

I am writing on behalf of **the Baskegur Association** to provide you with comments regarding the **consultation of the Draft Regulation declaring certain categories of aid in the agricultural and forestry sectors in rural areas compatible with the internal market in application of Articles 107 and 108 of the Treaty on the Functioning of the European Union and repealing Regulation (EU) No 702/2014.**

- Article 42 (7) of the [draft](#) Regulation provides that:

“Investments related to the use of wood as a raw material or energy source shall be limited to all operations prior to industrial processing”.

- Article 2 of the [draft Regulation](#) defines **pre-industrial processing operations** as: “operations prior to industrial processing”: any activity carried out until the wood reaches the sawmill, when the maximum annual capacity is 5 000 m³, with an absolute limit of 10 000 m³ for sawing”.

Under these conditions, we understand that in the new period:

- There will be no change for forest harvesting companies compared to the RDP 2014-2020 period, but there will be no change for sawmills.
- In the Basque Country, without affecting a large number of sawmills, it would restrict access to aid to those which are more viable in the future, restricting by de minimis application the possibility of continuing its modernisation and consolidation as a source of employment and traction of economic activity in rural populations.

In the light of the above, REQUESTS:

Amend the definition **in Article 2 “operations prior to industrial processing”**: *“any activity consisting of the **first processing of wood, prior to industrial processing leading to final processed products and provided that they are carried out on a small scale.** This condition of processing shall be expressly established through the size of the enterprise, so that the beneficiary is an SME, a micro-enterprise or a small or medium-sized enterprise as defined in the Recommendation.*

Commission Directive 2003/361/EC’.

In this way, the National Framework of the previous RDP can be maintained.

Carefully,

Oskar Azkarate
Director of Baskegur



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