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To:

European Commission
Directorate-General for Competition, Unit A3
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BIL Sweden's response to EUCOM's public consultation on the targeted review of the General Block Exemption Regulation (State aid): revised rules for State aid promoting the green and digital transition

BIL Sweden appreciate the opportunity to submit comments on the targeted review of the General Block Exemption Regulation (State aid): revised rules for State aid promoting the green and digital transition to the Commission.

BIL Sweden's comments

BIL Sweden welcomes changes in GBER that promote green and digital transition...

BIL Sweden shares the European Commission's assessment that the general block exemption (GBER), the part of state aid that does not need to be notified, should be reformed to promote the green and digital transition in the EU.

To enable faster and more predictable decisions in the member states linked to climate change and digitalisation is crucial for both Sweden's and the EU's global competitiveness as well as to be able to achieve a climate policy in line with the Paris Agreement and the EU's goal of becoming carbon neutral by 2040.

BIL Sweden is accordingly very positive that the EU Commission is now reviewing the General Block Exemption Regulation (GBER).

A reform of the state aid rules can imply better development opportunities for European industry, including the Swedish automotive industry, which benefits climate change in Sweden and the EU as well as in the global export markets.

...without trade barriers and/or reduced competitiveness

The automotive industry is global, and the technology development moves very fast. The Swedish vehicle manufacturers, as well as the European vehicle manufacturers, export their products both to countries within and outside the EU.

BIL Sweden believes that it is important that GBER is technology-neutral, that it is long-term and that it does not result in trade barriers and/or reduce the competitiveness of European companies.

Enable early testing/demo in the EU member states

For the Swedish as well as the European automotive industry, faster decisions in matters concerning for example charging infrastructure and the expansion of digital infrastructure imply an opportunity to try out new products at an early stage in the EU member states.

BIL Sweden's members believe that it is a great advantage to be able to test new products and services in Sweden, having close proximity to the automotive industry's research and development centers.

Renewable electricity and hydrogen

Article 36a, paragraphs 2 och 3, states that ”This Article shall only cover aid granted for recharging or refuelling infrastructures that supply vehicles with electricity or with renewable or low-carbon hydrogen for transport purposes.”. “The eligible costs may also cover the investment costs of integrated on-site production of renewable electricity or the investment costs of storage units for storing renewable electricity or renewable or low-carbon hydrogen.”.

BIL Sweden believes that the scope of eligible costs is good and welcomes that storage of renewable electricity and hydrogen is also included. BIL Sweden supports that the direction should be towards renewable energy carriers, both for electricity and hydrogen, in order to receive state support and thus be able to enable real climate change.

Destination charging

Article 36a, paragraph 7, states that ”Where the recharging or refuelling infrastructure is open for access by users other than the aid beneficiary or beneficiaries, aid shall only be granted for the construction, installation, upgrade or extension of recharging or refuelling infrastructure ~~accessible to the public and~~ providing non-discriminatory access to users, including in relation to tariffs, authentication and payment methods and other terms and conditions of use. The fees charged to users other than the aid beneficiary or beneficiaries for using the recharging or refuelling infrastructure shall correspond to market prices.”.

BIL Sweden believes that ”accessible to the public and” (the crossed-out text above) shall be deleted from the paragraph, this to include/enable destination charging, e.g. at logistics terminals, bus depots, ports, etc.

If “accessible to the public and“ will not be deleted, destination charging must be ensured separately, e.g. as set out in the proposal for a regulation on the deployment of alternative fuels infrastructure (AFIR), and repealing Directive 2014/94/EU, the introduction (17) ”A recharging or refuelling point located on a private property that is accessible to the general public should be considered as publicly accessible also in cases where access is restricted to a certain general group of users, for example to clients.”.

All forms of ownership

Article 36b ”Investment aid for the acquisition of clean vehicles or zero-emission vehicles and for the retrofitting of vehicles”.

BIL Sweden believes that it is beneficial that investment aid for the acquisition of clean vehicles or zero-emission vehicles and for the retrofitting of vehicles is included. We interpret the text as it is covering all forms of ownership, including operational leasing and rental fleets, which we support.

Construction Equipment

BIL Sweden believes that construction equipment should be included, pervading, in the regulations.

BIL Sweden is pleased to be available for further discussions or any clarifications.

Maria Backlund

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BIL Sweden