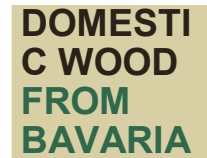




FBG Halblechthal w.V.  
At Mühlbach 46, D — 87642 Neckplate



European Commission  
Directorate-General for Competition  
Unit H.6  
1049 Bruxelles/Brussel  
**Belgique/Belgie**  
Ref.: HT.5788

Please include in your reply

Your characters, your message of our character

Mr Riedl

Date

11.03.2022

**Subject: “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**

Dear Sir or Madam,

we are a forestry association of around 320 members and 6 000 hectares of forest, except in mountain areas with difficult topographical conditions. Jointly implemented forestry economic measures are the only way to conserve the mountain forest in an environmentally and economically viable way.

We welcome the possibility of providing feedback on the following two documents:

**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 to be welcomed in principle.

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 farmers, the forestry associations do not primarily function as market organisations. Forestry associations provide small and micro-private forests with a range of services, such as support/advice in forest management, training events and an information platform on current policy issues, which are essential in particular for the forthcoming forest conversion. The *VeheMenz*, with which climate change affects existing forests, requires that, in particular, small- and micro-forests (0.5 to 20 ha) receive technical support and advice from the forestry industry. Adaptation of forests to climate change and building climate-tolerant forest stands

are a priority.

1st Chair: Winfried Schwarz  
Jurisdiction: Neck plate

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www.fbg-halblechtal.de

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Support for FEZs is essential because:

- Given the small-scale ownership structure, it can only optimise added value and structural development in rural areas;
- It is the only way to maintain the management of small private forest and, therefore, the multifunctional nature of forest assets;
- The sustainable management of forests and their preservation has been defined by the Paris Agreement at the latest as an important tool for achieving climate change objectives;
- Small-scale private forest without technical and financial support does not meet these objectives, nor does it meet other objectives such as diversity of functions, stability and performance of the beneficial, protective and recreational function;

The decisive factor is that the limitation of the aid to seven years is not sufficient to meet the above-mentioned requirements. Accordingly, it would be useful to *add the following point (566) to Section 2.6 of aid for cooperation in the forestry sector*: ‘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 declaring certain categories of aid in the agricultural and forestry sectors and 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 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 economic efficiency*, the description in **recital 51** recognises the need for far-reaching EAFRD independent measures to be exempted from the obligation to notify. 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 makes a significant contribution to legal certainty for the beneficiaries.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Florian Riedl', is positioned above the typed name.

(Florian Riedl), n.e.c. Winfried Schwarz