

**From:** [EPF](#)

**To:** ["EPF President & Managing Committee"](#)

**Date:** 9/29/2011 2:04:28 PM

**Subject:** Managing Committee Item IX - State Aid to Social Housing - SGEI Debate - epf11-100

**Attachments:** UEPCposition paper on the reform of the EU State Aid Rules on SGEI.docx

To: President, Managing Committee

**14 October Managing Committee Item IX - The EU Debate on Services of General Economic Interest – Freedom from Internal Market state aid rules for social and municipal housing companies competing with the private sector for middle income tenants**

As announced, please find attached the paper of the UEPC's lawyers on the Commission's proposals on reform of EU state aid rules. It is a superbly crafted document, raising questions that are of universal interest but particularly crucial to Belgian and French private landlords, investors and developers and possibly also to the Dutch.

This paper is meant for submission to the Commission in a consultation that closes on 16 October. I recommend that it be submitted without change by 'EPF in alliance with UEPC' and shall do so unless objections are raised **by Monday 3 October at 14:00**.

In the event of any objections, we can work at getting an agreement at the Managing Committee meeting for submission to the Commission same day. However, this should not be necessary, as the lawyers' comments are well grounded and sound, and submitting such a document to the Commission in a consultation process corresponds to the objective EPF/UEPC are espousing of avoiding public conflicts with the social housing world without, however, sacrificing EPF/UEPC members' interests.

This document will also be an excellent underpinning for the discussions on 14 October.

Sincerely

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Director General

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