

Organisation:

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Contribution:

In response to the announced consultations on a proposal to amend the regulation (EU) No. 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty, we apply for complementing the content of article 6 with the exclusion of requirement regarding the existence of an incentive effect or with consideration of the requirement as met for the investment aid granted for promotion of renewable resources energy in projects where preparatory works have been conducted at the construction site (such as land surveying, levelling, access roads building, networks connections etc.) but the construction of the renewable resources electricity generation installation itself has not been commenced yet.

Currently on the market, there are many pending projects in terms of the construction of the renewable resources electricity generation installations within which the first low-input works have been already conducted (what, pursuant to a given member state's law, indicates a formal start of the construction) but whose further realisation, due to a financial gap, depends on a possibility to deploy funds constituting the aid governed by the Regulation referred to at the beginning hereof. Allowing those projects to move forward would substantially shorten the time needed to launch these installations and thus to obtain the assumed effects in terms of the environmental protection, while contributing directly to meeting the environmental objectives of CO2 emission reduction. Possibility to initiate new projects in that field is very limited due to low availability of unoccupied investment sites (large enough area, designation, environmental and technical conditions) as they are mostly used in those projects with preparatory works already conducted.