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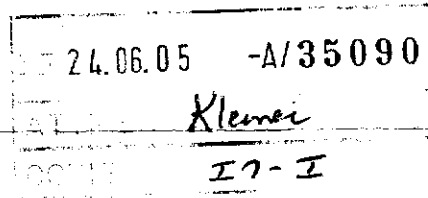
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Our Ref: RPC/SAAP/001  
Your Ref: State Aid Reform

21 June 2005

DG Competition  
State Aid Register  
SPA 3, Office 6/5  
B-1049 BRUSSELS  
BELGIUM



Dear Sir/Madam

### **STATE AID ACTION PLAN**

#### ***Less and better targeted state aid: a roadmap for state aid reform 2005-2009***

I have read the above consultation document and would like to comment on the Key Priorities element of the paper, specifically on section II.8, paragraph 47, *Setting up modern transport, energy and information and communication technology infrastructures.*

As a port operator, we support the onus on Member States to fulfil their commitments in terms of investments for transport networks. Whatever ports invest in improving the infrastructure within their areas of operation, they cannot function efficiently without a modern and effective road and/or rail network leading to and from them. They are reliant on the national government to provide the next link in the transport chain. Certainly state aid funded schemes should not give a particular port a competitive advantage, but nor should a lack of it penalise them either. Ports have vital national and international economic roles to play. State aid should be ensuring an effective level playing field in order to get the most out of a market driven economy.



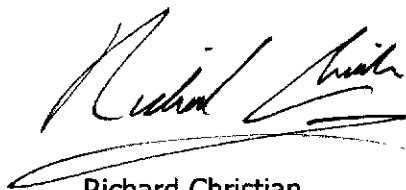
INVESTOR IN PEOPLE



Therefore, operating in a highly competitive industry, we are keen to see greater openness and transparency in terms of the assessment and use of public resources for transport infrastructure alongside the encouragement of Member States to invest. We support the need for clarity in state aid rules and the consideration of further guidance in this matter.

I hope that the above observations are helpful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Richard Christian', with a long horizontal flourish extending from the end of the signature.

Richard Christian  
**Planning Officer**