

## NEW EU STATE AID FRAMEWORK: LAND AND MULTIMODAL TRANSPORT GUIDELINES & TRANSPORT BLOCK EXEMPTION REGULATION

### ÖBB CONTRIBUTION TO THE PUBLIC CONSULTATION

After a thorough review of the proposals, **ÖBB recommends the following adjustments to the LMT Guidelines** and the **TBER** to increase the competitiveness of rail & multimodal transport:

- 1) **Fully compensating rail & multimodal transport for the external costs saved that would otherwise be caused by road transport** → LMTG: increase the intensity of aid to reduce the external costs to 100% of the eligible costs;
- 2) **Balancing out existing system-related competitive disadvantages of rail & multimodal transport compared to the far less complex road transport system** → LMTG: maintain aid for infrastructure use as a category of operating aid, including today's aid intensity of 100% of the eligible costs;
- 3) **Incentivising the renewal of Europe's freight wagon fleet to make it fit for DAC** → LMTG: allow for aid in form of direct grants and more flexible framework conditions.
- 4) **Encourage investments in rail network access** → TBER: set the threshold for private sidings projects at 2,5 Mio. EUR per project; → LMTG: set a clear aid intensity of 100% of eligible costs instead of the not realisable funding gap analysis (for multimodal transport facilities & private sidings projects); TBER&LMTG: include loading/unloading equipment to the list of eligible costs of private sidings projects;
- 5) **Encouraging innovation in the field of intermodal loading units** → TBER: broaden the definition of 'intermodal loading units'.
- 6) **Providing legal certainty to Member States and companies** → LMTG: let notified aid schemes expire as they were already considered as lawful aid by the Commission.