

RASSEGNE

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ADMINISTRATIVE SIMPLIFICATION AS A DRIVER OF FOREIGN DIRECT INVESTMENT

SUMMARY: 1. Introduction. – 2. The strategic role of Foreign Direct Investment. – 3. The bureaucratic burden on businesses. – 4. Administrative reforms to attract investment in Italy in recent years. The new Investment Facilitation and Unblocking Unit (*Unità di Missione per l'Attrazione e lo Sblocco degli Investimenti* – UMASI). – 5. From law to action: Silicon Box, Aws, Novo Nordisk, Metinvest and Vantage – 6. Conclusion.

1. Introduction

In today's global economy, shaped by geopolitical tensions, technological innovation and green transition, Foreign Direct Investment (FDI) plays a crucial role in promoting industrial development and sustainable growth.

The ability to attract productive investment has become a key factor in maintaining economic competitiveness in the context of catastrophic events (e.g., the 2008 financial crisis, the Covid-19 pandemic, the war in Ukraine, rising tensions between the United States and China, and widespread disruptions in global supply chains, challenging open markets and free trade)¹.

FDI brings much more than capital. It supports the diffusion of advanced technologies, strengthens local industrial ecosystems, fosters international integration of production, and creates high-quality jobs. Italy, with its complex industrial fabric and skilled workforce, is well positioned to attract such investments and play a central role in the new global investment landscape².

* The views expressed in this paper are solely those of the author and do not necessarily reflect the views of institution.

¹ This trend, described as “de-globalization”, has led to a renewed role for the state in regulating the economy, the return of industrial policies, more trade restrictions and a growing focus on economic sovereignty. K. Jakee and S. Turner, *Free Trade is Not Free: Why Deglobalization is (Unfortunately) Here to Stay*, in SSRN, April 15, 2024.

² For insights on the importance of foreign direct investment and the strengthening of

However, Italy continues to lag behind its main European and international competitors when it comes to attracting greenfield investments, which have the most positive, long-term effects on the economy³.

A detailed analysis of the data provided by United Nations Conference on Trade and Development (UNCTAD) on the value of greenfield projects by destination between 2003 and 2024, focusing on Italy, clearly highlights the significant increase since 2019. The value of greenfield investments has increased year over year, rising from approximately USD 10 billion in 2019 to around USD 20 billion in 2021, then to approximately USD 28 billion in 2023, and reaching USD 38.6 billion in 2024, an increase of 36.2 percent compared to the previous year⁴. As the Financial Times has recently pointed out, in 2024 Italy ranked among the top Eurozone countries for attracting greenfield foreign direct investment, surpassing both Germany and France⁵.

These results are particularly significant for Italy considering the data from the past two decades. For instance, in 2013 and 2014 annual values reached lows of around USD 3–4 billion.

Foreign companies show growing interest in investing in Italy, but are often discouraged by complex administrative procedures, legal uncertainty, and regulatory fragmentation⁶. Therefore, simplifying administrative processes has become a strategic priority. Ensuring faster and more predictable procedures is essential to supporting investments, especially in high-potential sectors such as advanced manufacturing, energy, pharmaceuticals, and semiconductors⁷.

Recent policy measures signal a significant change of pace (e.g., Ministry for enterprises and made in Italy's substitutive powers, the appointment of special commissioners for major foreign investment projects, the Special

local supply chains, see: R. Basile and M. Manutano, *L'attrazione di Investimenti Diretti Esteri in Italia e nel Mezzogiorno: il ruolo delle politiche nazionali e regionali*, in *L'industria*, 2008, n. 4, 623 ss.

³ Forty-five percent of capital expenditure on greenfield investments in the first half of 2024 was concentrated in five economies, with Italy ranking fifth, preceded by the United States, India, Australia, and the United Kingdom. OECD, *FDI in figures*, October 2024.

⁴ See Unctad, *World Investment Report 2025*, June 2025.

⁵ V. Romei and S. Fleming, *US share of global foreign direct investment surges to record*, in *Financial Times*, 21 January 2025.

⁶ Overall, Italy ranks 42nd out of 63 economies in the World Competitiveness Ranking, 42nd out of 132 in the Global Innovation Index, and 81st out of 184 countries in the most recent Index of Economic Freedom. See: Lloyds Bank Trade, *Foreign direct investment (FDI) in Italy*, March 2025, www.lloydsbanktrade.com/en/market-potential/italy/investment. See, also, Ernst & Young, *EY Attractiveness Survey Italy*, 2024.

⁷ Osservatorio imprese estere, *Le imprese estere in Italia. Competitività globale, innovazione locale. Il ruolo delle imprese estere per l'Italia nel nuovo scenario internazionale*, May 2025, 130.

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Economic Zone for Southern Italy (ZES) and the streamlined “single authorization” procedures). These tools aim to make the Italian Public Administration a reliable and proactive partner for investors, rather than a barrier⁸.

This paper has two main goals: first, to provide an up-to-date picture of the role and trends of FDI in Italy; second, to analyze the administrative simplification measures introduced since 2022 and to assess their impact on the country’s attractiveness. Based on data and practical experiences, this paper will conclude with policy reflections on how to improve public governance of investments and contribute to the broader debate on industrial policy and Italy’s competitive positioning in the global economy.

2. The strategic role of Foreign Direct Investment

Foreign direct investment is a cornerstone of international economic integration⁹. Unlike portfolio investments, which are made with no intention of involving business operations, FDI has direct long-term effects on the host country’s industrial base. It can result in creating new production facilities, transferring technology, generating high-quality employment, and integrating local firms into global value chains¹⁰.

FDI can take several forms: 1) greenfield investments, which involve the establishment of entirely new productive assets; 2) brownfield investments, which expand or repurpose existing facilities; and 3) mergers and acquisi-

⁸ According to the latest edition of the EY Attractiveness Survey Italy, foreign direct investment (FDI) projects in Italy grew by 5 percent in 2024 compared to 2023, with 224 FDI projects announced in 2024, up from 214 the previous year. This result marks a clear contrast with the European trend, where FDI declined by 5 percent in 2024 – following a similar drop in 2023 – highlighting the growing difficulties Europe is facing in remaining attractive as a destination for foreign investment, www.ey.com/it_it/newsroom/2025/07/ey-attractiveness-italy-2025.

⁹ According to the Organisation for Economic Cooperation and Development (OECD) definitions: «direct investment includes the initial equity transaction that meets the 10% threshold and all subsequent financial transactions and positions between the direct investor and the direct investment enterprise (DIE), as well as qualifying foreign direct investment financial transactions and positions between incorporated and unincorporated fellow enterprises included under the Foreign Direct Investment Relationship (FDIR)». See OECD, *Benchmark Definition of Foreign Direct Investment*, 5th Edition, 2024, 31.

¹⁰ International Monetary Fund (IMF), *Balance of Payments and International Investment Position Manual*, Sixth Edition (BPM6), 2009, Washington D.C.; S. Bariatti, *Current trend in foreign direct investment: open issues on national screening systems*, in *Foreign Direct Investment Screening. Il controllo sugli investimenti esteri diretti*, edited by G. Napolitano, Bologna, il Mulino, 2019, 39 ss.

tions, which consist in acquiring equity in existing firms without necessarily increasing productive capacity¹¹.

Among the various forms of FDI, greenfield investments are considered the most beneficial in terms of structural transformation. Several studies show that greenfield FDI tends to have a stronger positive impact on Gross Domestic Product (GDP) growth, employment, and innovation capacity when compared to mergers and acquisitions¹².

Therefore, FDI has been analyzed both within neoclassical growth models, which emphasize capital accumulation and endogenous growth models, highlighting its role in knowledge transfer and total factor productivity. While empirical results are not always uniform, there is broad consensus that, under appropriate institutional and infrastructural conditions, FDI's greenfield projects generate substantial benefits for the host economy¹³.

Furthermore, attracting FDI has become a strategic priority for many governments, particularly in light of structural changes triggered by the pandemic and ongoing geopolitical tensions. Recent research shows that geopolitical risk deters FDI flows and that the fragmentation of global investment patterns is increasingly driven by rising tensions and inward-looking policies¹⁴. These changes are reshaping global supply chains and accelerating the trend toward nearshoring. In this context, our country's ability to offer a stable and efficient regulatory environment, with clear rules and predictable timelines, is equally as important as tax rates or labor costs in determining investment attractiveness.

Italy has value to offer international investors, regarding its strong manufacturing sector, world-class universities and strategic location within the crossroads of Europe, North Africa, and the Middle East. However, without a coherent public strategy that simplifies administrative procedures and provides legal certainty, the country risks falling behind bureaucratically efficient economies.

¹¹ Today, FDI screening has become a key part of many governments' economic and security strategies, especially in sectors such as defense, energy, critical infrastructure, advanced technology, and data protection. The Italian FDI regime is also known as the Golden Power Law, as it gives the Italian government special powers to approve or veto FDIs.

¹² Unctad, *World Investment Report 2025*, June 2025; Osservatorio imprese estere, *Le imprese estere in Italia. Competitività globale, innovazione locale. Il ruolo delle imprese estere per l'Italia nel nuovo scenario internazionale*, May 2025.

¹³ E. Santos, *FDI and Firm Productivity: A Comprehensive Review of Macroeconomic and Microeconomic Models*, in *Economies*, 2023, n. 6, 164; B. Ferrett, *Foreign Direct Investment and Productivity Growth: A Survey of Theory*, in *University of Nottingham Working Paper*, 2004, n. 15.

¹⁴ A. Bussy and H. Zheng, *Responses of FDI to Geopolitical Risks: the Role of Governance, Information, and Technology*, in *International Business Review*, 28 April 2023.

3. The bureaucratic burden on businesses

In a globalized, interconnected economy, the country's ability to offer predictable regulatory framework, streamlined administrative procedures, and digital tools has become the deciding factor in attracting investment. An efficient public administration is among the key enablers of modern industrial policy¹⁵.

Administrative simplification has long been a cross-cutting priority of public policy and a crucial lever for improving national competitiveness. In Europe, there is growing awareness that the competitiveness of industrial systems is increasingly tied to the speed and efficiency of administrative processes, especially in a global environment where countries with Anglo-Saxon traditions or from Southeast Asia operate with highly simplified regulatory systems.

Simplification, in this context, requires a structural transformation on multiple fronts: both within the organization of the public sector and in its interaction with businesses. The rationalization of administrative procedures remains a central area of intervention. This includes eliminating unnecessary formalities (such as obsolete opinion requirements), streamlining permitting processes for industrial facilities and enhancing existing legal instruments, such as self-certification, the single administrative conference (the so called *conferenza dei servizi*¹⁶), substitute agreements, one-stop shops and the digitalization of procedures, to accelerate decision-making, and ensure more coordinated relationships between public institutions and private operators at both national and local levels.

Nevertheless, the effectiveness of these tools depends on consistent implementation, administrative capacity, and a systemic vision that combines simplification with legal certainty, effectiveness and transparency. Despite the reforms started with Law no. 241/1990, Italy's path toward effective administrative simplification in support of productive investment remains fragmented and uneven, hindered by procedural delays, and overlapping regulations¹⁷. Structural reforms, continuity in policymaking and full enforcement of existing measures are needed to overcome these challenges.

¹⁵ Confindustria, *Costo Zero. 80 proposte per la semplificazione a costo zero*, 2023, 2.

¹⁶ On the *conferenza di servizi* as an instrument of administrative simplification, see, among others, G. Vesperini, entry '*Semplificazione amministrativa*', in *Dizionario di diritto pubblico*, edited by S. Cassese, Milano, Giuffrè, 2006, 5480. F. Caporale, *I rapporti tra amministrazioni tra semplificazione e complessità*, in *La legge n. 241 del 1990, trent'anni dopo*, edited by A. Bartolini, T. Bonetti, B. Marchetti, B.G. Mattarella and M. Ramajoli, Torino, Giappichelli, 2021, 152.

¹⁷ F. Di Mascio, P. Coletti and A. Natalini, *How institutional design and leadership sustain*

Until a few years ago, despite more than three decades of legislative efforts aimed at administrative simplification, Italy continued to rank poorly in international benchmarks on the ease of doing business. According to the World Bank's Doing Business 2020 report, Italy ranked 58th out of 186 countries overall, and much lower, 98th in starting a business and 97th in obtaining construction permits¹⁸. These inefficiencies generate substantial costs for firms, not only in economic terms.

Recent report consistently identifies Italy's complex permitting procedures as a key barrier to foreign investment. Bureaucratic hurdles, especially in obtaining authorizations for establishing and operating production facilities, are often more burdensome for foreign firms than for domestic ones. Lengthy, unpredictable approval processes, the involvement of multiple public authorities, and regulatory fragmentation create significant administrative and financial burdens. These challenges, compounded by language and cultural barriers and the absence of fully functional one-stop shops, generate additional costs and risks that undermine the attractiveness of Italy's industrial system and deter foreign investors¹⁹.

Significantly, these concerns are not limited to foreign investors. Italian firms themselves perceive the public administration as slow, inconsistent, and often unreliable. The Italian Association of Traders (Confcommercio) estimates the bureaucratic burden at around 4.2 percent of GDP (roughly EUR 70 billion per year), but also in organizational and reputational terms, eroding the country's competitiveness compared to more efficient regulatory environments²⁰. Italy also leads the European Union (EU) in perceived bureaucratic pressure on businesses, with an index of 75.5 percent, far above the EU average of 58.3 percent²¹.

Although several simplification tools have been introduced over the years, their impact has been limited due to inconsistent enforcement, insufficient digitalization and lack of accountability.

Against this backdrop, starting in particular with the Draghi and Meloni administrations, a number of instruments have been introduced to pro-

collaborative public sector innovation: the case of administrative simplification in Italy, in *Policy Design and Practice*, 6 June 2025, 7 s.

¹⁸ According to the survey, starting a business costs Italian entrepreneurs twice as much as their counterparts in Germany and three times more than in Spain. See: World Bank, *Doing Business in the European Union 2020: Italy*, 2020.

¹⁹ Osservatorio imprese estere, *Le imprese estere in Italia. Competitività globale, innovazione locale. Il ruolo delle imprese estere per l'Italia nel nuovo scenario internazionale*, May 2025, 130.

²⁰ Confcommercio, *Burocrazia una palla al piede per la competitività del Paese*, 8 July 2020.

²¹ Confartigianato Imprese, *Una buona burocrazia per le imprese? Si può fare*, 6 May 2023.

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mote administrative simplification for enterprises, with the specific goal of facilitating the establishment and implementation of investment projects, particularly those of strategic relevance or high economic impact. These measures aim to reduce permitting timelines, strengthen the administrative capacity of the authorities involved and provide investors with a more stable and predictable regulatory framework.

4. Administrative reforms to attract investment in Italy in recent years. The new Investment Facilitation and Unblocking Unit (*Unità di Missione per l'Attrazione e lo Sblocco degli Investimenti* – UMASI)

Over the past three decades, Italy has attempted to address these issues through multiple waves of administrative reform. From the foundational Law no. 241/1990, which set general principles for administrative procedures, to the so-called Bassanini Laws of the late 1990s, the aim has been to improve efficiency and responsiveness in public decision-making²². Nonetheless, structural inefficiencies persist, particularly in comparison with international standards.

A more assertive approach began with the adoption of the National Recovery and Resilience Plan (NRRP) in 2020, which introduced the principle of substitutive powers, enabling central government intervention when regional or local bodies fail to meet deadlines. This model, outlined in Decree-Law no. 77/2021, has served as a framework for further reforms.

This regulatory framework was further strengthened by Decree-Law no. 173/2022, which rebranded the Ministry of economic development (MISE) as Ministry for enterprises and made in Italy (MIMIT) to emphasize its focus on business competitiveness. Furthermore, in 2023 the Italian Government established a dedicated the Investment Facilitation and Unblocking Unit (*Unità di Missione per l'Attrazione e lo Sblocco degli Investimenti* – UMASI) within the MIMIT. The Unit's core mandate is to simplify and expedite administrative procedures, particularly in relation to large-scale or stalled investment projects burdened by regulatory delays or jurisdictional fragmentation²³.

Recent legislative reforms have significantly strengthened UMASI's op-

²² S. Cassese, *La semplificazione amministrativa e l'orologio di Taylor*, in *Riv. trim. dir. pubbl.*, 1998, 699.

²³ For further information see also www.mimit.gov.it/images/stories/documenti/Slide_UMASI_-_May_2025.pdf.

erational capacity, equipping both the unit and the Ministry with a suite of legal instruments specifically designed to support investment attraction and unblock procedural bottlenecks. It also works in cooperation with chambers of commerce and is organized in one director-level office under a general director, with an administrative staff of 15 officials.

Among these, the most impactful development has been article 13 of Decree-Law no. 104/2023, which has generated considerable interest among business stakeholders. The provision empowers the Council of Ministers, acting on a proposal from the Minister for Enterprises and Made in Italy, to designate specific foreign and domestic investment programmed as being of «overriding national strategic interest»²⁴. This designation may be conferred on high-value investments, exceeding 1 billion, that require coordinated administrative action across multiple levels of government, including local authorities, regional administrations and other public bodies.

Once an investment has been classified as strategically relevant, the Prime Minister may appoint, by decree and in agreement with the President of the affected region, a Special Government Commissioner. This commissioner operates with the support of UMASI and is empowered to convene a single, fast-tracked permitting conference integrating all necessary authorizations into a consolidated process.

Inspired by the emergency model used to rebuild the Morandi Bridge in Genoa, this mechanism allows the commissioner to operate through a unified permitting process, issuing a single comprehensive authorization that replaces all individual permits, approvals and opinions. The Commissioner is vested with extraordinary regulatory powers, including the authority to issue orders that override all legal provisions, except for criminal law, anti-mafia legislation, EU law, and national security rules such as those governing Italy's golden power regime²⁵. The single permit issued by the Commissioner functions as a comprehensive authorization, replacing all other permits or approvals, and authorizes the full implementation of the investment program, including the execution of related works and activities.

An even more ambitious tool was introduced by Decree-Law no.

²⁴ Recently, has come into effect the Decree Law no. 25/2025, as modified by Law no. 69/2025, which has extended article 13 to domestic investment.

²⁵ On this topic, see, among others, M. D'Alberti, *Il golden power in Italia: norme ed equilibri*, in *Foreign Direct Investment Screening. Il controllo sugli investimenti esteri diretti*, edited by G. Napolitano, Bologna, il Mulino, 2019, 83 ss.; A. Sacco Ginevri, *Golden powers e funzionamento delle imprese strategiche*, in *Foreign Direct Investment Screening. Il controllo sugli investimenti esteri diretti*, edited by G. Napolitano, Bologna, il Mulino, 2019, 153 ss.; B. Argiolas, *Il golden power tra Stato e mercato*, in *Giorn. dir. amm.*, 2022, 721 ss.

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50/2022, adopted under the Draghi Government, which expanded this logic by establishing specific substitutive powers for productive investments exceeding EUR 25 million. In cases of inaction by national administrations, the UMASI can replace the competent authority and issue the necessary authorizations. If the delay stems from regional or local governments, the Council of Ministers may intervene, either by designating a different administration or appointing special commissioners to carry out the procedures. Indeed, even the deterrent effect embedded in such provisions, similar in spirit to those introduced by Decree-Law no. 77/2022, which aimed to enhance the administrative capacity of the Italian public sector in implementing NRRP projects, carries significant signaling and catalytic value. This is a form of institutional *whatever it takes*: a strong declaratory commitment that, by its mere announcement, can generate tangible impacts in terms of procedural acceleration and institutional responsiveness²⁶.

Outside the specific cases covered by article 30 of Decree Law no. 50/2022 or article 13 of Decree Law no. 104/2023, the Investment Facilitation and Unblocking Unit is meant to play an “advocacy” role in support of businesses, conducting all necessary interactions with the relevant administrations to facilitate both national and foreign investments of significant economic value and with substantial employment impacts²⁷.

This model has been reinforced by subsequent provisions, including article 1 of Decree-Law no. 153/2024, which gives environmental and energy commissions priority treatment for projects declared of strategic national interest under article 13. Additional instruments include the designation of strategic investment areas under Decree-Law no. 115/2022, the regional accelerated authorization procedure (PAUAR), and the establishment of a digital one-stop shop for the Special Economic Zone (ZES) in Southern Italy.

PAUAR mechanism is structured as a highly time-bound procedural sequence, coordinated primarily by regional authorities, which are tasked with several key steps. Within five days of receiving the application, the competent regional office must forward the documentation to all potentially involved public administrations and entities, publish the application on its institutional website, and, within the following 30 days, jointly verify, together with the relevant authorities, the completeness of the submitted documentation. Within the subsequent 20 days, the regional office must issue a non-extendable deadline, not exceeding 30 days, for the applicant to submit

²⁶ So far, article 30 of Decree-Law no. 50/2022 has never been formally implemented.

²⁷ See the document published on www.mimit.gov.it/images/stories/documenti/Slide_UMASI_-_May_2025.pdf.

any necessary supplementary materials. Once the additional documentation is received, the regional administration republishes the updated information online and convenes a “synchronous” services conference (as per article 14-ter of Law no. 241/1990), which must conclude within 60 days from the date of its first meeting.

A separate but related development concerns the introduction of a streamlined single authorization procedure within Italy’s new Special Economic Zone (ZES)²⁸. Pursuant to article 13 of Law no. 124/2023, which established the Unified ZES for Southern Italy²⁹, a dedicated Task Force under the Presidency of the Council of Ministers has been created, alongside the launch of the Digital One-Stop Shop for Productive Activities (SUAP) in the Unified ZES, known as S.U.D. ZES. This platform consolidates the previous digital one-stop shops created under Decree-Law no. 91/2017 and assumes the functions traditionally performed by SUAP.

Article 15 of Law no. 124/2023 governs the “single authorization” procedure within the Unified ZES. It allows any investor seeking to initiate economic activities within the zone – without any threshold of minimum investment or project scale, unlike other fast-track regimes – to submit their application directly to the ZES platform, which in turn notifies all competent public offices. Upon receipt, and following a preliminary check for completeness, the relevant authorities may, within 20 days, request additional documentation. The proponent may, in this case, also request a suspension of the process for up to 30 days. Once the requested materials are submitted, the ZES Task Force must, within three working days, convene a simplified services conference under article 14-bis of Law no. 241/1990. This process benefits from accelerated timelines compared to standard procedures: all participating authorities must issue their formal determinations within 30 days (instead of the ordinary 45), with a maximum of 45 days (instead of 90) for authorities responsible for environmental, landscape, cultural heritage, health or public safety matters. Finally, within 30 days of the expiry of those deadlines, the leading administration convenes a virtual coordination meeting with all relevant bodies to finalize the reasoned determination concluding the permitting conference.

These reforms mark a shift in Italy’s investment policy, positioning ad-

²⁸ G.P. Manzella, *Vantaggi e rischi della ZES Unica*, in *Giorn. dir. amm.*, 2024, n. 2.

²⁹ Italian regions included in the Unified ZES are Abruzzo, Basilicata, Calabria, Campania, Molise, Puglia, Sardinia, and Sicily. Recently, the Council of Ministers, on 4 August 2025, approved a draft law aimed at expanding the perimeter of the Special Economic Zone (ZES) to include the regions of Umbria and Marche. The measure is intended to enhance territorial cohesion and broaden the economic benefits linked to the ZES regime.

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ministrative simplification not as a mere technical adjustment but as a strategic industrial policy tool. If implemented consistently and accompanied by administrative capacity and political commitment, they could significantly enhance Italy's attractiveness to foreign investors and improve the country's position in the global competition for productive capital.

5. From law to action: Silicon Box, Aws, Novo Nordisk, Metinvest and Vantage

A concrete demonstration of the evolving approach in Italy's investment governance is the implementation of article 13 of Decree-Law no. 104/2023 (activated for the Silicon Box, AWS, Novo Nordisk, Vantage and Metinvest investment projects). As said above, it is a fast-track mechanism with clear transformative potential, specifically designed to facilitate large-scale foreign investments.

Nowadays, this mechanism has already been applied to five large-scale, high-impact projects of European and global relevance, signaling a concrete shift towards an enabling role of the State in supporting strategic investments.

At present, it is estimated that investments amounting to approximately EUR 40 billion could be realized thanks to the application of article 13³⁰.

The first application concerns the Vulcan Project promoted by Silicon Box, a Singapore-based company, involving the construction of the first European plant for advanced semiconductor packaging using chiplet technology. The total investment amounts to EUR 3.2 billion in capital expenditure and EUR 4 billion in operating costs over 15 years. The project is strategic for Europe, as it fills a critical gap in the semiconductor value chain and contributes to the objectives of the European Chips Act. The expected impact on employment is substantial, with 1,600 direct jobs, 2,900 indirect jobs across the supply chain, and 1,000 temporary jobs during construction. The project was declared as an overriding national strategic interest by the Council of Ministers on 27 September 2024³¹ and the Mayor of Novara, Alessandro Canelli, was appointed Government Commissioner by Prime Ministerial Decree (d.P.C.) dated 7 March 2025³².

³⁰ See www.mimit.gov.it/images/stories/documenti/Slide_UMASI_-_May_2025.pdf.

³¹ See the press release by the Council of Ministers, 27th September 2024.

³² See presidenza.governo.it/AmministrazioneTrasparente/Organizzazione/CommissionariStraordinari/DPCM_20250307.pdf.

The second case relates to the Aws Europe (Milan) Region – Expansion program by Amazon Data Services, aimed at building two new data centers in the Lombardy region. The planned investment of at least EUR 1.2 billion is expected to generate a direct positive impact of approximately EUR 880 million on the national economy, including the creation of 5,500 jobs (direct and indirect) over five years in sectors such as security, facility management and technical services. The project was granted strategic national status by the Council of Ministers on 29 November 2024³³ and Prefect Giorgio Zanzi was appointed as Government Commissioner with d.P.C. dated 21 March 2025³⁴.

The third investment program is led by Novo Nordisk, the Danish pharmaceutical giant and Europe’s most valuable listed company. The project involves the expansion of the company’s existing site in Anagni, Lazio, through the construction of new buildings for aseptic production and finished pharmaceutical products. With an overall investment exceeding EUR 2 billion, the initiative is expected to create between 1,000 and 2,000 new jobs and to further consolidate the Lazio region’s position as a strategic hub for advanced pharmaceutical manufacturing. The Council of Ministers declared the project of national strategic interest on 13 March 2025³⁵, and the President of the Lazio Region, Francesco Rocca, was appointed Government Commissioner by d.P.C. on 9 April 2025³⁶.

The fourth investment program concerns Vantage Data Centers, a US-based multinational specializing in the design, construction and operation of large-scale data-center campuses serving hyperscalers, cloud providers and major enterprises. The initiative entails the development of four advanced data-center campuses in Lombardy, with a potential overall investment estimated at EUR 4 billion³⁷. The project is expected to generate substantial economic and employment effects, including approximately 4,000 direct jobs over an eight-year construction horizon and about 250 permanent positions

³³ See the press release by the Council of Ministers, 29th November 2024.

³⁴ See presidenza.governo.it/AmministrazioneTrasparente/Organizzazione/CommissionariStraordinari/DPCM20250321.pdf.

³⁵ See the press release by the Council of Ministers, 13th March 2025.

³⁶ See presidenza.governo.it/AmministrazioneTrasparente/Organizzazione/CommissionariStraordinari/CommNormSettore/Dpcm_20250409_Rocca.pdf.

³⁷ The program is structured into four distinct projects: the first, involving an investment exceeding EUR 1 billion; the second, requiring more than EUR 300 million; the third, involving over EUR 2.5 billion; and the fourth, with a planned investment of more than EUR 7 billion. The first three projects have already been granted the status of overriding national strategic interest.

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once operations begin, in addition to significant indirect employment across the supply chain. The investments reinforce Italy's positioning as a European hub for digital infrastructure. The Council of Ministers declared the first three projects of overriding national strategic interest on 2 October 2025³⁸.

The fifth investment concerns Metinvest, a leading Ukrainian industrial group active in the steel and mining sectors and among Europe's major producers of steel for multiple industrial applications. On 10 July 2025, within the framework of the Ukraine Recovery Conference, a Programme Agreement was signed for the relaunch and redevelopment of the Piombino steel hub. (Qui aggiungere nota: The agreement involves the Ministry for Enterprises and Made in Italy, the Tuscany Region, the Municipality of Piombino, the Port System Authority and Metinvest Adria S.p.A., the Italian subsidiary of the Metinvest Group. See <https://www.mimit.gov.it/it/notizie-stampa/firmato-laccordo-di-programma-per-il-rilancio-del-polo-siderurgico-di-piombino>).

The investment plan provides for the construction of a new electric steel plant, with an overall estimated value of approximately Eur 2.6 billion.

The facility will include two electric arc furnaces, a rolling mill and advanced technological systems, with an annual production capacity of approximately 2.7 million tonnes of steel and CO₂ emissions about 35 percent lower than the recent European average, contributing significantly to the decarbonisation of the Italian steel industry.

Metinvest will also be responsible for the environmental remediation of the concession areas, the construction of internal infrastructure and the development of a dedicated port terminal, enhancing the logistical efficiency of the site and strengthening the integration between industrial production and port operations. The project is expected to generate substantial benefits in terms of industrial revival, environmental sustainability, reinforcement of national steelmaking capacity and the strategic development of port logistics.

In addition, pursuant to the Programme Agreement of 10 July 2025, Metinvest signed a framework trade union agreement committing the company to hire at least 800 workers, giving priority to employees currently under redundancy schemes at JSW Steel Italy.

The Council of Ministers declared the project of overriding national strategic interest on the 20th of November 2025 (aggiungere nota: See the press release by the Council of Ministers, 20th November 2025)

These five cases clearly show that the special commissioner model pro-

³⁸ See the press release by the Council of Ministers, 2nd October 2025.

vided under article 13 can effectively accelerate investment implementation by streamlining authorization processes and fostering cooperation among institutions, investors, and local communities. If further strengthened and institutionalized, this mechanism may serve as a replicable model for supporting strategic industrial investments in Italy and across Europe³⁹.

It is important to note, however, that although article 13 is designed as an exceptional procedure, the increasing number of companies now applying for this status signals a more systemic issue. Many investors are turning to the extraordinary route due to the structural weaknesses that affect ordinary administrative proceedings. Yet, article 13 has to be conceived as a tool of *extrema ratio* not as the norm. For this reason, it is essential that public administrations at all levels work in close synergy, adopting a cooperative approach to accelerate standard procedures and reduce the need to rely on exceptional instruments. A structural reform of administrative performance is ultimately needed to ensure that Italy becomes a consistently attractive destination for investment, without relying on emergency-driven solutions.

6. Conclusion

According to data published by UNCTAD⁴⁰, the most significant increases in the value of greenfield investment projects in 2024 were recorded in Italy +71 percent, USD 43 billion, along with the United States (+93 percent, reaching USD 266 billion) and the United Kingdom (+32 percent, USD 85 billion).

Italy thus stands out globally as one of the countries that experienced the sharpest growth in greenfield investment, an especially noteworthy result given the marked declines observed in France and Germany, two economies traditionally considered benchmarks for Italy⁴¹.

This progress is presumably linked also to recent reforms, in particular article 13 of Decree-Law no. 104/2023, which has emerged as a cornerstone of the country's new investment strategy. By introducing fast-track procedures, centralized decision-making and the appointment of special

³⁹ See also the speech delivered by the President of the Council of Ministers, Giorgia Meloni, at the Confindustria Assembly on May 27, 2025.

⁴⁰ See Unctad, *World Investment Report 2025*, January 2025.

⁴¹ V. Romei and S. Fleming, *US share of global foreign direct investment surges to record*, in *Financial Times*, 21 January 2025. See also, A. Monizzi, *La nuova governance del MIMIT e le recenti norme di semplificazione per l'attrazione e lo sblocco degli investimenti*, Thesis of Master Degree in Government, Administration and Politics of School of Government, Luiss Guido Carli.

administrative simplification as a driver of foreign direct investment

government commissioners, Italy has demonstrated that targeted regulatory interventions can substantially improve the country's ability to attract and implement complex, high-impact projects.

Case studies such as Silicon Box, Amazon Web Services, Novo Nordisk, Metinvest and Vantage show that when empowered by flexible, responsive institutions, Italy is not only capable of hosting transformative industrial investments but can position itself as a strategic production and innovation hub in Europe. These projects, totaling over EUR 13 billion in planned investment, would likely not have been possible, at least not within such tight timeframes, without the extraordinary procedures introduced by the recent reforms.

However, the growing demand for exceptional mechanisms such as those under article 13 also reveals the persistent weaknesses of the ordinary administrative framework. Many investors turn to emergency-based routes not because of the strategic nature of their projects, but because standard permitting pathways remain too slow, fragmented or uncertain. This reliance on exceptional measures underscores the urgency of reforming the baseline performance of the public administration across all levels of government.

Italy now faces a critical opportunity: to convert the momentum of recent achievements into a systemic transformation. This entails investing in administrative capacity, digital infrastructure, and above all, cultivating a culture of accountability and institutional coordination. The goal should be to ensure that legal certainty, speed, and predictability become the norm, not the exception, in the investor experience.

In a broader European context, the findings of the Draghi Report⁴² point to a continental investment gap of nearly EUR 800 billion per year, roughly 4.5 percent of euro area GDP, required to support the green and digital transitions. While national Recovery and Resilience Plans, including Italy's NRRP, offer crucial funding, their temporary nature reinforces the need to attract long-term private capital. In this light, foreign direct investment emerges not simply as a financial inflow, but as a key pillar of sustainable growth, technological upgrading, and global competitiveness.

Ultimately, administrative simplification is not a marginal concern, it is central to Italy's economic future. A streamlined, transparent, and cooperative public sector is indispensable for ensuring that Italy can fully participate in the new industrial geography shaped by geopolitical realignments, digital transformation, and climate imperatives. The country's ability to deliver on

⁴² The Draghi report, *A competitiveness strategy for Europe*, 9 September 2024.

this front will determine whether recent successes become a structural turning point or a missed opportunity.

Abstract

This paper explores how administrative simplification has become a strategic tool to attract foreign direct investment (FDI) in Italy. While recent years, especially 2021-2024, have seen record levels of greenfield investment, Italy continues to suffer from regulatory fragmentation and bureaucratic inefficiencies. The work analyzes key reforms, such as article 13 of Decree-Law no. 104/2023 article 30 of Decree-Law no. 50/2022 and the new Special Economic Zone for Southern Italy (ZES). It argues that while exceptional procedures have proven effective, long-term competitiveness depends on structural improvements in ordinary administrative performance, legal certainty and institutional coordination.