

I am writing on behalf of the Ourense de Madeira Provincial Association (APROUMA) 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 believe that in the new period it would limit access to aid to sawmills that are more viable in the future, restricting by de minimis application the possibility of continuing to modernise and consolidate them as a source of employment and traction of economic activity in rural populations.

A clear indication of the very restrictive nature of the 10.000 m³ limit can be seen from the fact that, 40 years ago, in its work on ‘small and medium-sized sawmills in developing countries, a guide to their planning and establishment (1982)’ these sawmills were defined as undertakings with consumption of 5.000-20.000 m³ per year.

Therefore, taking as a reference the National Framework for the EAFRD programming period 2014-2020, **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 laid down by 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 Commission Recommendation 2003/361/EC.”*

Carefully,

Elier Ojea Ureña
PRESIDENT

APROUMA
 Costa Vella Business Centre

NOTICE ON CONFIDENTIALITY: This message is addressed exclusively to the addressee and may contain inside or confidential information. If you are not the named consignee, you are notified that unauthorised use, disclosure or copying is prohibited under the legislation in force.

DATA PROTECTION: We would like to inform you that the personal data you provide on a voluntary basis through our means of collecting information will be incorporated into our automated or manual processing, the purposes of which are: Managing contacts with partners, drawing up budgets and invoices for services/products; compliance with accounting and tax obligations; labour management and other management with workers, commercial management by the OURENSÁ PROVINCIAL ASSOCIATION DA MADEIRA (APROUMA), with CIF: G32019259 without prejudice to the exercise of your rights of access, rectification, erasure, objection, restriction and portability to the processing of your personal data in writing (always proving your identity) addressed to PROVINCIAL OURENSÁ ASSOCIATION DA MADEIRA (APROUMA) in RUA Amio 114 — EMPRESARIAL COSTA VELLA, 15707- SANTIAGO DE COMPOSTELA (A CORUÑA).