

7 January 2021

## **The Danish Chamber of Commerce response to consultation regarding revised guidelines for state aid for environmental protection and energy**

The Danish Chamber of Commerce thanks the EU Commission for the opportunity to respond to the consultation regarding revised guidelines for state aid for environmental protection and energy (EEAG).

The Danish Chamber of Commerce supports the EU Green Deal and its complementary policies, such as the modernisation of EEAG. EU Green Deal is necessary to transform EU to a fair and thriving society with a modern, effective, and competitive economy. It is crucial that we continuously analyse and evaluate policies and projects, so they are always relevant and never result in negative consequences. We strongly support the Commissions focus to address new challenges and facilitating change by adjusting legislation in contrast to the introduction of new legislation. Furthermore, the Danish Chamber of Commerce strives for ambitious climate goals that are shared throughout the union. The climate goals need to be effective, increase competitiveness, and more accessible. High and ambitious EU-goals is the key to a successful green transition in Denmark and the EU. In addition, the Danish Chamber of Commerce agrees that the green and digital transition go hand in hand.

Balance in trade and competition between all member states is vital for the EU to reach the climate goals and to avoid other countries obtaining a competitive advantage by being less green. We acknowledge a particular attentiveness should be given to secure that the green transition is supported by regulatory measures. Denmark's leadership role put us in an especially vulnerable position, which can impair Danish competitiveness. Therefore, we need to eradicate climate dumping and carbon leakage which counteract the climate goal's effect.

The Danish Chamber of Commerce's general position is that legislation targeted general problems should be general in nature to secure that the legislation can be applied regardless of industry, sector, or technology. The primary focus needs to be on promoting a level playing field so no individual industry, sector or technology receive a competitive advantage.

We believe a healthy and competitive economy with good framework conditions in EU's single market is necessary so European companies can compete globally and become leaders within green innovation and development. The Danish Chamber of Commerce supports the Commissions

initiative to research opportunities to prevent distortions in the single market from foreign subsidies.

Best regards,

**Ulrich Bang**

Head of Climate and Energy