

**To:** [REDACTED] [COMP STATE AID GREFFE](#)  
**Cc:** [COMP RAIL REVISION](#)  
**Subject:** HT.5524\_Reply\_from\_an\_organisation  
**Date:** 20 September 2024 14:52:53  
**Attachments:** [image001.jpg](#)

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Dear Ladies and Gentlemen,

Contargo is one of Europe's leading container hinterland logistics networks. We integrate multimodal freight transport between the western sea ports, Germany's North Sea ports and the European hinterland.

We have the following multimodal freight transport requests regarding the State aid guidelines and TBER:

1. Operational aid for multimodal transport on the territory of the Member State: the rail transport distance should be increased to 1100km or the longest domestic railway distance from a major port or terminal to the dominant border-crossing station.
2. The multimodal freight transport sector fails to recognise the merits of public services in rail freight transport, therefore suggests the omission of this section.
3. Aid to launch new commercial connections: the definition of a "new commercial rail freight connection" should be precisely provided.
4. Investment aid for new facilities or their renewal: consideration should be given to the commercial interests of modern functioning facilities within a 100km radius to the beneficiary with a potential need for compensation payments or other form of state support should be offered.
5. The threshold for the exemption for investment state aid for the construction of terminals set at €3 million per projects should be revised upwards in the TBER.
6. Interoperability aid or aid for technical adaptation and modernisation: consideration should be given to the commercial interests of owners of investments, which are already interoperable, especially owners of ETCS-compliant locomotives and DAC-equipped wagons, that have been funded without state aid, with a potential need for compensation payments or other form of state support should be offered.
7. In order to close the information gap between national and foreign companies and facilitate cross border transports, the transparency provisions in 82 and 83 should also be published on one single European website, that comprehends all Member States state aid schemes.

Thank you for your consideration.

With best regards,

[REDACTED]

[REDACTED]

[REDACTED]

