

# Reply to consultation on De-minimis Aid

## Introduction

SMEUnited welcomes the possibility to **provide** feedback and comments **on the draft for a revised regulation on "State aid - exemptions for small amounts of aid (de minimis aid).**

Even if we agree that the current regulation is in principle fit for purpose as the result of the fitness check in 2019 has shown, SMEUnited and its members want to restate some suggestions to improve the current regulation further, when reviewed for 2023:

## Increase of threshold for de-minimis aid

SMEUnited welcomes the intention to increase of the de-minimis threshold in line with the inflation rate to ensure that the real amount of aid provided under the de-minimis regulation is stable. The vast majority of our members agrees with the suggested amount on EUR 275.000 as new threshold for de-minimis aid.

An increase in line with the inflation rate avoids a negative impact on competition between SMEs at local and regional level.

## Mandatory register

SMEUnited supports the introduction of a mandatory register, which would provide more transparency about who receives such aid and - even more important - it will reduce the administrative burden for companies who currently use a self-declaration system. However, such a register - especially if it is a public one - has to ensure that competitors and other companies will not have access to business secrets of other companies via such a register. Therefore, such a register should only be accessible for provider of State aid or the public available information may only cover the amount but not the purpose of a specific aid provided.

Furthermore, some national members complain about the high burden related to very small amounts of aid (i.e. seminars, advisory services, etc.), which often are below € 1000 and create fully unproportionate administrative burdens for both the SMEs and the provider of aid (i.e.

craft chambers) without risking to come even close to the overall threshold for de-minimis. In case the introduction of a mandatory register fails again, the European Commission should provide a less burdensome solution for this very small amounts of aid.

## Calculation of gross grant equivalents

SMEUnited welcomes the inclusion of a calculation method for the gross grant equivalent of de-minimis aid provided in form of guarantees and loans in the revised regulation. Such safe can significantly simplify the provision of small amount of aid in form of guarantees and loans, which are widely used by Member States to support access to finance for SMEs and to help SMEs during periods of crises.

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