



## **Contribution from Moravian-Silesian Region to the Guidelines on State aid for climate, environmental protection and energy 2022**

We very much appreciate the Public consultation on the revised Climate, Energy and Environmental Aid Guidelines (CEEAG). We see the link between these Guidelines and the initiative Green Deal.

Unfortunately, one kind of aid we still miss. We miss aid for brownfields, not only in CEEAG but in GBER too.

There is Aid for the remediation of contaminated sites, for the rehabilitation of natural habitats and ecosystems and for biodiversity and nature-based solutions in the CEEAG. However, not every brownfield is a contaminated site.

It is possible to support investment in the brownfield under individual articles in CEEAG depending on what the main part of the investment is focused on. We assume that this will be most often under the Chapter 4.1 Aid for the reduction and removal of greenhouse gas emissions including through support for renewable energy. However, there are two points, based on which we would like to explain that support for brownfields is insufficient.

Firstly, there is no difference under the state aid rules, if the investment is realized on the brownfield or on the greenfield. However, to build and develop activities on the greenfield is from the investor's point of view cheaper. There is no motivation for the investors to realize their investments on the brownfields. The investment realized on the brownfield is more expensive. Such investment is limited by the construction, technical parameters and other factors. Therefore, we would welcome aid for brownfields in the state aid rules.

Secondly, not every project realized on the brownfield is possible to support under the CEEAG. There are projects, which do not meet the requirements of CEEAG. For example, initial investment is such kind of the investment. The state aid rules do not give to the investors any motivation to realize their investments on the brownfields. Especially in coal regions, the brownfields are ecological burden for the landscape. Example of such brownfield is previous coal mine. That's the reason, why we would very welcome, if the aid for brownfields would be introduced as a new category of aid in the state aid rules.

The easiest way, how to support investments on the brownfields is to grant bonus 35% for projects realized on the brownfields.

Another option is to support the revitalization of the brownfields, which will be used for economic activities after the revitalization. The aid intensity should be 35%.

In line with Regional Aid Guidelines, which will be in force from the year 2022, we suggest to increase the aid intensities by 10 percentage points for territories identified for support from the JTF in a territorial just transition plan of a Member State.

We have hundreds of brownfields of different type and different size in the Moravian-Silesian Region. As you can see in this application: <https://geoportal.msk.cz/Public/Apps/brownfield/index.html>, it is 653 brownfields in the Moravian-Silesian Region all around the region.

You can see examples of brownfields in the Moravian-Silesian Region on the pictures below:



Former coal mine Lazy Orlova



Former coal mine Staric



Former coal mine CSA Karvina

