

From:"SCHULYOK Felix (COMP)"
Sent:Wed, 17 Jul 2024 09:37:02 +0200
To:"COMP H6 CONSULTATION" <COMP-H6-CONSULTATION@ec.europa.eu>
Cc:"FOSZCZYNSKI Ania (COMP)" <Anna.FOSZCZYNSKI@ec.europa.eu>; "BLEHOVA Lenka (COMP)" <Lenka.BLEHOVA@ec.europa.eu>; "COMP STATE AID GREFFE" <Stateaidgreffe@ec.europa.eu>
Subject:FW: HT.100254_Reply_from_an_organisation

Dear colleagues,

The organisation below is asking for a confirmation that their input was well received. Have you already sent this? If not, can you please just sent a reply confirming that we received it and thanking them for their input?

Many thanks,
Felix

From: COMP H6 CONSULTATION <COMP-H6-CONSULTATION@ec.europa.eu>
Sent: Tuesday, July 16, 2024 4:11 PM
To: SCHULYOK Felix (COMP) <Felix.SCHULYOK@ec.europa.eu>; FOSZCZYNSKI Ania (COMP) <Anna.FOSZCZYNSKI@ec.europa.eu>; BLEHOVA Lenka (COMP) <Lenka.BLEHOVA@ec.europa.eu>
Subject: FW: HT.100254_Reply_from_an_organisation

From: Patrick Nuvelstijn <P.Nuvelstijn@Natuurmonumenten.nl>
Sent: Tuesday, July 16, 2024 12:35 PM
To: COMP STATE AID GREFFE <Stateaidgreffe@ec.europa.eu>
Cc: COMP H6 CONSULTATION <COMP-H6-CONSULTATION@ec.europa.eu>
Subject: HT.100254_Reply_from_an_organisation

Dear LS,

Usually, the link for a consultation leads to a form to be filled in. Now, even with help from our ICT department we only got this reply-address.

To be certain that our input is duly received I would like to have a confirmation.

European Commission
(attn. DG Competition)
Place Madou/Madouplein 1
1210 Bruxelles/Brussel
Belgium

Subject: Public consultation concerning the draft targeted amendments to rules on small amounts of State aid to the agricultural sector

Transparency register number of our organization Natuurmonumenten is **77926494338-54**

Amersfoort, 16 July 2024

Natuurmonumenten, also on behalf of Vogelbescherming Nederland (Birdlife Netherlands) <https://www.vogelbescherming.nl/> would like to thank the European Commission for the opportunity to provide input as regards the draft targeted amendments to rules on small amounts of State aid to the agricultural sector.

We support the system of de-minimis support for agriculture and understand the current need for an update, given the economic challenges the farming sector is facing. The proposed changes are logical but, in our view, need to go further.

The agricultural sector does not only need financial support in view of e.g. political instability, but is also facing serious challenges for enhanced sustainable production. The challenges concern mitigation of and adaptation to climate change, pollution reduction (e.g. pesticides use, nitrate etc.) and biodiversity protection and restoration.

Traditionally, de-minimis support is being provided by governments for this purpose, along with de-minimis support for purely economic reasons. The applicable individual and national ceilings however are too low to leverage the sustainability transition significantly through de-minimis support.

We therefore request the European Commission to supplement the proposed updated de-minimis with a mechanism in which the applicable de-minimis individual and national ceilings are doubled, on condition that the additional support is provided exclusively for agro-environment-climate measures as may be supported through the Common Agricultural Policy (Article 70 of Regulation 2021/2115) on the basis of costs incurred and income foregone. Such support does not distort competition or trade, nor the functioning of the internal market. Evidently, it should be registered separately.

Increasing the de-minimis ceilings specifically for sustainability purposes will help farmers adjust to legal and societal requirements in this respect, and will help alleviate the tensions in society between the farming sector and environmental interests.

Thanks very much for taking our suggestions in consideration. We will be happy to provide further clarification if so requested.

Kind regards,

Patrick Nuvelstijn

Coordinator European & International Affairs

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Doe mee met [Natuurmonumenten](http://www.natuurmonumenten.nl) en bescherm natuur in Nederland.

