

Dear reader,

I write you in reaction to the proposal for the 'targeted review of the General Block Exemption Regulation (State aid): revised rules for State aid promoting the green and digital transition'.

Natuur & Milieu (Nature & Environment) is an independent environmental organisation, focused on the Netherlands. We are in particular concerned with the proposed amendments in relation to Investment aid for recharging or refuelling infrastructure (article 36a) and Investment aid for the acquisition of clean vehicles or zero-emission vehicles and for the retrofitting of vehicles (article 36 b). Our concern relates to the obligatory bidding procedure (Sub 4).

Although we understand the underlying arguments for this idea, as it would probably help to bring down purchase costs, we feel such as bidding procedure would be create unnecessarily complexity resulting in higher implementation costs and moreover would raise the threshold for SME's to apply for such schemes.

We are in particular looking at what this means for aid with respect to zero-emission trucks. In this phase of the transition it makes sense to focus on urban logistics. This is logical from a range perspective as well as additional societal benefits such as air pollution. Therefore we feel a max off 25 % of the weighting of the selection criteria for other aspects than price is miss balanced and thus not reflect the current societal needs and phase off the transition.

Finally, it would make sense to include a transitional period for existing grants schemes (published before introduction of these new rules). This is important as companies rely on these schemes to exist for a couple of years. The reliability of the government would diminish if all national government suddenly had to change existing schemes.

We hope you will take these arguments into consideration. If you have any additional question please feel free to ask.

Kind regards,

Natuur & Milieu