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European Commission
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Belgium

Public consultation on revised State aid rules for the agricultural and forestry sectors and in rural areas

Directorate-General for Competition — Unit H.6

HT.5788

Participation as a private individual

Dear Sir or Madam,

I am replying to this consultation as a private individual.

I am a forest owner in Bavaria with 85 ha of forest. I therefore already count among the larger forest holdings, bearing in mind that the average forest in Bavaria is about 2.5 ha. However, I cannot provide my own forestry staff to manage this area. I therefore revert to the service provided by the Forest Groups, in Bavaria Waldbesitzervereining — WBV — or FBG. In fact, I am a member of three such a group. This has historical but also practical reasons, as the different FBGs have different profiles and I am best advised by increasing specialist membership. In a merger, I am also working on the Board of Directors. Without the services and advice on the mergers, I would be able to take care of my forest so successfully. It is important to strengthen mergers so that they can be a reliable contributor to rural areas in the long term. This is the only way that a position as a forster in him is attractive and attracts well-trained and competent staff to work on the ground.

[Insert here]

Forestry is very long and long-term. There must therefore be a good and robust relationship of trust with stakeholders. This is the only way for FEZ advisors and forest owners to build stable forests over the years.

I would like to make the following comments on the Commission's Communication and thank you for the opportunity to participate.

1. COMMUNICATION FROM THE COMMISSION

Guidelines for State aid in the agricultural and forestry sectors and in rural areas

The comments in *Chapter 2: Aid in the forestry* sector is fundamentally well-founded.

Private forests in Germany and the EU are characterised by small-scale structures. The average farm size in Germany is 3 ha and in the EU 13 ha. Accordingly, inter-company cooperation within the framework of 'forestry associations' (FWZ) as self-help facilities for forest owners will continue to play an increasing role in the management of small and very small forest ownership. The aim and purpose of the support must be to build as autonomous and structurally efficient FEZs as possible. The economic viability of the FEZs can only be drawn from a wide range of services for the entire range of forest ownership. It should be noted that, unlike in the case of agricultural groups, forestry associations do not primarily function as marketing bodies. Forestry associations provide small and micro-private forests with a range of services, such as support/advice in forest management, training sessions and an information platform on topical policy issues which are essential in particular for future forest conversion. The Vehemenz with that of the Climate change affects existing forests and requires that the owners of small and micro-forests (0.5 to 20 ha) in particular be given technical and technical support and advice by foresters' associations. Adapting forests to climate change and building climate-tolerant forest stands has a priority.

Support for FEZs is essential because:

- Given the small-scale ownership structure, it can only optimise added value and structural development in rural areas;
- This is the only way to obtain the management of small private forest and, therefore, of the Kul turgut Forest with its multifunctional services, who can do so;
- The Paris Agreement on climate change defined the sustainable management of forests and their preservation as an important tool for achieving climate change objectives at the latest;

- Small private forest without technical and financial support does not meet its objectives or other objectives, such as the diversity, stability and performance of the utility, protection and recreation function.
- FEZ staff keep in touch with forest owners and motivate them to actively cultivate — what is not to be underestimated what is otherwise provided by nobody

The decisive factor is that the limitation of the aid to seven years is not sufficient to fulfil the above-mentioned tasks. Accordingly, it would be useful to add the following to *Chapter 2.6 Aid for cooperation in the forestry sector* (566): 'Aid must be limited to a maximum period of seven years, except in the case of activities referred to in point 561(c) and (g)...'.

2. COMMUNICATION FROM THE COMMISSION

Approval of a draft Commission Regulation establishing the compatibility-with the internal market of certain categories of aid in the agricultural and forestry sectors and in rural areas in application of Articles 107 and 108 of the Treaty on the Functioning of the European Union and repealing Commission Regulation (EU) No 702/2014

We expressly welcome the further development of the content of the exemption regulation referred to above. In particular, we would like to highlight **positively** the following points:

The content of **recital 46** indicates that the previous national support measures have already complied with the Commission's requirements. The exemption from notification is an important step towards reducing red tape and a significant gain of time compared to the notification procedure.

In the interests of *simplification and procedural economy*, the presentation in **recital 51** recognises the need for extensive EAFRD measures to be exempt from the notification requirement. This makes it possible to take account of the diversity of forests and their management in the Member States.

Article 11(1) is fully supported, as the 20-day scheme contributes significantly to legal certainty for the beneficiaries of the aid.

Thank you very much for taking into account our comments from practice.

Yours sincerely,

[Insert here]

A handwritten signature in blue ink, reading "Hans Ludwig grains". The script is cursive and fluid, with the first name "Hans" and last name "Ludwig" clearly legible, followed by the word "grains".

Hans Ludwig grains