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**Sent:** vendredi 20 septembre 2024 16:34  
**To:** COMP STATE AID GREFFE  
**Cc:** COMP RAIL REVISION  
**Subject:** HT.5524\_Reply\_from\_an\_organisation

**Importance:** High

Dear Sirs,

I hereby present the position of the Portuguese Rail Operators Association (APEF – Associação Portuguesa de Empresas Ferroviárias) regarding the European Commission proposal for State Aid Rules for Land and Multimodal Transport.

APEF is generally aligned with the objectives of the Regulation proposed to streamline support for the rail freight sector, prioritizing support granted with the aim of improving coordination between transport (multimodal), among others, reducing administrative burdens with the approval of support, exempting the need for EC approval, ensuring certain issues such as, for example, that no distortions to competition are created.

This instrument can be crucial to capitalize on rail services to the detriment of road services.

APEF is aligned with the European Commission that indirect support measures are essential to encourage modal transition, such as, for example, support for the reduction of taxation on rail activity and track access charges.

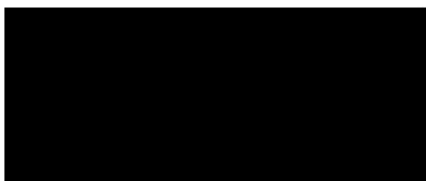
We also support the willingness to streamline financial support for investment in the implementation of the ERTMS and that, as one of the greatest current investment financing needs of the system, we believe that 100% financing should be made viable, given that the main beneficiary of the ERTMS is the infrastructure manager.

We believe, however, that there should be no distance restrictions for the purposes of eligibility for aid in rail transport, contrary to what is proposed by the European Commission for multimodal and unimodal transport, taking into account the unequal reality that exists in the European area between the different countries. If this were to be the case, we would jeopardize competition between rail operators, which would go against the intended objectives of encouraging modal transition in a transversal and sustainable manner, regardless of the Member State.

It is of the utmost importance that Member States be able to approve support packages that are exempt from EC approval, so that they can be agile and effective, as long as they comply with European objectives/aims, which can and should be defined objectively and judiciously, such as allowing an increase in the modal share of rail and having underlying solutions/investments that promote multimodality and interoperability, thus encouraging the decarbonization of transport.

We are conscious of the various challenges the rail freight is facing and will be facing in the future to enable the attainment of the ambitious goals European Commission has set and we are confident that the establishment of such kind of instruments may give the rail sector the necessary tools to increase its competitiveness.

With our kind regards,



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**APEF**

Associação Portuguesa de Empresas Ferro