

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** HT.5524\_Reply\_from\_an\_organisation  
**Date:** vendredi 20 septembre 2024 09:51:27  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear,

Please find below a contribution to the consultation on the draft Land and Multimodal Transport Guidelines (LMTG) and Transport Block Exemption Regulation (TBER) from Lineas (Transparency register number 849769034280-22):

We welcome the State Aid - draft Land and Multimodal Transport Guidelines (LMTG) and draft Transport Block Exemption Regulation (TBER).

We do observe that the LMTG and the TBER do not mention TAC (Track access Charges) aid schemes in particular.

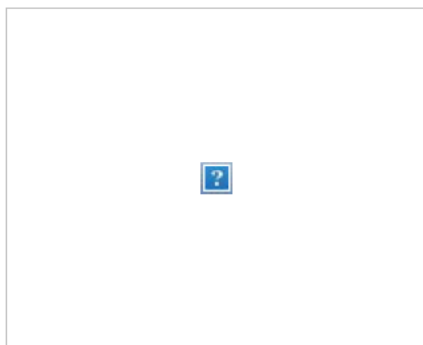
In the draft TBER any exemption for notification by the Member States is based on aid schemes (to reduce the external costs of transport) with a limit for the distance covered by the transport (Article 10 draft TBER, with the exception of single wagonload operations).

But, on the one hand, TAC schemes based on the exploitation costs of infrastructure usually do not have a distance limit for a specific transport and therefore would difficultly fall within the remit of Article 10.

On the other hand, we think that TAC aid schemes are one of the most non-discriminatory and transparent ways to support the modal shift from road to rail and should be eligible for an exemption of notification.

Therefore, we would urge the EC to include TAC aid schemes in separate dispositions and articles within the LMTG and the TBER, to be able to take into account the specificities of TAC aid schemes (in particular, the fact they do not have a distance limit for a specific transport).

Kind regards,



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