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Subject: State Aid SA.63699 (2021/N) - Spain
RRF – Aid to professional operators investing in protection facilities
against vector insects

Excellency,

The European Commission ("the Commission") wishes to inform Spain that, having examined the information supplied by your authorities on the State aid measure referred to above, it has decided not to raise objections to the relevant measure as it is compatible with the internal market pursuant to Article 107(3)(c) of the Treaty on the Functioning of the European Union ("TFEU").

The Commission has based its decision on the following considerations:

1. PROCEDURE

- (1) By letter of 25 June 2021, registered by the Commission on the same day, Spain notified, according to Article 108(3) TFEU, the above-mentioned measure.
- (2) The Commission sent a request for additional information to the Spanish authorities on 6 July 2021, which the Spanish authorities answered by e-mails of 6 and 7 July 2021, registered by the Commission on the same dates.
- (3) Spain exceptionally agrees to waive its rights deriving from Article 342 TFEU, in conjunction with Article 3 of Regulation 1/1958¹, and to have this decision adopted and notified in English.

¹ Regulation No 1 determining the languages to be used by the European Economic Community, OJ 17, 6.10.1958, p. 385

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2. DESCRIPTION OF THE MEASURE

2.1. Title

- (4) RRF- Aid to professional operators investing in protection facilities against vector insects

2.2. Objective

- (5) The objective of the notified scheme is to finance investments of a preventive nature in the field of plant health, to prevent vector insects from entering the production nurseries of the various types of reproductive plant material (RPM) that can be affected by, among others, the following quarantine pests: *Xylella fastidiosa*, *Bursaphelenchus xilophilus*, HLB or greening citrus fruit and vine flavescence dorée.

2.3. Legal basis

- (6) Draft Royal Decree ---/2021, laying down the regulatory bases for granting subsidies for biosecurity investments for the improvement or construction of cleaning and disinfection centres for livestock vehicles and for investments in biosafety in nurseries undertaken by certain producers of plant reproductive material (“Proyecto de Real Decreto ---/2021, por el que se establecen las bases reguladoras para la concesión de subvenciones destinadas a inversiones en materia de bioseguridad para la mejora o construcción de centros de limpieza y desinfección de vehículos de transporte por carretera de ganado, así como para inversiones en bioseguridad en viveros, acometidas por determinados productores de materiales vegetales de reproducción”).

2.4. Duration

- (7) From the date of the notification of the present decision to the Spanish authorities until 31 December 2023. The notified aid scheme will be adapted to bring it in line with the State aid rules applicable after the expiry the 2014 European Union Guidelines for State aid in the agricultural and forestry sectors and in rural areas² (“the Guidelines”).

2.5. Budget

- (8) The budget of the notified measure is EUR 19 000 000, totally made available through the Recovery and Resilience Facility (RRF)³. The granting authority is the Ministry of Agriculture, Fisheries and Food – Directorate General for Health and Agrarian production.

2.6. Beneficiaries

- (9) The beneficiaries of the notified scheme are natural or legal persons that are primary producers, of all sizes, meeting the following requirements:

² OJ C 204 of 1.7.2014, p. 1. Amended by the Notices published in OJ C 390, 24.11.2015, p. 4; OJ C 139, 20.4.2018, p. 3, OJ C 403, 9.11.2018, p. 10 and OJ C 424, 8.12.2020, p. 30.

³ Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility, OJ L 57, 18.2.2021, p. 17.

- (a) being a professional operator registered as producer in the Register of Professional Plant Operators and, therefore, authorised by the competent authority of the Autonomous Community to produce RPM;
 - (b) being a producer of RPM that can be affected by, among others, these quarantine pests transmitted by vector insects: *Xylella fastidiosa*, *Bursaphelenchus xilophilus*, *HLB* or *citrus greening and Flavescence dorée*.
 - (c) being a RPM producer in any of the following production sites:
 - initial category of fruit and vine mother plant fields and base category of citrus mother plant fields;
 - base category of fruit and vine mother plant fields (no citrus fruit), certified, *Conformitas Agraria Communitatis* (CAC) and standard;
 - nurseries for fruit plants and vines of certified categories, CAC and standard;
 - fields of reproductive material of aromatic and ornamental species;
 - mother plant fields for the production of forest reproductive material;
 - forest nurseries;
 - seed production fields of horticultural species of pre-base, base and standard categories;
 - vegetable propagating material fields.
 - (d) submit an application for a grant for investment in biosecurity in facilities for protection against vector insects, in the Autonomous Community where the investment is carried out.
- (10) The number of beneficiaries is estimated to be between 501 and 1000.
- (11) Undertakings in difficulty within the meaning of point (35)15 of the Guidelines are not eligible for the aid, except for undertakings that were not in difficulty on 31 December 2019 but became in difficulty in the period from 1 January 2020 until 30 June 2021. Undertakings still having at their disposal an earlier unlawful aid that was declared incompatible by a Commission decision will not benefit from the aid.

2.7. Description of the measure

- (12) Spain has explained that the notified measure is an aid scheme within the meaning of point (35)4 of the Guidelines.
- (13) The notified scheme is intended to grant aid for investments to prevent the entry of vector insects from the main plant pests in nurseries growing RPM. It is therefore essential to put in place biosecurity measures to protect the production of RPM of initial and basic categories of plant species that can be affected by, among others, these quarantine pests transmitted by vector insects: *Xylella*

fastidiosa, Bursaphelenchus xilophilus, HLB or citrus greening and Flavescence dorée.

- (14) The notified scheme is not part of any of the 18 Rural Development Programmes (RDP) for Spain for 2014-2020⁴ but the Spanish authorities provided information to show that it is consistent with them, closely related to the Common Agricultural Policy (CAP) and in line with the Farm to Fork Strategy established by the European Commission⁵. This Strategy states that the EU's objectives are to reduce the environmental and climate footprint of its food system and strengthen its resilience, ensure food security against climate change and biodiversity loss, and lead a global transition to competitive sustainability from farm to fork and to take advantage of new opportunities. The investments to be financed by the notified scheme contribute to the afore-mentioned objectives.
- (15) The Spanish authorities explained that the investments financed by the scheme are not expected to have an environmental impact; they aim at the prevention and risk mitigation of damage caused by plant pests.
- (16) The aid will be granted in the form of direct grants. The Spanish authorities explained that this is the most appropriate form as the eligible investments are costly, linked to a certain objective (greater protection of nurseries from vector insects) and have a social impact (due to the importance of the sector in the Spanish economy).
- (17) The beneficiary will submit an application for the aid to the granting authority before wherever work on the project or activity has started, which includes at least the applicant's name and the size of the undertaking, a description of the project or activity, including its location and start and end dates and the amount of aid needed to carry it out and the eligible costs. Large undertakings applying for aid will explain in the application what would happen without aid (i.e. the counterfactual scenario) and submit documentary evidence in support of the counterfactual described in the application. The granting authority will carry out a credibility check of the counterfactual scenario and confirm that the aid has the required incentive effect.
- (18) The following investments are eligible under the scheme:
 - (a) installation or modernisation of structures and meshes in RPM production sites to protect them against the introduction of vector insects of quarantine pests;
 - (b) installation of all or some of the following additional infrastructures, provided that the final outcome of the investment provides for an effective system of protection against vector insects of quarantine pests:
 - a double-door system (including the inner door) wide enough to allow the entrance of the machinery necessary to operate inside the installations;

⁴ Still in force, awaiting adoption of the following instruments.

⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, COM (2020) 381 final, of 20.05.2020.

- installation of a perimeter outer edge, of at least one metre wide and covered with impermeable material;
 - installation of a meshing network in the gangway and ridges openings, and lateral and roof ventilation;
 - isolation of open gutters for water and implementation of a no-return system;
 - gastight insulation in the joints with the windows;
 - any other innovation or improvement aimed at the isolation of plant material from vector insects;
- (c) facilities for thermotherapy treatment equipment in vine nurseries.
- (19) The draft legal basis submitted by the Spanish authorities (cf. recital (6)) covers, under Chapter II, investments that are not listed under recital (18) above. These are investments in biosecurity for the improvement or construction of centres for the cleaning and disinfection of livestock road vehicles that are not part of the notified scheme; they are intended for other beneficiaries different from those stated under recital (9) and will be financed with *de minimis* aid⁶.
- (20) The eligible cost are the following:
- (a) the purchase or lease purchase of machinery and equipment up to the market value of the assets;
 - (b) general costs linked to the expenditure referred to in point (a) above, such as architect, engineer and consultation fees, fees relating to advice on environmental and economic sustainability, including feasibility studies; feasibility studies remain eligible costs even where based on their results, no expenditure under point (a) is incurred;
 - (c) the acquisition or development of computer software and acquisition of patents, licences, copyrights and trademarks;
 - (d) the costs of specific prevention actions aiming at reducing the consequences of the probable plant pests referred to under recital (13).
- (21) The following cost are not eligible under the scheme:
- (a) the purchase of production rights, payment entitlements and annual plants;
 - (b) the planting of annual plants;
 - (c) the purchase of animals;

⁶ Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid, OJ L 352, 24.12.2013, p. 1, as amended, or Commission Regulation (EU) No 1408/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid in the agriculture sector, OJ L 352, 24.12.2013, p. 9.

- (d) investments to comply with Union standards in force;
- (e) costs, other than those referred to under recital xx above (eligible costs) connected with leasing contracts, such as lessor's margin, interest refinancing costs, overheads and insurance charges;
- (f) working capital.
- (22) The amount of the grant will depend on the investment made, the maximum eligible investment being EUR 120 000 per installation. The maximum grant per eligible investment is EUR 84 000. The maximum aid intensity under the notified scheme is 80%.
- (23) The Spanish authorities confirmed that the investments at which the aid is aimed do not increase production beyond restrictions or exceed limitations on Union support at the level of individual undertakings, holdings or processing plants set by a common organisation of the market, including direct support schemes, financed by the European Agricultural Guarantee Fund (EAGF). The investments are carried out by one or more beneficiaries and are not linked to the production of energy from renewable sources or the production of biofuels on holdings.
- (24) The maximum aid amount must be calculated by the granting authority when granting the aid; the eligible costs must be supported by documentary evidence, which should be clear, specific and contemporary and, for the purposes of calculating the aid intensity and the eligible costs, all figures used must be taken before any deduction of tax or other charge. Value added tax (VAT) is not eligible for aid.
- (25) When granting aid to large enterprises under the notified scheme, the Spanish authorities explained that they must ensure that the aid amount is limited to the minimum based on a 'net-extra cost approach'. The aid amount should not exceed the minimum necessary to render the project sufficiently profitable. Furthermore, they must ensure that the aid amount corresponds to the net extra costs of implementing the investment in the area concerned, compared to the counterfactual scenario in the absence of aid.
- (26) The aid can be cumulated with aid granted under other schemes for the same eligible costs only if it does not exceed the applicable limits set under the Guidelines. The aid cannot be cumulated neither with *de minimis* aid nor with aid for the compensation of material damage referred to in Sections 1.2.1.1, 1.2.1.2 and 1.2.1.3 of Part II of the Guidelines.
- (27) The Spanish authorities informed the Commission that in order to comply with the transparency requirement the publication of the aid scheme and the individual aid grants above 60 000 EUR will be done through the following web page: <https://www.pap.hacienda.gob.es/bdnstrans/GE/es/convocatorias>. The Spanish authorities confirmed that the information will be published after the decision to grant the aid has been taken, it shall be kept for at least ten years and it shall be available to the general public without restriction.

3. ASSESSMENT

3.1. Existence of aid - Application of Article 107(1) TFEU

- (28) According to Article 107(1) TFEU, "[s]ave as otherwise provided in the Treaties, any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods shall, in so far as it affects trade between Member States, be incompatible with the internal market".
- (29) The qualification of a measure as aid within the meaning of this provision therefore requires the following cumulative conditions to be met: (i) the measure must be imputable to the State and financed through State resources; (ii) it must confer an advantage on its recipient; (iii) that advantage must be selective; and (iv) the measure must distort or threaten to distort competition and affect trade between Member States.
- (30) The measure in question is imputable to the State as it is based on the legal act mentioned in recital (6). It is financed through State resources since it is paid from public funds (cf. recital (8)).
- (31) The notified measure confers an advantage on its beneficiaries in the form of direct grants (cf. recital (16)). The measure thus relieves those beneficiaries of costs which they would have to bear under normal market conditions.
- (32) The aid is selective because other undertakings in a comparable legal and factual situation in light of the objective pursued by the measure in the agricultural sector (such as processing and marketing undertakings) or in other sectors, are not eligible for aid and thus will not receive the same advantage. The notified measure therefore gives only certain undertakings (cf. recitals (9) to (11)) a selective economic advantage, by strengthening their competitive position on the market. According to the case law of the Court of Justice, the mere fact that the competitive position of an undertaking is strengthened compared to other competing undertakings, by giving it an economic benefit which it would not otherwise have received in the normal course of its business, points to a possible distortion of competition⁷.
- (33) Pursuant to the case law of the Court of Justice, aid to an undertaking appears to affect trade between Member States where that undertaking operates in a market open to intra-EU trade⁸. The beneficiaries of aid operate in the agricultural sector, where intra-EU trade takes place⁹. The sector concerned is thus open to competition at EU level and therefore sensitive to any measure in favour of the production in one or more Member States. Therefore, the present measure is liable to distort competition and to affect trade between Member States.

⁷ Judgment of the Court of 17 September 1980 in Case 730/79 Philip Morris Holland BV v Commission of the European Communities, ECLI:EU:C:1980:209.

⁸ See in particular the judgment of the Court of 13 July 1988 in Case 102/87 French Republic v Commission of the European Communities, ECLI:EU:C:1988:391.

⁹ In 2019, the Spanish trade with agricultural commodities with EU countries for imports amounted to EUR 19 761 000 and for exports to EUR 34 704 000. Source: "European Commission, Agricultural Policy Perspectives, Spain: agriculture statistical factsheet – June 2020". Disponible sur https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/agri-statistical-factsheet-es_en.pdf).

- (34) In light of the above, the conditions of Article 107(1) TFEU are fulfilled. It can therefore be concluded that the proposed measure constitutes State aid within the meaning of that Article.
- (35) Due to the fact that the notified measure is an act on the basis of which, without further implementing measures being required, individual aid awards may be made to undertakings defined within the act in a general and abstract manner (cf. recitals (6) and (9) to (11)), the Commission considers that it is an aid scheme within the meaning of point (35)4 of the Guidelines.
- (36) The scheme may only be considered compatible with the internal market if it can benefit from one of the derogations provided for in the TFEU.

3.2. Lawfulness of the aid – Application of Article 108(3) TFEU

- (37) The aid scheme was notified to the Commission on 25 June 2021. It has not been implemented yet (cf. recital (6)). Therefore, Spain has complied with its obligation under Article 108(3) TFEU.

3.3. Compatibility of the aid

- (38) The aid may only be considered compatible with the internal market if it can benefit from one of the derogations provided for in the TFEU.

3.3.1. Application of Article 107(3)(c) TFEU

- (39) Under Article 107(3)(c) TFEU, an aid may be considered compatible with the internal market, if it is found “to facilitate the development of certain economic activities or of certain economic areas, where such aid does not adversely affect trading conditions to an extent contrary to the common interest”.
- (40) Therefore, compatible aid under that provision of the Treaty must (i) contribute to the development of a certain economic activity and (ii) should not distort competition in a way contrary to the common interest. The aid must also comply with the relevant Union State aid rules.
- (41) In the case at stake, the Commission has assessed the compatibility of the measure in light of the conditions laid down in the Guidelines (cf. section 3.3.2 below).
- (42) The Commission notes that the scheme aims at financing investments of a preventive nature in the field of plant health.

3.3.2. Application of the Guidelines

- (43) As regards the notified aid scheme, Part I “Common provisions”, Part II, Chapter 1, Sections 1.1.1 “Aid for investment” and 1.1.1.1 “Aid for investment in tangible assets and intangible assets on agricultural holdings linked to primary agricultural production” and Part III of the Guidelines apply.
- (44) Point (135) of the Guidelines states that the Commission will consider aid for investment in tangible assets and intangible assets on agricultural holdings linked to primary agricultural production compatible with the internal market under Article 107(3)(c) TFEU if it complies with the common assessment principles, the

general condition for investment aid set out in point (134) and with the conditions under points (136) to (155) thereof.

3.3.2.1. Common Assessment Principles

Objective of the measure

- (45) The objective of the notified scheme, as indicated in recital (5), is to finance investments of a preventive nature in the field of plant health. Therefore, it ensures viable food production and contributes to promote the efficient and sustainable use of resources in order to achieve intelligent and sustainable growth in line with point (43) of the Guidelines. Furthermore, in line with points (44) and (47) of the Guidelines, the proposed scheme is a rural development-like measure, which is not part of the RDPs for Spain but the Spanish authorities provided information to prove that it is consistent with the objectives and priorities of the RDP and it is closely related to the CAP, without being incompatible with the common organization of the market (cf. recital (14)).
- (46) In compliance with point (52) of the Guidelines, the Spanish authorities have explained that the investments financed by the scheme are not expected to have an environmental impact as they aim at the prevention and risk mitigation of damage caused by plant pests (cf. recital (15)).

Need for State intervention

- (47) The notified aid scheme fulfils the specific requirements laid down in Sections 1.1.1 and 1.1.1.1 (cf. recitals (60) to (68)) of Part II of the Guidelines and, therefore, point (55) of the Guidelines is complied with.

Appropriateness of aid

- (48) As stated under recital (47) above, the notified scheme complies with the specific requirements laid down in the relevant Sections of Part II of the Guidelines and, therefore, it is an appropriate policy instrument which is necessary to contribute to the development of certain economic activities as the production of viable food by the prevention and risk mitigation of damage caused by plant pests, in line with point (57) thereof.
- (49) According to the information submitted by Spain, the aid under the notified scheme is granted through direct grants (cf. recital (16)). The Commission considers that, taking into account the objective of the scheme (cf. recital (5)), this form of aid is the most appropriate to achieve it.

Incentive effect and need for aid

- (50) The notified scheme has an incentive effect in compliance with point (66) of the Guidelines, as the proposed aid changes the behaviour of the beneficiaries in such a way that it engages them in additional activity contributing to the development of the sector in which they would have normally not engaged without the aid or in which they would have engaged only in a restricted or different manner.
- (51) It follows from recital (17) above that, in compliance with point (70) of the Guidelines, work on the relevant activity will only start after the beneficiary has

submitted the aid application and that the aid application will include the elements required under point (71) of the Guidelines. The specific requirements for large undertakings stated under points (72) and (73) of the Guidelines are fulfilled (cf. recital (17)).

Proportionality of the aid

- (52) According to point (82) of the Guidelines, for the aid to be proportionate, the aid amount should not exceed the eligible costs. As described below, the eligible costs and aid intensities respect the requirements set out in Section 1.1.1.1 of Part II of the Guidelines (cf. recitals (63), (64) and (66)), in line with points (82), (83) and (84) thereof.
- (53) The notified scheme is in line with point (85) of the Guidelines on the calculation of the maximum aid intensity and aid amount (cf. recital (24)). For investment aid to large undertakings, the specific requirements stated under points (96) and (97) of the Guidelines are fulfilled too (cf. recital (25)).
- (54) The provisions of points (99), (100) and (104) of the Guidelines with regard to cumulation are complied with (cf. recital (26)).

Avoidance of undue negative effects on competition and trade and balancing test

- (55) Pursuant to point (113) of the Guidelines, the negative effect on competition and trade is limited to the minimum and the aid has positive effects on the development of the sector, if it fulfils the conditions set out in the applicable Section of Part II of the Guidelines and does not exceed the relevant maximum aid intensities specified therein. The notified aid scheme fulfils these requirements as explained under recitals (60) to (68).
- (56) Moreover, the measure has positive effects by the prevention and risk mitigation of damage caused by plant pests (cf. recital (5)) and it is closely related to the CAP without being incompatible with the common organization of the market (cf. recital (14)).
- (57) The Commission concludes that the scheme has positive effects in terms of facilitating and economic activity while not leading to undue distortions of competition and trade. It follows that the positive effects of the aid outweigh its negative effects on competition and trade.

Transparency

- (58) The notified scheme fulfils the relevant transparency requirements stated under points (128) and (131) of the Guidelines (cf. recital (27)).
- (59) On the basis of the above, the Commission concludes that the notified scheme complies with the common assessment principles under Part I of the Guidelines.

3.3.2.2. Specific assessment according to the category of aid

Section 1.1.1. 'Aid for investment' – 1.1.1.1 "Aid for investment in tangible assets and intangible assets on agricultural holdings linked to primary agricultural production"

- (60) Aid for investment granted under the notified scheme complies with points (133) and (134) of the Guidelines (cf. recitals (9) and (23)).
- (61) In compliance with point (136) of the Guidelines, aid for investments in tangible assets and intangible assets on agricultural holdings under the notified scheme is linked to the primary agricultural production (cf. recital (9)) and the investment is carried out by one or more beneficiaries (cf. recital (23)).
- (62) Points (137) to (142) are not applicable to the notified scheme, as it is not linked to the production of energy from renewable sources or the production of biofuels on holdings (cf. recital (23)).
- (63) According to the information submitted by the Spanish authorities, the investments covered by the notified scheme pursue the prevention and risk mitigation of damage caused by plant pests, in compliance with point (143)(e) of the Guidelines (cf. recital (18)). They cover the costs specified under point (144)(b), (c), (d) and (g) of the Guidelines (cf. recital (20)).
- (64) In compliance with point (145) of the Guidelines, aid is not granted in respect of the costs stated thereof (cf. recital (21)).
- (65) Points (146) to (151) of the Guidelines are not applicable to the notified scheme as none of the costs covered by those points are eligible for aid.
- (66) The Spanish authorities indicated, in compliance with point (155) of the Guidelines and as a derogation from the ceiling of eligible costs laid down in point (152)(a) and (e) thereof, that the maximum aid intensity for investments referred to in point (143)(e) must not exceed 80% of the eligible costs (cf. recital (22)).
- (67) Neither point (153) on intensity increases, nor point (154) of the Guidelines on investments with environmental objectives, apply to the notified scheme.
- (68) On the basis of the above, the Commission concludes that the provisions set out in Sections 1.1.1 and 1.1.1.1 of Part II of the Guidelines are complied with.

3.3.2.3. Other considerations

- (69) The Commission notes that the scheme meets the requirements stated under points (26) and (27) of the Guidelines concerning undertakings in difficulty and undertakings which are subject to an outstanding recovery order following a previous Commission decision declaring an aid illegal and incompatible with the internal market (cf. recital (11)).
- (70) It follows from recital (7) that the duration requirement under point (719) of the Guidelines is met.
- (71) The Spanish authorities commit to adapt the notified aid scheme to the State aid rules applicable after the expiry of the Guidelines (cf. recital (7)).

3.3.2.4. Conclusion with regard to the compatibility of the measure

- (72) In light of the above, the Commission concludes that the aid facilitates the development of an economic activity and does not adversely affect trading

conditions to an extent contrary to the common interest. Therefore, the Commission considers the aid compatible with the internal market based on Article 107(3)(c) TFEU and on the relevant provisions of the Guidelines on measures for the development of the agricultural sector.

4. CONCLUSION

The Commission has accordingly decided not to raise objections to the aid on the grounds that it is compatible with the internal market pursuant to Article 107(3)(c) TFEU.

If this letter contains confidential information which should not be disclosed to third parties, please inform the Commission within fifteen working days of the date of receipt. If the Commission does not receive a reasoned request by that deadline, you will be deemed to agree to the disclosure to third parties and to the publication of the full text of the letter in the authentic language on the Internet site: <http://ec.europa.eu/competition/elojade/isef/index.cfm>.

Your request should be sent electronically to the following address:

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Yours faithfully,

For the Commission

Margrethe VESTAGER
Executive Vice-President