

[REDACTED]

---

Sent: Vendredi 20 septembre 2024 13:45  
To: COMP STATE AID GREFFE  
CC: Supplementary AnnexesCOMP RAIL REVISION [REDACTED] [REDACTED]  
Subject: HT.5524\_Reply\_from\_an\_organisation

DEAR Sir or Madam,

please find our contribution to the consultation regarding the draft Land and Multimodal Transport Guidelines (LMTG) and Transport Block Exemption Regulation (TBER).

“It is encouraging that, in addition to the guidelines, the European Commission adopts a block exemption regulation for the transport sector, which makes it quicker and easier to grant aid. The inclusion of not only rail, but also inland rail and multimodal transport, and the introduction of new categories of operating and investment aid is also to be welcomed. For example, for interoperability aid, at least for ETCS and DAK on-board equipment, support intensities of up to 80 % of the retrofitting costs should be possible in the future.

However, the guidelines and the GMOs should be consistent and coherent with other EU legislation, such as the revision of the Combined Transport Directive, in particular as regards their applicability and definition. This concerns, in particular, the link between aid and the requirement to calculate external costs of transport, which can only be carried out with a great deal of effort for undertakings. New and revised guidelines, as well as a GMO, are only useful if they set realistic conditions, are pragmatic and easily applicable, so that incentives and support schemes are effectively accessible to companies.

The restriction of coordination aid to certain distances (800 km for multimodal transport and 350 km for unimodal transport) in the Guidelines and the BER is also unfavourable. Beyond these distances, rail is also in strong competition with road. Finally, the restriction of vehicle support to ‘new entrants’ and SMEs, which are supposedly more in need of support, is not appropriate.

In addition, EU steps should be undertaken to facilitate and improve cross-border transparency and thus access to the different State aid support schemes of the Member States, specifically in the transport sector, for example by providing an overview of appropriate national support instruments in the transport sector.”

With regard to children,  
[REDACTED]  
[REDACTED]  
[REDACTED]

Federation of German Industries | Bundesverband der Deutschen Industries e.V.  
Wide road 29 | 10178 Berlin | Germany  
[www.bdi.eu](http://www.bdi.eu) | [X](#) | [LinkedIn](#) | [Instagram](#)

Member Association of BUSINESSEUROPE  
Lobby [registration number](#) R000534 | EU Transparency Register [1771817758-48](#)