

BY EMAIL: COMP-HBERS-REVIEW@EC.EUROPA.EU

DG Competition
European Commission

12 February 2020

Dear Madam/Sir,

**Public questionnaire for the 2019 Evaluation of the Research & Development and Specialisation
Block Exemption Regulations**

We are pleased to take part in and hereby submit our reply to the public consultation that DG Competition launched on 6 November 2019.

Please note that this reply is targeted and, specifically, addresses a number of issues and concerns that have been voiced by a number of trade associations that Dentons regularly advises. In particular, our input relates to (i) information exchange and market studies, (ii) the design and implementation of industry-wide best practices and recommendations and (iii) industry-wide R&D initiatives, which are aimed at solving the environment and human health challenges, including climate change, sustainability and the circular economy.

Our comments should be read in the context of the Commission's Green Deal aiming at making Europe the world's first climate-neutral continent by 2050 and call for DG Competition to adapt its competition policy and enforcement agenda accordingly, namely by enabling industry to engage in the transformation towards a carbon-neutral and sustainable economy through cooperation and collaboration agreements.

Dentons may provide further comments on those as well as other aspects of the BERs and HGL in due course.

We look forward to participating further in the ongoing consultation and future assessment of the current horizontal cooperation regime.

Best regards,



Yves Botteman
Partner
Dentons Europe LLP