

**RESPONSE TO THE PUBLIC CONSULTATION ON THE TARGETED  
REVIEW OF THE GENERAL BLOCK EXEMPTION REGULATION (STATE  
AID): REVISED RULES FOR STATE AID PROMOTING THE GREEN AND  
DIGITAL TRANSITION**

The Spanish Confederation of Bus & Coach Transport (CONFEBUS) takes note of the revision of Regulation (EU) No. 651/2014, which declares certain categories of aid compatible with the internal market in application of articles 107 and 108 of the Treaty and the extension of the scope to include the changes that are necessary, especially in light of the new priorities of the European Commission, the digital and industrial strategies and the "Green Deal". State aid rules will play a crucial role in achieving these goals and, in particular, in the transition towards efficient and sustainable mobility by 2050 and reducing greenhouse gases by at least 55% by 2030.

In this scenario, from CONFEBUS we see the revision of the Regulation in a positive way, as it is highly relevant for the road passenger transport sector. Specifically, it plays a fundamental role in the modernization of the operators' fleets, in a context in which the pandemic has had disastrous effects on the mobility of people and, consequently, on the competitiveness of companies that operate passenger transport services by buses and coaches.

First, we note that the clarification and inclusion of the definitions of "transport sector" and "clean vehicle" is included in the Proposal. This can help increase legal certainty, while at the same time limiting potential disruptions to competition in public procurement processes to a minimum. It seems appropriate to introduce specific conditions for the compatibility of aid in the transport sector, which guarantee that it is proportionate and does not unduly distort competition, but at the same time it allows aid to be important and real incentives for the incorporation of more sustainable fleets in bus and coach transport.

Secondly, the introduction of a new specific category of exemption for investment aid in clean or zero-emission vehicles is supported. The high price of this type of vehicles, and in particular of electric and hydrogen buses, continues to be the main barrier to their acquisition and deployment, especially in a context of economic crisis in which bus and coach companies have become severely affected and prospects for recovery are uncertain. This situation not only endangers the existence of companies in the sector, mostly SMEs, but also the decarbonisation

objectives of road transport, given the strategic role that this sector plays.

Indeed, CONFEBUS has been supporting for years all those measures that contribute to promoting the change towards emission-free mobility and the achievement of decarbonisation objectives through bus and coach transport. But the Proposal must consider that not all clean technologies are mature and that, in some cases, such as heavy long-distance vehicles as coaches, zero-emission technologies do not yet exist. In any case, it should be noted that this review is late as aid for the renewal of more sustainable fleets have been limited by the State aid rules and are preventing them from being used by companies due to the high cost of vehicles and the aid limits currently established.

Thirdly, the objective of the proposal to “strengthen” the provisions on aid for investment in charging and refueling infrastructure is supported. This will also contribute to meeting the objective of decarbonizing road mobility, promoting recharging points throughout the EU.

Finally, it is important to note that the current implementation of the National Recovery and Resilience Plans within the framework of the Next Generation EU Mechanism will coincide with the entry into force of this new Proposal -with approval expected in mid-2022- and, as the Commission has recalled in his evaluation of the National Plans, the aid to companies from the Next Generation funds will be considered State aid and the presentation of the National Plans cannot be equivalent to a formal notification in the terms of article 107 of the TFEU.

Madrid, 3rd December 2021