

**Contribution of the Port of Rotterdam to the public consultation regarding the**

## **European Commission's targeted modification of the General Block Exemption Regulation (No 651/2014) in relation to the EU funding programmes**

The Port of Rotterdam welcomes the European Commission's Initiative towards the amendment of the General Block Exemption Regulation (EU) No 651/2014 (GBER) leading to its applicability on national funds combined with certain EU programmes. This will not only solve the problem of time consuming procedures, but will also reduce the administrative burdens which are very costly. National procedures will be more in line with EU procedures, which provides more transparency, certainty and effectiveness regarding the use of the national funding alongside EU funding.

The European Commission suggests to accept national funds as compatible aid with the internal market when, under certain circumstances, combined with EU funding. This regards three specific areas:

- National Funding involved in financial products supported by the Invest EU Fund;
- R&D&I projects having received a Seal of Excellence under H2020 or Horizon Europe, as well as co-fund projects and Teaming actions under H2020 or Horizon Europe;
- European Territorial Cooperation projects (ETC).

The Port of Rotterdam is in favour of this development.

### **However**

**The Port of Rotterdam believes that the amendment could be more complete and effective by also extending the GBER to national funds combined with Connecting Europe Facility (CEF) grants.**

As seen in the past years there has often been a discrepancy between the available budget under the CEF and the actual demand based on the project applications. Projects have been declined funding due to budget restraints. In addition the provisioned completion of the TEN-T core network is limited in time knowing that this is set for 2030. One needs to take into account that the CEF instrument will remain an important funding tool for projects that will contribute to the aforementioned completion. Depending on the magnitude and/or complexity of the projects in relation to the available CEF budget, it could be very much the case that these projects will be needing additional national funding next to the available EU funding. This is expected for port related investments which are undisputable necessary for

a vital TEN-T network. Unnecessary state aid issues should not have to be reason for delay in achieving the completion of the TEN-T network.

To be able to keep things simple, to prevent unnecessary workloads and administrative burdens or other time consuming procedures which will delay the actual implementation of necessary project initiatives, the Port of Rotterdam urges the European Commission to also extend the GBER to national funds combined with CEF funding. The CEF instrument is centrally managed by INEA with independent evaluators to make sure the common European Interest is served. Funding of selected project, whether just EU or in combination with national funding, are meant to serve the European Interest and should therefore be considered compatible with the state aid rules. The GBER can provide the necessary conditions to make this possible. If not, future CEF grants could possibly remain ineffective and unused when one needs to wait for the results of a notification procedure in case of an inevitable national grant for the success of the project (the Action).