>General requirements</b>			
	<p>“Art. 2(1). 1) This procedure applies to any economic operator, legal person, registered in a member state of the European Union, other than Romania, if the respective operator fulfills, cumulatively, the following conditions:</p> <p>a). <i>holds, in the state where its registered office is registered, a valid license or other similar document</i>”</p>	<p>[Draft ANRE Regulation, version 30.10.2024]</p> <p>“Art. 8. (6) At the request of foreign economic operators with their headquarters in one of the member states of the European Union, ANRE issues a decision under the conditions and in compliance with the Procedure for confirming the right to participate in the electricity/natural gas markets in Romania of some foreign legal entities having their headquarters in a member state of the European Union. If in the member state, the regulatory authority in the field of energy or, as the case may be, another public authority from that state, does not issue licenses or similar documents, based on which the right to carry out the activity of natural gas supply is granted or the activity of the natural gas trader, the economic operator who wants to carry out the activity of supplying or trading natural gas in Romania, must request the granting of a license for supplying or trading natural gas, according to the requirements of this regulation, by establishing in Romania, throughout the validity period of the license, a secondary headquarters - branch, agency, representative office or other such unit without legal</p>	

		personality, having taxpayer status according to the provisions of the Fiscal Procedure Code approved by Law 207/2015, with subsequent changes and additions.
	Art. 2(1). c) <i>"Is not in bankruptcy proceedings"</i>	<i>Art. 9.(10) Can't be granted with establishment authorization/license: (i) applicants in bankruptcy proceedings.</i> [Draft ANRE Regulation 30.10.2024] <i>"Art. 8 (10) Cannot be granted with establishment authorization/license: (i) applicants in bankruptcy or liquidation proceedings;"</i>
	Art. 2(1). d) <i>"no license or other similar document issued/issued, in the field of electricity or natural gas, by the regulatory authority in the field of energy or, as the case may be, by a another public authority in a member state entitled to issue such a document"</i>	
	Art. 2(1). e) <i>"the right to participate in the electricity/natural gas markets in Romania has not been withdrawn by ANRE, in the last 5 years prior to the registration of the confirmation request, for reasons attributable to it"</i>	<i>Art. 9. Can't be granted with establishment authorization/license: (ii) applicants whose authorization/license was withdrawn or suspended in a period of 5 years prior to the registration of the application, according to the provisions of this regulation;</i> [Draft ANRE Regulation, version 30.10.2024] <i>"Art. 8 (10) Cannot be granted with establishment authorization/license: (ii) applicants whose authorization/license was withdrawn by ANRE in the last 5 years for reasons attributable to them. In the situation where the withdrawal decision was challenged within the legal term, it must be confirmed by a court through a final sentence by which they are forbidden the right to carry out the activity for which they request the authorization/license;"</i>
	Art. 2(1). f) <i>"does not have as controlling shareholders/associates, as well as, as the case may be, administrators/members of the Board of Directors persons who held these qualities within economic operators holding a license/confirmation decision who have not paid their obligations of payment resulting from transactions carried out on the electricity market or on the natural gas market in Romania."</i>	<i>Art. 9. Can't be granted with establishment authorization/license: (iii) applicants who have as controlling shareholders or as administrators persons who previously had the capacity of controlling shareholders or administrators within licensed economic operators who have not paid their payment obligations resulting from transactions carried out on the market of natural gas.</i> Draft ANRE Regulation 30.10.2024 <i>"Art. 8 (10) Cannot be granted with establishment authorization/license: (iii) applicants whose shareholders/associates holding control/administrators are persons who hold/have held the status of shareholder/associate holding control/administrator within licensed economic operators who have not paid their payment obligations</i>

		<p>resulting from transactions made on the natural gas market and/or on the electricity market;</p> <p>(iv) applicants whose shareholders/partners holding control/administrators are persons who hold/have held the status of shareholder/partner holding control/administrator within license holders for the activity of supplying electricity and/or natural gas who violated the legal prohibition provided for in art. 58 para. (11) and/or to art. 143 para. (1) lit. r) of the Law by sending notices of unilateral denunciation of electricity/natural gas supply contracts concluded with final customers, prohibition violated at the time of their possession of the mentioned qualities.”</p>
<p><b>Specific requirements for licensing</b></p>		
	<p>Art. 6. - (1) In order to obtain confirmation of the right to participate in the electricity/natural gas markets in Romania by a foreign legal entity with its registered office in one of the other member states of the European Union, the following will be taken into account documents:</p> <p>a) "an application containing the data and information from the model provided in annex no. 1"</p>	<p><i>Art. 8. - (1) In order to grant/modify/extend the validity of an establishment authorization/license, the applicants submit to ANRE headquarters an application, drawn up according to the model in annex no. 1, accompanied by the documents provided for in this regulation.</i></p> <p><i>(...)</i></p> <p><i>(6) At the request of foreign economic operators with registered office in one of the member states of the European Union, ANRE issues a decision under the conditions and in compliance with the Procedure for confirming the right to participate in the electricity/natural gas markets in Romania of certain legal entities foreign companies having their headquarters in a member state of the European Union.</i></p> <p>[Draft ANRE Regulation, version 30.10.2024]</p> <p>“Art. 8. (6) At the request of foreign economic operators with their headquarters in one of the member states of the European Union, ANRE issues a decision under the conditions and in compliance with the Procedure for confirming the right to participate in the electricity/natural gas markets in Romania of some foreign legal entities having their headquarters in a member state of the European Union. If in the member state, the regulatory authority in the field of energy or, as the case may be, another public authority from that state, does not issue licenses or similar documents, based on which the right to carry out the activity of natural gas supply is granted or the activity of the natural gas trader, the economic operator who wants to carry out the activity of supplying or trading natural gas in Romania, must request the granting of a license for supplying or trading natural gas, according to the requirements of this regulation, by</p>

		establishing in Romania, during the validity period of the license, a secondary headquarter - branch, agency, representative office or other such unit without legal personality, having taxpayer status according to the provisions of the Fiscal Procedure Code approved by Law 207/2015, with subsequent changes and additions."	
	Art. 6. (1) b): <i>"the license or similar document that was issued by a public regulatory authority in the field of energy or, as the case may be, by another public authority entitled to issue such a document from the European Union state, other than Romania, in which it has its registered office the applicant, who proves that he benefits from the right provided for in art. 2 para. (1) lit. a) , in copy, as well as a non-certified translation thereof in Romanian;"</i>		
	Art. 6. (1) c) : <i>"a declaration on one's own responsibility, according to the model provided in annex no. 2 "</i>		
	Art. 6. (1) d): <i>" specification of the unique identification code allocated in the European Centralized Register of Energy Market Participants..."</i>		
	Art. 6. (1) f): <i>" a document issued by the energy regulatory authority in the respective state or, as the case may be, another public authority, containing information on: (i) trading relationships carried out on the electricity/natural gas market in the member state where the applicant is based; (ii) if sanctions have been applied to the applicant, generated by the violation of the provisions of the legislation applicable to the field of electricity/natural gas in the member state and if there were such sanctions, for which violations they were applied;"</i>		

		<p><i>Art. 10.(1) The application regarding the grant/modification/extension of the establishment authorization/license drawn up according to the model provided in annex no. 1 is accompanied by the following documents:</i></p>
		<p><i>Art. 10.(1) a) the ascertaining certificate issued by the National Office of the Trade Register (ONRC) no later than 30 days before the date of submission to ANRE in the original or with the electronic signature of the legal representative or in a certified copy for compliance with the original by the applicant's legal representative or the information provision report issued through the Infocert service by the ONRC, which includes the applicant's identification information, the name, the address of the registered/professional headquarters, the unique registration code, the order number in the trade register, the status of the applicant, form of organization, duration of incorporation, share capital, associations/shareholders of the applicant, person/persons authorized to represent the applicant, fields of activity of the applicant that include the field of activity for which the establishment authorization/license is requested, branches/subunits /branches, secondary offices/workpoints in Romania or other similar documents issued by competent authorities or the documents establishing administrative-territorial units and/or their associations, which contain this information;</i></p>
		<p><i>Art. 10.(1) b) the statement of the legal representative attesting to the fact that the management team within the economic operator is made up of:</i></p> <p><i>(i) general manager (legal representative/administrator/general director) with at least 2 years of experience in managerial activities;</i></p> <p><i>Art. 10.(1) c) CVs of the management team mentioned in letter b), updated on the date of submission to ANRE;</i></p> <p><i>Art. 10.(1) d) the declarations of the persons referred to in letter b), regarding the consent regarding the processing of personal data, drawn up according to the model in annex no. 2;</i></p>
		<p><i>Art.12.(8) When applying for the granting of a natural gas trader's license, the documents provided for in art. 10 are accompanied by the following documents:</i></p> <p><i>a) copy of the applicant's organization and operation regulation, in electronic format, in full or in an extract, from which the attributions and responsibilities of the departments engaged in the activity of natural gas trader result;</i></p> <p><i>b) the list of offices in Romania through which the applicant is going to carry out the activity of the natural gas trader, in electronic format;</i></p>

		<p><i>c) the document(s) in electronic format, from which it can be concluded that the applicant has an amount of money at least equal to 25% of the value of the turnover estimated to be achieved in the first 12 months of activity as a natural gas trader, but not less than 100,000 euros, at the exchange rate of the National Bank of Romania valid on the 1st of the month in which the license application is registered, an amount that comes from one or more of the following resources:</i></p> <p><i>(i) equity - the value of which is calculated based on the data from the last monthly verification balance according to the formula used to draw up the annual financial statements that the economic operator communicates to the tax authorities;</i></p> <p><i>(ii) available from bank credit lines that the applicant benefits from according to the supporting financial documents in this regard;</i></p> <p><i>(iii) financial resources that the applicant's associates and/or shareholders make available to him through financing/loan contracts or through other types of contracts accompanied by supporting financial documents;</i></p> <p><i>(iv) available from the current account, proven with the applicant's bank account statement signed by his legal representative, on the date of submission to ANRE;</i></p> <p><i>d) the written declaration, in the original, on the personal responsibility of the legal representative of the applicant regarding the estimated quantities of natural gas that are the subject of trading in the year in which the license is granted, expressed in MWh;</i></p> <p><i>e) the written declaration on personal responsibility of the applicant's legal representative regarding the estimated turnover to be achieved as a natural gas trader in the first year of activity.</i></p>
		<p>Draft ANRE Regulation, version 30.10.2024</p> <p>"Art. 12.(8) When requesting the granting of a natural gas trader license, the documents provided for in art. 10 are accompanied by the following documents:</p> <p>a) copy of the applicant's organization and operation regulation, in electronic format, in full or in an extract, from which the attributions and responsibilities of the departments engaged in the activity of natural gas trader result;</p> <p>b) the list of offices in Romania through which the applicant is going to carry out the activity of the natural gas trader, in electronic format;</p> <p>c) the document/documents showing the financial resources of the applicant, i.e. own capital, availability from credit lines or bank loan contracts, of at least 1,000,000 lei, at the exchange rate of the National Bank of Romania valid on by the 1st of the month in which the license application is registered;</p> <p>d) documents showing the employment of at least 3 people with at least 3 years of previous experience in the field of natural gas (REVISAL extracts/work certificates as</p>

		well as curriculum vitae or other relevant documents); for foreign economic operators, the documents related to Romanian natural persons assigned to the trading activity will also be presented."
<b>Licensing process timeline</b>		
	Art. 7. (1) : "The application and the documents attached to it are analyzed by ANRE, according to the provisions of this procedure, within 30 days from the date of registration of the application, and, if necessary, a notification is sent to the applicant by which he is informed of the additions or clarifications necessary to resolve his request."	Art. 9. - (1) ANRE analyzes the documentation submitted by the applicant according to the provisions of this regulation and, if necessary, sends the applicant a notification informing him of the necessary additions or clarifications, within a maximum period of 30 days from on the date of registration of the request. (2) The applicant has the obligation to complete the documentation according to the observations sent by ANRE, within a maximum of 30 days from the receipt of the notification.
	Art. 7. (4) : "If, within 90 days from the date of registration of the application, the submitted documentation is not complete, it is classified, and the applicant is notified accordingly."	Art. 9. (3) If, within 6 months from the date of registration of the application, the applicant has not submitted all the documents, according to ANRE's observations, the application is classified, the applicant being notified accordingly.
	Art. 9.(2) : "The draft decision and the report provided for in para. (1) enters the agenda of the ANRE Regulatory Committee meeting only after payment of the tariff approving the decision confirming the applicant's right to participate in the electricity/natural gas markets in Romania, which must be paid by the applicant according to ANRE regulations incidents."	Art. 13.(3) The regulatory committee of ANRE decides with reasons to grant or reject the grant/modification/extension of validity/suspension/withdrawal of the establishment authorization/license, within up to 30 days from the date of submission of complete documentation by the applicant .
<b>License validity</b>	" <b>Art. 11.</b> - The confirmation decision provided for in art. 9 has an initial period of validity of a maximum of one year and may be successively extended for periods of a maximum of <b>5 years</b> , so that its total period of validity does not exceed the period of validity of the license or similar document, issued by the public regulatory authority in the field of energy or, as the case may be, by another public	Art. 19. - In the grant report provided for in art. 13 para. (1) specify the proposed period of validity for the establishment authorization/license, as follows: (...) c) the licenses provided for in art. 7 lit. a), lit. b) point (v) and letter c), d) and e) are valid for a maximum period of <b>25 years.</b> "  [Draft ANRE Regulation, version 30.10.2024]



	<i>authority entitled to issue such a document from the European Union state where the applicant has its registered office."</i>	"Art. 20. (d) the licenses provided for in art. 7 lit. a), lit. b) point (v) and letter c), d) and e) are valid for a maximum period of 25 years; the initial validity period of the licenses provided for in art. 7 lit. a) and d) is a maximum of 5 years and can be successively extended, so that its total validity period does not exceed 25 years."	
<b>Rights and obligations</b>			
	<b>Art. 13.</b> - (1) The economic operator provided for in art. 12 has all the obligations of a holder of a license granted by ANRE for the activity of supplying electricity/natural gas or, as the case may be, for the activity of the trader of electricity/natural gas. (2) In applying the provisions of para. (1) , the economic operator provided for in art. 12 has the following obligations:		
	a) to comply, under the same conditions as any holder of a license granted by ANRE for carrying out the activity provided for in the confirmation decision issued by the ANRE president, throughout the validity period of the confirmation decision, the General Conditions associated with the license for the energy supply activity electricity or, as the case may be, the General Conditions associated with the license for the electricity trader activity, respectively the Framework Conditions of validity associated with the license for the natural gas supply activity or, as the case may be, the Framework Conditions of validity associated with the license for the gas trader activity natural, approved by order of the president of ANRE, as well as any technical and commercial regulation approved by ANRE or any legal provisions applicable to the respective activities;		
	b) to inform ANRE about the modification of any data or information of the applicant included in the		

	application in annex no. 1 , in the terms contained in the General Conditions associated with the license for the activity of electricity supply or, as the case may be, in the General Conditions associated with the license for the activity of the electricity trader, respectively in the Framework Conditions of validity associated with the license for the activity of natural gas supply or, as the case may be, the framework conditions of validity associated with the license for the natural gas trader activity, approved by order of the ANRE president;		
	c) to pay ANRE an annual contribution established and levied according to the provisions of the ANRE president's order regarding the approval of tariffs and financial contributions levied by ANRE, related to the turnover achieved in Romania or the amount of natural gas supplied in Romania, expressed in MWh;		
	d) to establish and maintain a financial guarantee in the form of a letter of bank guarantee or cash collateral, in the amount of 1 million euros, equivalent in lei, if the economic operator is a non-resident, according to the provisions of art. IV para. (5) from Government Emergency Ordinance no. 119/2022 for the amendment and completion of the Government Emergency Ordinance no. 27/2022 regarding the measures applicable to final customers in the electricity and natural gas market in the period April 1, 2022-March 31, 2023, as well as for the amendment and completion of some normative acts in the field of energy, approved with amendments and additions by Law no. 357/2022, with subsequent amendments;	Indirectly required to comply by the provisions of GEO 27/2022, approved by Law:  <i>Art IV, para (1) In order to pay the contribution to the Energy Transition Fund, starting from September 1, 2022, non-residents who carry out transactions on the energy market in Romania are obliged to calculate, declare and pay the contribution to the Energy Transition Fund Energy Transition directly or appoint a representative</i>	Not applicable

		<p><i>to fulfill his obligations under this emergency ordinance.</i></p> <p><i>Para (5) The persons referred to in para. (1) are required to provide a guarantee in the form of a letter of bank guarantee or cash collateral, in the amount of 1 million Euros, equivalent in lei.</i></p>	
	<p>e) to submit annually on the portal of the National Energy Regulatory Authority (<a href="https://spv.anre.ro">https://spv.anre.ro</a>), by the end of February, the declaration containing the basis for calculating the estimated monetary contribution related to the activities that are the subject of the confirmation decision , according to the provisions of the order of the president of the National Regulatory Authority in the Field of Energy establishing ANRE tariffs and contributions.</p>		
	<p>Art. 14. In addition to the obligations provided for in art. 13 the economic operator provided for in art. 12 has the obligation to inform ANRE, within 10 calendar days, about the modification/suspension/withdrawal of the license or similar document, issued by the public regulatory authority in the field of energy or, as the case may be, by another public authority entitled to issue such a document from the European Union state, other than Romania, where the applicant has its registered office, which was the basis for ANRE issuing the confirmation decision.</p>		
<b>Modification/ Suspension/</b>			

Termination of the validity		
	<p>Art. 15. - (1) <i>The foreign legal person economic operator who requests ANRE to modify the confirmation decision in the sense of extending its validity period has the obligation to submit the request at least 60 days before the expiry date of the confirmation decision; the request will be accompanied by the documents provided for in art. 6 para. (1) lit. c) and f) .</i></p>	<p>Art. 24. (8) <i>The request regarding the modification of the license provided for in art. 7 lit. a), c) or d), drawn up according to the model provided in annex no. 1, it is sent accompanied by the documents provided for in art. 10.</i></p>
	<p>Art. 15. (2)  <i>"In addition to the situation provided for in para. (1), ANRE modifies the confirmation decision at the holder's request, when one of the following situations has occurred:</i>  <i>a) change of name and/or legal form of the holder;</i>  <i>b) change of the social/professional headquarters of the owner or other elements provided in the content of the confirmation decision."</i></p>	

	<p><b>Art. 16.</b> - (1)  <i>"Upon the notification sent by the economic operator provided for in art. 12 , upon notification sent by a third party or upon finding by ANRE ex officio, ANRE may decide, through the specialized department, <b>to suspend a confirmation decision</b> in the following situations:</i>  <i>a) at the written, motivated request of the economic operator;</i>  <i>b) during the suspension of the license or similar document provided for in art. 2 para. (1) lit. a) , until the date of termination of this suspension;</i>  <i>c) if it is found that the holder of the confirmation decision violated an obligation that is applicable to it according to the law or the regulations issued by ANRE, and the situation created can be remedied;</i></p>	<p><i>Art. 25. - (1) Following the finding by ANRE ex officio, upon reporting by third parties or upon notification by the license holder, ANRE applies the measures provided for in para. (2) or (3), as the case may be, in case of the impossibility of carrying out the activity, as a result of non-compliance with the legal obligations incident to the natural gas sector, provided in:</i>  <i>a) primary legislation;</i>  <i>b) the conditions associated with the establishment authorization/license;</i>  <i>c) regulations issued by ANRE;</i>  <i>d) directly applicable European regulations;</i>  <i>e) standards and other normative acts in force in the natural gas sector or imposed by the normative framework in force.</i></p> <p><i>(2) If the reasons that led to the impossibility provided for in para. (1) are not imputable to the establishment/license holder, ANRE proceeds as follows:</i>  <i>a) if the created situation can be remedied, grant a compliance period of a maximum of 3 months, under penalty of suspending the establishment authorization/license;</i>  <i>b) if the created situation cannot be remedied, withdraw the establishment authorization/license.</i></p> <p><i>(3) If the reasons that led to the impossibility provided for in para. (1) are imputable to the establishment/license holder, ANRE proceeds as follows:</i>  <i>a) if the created situation can be remedied, suspend the establishment authorization/license for a period of 60 calendar days in order to remedy the created situation and comply with the establishment authorization/license; in this sense, the holder of the establishment authorization/license has the obligation to submit to ANRE, at least 15 calendar days before the expiration of the suspension period, the documents certifying the remedy of the situation that led to the suspension of the establishment authorization/license;</i></p>
	<p><b>Art. 17.</b> - <i>Upon the notification sent by the economic operator provided for in art. 12 , upon notification sent by a third party or upon finding by ANRE ex officio, ANRE may decide, through the specialized department, <b>to terminate the validity of a confirmation decision</b> in the following situations:</i></p>	<p><i>Art. 25.(3). b) if the created situation cannot be remedied, <b>withdraw the establishment authorization/license.</b></i></p>

	<i>a) at the written, motivated request of the economic operator;</i>		
	<i>b) withdrawal of the license or similar document provided for in art. 2 para. (1) lit. a )</i>		
	<i>c) if it is found that the holder of the confirmation decision has violated an obligation that is applicable to it according to the law or the regulations issued by ANRE, and the situation created cannot be remedied;</i>		
	<i>d) in case of bankruptcy;</i>		
	<i>e) in the case of the impossibility of remedying the situations provided for in art. 16 para. (1) lit. d) and e) ;</i>		
	<i>f) if the economic operator provided for in art. 12 , electricity supplier, violates the legal prohibition provided for in art. 58 para. (1 1 ) from the Electricity and Natural Gas Law no. 123/2012, with subsequent amendments and additions, by sending notices of unilateral termination of electricity supply contracts concluded with final customers;</i>		
	<i>g) if the economic operator provided for in art. 12 does not pay the amounts owed to ANRE or cannot be contacted in order to pay the amounts owed to ANRE, within one year from the date of issuing the invoice.</i>		
		[Draft ANRE Regulation, version 30.10.2024] "Art. 36 Holders of licenses for the supply of natural gas or biogas/biomethane or LNG, for natural gas trading, have the obligation to submit to ANRE, within a maximum of 6 months from the date of approval of this regulation, documents from which it can be seen that the requirement has been met provided for in art. 13 para. (1) lit. c) or para. (8) lit. c), as the case may be."	