

Input Port of Rotterdam for Public Consultation on revised State aid rules for land and multimodal transport

Port of Rotterdam Authority agrees with the changes as proposed by the European Commission as they broaden the possibility to support transport modalities. We hope it will provide a future proof basis to make sure decarbonization in these sectors can be financed where needed.

We agree with the choice to add multimodal transport to *sustainable* transport modes as we hope it will provide shippers and transport companies with the option to combine their transport operations. This should result in decreased congestion and a modal shift. There is a specific need to at the entirety of projects. Projects that combine changes in or expansion of infrastructure, energy infrastructure and digitalization should be supported as they add value to infrastructure on multiple levels.

Port of Rotterdam also advocates for recognizing pipelines as a separate modality. Pipelines should be taken into consideration in the revision of the state aid rules and guidance. To make sure state aid rules are future proof it would be worthwhile to look at including modalities such as hyperloop and drones. If the rules are designed with a too narrow scope it will be difficult to provide support to modalities that will play an important part of the modal shift in the future.

The revision does not include deep sea shipping. The larger ports in Europe need to prepare to receive bigger ships. Port facilities that are able to receive these types of vessels should be included in the revised rules.

Ports will have to invest in infrastructure needed for military mobility, it would therefore be wise to include investments for this type of mobility as well.

There are two passages in the text that are in need of clarification:

- What conditions are foreseen relating to distortion of the internal market?
- What can be supported when financing 'new commercial connections', does this include operational costs as well or only studies and pilots?