

Competition Policy supporting the Green Deal - ŠKODA AUTO COMMENTS

Part 1: State aid control

1. What are the main changes you would like to see in the current State aid rulebook to make sure it fully supports the Green Deal? Where possible, please provide examples where you consider that current State aid rules do not sufficiently support the greening of the economy and/or where current State aid rules enable support that runs counter to environmental objectives.

Proposed changes to existing rules incl. examples:

- Maintain support for large enterprises as well
- A higher share of support with regard to the investment costs of "green" projects
- Simplification of conditions (and administration)
- Shortening the sustainability period
- Support for follow-up projects as a whole (eg charging stations - storage batteries - photovoltaics)
- Support for more / all environmental outputs in one project (eg use of Gray Waters from the production process, not only support for measures for the use of energy, but also heat, recycled water, etc.)

2. If you consider that lower levels of State aid, or fewer State aid measures, should be approved for activities with a negative environmental impact, what are your ideas for how that should be done?

a. For projects that have a negative environmental impact, what ways are there for Member States or the beneficiary to mitigate the negative effects? (For instance: if a broadband/railway investment could impact biodiversity, how could it be ensured that such biodiversity is preserved during the works; or if a hydro power plant would put fish populations at risk, how could fish be protected?)

3. If you consider that more State aid to support environmental objectives should be allowed, what are your ideas on how that should be done?

a. Should this take the form of allowing more aid (or aid on easier terms) for environmentally beneficial projects than for comparable projects which do not bring the same benefits ("green bonus")? If so, how should this green bonus be defined?

Proposed changes to existing rules incl. examples:

- Support under easier conditions for enviro beneficial projects.
- A green bonus could be defined if the project falls into one of the supported categories (decarbonisation, energy efficiency, sustainable mobility, circular economy, zero pollution target, recycling)

b. Which criteria should inform the assessment of a green bonus? Could you give concrete examples where, in your view, a green bonus would be justified, compared to examples where it would not be justified? Please provide reasons explaining your choice.



4. How should we define positive environmental benefits?

a. Should it be by reference to the EU taxonomy³ and, if yes, should it be by reference to all sustainability criteria of the EU taxonomy? Or would any kind of environmental benefit be sufficient?

Proposal:

- Sufficient benefit for the environment, taxonomy only instructive

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